

# Draft Gas Distribution Quality of Service Regulatory Instructions and Guidance Version 5 – 1 October 2011

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#### Overview:

This document has been issued pursuant to Standard Special Condition D9 of the gas transporters licence. It explains what the gas distribution networks (GDNs) need to do in order to comply with their licence obligation to report on their quality of service performance.

The document has been amended to include guidance and instructions for reporting on complaints handling and has been updated to include changes to reporting on the customer satisfaction survey. The changes have been agreed between Ofgem and the GDNs in order to enable us to trial the new survey and complaints reporting before we set the new incentives included as part of our proposed broad measure of customer satisfaction proposals as set out in our decision on strategy for RIIO-GD1.

This version of the RIGs is in draft form and has not been through a statutory consultation. It will take effect from 1 October 2011 and subject to the results of the trials, is anticipated to run through to the next price control RIIO-GD1. This version of the RIGs must be read in conjunction with our Letter of Agreement to participate in the broad measure of customer satisfaction trials, which has been published alongside this document, which details our approach.

# Context

This document provides instructions for reporting on the number and duration of interruptions, complaints handling performance, customer satisfaction surveys, the accuracy of pipe-line records and the environmental performance and other supporting information.

The purpose of this document is to provide a framework to allow Ofgem to collect accurate and consistent customer service performance data from the Gas Distribution Network Operators (GDNs) and to provide guidance to the GDNs on how to report on their standards of performance. Under their licence (Standard Special Condition D9), GDNs are required to collect information regarding their delivery of the outputs specified and report the same to Ofgem.

This version of the Regulatory Instructions and Guidance has been updated to include instructions for reporting complaints handling as part of the new broad measure of customer satisfaction to be introduced on 1 April 2013 and will incentivise companies in the management of complaints handling following the introduction of RIIO-GD1 on 1 April 2013. It also includes the following changes to the customer satisfaction survey, in preparation for the new broad measure of customer satisfaction following the introduction of RIIO-GD1 on 1 April 2013:

- a request for the GDNs to carry out the customer satisfaction survey on a monthly basis with the results reported to Ofgem on a quarterly basis,
- a request for the GDNs to report the results of the customer satisfaction survey two months after the end of each quarter,
- · changes to the scoring mechanism, and
- minor changes to the customer survey questionnaire.

The document is in draft form as and has not been through a statutory consultation. It should be read in conjunction with our letter of agreement to participate in the broad measure of customer satisfaction trials, which details our approach.

# Associated documents:

- Decision on strategy for the next gas distribution price control RIIO-GD1, 31 March 2011 (Ref 47/11)
- Gas Distribution Quality of Service Regulatory Instructions and Guidance Version 4, August 2008 (Ref 111/08)

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# **Executive Summary**

Ofgem places incentives on gas distribution networks (GDNs) to operate efficiently. To protect against the risk that GDNs will respond to these incentives by reducing the quality of service which they provide to customers, we also specify a number of outputs and standards of performance which GDNs must deliver.

Under their licence (Standard Special Condition D9), GDNs are required to collect information regarding their delivery of the outputs specified and report this to Ofgem. These Regulatory Instructions and Guidance (RIGs) explain what GDNs need to do in order to comply with this licence condition and include definitions and guidance for collating information and data on these outputs.

In our March 2011 decision on strategy for the next gas distribution price control document – RIIO- $GD1^1$  we set out our proposals to introduce a broad measure of customer satisfaction incentive. The broad measure comprises of a customer satisfaction survey, a complaints handling mechanism and a stakeholder engagement metric.

We are currently in the process of setting the incentive parameters for the three elements of the broad measure. As part of this work, the Regulatory Instructions and Guidance has been updated primarily to incorporate guidance and reporting requirements for complaints handling and changes to the customer satisfaction survey. These changes will take effect from 1 October 2011 and, subject to the results of the trials, are intended to be effective for the next price control GD1-RIIO. The changes will enable the GDNs to pilot the survey and customer complaints reporting in advance of the price control and the data from the pilot survey will enable us to inform the incentive parameters for the customer survey and the complaints metric as part of our gas distribution price control proposals.

This version of the RIGs is in draft form and has not been through a statutory consultation. It is meant to provide guidance to the GDNs on how to conduct customer surveys and report on customer complaints and we have issued a letter of agreement to participate in the broad measure of customer satisfaction trials to that effect.

We envisage that further amendments may be required to these RIGs as part of our RIIO-GD1 deliberations and also as a result of the pilot. We, therefore, intend to undertake the statutory consultation for the RIGs closer to the implementation of RIIO-GD1.

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<sup>&</sup>lt;sup>1</sup> Decision on strategy for the next gas distribution price control – RIIO-GD1 (<a href="http://www.ofgem.gov.uk/Networks/GasDistr/RIIO-GD1/ConRes/Documents1/GD1decision.pdf">http://www.ofgem.gov.uk/Networks/GasDistr/RIIO-GD1/ConRes/Documents1/GD1decision.pdf</a>)



#### **Chapter Summary**

This chapter explains the purpose of the Gas Distribution Quality of Service Regulatory Instructions and Guidance and provides some background and outlines the structure of the document.

## **Purpose of this document**

- 1.1. Gas distribution networks (GDNs) are subject to licence conditions which require them to submit information to Ofgem<sup>2</sup> about various aspects of their performance. We publish Regulatory Instructions and Guidance (or "RIGs") so that GDNs and other interested parties have a clear understanding of what information must be included in the reports, how it should be collected and to ensure consistency of returns across the GDNs.
- 1.2. This document explains what GDNs need to do in order to report on their quality of supply performance. Standard Special Condition D9 (Distribution network transportation activity incentive scheme) of the GDN licence requires GDNs to report on specified information, where "specified information" is defined to include:
- number and duration of non-contractual interruptions,
- complaints handling information,
- customer satisfaction surveys,
- accuracy of pipe-line records,
- environmental performance, and
- other supporting information.
- 1.3. This document describes the information to be reported, the definitions to adopt and the reporting arrangements in respect of each area of performance covered by Standard Special Condition D9. It also includes the reporting arrangements for complaints handling information which we are piloting in advance of the introduction of the broad measure of customer satisfaction for RIIO-GD1.

# **Background**

1.4. This document has been updated to include complaints handling, a component of the new broad measure of customer satisfaction which comes into effect on 01 April 2013 and changes to the customer satisfaction survey. The changes to the survey obligations and introduction of complaints handling are taking effect within the current price control period with the intention of informing the broad customer measure for the next price control period following the introduction of

<sup>&</sup>lt;sup>2</sup> Ofgem is the office set up to assist the Gas and Electricity Markets Authority in carrying out its statutory functions.



RIIO-GD1. In addition, the results from the survey and complaints handling will be used to inform the incentive parameters for the broad measure of customer satisfaction for RIIO-GD1. The changes in this version of the RIGs include a request for:

- the inclusion of complaints handling information,
- the GDNs to carry out the customer satisfaction survey on a monthly basis with the results reported to Ofgem on a quarterly basis,
- GDNs to report the results of the customer satisfaction survey two months after the end of each quarter, and
- changes to the scoring mechanism, and
- minor changes to the customer satisfaction survey questionnaire.
- 1.5. Both the customer satisfaction survey and complaint handling trials, that will help inform the broad measure, are intended to operate from 1 October 2011 to 31 March 2012.
- 1.6. This document is intended to add to the Gas Distribution Quality of Service Regulatory Instructions and Guidance Version 4 (Ref: Ref 111/08).

#### Status of the RIGs

- 1.7. The RIGs include definitions and related guidance for collating the specified information as set out in Standard Special Condition D9 of the GDN licence. For the avoidance of doubt this RIGs document is subordinate to the licence conditions. Consequently, the RIGs will not change any definitions or obligations contained within the GDNs' gas transporter licence (or its successor documents) and in the event of any ambiguity the licence condition will always take precedence.
- 1.8. This version of the Gas Distribution Quality of Service RIGs (Version 5) is a draft and must be read in conjunction with our letter of Agreement to participate in the broad measure of customer satisfaction trials which has been published alongside this document. This version of the RIGs comes into effect on 01 October 2011. For clarification in the reporting year 1 April 2011 to 31 March 2012 the customer survey should comply with version 4 of the Gas Distribution Quality of Service RIGs for April to September and the survey should comply with this version of the RIGs for October to March. GDNs will also commence reporting on complaints handling from 1 October 2011.

#### Structure of the document

- 1.9. The Gas Distribution Quality of Service RIGs are structured as follows:
- Chapter 2 number and duration of interruptions,
- Chapter 3 complaints handling reporting,
- Chapter 4 customer satisfaction surveys,



- Chapter 5 accuracy of pipe-line records, and Chapter 6 environmental performance and other supporting information.



# 2. Number and duration of interruptions

#### **Chapter Summary**

This section sets out the regulatory instructions and guidance for reporting the number and duration of non-contractual interruptions.

## Information to be reported

- 2.1. Each GDN must have in place systems and processes that allow it to accurately record:
- the number of customers interrupted by non-contractual network supply interruptions; and
- the duration of non-contractual network supply interruptions.
- 2.2. The number of non-contractual network supply interruptions per year is measured by the number of non-contractual network supply interruptions to customers from all planned and unplanned sources per 10,000 customers per year. It is calculated as:

Total number of interruptions per year \* 10,000

Total number of customers

2.3. The duration of non-contractual network supply interruptions per year is measured by the average number of customer minutes lost per interruption resulting from non-contractual network supply interruptions to customers whose premises are connected to the GDN. This is calculated as:

Total number of customer minutes lost per year

Total number of interruptions per year

2.4. The information must be submitted in both aggregate form and disaggregate form. Paragraphs 2.5 - 2.8 set out the requirements for disaggregated reporting.

#### Disaggregated reporting

2.5. In addition to reporting the total number and duration of planned non-contractual supply interruptions, each GDN must report the number and duration of planned non-contractual supply interruptions attributable to each of the categories set out in Table 2.1 (see page 11). Each GDN must report the number and duration of unplanned non-contractual supply interruptions attributable to each the categories set out in Table 2.2 (see page 12).

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- 2.6. GDNs must separately report on major incidents. For each major incident, GDNs must report:
- the cause of the incident;
- the number of customers that were interrupted as a result of the incident; and
- the total customer hours lost as a result of the incident.
- 2.7. For the avoidance of doubt, GDNs should include major incidents when reporting the overall number and duration of interruptions.
- 2.8. Ofgem will monitor the materiality of these events and determine whether additional reporting is required.

#### **Definitions**

2.9. For the purposes of paragraphs 2.2 to 2.8, the following definitions apply.

#### Distribution Network (GDN)

2.10. Distribution Network has the meaning given in Special Condition E1 ('Revenue Restriction definitions in respect of the Distribution Network') of the GDN's licence.

#### Customer

2.11. A customer means any person to whose premises or pipe-line system gas has been conveyed by a GDN. Customers should be identified from their unique Supply Meter Point Reference Number (MPRN) or connected system exit point (CSEP) location. The method adopted by GDNs to identify customers from their MPRNs or CSEPs shall be agreed in advance with the Gas and Electricity Markets Authority (the "Authority").

#### Total number of customers

2.12. The total number of customers connected to the GDN is derived by the following equation:

Total number of customers at the start of the reporting year + total number of customers at the end of the reporting year

2

#### Interruptions

2.13. An interruption is a loss of gas supply upstream of, or at, the customer's first emergency control valve (ECV). This includes planned and unplanned non-contractual network supply interruptions. Contractual network supply interruptions and interruptions not caused by any of the activities set out in Tables 2.1 and 2.2 are excluded.



#### Planned non-contractual interruptions

2.14. Planned non-contractual interruptions are non-contractual interruptions resulting from the GDN's planned activities and include all non-contractual interruptions resulting from the planned activities set out in Table 2.1.

Table 2.1 Non-contractual interruptions resulting from planned activities

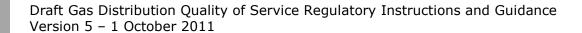
	ractual interruptions re		
Activity	Definition	Example	Required notice
Customer/shipper initiated service alterations	Any change to a service pipe or associated GDN plant at the request of a customer or shipper.	Alteration to route or size of service pipe for a housing extension.	By appointment.
Customer or Local Authority initiated mains diversions	Diversion of pipe-lines and mains at the request of a Local Authority, highway authorities, developer, agent of a developer, landowner, or any other agency.	A new development will encroach on the location of the pipe-line or main and will be diverted for safety reasons.	By appointment.
GDN initiated	Mains replacement driven service transfers or replacement or any other GDN initiated operation in association with planned programmes of work.  A relay and subsequent transfer will count as two non- contractual interruptions.	Safety and asset maintenance related replacement.	Five working days for customers due to be interrupted.

#### Unplanned non-contractual interruptions

2.15. Unplanned non-contractual interruptions are non-contractual interruptions resulting from unplanned activities and include all non-contractual interruptions resulting from the unplanned activities set out in Table 2.2 below. All unplanned interruptions upstream of, or at, the ECV may be attributed to one of the categories in Table 2.2.

Table 2.2 Non-contractual interruptions resulting from unplanned activities

	Table 2.2 Non-contractual interruptions resulting from unplanned activities									
Activity	Definition	Examples								
Inadequate	An occurrence of insufficient system capability	Additional capacity								
Network	to provide the required quantity of gas to a	not planned and/or								
Capacity	supply point or CSEP as a result of the design	completed in time.								
	of the network. This includes failure to	_								
	construct adequate network capability in	System pressures								
	accordance with Standard Special Condition A9	not increased								
	of the GDN licence.	sufficiently.								
1 in 20 peak	An occurrence of insufficient system capability	Severe weather								
demand	to provide the required quantity of gas to a	conditions greater								
conditions	supply point or CSEP as a result of 1 in 20 peak	than 1 in 20 peak								
exceeded	demand conditions being exceeded.	demand conditions.								
Leakage	Interruptions arising from repair or	Temporary								
from service	replacement due to corrosion, deterioration or	disconnection due								
pipes	joint failure resulting in leakage from service	to metal service								
	pipes and/or associated plant. Excludes failures	corroding resulting								
	resulting from third party actions or omissions.	in leaking gas.								
Mechanical	Interruptions of supply arising from repair or	Component failure								
Pipe / Plant	replacement due to mechanical pipe/plant	Governor/PRS								
Failure	failure. This includes failures of pipe-lines and	failure								
	pressure control systems. Excludes failures									
	resulting from third party actions or omissions.	Pipe fracture								
Non-	An occurrence of insufficient system capability	Maintenance								
mechanical	to provide the required quantity of gas to a	procedures not								
Pipe / Plant	supply point and /or CSEPs as a result of non-	followed.								
Failure	mechanical plant/pipe failure. This includes									
	errors and operational procedures and									
	inadequate asset records. Excludes failures									
	resulting from third party actions or omissions.									
NTS	An occurrence of insufficient system capability	Gas not available at								
(upstream)	to provide the required quantity of gas to a	network boundary								
failure	supply point and/or CSEP as a result of failures	point.								
	of NTS pipe-lines, pressure control systems,	Politica								
	operational procedures and non-availability of									
	beach gas irrespective of cause.									
Third Party	An occurrence of isolation of a supply point	Contractor severing								
action	resulting from third party action which reduces	a GDN's pipe-line.								
0.00.01.	the capability of a GDN's:	a serve pipe iiiie.								
	<ul> <li>pipe-line, mains and associated control</li> </ul>	A customer piercing								
	equipment	a service pipe.								
	service pipes and associated control	a service piper								
	equipment.	Third party water								
	It also includes interruptions necessitated by	ingress incidents.								
	release of gases from plant and pipe-work not	mgress melacites.								
	owned or operated by a GDN, and as	Police requests for								
	necessitated by requests from civic authorities.	supply to be								
	incoessituted by requests from civic authorities.	disconnected.								
Other	Any other interruptions to supply arising at or	aisconnecteu.								
upstream	upstream of the ECV.									
events	apsacam of the Levi									
EVELICS										



#### Customer minutes lost

2.16. Customer minutes lost, for any given interruption, is defined as the period of time between the start and end of the interruption, where the interruption start and interruption end are defined as set out below. Where the interruption spans two reporting periods, it should be allocated to the period in which it started.

#### Interruption start

- 2.17. The interruption start time is the earlier of:
- the date and time at which the supply of gas to the premises is shut off by the GDN's personnel (or in some emergency situations, by the customer);
- the date and time at which plant is isolated by the GDN's personnel; or
- the date and time initially logged by the call centre following calls received to the Emergency Services number in respect of multiple losses of supply arising from a single cause.

#### Interruption end

- 2.18. The interruption end is the date and time at which:
- gas is made available to the ECV by the GDN's personnel; or
- there are considerations outside of the GDN's control (in the absence of which the gas supply could be restored to the ECV) which prevent the restoration of supply.
- 2.19. In instances where there are considerations outside of the GDN's control, the GDN's personnel should record the reasons why supply could not be restored to the ECV.

#### **Additional definitions**

2.20. This section sets out further definitions for the interpretation of paragraphs 2.1 to 2.19.

#### 1 in 20 peak demand

2.21. 1 in 20 peak demand has the meaning given in Standard Special Condition A9 (Pipeline System Security Standard) of the GDN licences.

#### Connected System Exit Point (CSEP)

- 2.22. CSEP has the meaning given in the Uniform Network Code (Transportation Principal Document, Section A3.3).
- 2.23. For clarity, each CSEP interrupted counts as one customer regardless of the number of end users whose premises are connected to the CSEP. Interruptions to CSEP customers which are not associated with an interruption on the GDN are excluded from the Quality of Service RIGs.



#### Emergency control valve (ECV)

2.24. Emergency control valve means the valve for shutting off the supply of gas in an emergency, being a valve intended for use by a consumer of gas.

#### Mains replacement driven service transfers

2.25. The disconnection of an existing service from a main and subsequent reconnection onto a new main.

#### Major incident

2.26. A major incident occurs if 250 or more customers experience a non-contractual network supply interruption as a result of a single incident.

#### Mechanical pipe/plant failure

2.27. A mechanical pipe/plant failure occurs when equipment installed to convey gas ceases to operate.

#### Supply Meter Point Reference Number

2.28. Supply Meter Point Reference Number (MPRN) has the meaning given in the Uniform Network Code (Transportation Principal Document, Section G1.9.2(a)).

#### Pressure Reduction Station

2.29. A pressure reduction station (PRS) allows for the transfer of gas from a high pressure distribution network to a low pressure network. The main components of these installations may include: valves, filtering equipment, gas heating facilities, pressure regulator streams, metering facilities, and telemetry and instrumentation equipment.

#### Service alteration

2.30. Changes to the position and/or size of a customer's service pipe and associated plant including regulators, meters, valves, loggers etc.

#### Shipper

2.31. Shipper has the meaning given to "gas shipper" in section 48(1) of the Gas Act 1986.

#### Supply point

2.32. Supply point has the meaning given in the Uniform Network Code (Transportation Principal Document, Section G1.1.1(a)).



- 2.33. Standard Special Condition D9 of the GDN licence enables Ofgem to issue instructions and guidance that include requirements as to the standards of accuracy and reliability with which specified information is recorded.
- 2.34. The reported data on the number and duration of interruptions must be at least 95 per cent complete. The completeness of the data should be verified by reviewing a statistically robust sample of planned and unplanned jobs which would have given rise to interruptions and in each case verifying whether the interruption and the duration of the interruption were recorded on the companies' interruption recording systems. Having established these targets we will look to improve them over time subject to cost implications.
- 2.35. At present, there is no secondary data with which to validate information on the duration of interruptions as it is entered by staff in the field.
- 2.36. Standard Special Condition D9 provides for the GDNs' data collection systems, processes and procedures to be examined by a person nominated by Ofgem. GDNs must develop appropriate auditing and governance procedures to demonstrate to Ofgem that they have satisfied the requirements for the completeness of their interruptions data.
- 2.37. Ofgem intends to undertake an audit of GDNs interruptions reporting systems and data early in this price control period. Where information is not sufficiently robust, Ofgem will take appropriate action to ensure future compliance in this area.

# **Reporting arrangements**

2.38. GDNs must submit the information set out in this chapter by 31 July in each relevant year. Where Ofgem provides a template, GDNs must submit the information in the format specified in the template.

# 3. Complaints handling reporting

#### Chapter summary

This section sets out the definitions and reporting requirements for complaints handling. The information included here is intended to help GDNs record and manage customer complaints effectively and promptly.

#### **Introduction**

- 3.1. The purpose of the instructions and guidance in this chapter is to provide a framework for the collection and provision of accurate and consistent complaints data by GDNs to Ofgem.
- 3.2. This chapter deals with the complaints information that will be used to monitor current and future performance and will form part of the broad measure of customer satisfaction incentive in the RIIO-GD1 period.

## **Complaints handling workbook**

3.3. The tables in this workbook allow Ofgem to monitor GDN complaints handling.

# Definitions and reporting requirements for complaints handling

- 3.4. This section sets out definitions and related reporting requirements for the reporting of:
- the number of complaints,
- the number of resolved complaints,
- the number of complaints resolved in D+1 working days and D+31 working days,
- the number of repeated complaints,
- the number of deadlock letters.
- the number of Energy Ombudsman referrals,
- the number of Energy Ombudsman decisions in favour of the complainant, and
- the number of Ofgem determinations.

## **Complaints**

3.5. GDNs must report all complaints falling within the scope of the definition of complaint and consumer complaint specified in the Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008 ("the Standards") subject to the definitions and guidance contained in these RIGs. For the reporting requirement



contained in these RIGs, the definition of Relevant Consumer in the Standards has been expanded<sup>3</sup> to enable reporting across all types of consumer.

#### **Definitions**

- 3.6. Complaint means any expression of dissatisfaction made to an organisation, related to any one or more of its products, its services or the manner in which it has dealt with any such expression of dissatisfaction, where a response is either provided by or on behalf of that organisation at the point at which contact is made or a response is explicitly or implicitly required or expected to be provided thereafter.
- 3.7. Complaint means a complaint, other than network outage report, which is made against a regulated provider either (a) by a person in that person's capacity as a relevant consumer in relation to that regulated provider; or (b) by a person acting on behalf of such a relevant consumer.
- 3.8. Where it is unclear if a relevant consumer or a person acting on behalf of a relevant consumer is wishing to have their contact treated as a complaint, the GDN may ask them the question for clarification.
- 3.9. Relevant consumer in the context of the RIGs means any one or more of the following:
- (a) a person who is a consumer in relation to gas supplied by a regulated provider, or
- (b) a person who is a consumer in relation to services provided by a regulated provider.
- 3.10. Unless otherwise expressed, reference to days will mean working days which shall be interpreted as any day other than a Saturday, Sunday, Christmas Day, good Friday or a day which is a bank holiday within the meaning of the Banking and Financial Dealings Act 1971.

#### **Instructions**

3.11. We request GDNs to record and report complaints which:

- relate to the regulated products and services of the GDNs, and
- may be substantially covered by other, established forms of redress, and which must be passed on to the relevant party for resolution by the redress scheme.

<sup>&</sup>lt;sup>3</sup> The Consumer Complaints Handling Standards only cover domestic consumers and micro business consumers. For the broad measure we have extended the coverage to include other types of consumers, such as large business consumers.

- 3.12. We request GDNs to report information on the number of complaints according to the following categories:
- the number of complaints concerning emergency response and repair work (including unplanned loss of supply),
- the number of complaints concerning planned work,
- the number of complaints concerning connections services (including connection quotations or pre-quotation enquiries as well as the delivery of connection services and disconnections),
- the number of complaints concerning other issues including (but not limited to) reinstatement and excavation, communication and engineering work where they have not been recorded under the above categories.
- 3.13. GDNs' systems do not need to be able to extract complaints from separate categories of relevant consumers (i.e. from domestic and micro business consumers).

#### Reporting requirement

- 3.14. This section provides examples of scenarios that the GDNs must record and report as complaints:
- where a customer reports a loss of supply and expressly complains about there being an ongoing problem with the quality of their supply, the ongoing issue must be recorded as a complaint,
- during a planned interruption a customer complains that the interruption started earlier than had been notified.
- Complaints from MPs, Independent Connections Providers (ICPs), Independent Gas Transporters (IGTs) and other customer representatives,
- Complaints concerning the GDNs' product and/or service.
- 3.15. The following are examples of scenarios that must not be recorded as complaints:
- where a customer calls to report an unplanned loss of supply,
- where, during a planned interruption, the customer calls to report a loss of supply,
- where the matter arises as the result of a road traffic accident, slip, trip or fall,

- where the matter concerns a utility, telecommunications company or local authority in respect of damage caused to the assets of that utility, telecommunications company or local authority,
- where the matter relates to contractual disputes with commercial/industrial customers,
- where the customer makes contact to pursue a claim under the Guaranteed Standards of Performance (unless expressly complaining at the same time),
- wayleave disputes and landowner negotiations<sup>4</sup>,
- Where a builder/contractor/customer disputes the invoice for damaging GDN apparatus, and
- Claims for loss of business resulting from a GDN action,
- Claims for loss of earnings, and
- Claims for personal injury.

## **Resolved complaints**

#### **Definitions**

3.16. A resolved complaint is a consumer complaint in respect of which there remains no outstanding action to be taken by the regulated provider. In this case, the complaint has either (i) been resolved to the satisfaction of the relevant consumer who made that consumer complaint or on whose behalf that consumer complaint was made, or (ii) although the consumer is not openly satisfied with the outcome, the consumer has agreed that the regulated provider has taken all action reasonably expected.

#### **Instructions**

3.17. A complaint must not be treated as resolved until the customer is satisfied, or is reasonably believed to be satisfied, with the outcome of any actions taken by the GDN or agrees the regulated provider has taken all action reasonably expected. This will include awaiting the results of any monitoring process undertaken and subsequent actions (such as system reinforcement) before closing the complaint concerned.

## **Reporting Requirements**

<sup>4</sup> Complaints about the GDNs service during works undertaken must be captured as a complaint

- 3.18. GDNs must not record and report the following scenarios as resolved complaints:
- where a course of action has been agreed with the customer but not yet completed, or
- where further information or contact from the customer is pending.
- 3.19. Where a GDN carries out the action(s) that it had stated it would do in order to resolve a complaint and obtains confirmation from the customer, either written or oral, that the customer is satisfied with the work carried out, then the time at which all of those actions had been completed must be taken as the time that the complaint is resolved. For example, a complaint is deemed to be resolved in D+1 where a GDN carries out the action(s) that it had stated it would do in order to resolve a complaint and receives confirmation from the customer on the next working day after the complaint is received that the customer is satisfied with the work carried out.
- 3.20. All complaints, regardless of the method of receipt, must be treated as received on the working day that the complaint is made. For the avoidance of doubt a complaint received by 23:59 on day D must be treated as being received on day D.
- 3.21. Any complaint resolved by 23:59 on day D or D+1 must be treated as being resolved by D+1. Any complaint resolved after D+1 and up to 31 days later is deemed to be resolved in D+31.
- 3.22. If the GDN completes the work within D+1 or D+31 but is unable to contact the customer for confirmation after the work is carried out, the GDN can then write to the customer to confirm that the customer is satisfied. If after 10 days from the day the letter was sent out there is no response from the customer, the GDN should treat this complaint as resolved in D+1 or D+31. The complaint should be treated as resolved at the expiry of 10 working days. If the customer comes back within 10 working days to report otherwise, the complaint should be treated as unresolved. If the customer comes back after D+10 to report otherwise the complaint will be classed as unresolved.

# Repeated complaints

#### **Definitions**

3.23. A repeated complaint is where the customer makes contact to express dissatisfaction with the same or substantially the same matter that was the subject of a previously resolved complaint within a 12 month period.

#### Reporting requirements

3.24. The following are examples of complaints which must be recorded as repeated complaints:

- a customer complains regarding the unacceptable quality of reinstatement carried out in their drive. The GDN carries out further work to the satisfaction of the customer and resolves the complaint. The reinstatement fails, within 12 months of the resolution date, and the customer complains,
- an MP complains about the number of interruptions a certain constituent has
  received and the GDN duly informs the MP that it has identified the issue and
  rectified the fault, thus resolving the complaint. The MP/customer/other
  customer representative contacts the company, within 12 months, to raise the
  same issue and it is the repaired, or replaced, piece of equipment that is faulty.
- 3.25. the following are examples of scenarios not to be recorded as repeated complaints:
- where the previously resolved complaint was resolved more than 12 months before the GDN receives a similar or substantially the same complaint from the customer, or
- where the GDN receives a similar or substantially the same complaint from the customer relating to a matter that has been the subject of an Energy Ombudsman finding in favour of the GDN in the last 12 months.

## **Escalated Complaints**

- 3.26. An escalated complaint is a complaint where a consumer remains dissatisfied with the response provided by the regulated provider and should be escalated in line with the GDNs published complaints handling procedure until it either becomes a resolved complaint or it exhausts all relevant forms of redress available.
- 3.27. An escalated complaint will still be classified as an unresolved complaint.

#### **Deadlock letters**

#### **Definitions**

3.28. A deadlock letter is a final response from the GDN to the customer in which the position of the GDN is stated to be different from that of the customer.

#### Reporting requirements

3.29. A GDN must record all those letters it has issued where its stance could reasonably be interpreted as being at odds with that of the customer.

### **Energy Ombudsman decisions in favour of the complainant**



3.30. An Energy Ombudsman decision in favour of the complainant is one where the GDN is required to make a payment over and above that previously offered to the complainant, change its processes beyond what it had previously indicated to the complainant that it would, or both.

#### **Reporting Requirements**

3.31. A GDN must not record as Energy Ombudsman decisions in favour of the complainant instances where the decision is as favourable (or less) to the customer as the offer previously made by the GDN to the customer.

# **Reporting Arrangements**

- 3.32. GDNs must submit the information set out in this chapter by 31 July in each relevant year. Where Ofgem provides a template, GDNs must submit the information in the format specified in the template.
- 3.33. For purposes of the trial, the GDNs will submit information for complaints received for a period of six months from 1 October. For Energy Ombudsman complaints, GDNs should report on determinations made between October and March regardless of date of receipt to ensure there is available data.



# 4. Customer satisfaction survey

#### **Chapter Summary**

This section sets out the regulatory instructions and guidance for reporting on the results of the customer satisfaction survey.

- 4.1. Each GDN must carry out the three customer satisfaction surveys on a monthly basis and submit to Ofgem on a quarterly basis the results of these surveys. Each survey should reflect the views of a sample of customers who are likely to have experienced certain aspects of the GDN's customer service, where the relevant service areas are emergency response and repair, planned work and connections services.
- 4.2. This chapter details:
- the form of the customer satisfaction surveys and the manner in which they are to be conducted,
- the provision of information to the independent third parties appointed to carry out the surveys,
- the sample selection and timing of the surveys,
- the method of calculating the results of the customer survey, and
- the arrangements for reporting the survey results to Ofgem.

#### Form of the surveys

- 4.3. Each GDN is required to appoint an independent third party, such as a market research company, to undertake regular postal customer satisfaction surveys. The terms of reference used to appoint the independent third party must be submitted to Ofgem for approval. A GDN can appoint different third parties to carry out each monthly survey but in this case the terms of reference for each third party must be agreed with Ofgem.
- 4.4. GDNs (or their appointed third party) must not use financial or non-financial incentives to encourage customers to return completed surveys.
- 4.5. The surveys and covering letter that accompanies the surveys must follow the standard templates set out in Appendices 1-4 of this document.
- 4.6. If a GDN wishes to use a format that is different to the standard templates, they may apply to Ofgem for permission to do so. Any additional survey questions should appear after the questions required by the template.



4.7. GDNs must satisfy themselves that in undertaking these customer surveys they comply with the relevant data protection and other information legislation.

# Provision of information to the independent third party

#### Survey population

4.8. For each month, GDNs must provide to the independent third party all relevant details of customers who have experienced an activity specified in Table 4.1 since the beginning of the month for which records are available, as well as any customers that experienced the activity in previous months but whose details were not presented for sampling in that month. The provision of information is subject to certain exclusions specified below.

**Table 4.1 Customer survey population** 

Activity	Population
Planned work	Customers of the GDN who have, during the relevant month, been affected by planned work carried out by the GDN on service pipes which is likely to have caused an interruption to their gas supply.
Emergency and repair	Customers of the GDN who have, during the relevant month:  • been affected by work carried out by the GDN on service pipes which is likely to have been associated with an unplanned interruption to their gas supply, and/or
	• contacted the gas emergency telephone line to report a leak or interruption to their gas supply.
Connections	Domestic customers and non-domestic customers consuming less than 73,200 kWh per annum who have had work completed on a new or altered existing gas connection during the relevant month. The sample group does not include customers whose dealings with the GDN were via a gas supplier, independent gas transporter or utility infrastructure provider (UIP).

#### **Exclusions**

- 4.9. Customers who have been sent a customer satisfaction survey in accordance with Standard Special Condition D9 in the previous twelve months should be excluded from the sample group.
- 4.10. In addition, GDNs may exclude a customer from the survey if the customer has experienced, or is living within the vicinity of other customers that have experienced a major gas emergency situation such as an explosion or an incident involving carbon monoxide. In such cases the GDN does not need to provide the relevant customer's details to the third party.
- 4.11. Each GDN should inform Ofgem when the results are submitted of the number of customers that have been excluded from the data sent to the third party for sampling and the reasons for the exclusion.



#### Number of customers to be sampled

4.12. The appointed independent third party is required to select the samples for each survey randomly from the information provided by the GDN. The number of customers surveyed should be sufficient to ensure that a statistically robust sample of responses is returned by customers to the GDN. Table 4.2 sets out the minimum number of survey forms that should be completed and returned to the GDN for each type of survey in each quarter.

Table 4.2 Minimum sample sizes (per guarter)

Type of survey	Minimum number of survey returns
Emergency response and repair	200
Planned work	150
Connection services	100

- 4.13. We would expect the minimum quarterly targets to be spread across each month in the quarter, subject to meeting the minimum requirements.
- 4.14. If the number of survey forms returned for any survey in any quarter exceeds the minimum number, then the results should be calculated from all of the completed surveys.

#### Frequency of the surveys

4.15. Each GDN is required to undertake the surveys on a monthly basis with a one month lag after work/contact with the customer.

# Calculating the results of the survey

- 4.16. This section sets out how GDNs should calculate the results from the returned customer surveys.
- 4.17. The survey has a number of screening questions and questions that ask customers to score the GDN's performance. For the purposes of the RIGs, those questions which ask the customer to score the GDN's performance are termed 'relevant' questions'.
- 4.18. The customer satisfaction survey results for the relevant questions should be scored on a scale of one to ten, where a score of one indicates that the respondent is very dissatisfied and a score of ten indicates that the respondent is very satisfied.
- 4.19. While all questions in the customer satisfaction survey are relevant, for the purposes of the trial, and in preparation for the broad measure of customer



satisfaction, the customer satisfaction surveys will be scored on one question only. These will be:

- Planned work Question 11,
- Connections Question 11, and
- Emergency response and repair Question 15.
- 4.20. Where Ofgem provides a template, GDNs and their third parties should calculate the results of the survey in accordance with the template.

#### Reporting arrangements

- 4.21. This section sets out the enduring reporting arrangements for the customer survey. However between 1 October 2011 and 31 March 2012 during the customer survey pilot, we envisage that GDNs will report with greater frequency to Ofgem for the purposes of setting the incentive parameters for the customer survey element of the broad measure of customer satisfaction incentive.
- 4.22. Each GDN must report the results of the survey to Ofgem two months after the end of each quarter. In addition, GDNs are required to report cumulative annual results to Ofgem each year. Table 4.3 sets out the dates when GDNs should provide these results.

Table 4.3 Survey reporting timetable

	Tuble 4.5 Survey reporting timetable									
Date	Survey results rep	orted to Ofger	n							
	Emergency response & repair	Planned work	Connections							
31 August	Q1 & annual results of previous	Q1 & annual results of	Q1 & annual results of previous year							
	year	previous year								
30 November	Q2	Q2	Q2							
28 February	Q3	Q3	Q3							
31 May	Q4	Q4	Q4							

- 4.23. Where Ofgem provides a template, GDNs must submit the information in the format specified in the template.
- 4.24. Each GDN must publish its own quarterly and annual results on its website within one month of the results being provided to Ofgem. Ofgem will also publish the quarterly and annual results on its website.



# 5. Accuracy of pipe-line records

#### **Chapter Summary**

This section sets out the regulatory instructions and guidance for reporting the GDNs performance in maintaining accurate records of its pipe-line system.

## Information to be reported

- 5.1. Each GDN must have in place systems and processes that allow it to accurately record:
- a. the total number of asset error correction reports submitted during the reporting period;
- b. the total number and length<sup>5</sup> of pipe-line records that were digitised during the reporting period;
- c. the total number and length of pipe-line records that were awaiting digitisation at the end of the reporting period; and
- d. the total length of pipe-lines commissioned or abandoned during the reporting period; also
- e. the date of the oldest pipe-line record awaiting digitisation at the end of the reporting period.
- 5.2. The information must be submitted in both aggregate form and disaggregate form. Paragraphs 5.3-5.5 set out the requirements for disaggregated reporting.

#### Disaggregated reporting

- 5.3. In addition to the information to be submitted under paragraph 5.1a, GDNs must also record:
- the number of asset error correction reports submitted during the reporting period as part of work undertaken by GDNs or agents working on their behalf; and
- the number of asset error correction reports submitted during the reporting period as part of work undertaken by parties other than GDNs.

<sup>&</sup>lt;sup>5</sup> See paragraph 5.10.

- 5.4. In addition to the information to be submitted under paragraph 5.1b, GDNs must also record:
- the number and length of pipeline records that were digitised within 30 business days of commissioning new or modified assets or the abandonment of redundant assets;
- the number and length of pipeline records that were digitised between 30 and 60 business days after commissioning new or modified assets or the abandonment of redundant assets;
- the number and length of pipeline records that were digitised more than 60 business days after commissioning new or modified assets or the abandonment of redundant assets.
- 5.5. The information to be submitted under paragraph 5.1c must be submitted in the form specified below. GDNs must record:
- the total number and length of pipe-line records awaiting digitisation at the end of the reporting period; and
- the number and length of pipe-line records awaiting digitisation at the end of the reporting period where more than 30 business days have elapsed since the commissioning new or modified assets or the abandonment of redundant assets.

#### **Definitions**

Asset error correction report

5.6. Asset error correction report means a report of an instance in which the records of a licensee do not accurately describe the location or nature of the licensee's assets.

#### Asset information

- 5.7. Asset information means:
- the material that mains are made of;
- the diameters of mains;
- a representation of the location of mains;
- the pressure at which mains are operated: and
- other relevant information which, if incorrect, could result in an asset error correction report being submitted.

Commissioning new or modified assets or the abandonment of redundant assets



5.8. Commissioning new or modified assets or the abandonment of redundant assets occurs no later than when the New Roads and Streetworks Act "works closed" notice is sent for that street. To aid comparison between GDNs, the GDNs' annual reports to Ofgem must specify how they determine when an asset record becomes outstanding.

#### Digitise

5.9. Digitise means the process of making asset information available to view on the GDNs' geo-spatial information system.

#### Length of pipe-line records

- 5.10. For the purposes of these RIGs, the length of pipe-lines records means the length of the pipe-line for which records have been digitised/are yet to be digitised.
- 5.11. Where a GDN uses an insertion technique to replace a length of pipe-line, the GDN's calculation of the length of pipe-line records should include both the length of iron pipe-line that was abandoned and the length of polyethylene pipe-line that was inserted.

#### Oldest pipe-line record awaiting digitisation

5.12. The age of the pipe-line records awaiting digitisation should be measured by reference to the date on which the commissioning of new or modified assets or the abandonment of redundant assets occurred.

#### Pipe-line record

5.13. Pipe-line record means a record of the GDNs asset information.

#### **Reporting arrangements**

5.14. GDNs must submit the information set out in this chapter by 31 July in each relevant year. Where Ofgem provides a template, GDNs must submit the information in the format specified in the template.



#### **Chapter Summary**

This section sets out the regulatory instructions and guidance for reporting on environmental performance and other specified supporting information.

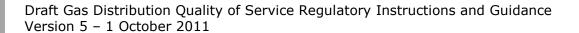
## Information to be reported and definitions

6.1. Each GDN must have in place systems and processes that allow it to accurately record the information set out in Table 7.1.

Table 5.1 Environmental performance and other supporting information

	nionnientai periormance and other su	<del> </del>		
Information	Definition	Reporting detail		
Loss of	Number of incidents involving release of	Number of incidents		
containment	gas from network storage assets that	reported under COMAH.		
	are subject to reporting under COMAH	Total gas lost in tonnes		
Publicly	Number of internal reports	Total per GDN		
reported	Number of external reports	Total per GDN.		
escapes		Disaggregate by pressure tier.		
	Number of cases where no essano is			
	Number of cases where no escape is found	Total per GDN		
	Histogram showing the annual numbers	Total per GDN.		
	of uncontrolled and controlled escapes	Mean attendance time		
	attended by time-band	should be indicated		
	Histogram showing the annual number	Total per GDN.		
	of escape-related repairs deferred	Median repair time should		
	beyond 28 days, by time-band	be indicated.		
	Date of oldest outstanding escape-			
	related repair.			
Gas in	Gas in buildings associated with	Total and disaggregated by		
Buildings	cast/spun iron mains fractures or	pressure tier and material		
	ductile iron corrosion failures consistent			
	with the latest GDN Engineering			
	Instructions and reports made to the			
	HSE			
Fractures	Number of instances of leakage being	Total and disaggregated by		
and	identified as a result of cast/spun iron	pressure tier and material.		
corrosion	mains fractures and ductile iron	Normalise to instances per		
failures	corrosion failures	1000 km of main.		

6.2. Where appropriate, GDNs should provide commentary to explain the results submitted, including narrative to explain trends.



# Reporting arrangements

6.3. GDNs must submit the information set out in this chapter to Ofgem by 31 July in each relevant year. Where Ofgem provides a template, GDNs must submit the information in the format specified in the template.



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# Appendix 1 – Customer satisfaction survey covering letter

Gas Customer [Customer Address]

[Date]

Dear Gas Customer,

#### We want to know what you think

[Company] is responsible for ensuring that gas is piped safely and efficiently across the [geographical area], irrespective of who you choose as your gas supplier.

[Company] is always looking for ways to improve the service it offers to gas customers. To help in this process [Company] has commissioned [agency name], an independent company, to conduct a survey on its behalf. The results of this survey will also be reported to Ofgem, the industry regulator, and published on its website (www.ofgem.gov.uk).

I enclose a questionnaire which seeks your views on the service provided by {Company} [when responding to your call to the gas emergency phone line and/or carrying out a repair to the gas pipes to your property]/[when replacing the gas mains outside your property]/[ completing connections work at your property].

The questionnaire should only take a couple of minutes to complete and any answers you give will be treated in complete confidence. Please tick the box at the end of the survey if you would like any information which personally identifies you to be destroyed. Please return the survey using the enclosed pre-paid envelope.

If you need help to complete this survey, for instance if English is not your first language or you are blind or partially sighted, please contact us on [insert agency details]. If you have an issue that you would like to discuss directly with [company], please contact the [Company] Customer Service Team on [insert details].

Your views are valuable to us and we would like to thank you for your help in completing this survey.

Yours faithfully,

[Insert name]

**Safety note:** If you smell gas, please call the national 24 hour gas emergency service on freephone 0800 111 999 (calls will be recorded and may be monitored).

# Appendix 2 - Planned work survey

[Company name's] records show that they carried out work on your incoming gas supply. Please complete the questionnaire using a black pen to put a cross in the appropriate boxes like this  $\boxtimes$ . Where the question asks you to indicate your level of satisfaction, please rate your level of satisfaction on a scale of one to ten.

1. Was your gas supply interrupted as a result of the work on your incoming gas supply?

Yes No (please go to question 4)

2. For how many hours was your gas supply interrupted?

\_\_\_\_\_ 0-4 \_\_\_\_ 5-8 \_\_\_\_ 9-12 \_\_\_\_ 13-16 \_\_\_\_ 17-23 \_\_\_\_ 24+ \_\_\_\_ I don't know

3. How satisfied were you that your supply was restored as soon as possible?



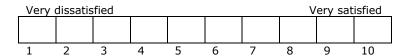
4. Did you receive advance notification that we would be working in your area?

Yes No (please go to question 6)

5. How satisfied were you with the advance notification?



6. How satisified were you with site tidiness?



7. How satisfied were you with the communication from [company name](or their contractors) while the work was being carried out?



8. After the work was completed, how satisfied were you with the length of time it took to make good the excavation?



9 How satisfied were you with the skill and professionalism of the workforce that carried out the work at your property?

Very	Very dissatisfied							ery sat	isfied
1	2	3	4	5	6	7	8	9	10

10. How satisfied were you with the overall quality of work carried out?



11. Overall how satisfied are you with the service you have received from (company name)?



All information given here will be treated as confidential. Your responses and comments will be used only as part of this survey and will not be attributed to you or to your address. However, it is sometimes appropriate for us to pass on your comments, together with your contact details to [company name] for their attention. We will only do this if you do not tick the box below.

No, I would not like my contact details passed to [company name], as appropriate.

# Appendix 3 – Emergency response and repair survey template

[Company name's] records show that:

- you reported a leak or interruption to your incoming gas supply; and/or
- they carried out a repair on your incoming gas supply.

Please complete the questionnaire using a black pen to put a cross in the appropriate boxes like this  $\boxtimes$ . Where the question asks you to indicate your level of satisfaction, please rate your level of satisfaction on a scale of one to ten.

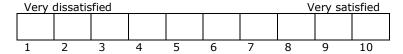
1.	Did you ring	the national	gas emergency	telephone	service	0080)	111	999)	to
report	a gas leak or	an interrupti	ion to your gas	supply?					

Yes No (please go to question 6)

2. How satisfied were you with the length of time it took to get through to an operator?



3. How satisfied were you with the information and safety advice provided by the operator?



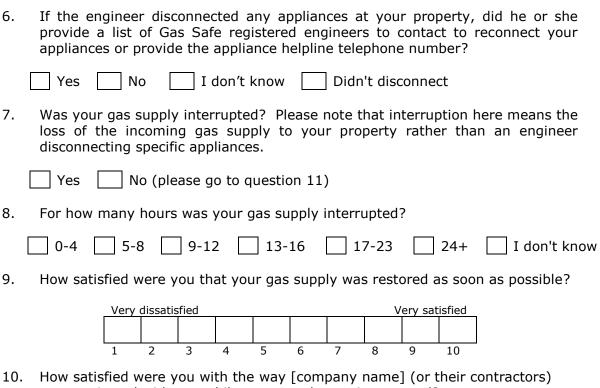
4. Did a gas safety engineer attend your premises to investigate a gas leak or interruption to your gas supply?

Yes No (please go to question 7)

5. How satisfied were you with the time it took for the engineer to attend your property in response to your reported gas leak or interruption to your gas supply?







communicated with you while your supply was interrupted?



How satisified were you with site tidiness? 11.



12. After the work was completed, how satisfied were you with the length of time it took to make good the excavation?





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13. How satisfied were you with the skill and professionalism of the workforce that carried out the work at your property?



14. How satisfied were you with the overall quality of work carried out?

Very dissatisfied								ery sati	sfied
1	2	3	4	5	6	7	8	9	10

15. Overall how satisfied are you with the service you have received from (company name)?



- All information given here will be treated as confidential. Your responses and comments will be used only as part of this survey and will not be attributed to you or to your address. However, it is sometimes appropriate for us to pass on your comments, together with your contact details to [company name] for their attention. We will only do this if you do not tick the box below.
- No, I would not like my contact details passed to [company name], as appropriate.

# Appendix 4 – Connections survey template

[Company name's] records show that they issued you a quotation and / or carried out work to lay a new connection, or to alter an existing gas supply to your property. Please complete the questionnaire using a black pen to put a cross in the appropriate boxes like this  $\boxtimes$ . Where the question asks you to indicate your level of satisfaction, please rate your level of satisfaction on a scale of one to ten.



Domestic	Business
----------	----------

2. How satisfied were you with the application process and the clarity of the forms you were required to complete?

Very	Very dissatisfied						V	Very satisfied		
1	2	3	4	5	6	7	8	9	10	

3. How satisfied were you with the time taken to provide the quotation?

Ver	Very dissatisfied						V	Very satisfied		
1	2	3	4	5	6	7	8	9	10	

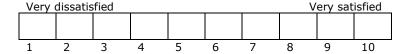
4. How satisfied were you with the time it took for [company name] to schedule a date for your works to be carried out once you had accepted the quotation?

Very dissatisfied							V	ery sat	isfied
1	2	3	4	5	6	7	8	9	10

5. If the works at your property are complete, how satisfied were you with the length of time it took for the work to be carried out?



6. How satisfied were you with the skill and professionalism of the workforce?



7. How satisfied were you with site tidiness?





8. After the work was completed, how satisfied were you with the length of time it took to make good the excavation?



9. How satisfied were you with the overall quality of work completed?

Very dissatisfied						V	ery sat	isfied	
1	2	3	4	5	6	7	8	9	10

10. How satisfied were you with the overall communication from [company name]?



11. Overall how satisfied are you with the service you have received from (company name)?



All information given here will be treated as confidential. Your responses and comments will be used only as part of this survey and will not be attributed to you or to your address. However, it is sometimes appropriate for us to pass on your comments, together with your contact details to [company name] for their attention. We will only do this if you do not tick the box below.

No, I would not like my contact details passed to [company name], as appropriate.