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Richard Clay  
Senior Quality of Supply Manager  
The Office of Gas and Electricity Markets  
9 Millbank  
London  
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Dear Richard,

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

I am writing to provide comments on the proposed amendments to the RIGs for measuring speed of response, published on 31 July 2003.

Whilst we believe the amendments proposed will bring greater consistency to the measurement of speed of telephone response across the industry, we are deeply concerned that what is proposed could lead to a mechanism which is not robust and is potentially discriminatory in that:

- It favours those distributors who remain integrated with a supply business;
- It excludes the investment made in telephone systems and messaging, which provides information to the customer without requiring an agent;
- It fails to capture **all calls on the specified lines**; and finally
- It should exclude exceptional events, consistent with other areas of IIP

There are also a couple of areas in the document where understanding and drafting could be tighter

**Business Separation**

By focusing purely on those calls that are answered by an agent, companies that maintain an overflow to their supply business, or have several distribution licences, will have a much greater ability to answer calls than a single distribution only company such as ourselves. Such an arrangement would be particularly inappropriate since, during deliberations on our licence obligations to ensure the

operational separation of Supply from Distribution (Business Separation), Ofgem was particularly averse to us maintaining a regular call overflow to npower. Given that other companies continue to have a greater capacity to handle calls and Ofgem was less forceful in requiring separation, a scheme which seeks to compare company performance in this area would be wholly inappropriate.

### **Telephone messaging**

We note with interest in paragraph 2.4 that the remit of the IIP was to introduce a mechanism “on the speed with which customers can access information regarding faults over the telephone”. We, as have most companies, have invested significantly in a telephony system that seeks to provide information regarding faults via local messaging. From the drafting of the RIGs as proposed, such solutions have been excluded from the measure of speed of response, exaggerating the implications of Business Separation by removing an opportunity for us to seek innovative solutions to meeting customers expectations. It also creating a perverse incentive deterring us from implementing an efficient solution to call handling.

Whilst we are not opposed to focusing on a mechanism purely on calls answered by an agent, particularly to gain greater consistency in measurement, this lack of opportunity, and the implications of corporate structure, make a comparative scheme impossible without discriminating against companies such as ourselves.

### **Inclusion of all calls**

We are concerned about the robustness of such a measure, having raised with Ofgem issues around the possible filtering of calls for surveying in assessing quality of telephone response. For a mechanism to assess speed of response to be credible, Ofgem must be more focused on auditing the data and the inclusion of all calls made to the specified telephone numbers, irrespective of nature of the call.

### **Exceptional events**

Within Appendix A, paragraph 1.4, under time taken for response by an agent, Ofgem refers to the response time being, “under normal conditions” from the end of a message or the caller redialling, until the call is answered by an agent. We therefore expect calls made during the period of an exceptional event, as defined within the wider RIGs, to be excluded from such a measure.

### **Specific drafting issues**

Whilst we believe the RIGs as proposed will go a long way to ensuring greater consistency of measurement between companies, we would point out a couple of areas where drafting could be improved for better understanding and tighter compliance.

- Throughout the proposed RIGs, narrative and diagrams refer to the message boxes being within company systems. This to our knowledge is not the case and for several distributors we are aware, including ourselves, such messaging sits out on the BT network.
- In the appendix, the total calls answered by an agent specifies that DNOs will report either [those calls after holding for an agent] or [those calls where the customer is required to redial] **but not both**, dependent upon the telephony system used. This is unlikely to be true in the majority of companies. Where there is no message initially, then customers will be expected to hold for an agent under either telephony solution. It is only when a message has been activated that customers will be expected to hold or redial having heard that message. Consequently, reporting will not be wholly distinct between the two telephony systems employed as suggested by the proposed RIGs, and therefore we would expect companies to report under both approaches.

In conclusion, therefore, we are happy with the RIGs as drafted, subject to a couple of amendments, provided that Ofgem can guarantee there will be no comparative benchmarking of average speed of response. To do otherwise would discriminate in favour of multiple licensees, or those that are integrated with a supply business.

If you have any questions with regard to the content of this letter or any other aspect of the consultation, then please don't hesitate to give Jonathan Ashcroft or myself a call.

Yours sincerely

**A.K. Phelps**  
**Regulation Director**