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**25 August 2016**

Dear Mark,

As Citizens Advice, we are pleased to respond to the consultation on the E-Serve Supplier Performance Report (SPR). We agree that publishing the SPR has the potential to help promote the interests of consumers.

We recognise Ofgem's concern that there are cases of persistent non-compliance that add to the cost of administration of the E-Serve schemes, but where it may not be efficient or appropriate to pursue enforcement action. Consumers have an interest in minimising the costs of these schemes, as they ultimately pay for these costs, whether incurred by suppliers or Ofgem. They also have an interest in schemes being delivered to a high standard, particularly those, such as the Energy Company Obligation, where the consumer is the direct beneficiary. We note that competition in the retail market does not always minimise the delivery costs for these schemes, as indicated by variation across suppliers' reported Energy Company Obligation costs.

We agree with Ofgem's rationale for publication, that transparency between suppliers can help deliver better compliance. For suppliers, it could help benchmark their performance against others, including helping newly-obligated suppliers anticipate hurdles in delivering their obligations. As with public data in general, we see benefits to opening up this data to other parties. Consumer organisations, like ourselves, may be able to make use of the data as part of their research and advocacy work. In our role as the consumer advocate for energy consumers, we may find it useful to identify trends in relation to any particular supplier or issues, including how these relate to wider concerns around the delivery of schemes and/or competition in the supply market. We can use this information to work with suppliers, Ofgem and the Department for Business, Energy and Industrial Strategy to improve delivery of these schemes for the benefit of consumers.

There may be other ways the data can be used that may only become apparent after it is released. This is why transparency should be considered as a default for public data. We consider this public data, as it is created by a public body, through its administration of government schemes.

Due to the nature of the data, we do not expect it would be of great interest to most individual consumers, for example when making a switching decision. We do not anticipate integrating it into our consumer-facing information, for example, our



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comparison table, which integrates several metrics to rank suppliers. In this case, the data does not cover all suppliers, is several steps removed from consumer experience and is unlikely to usefully influence consumer behaviour.

We agree with proposed scoring and definitions, the data planned for publication and the proposed timings for publication. We consider the proposed website suitable summary of the data, although as outlined, although this is unlikely to be used directly by many individual consumers. We consider the raw data in Excel format particularly useful for the purposes outlined above.

If you have any questions about this consultation response, or would like to discuss any of the issues raised, please do not hesitate to contact me.

Yours sincerely,

Peter Broad  
**Policy Manager**  
**Citizens Advice**