

25 August 2016

## **Energy Saving Trust consultation response: E-Serve Supplier Performance Report**

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Energy Saving Trust is pleased to respond to Ofgem's Supplier Performance Report consultation.

Energy Saving Trust is the leading, impartial sustainable energy organisation. We work on behalf of governments and businesses across the UK providing services in the area of data, assurance, grant and loan administration, consumer engagement and advice.

For the Department for Business, Energy and Industrial Strategy (BEIS) the Energy Saving Trust delivers the telephone-based Energy Saving Advice Service in England and Wales. We also undertake other research and awareness-raising work for the department on a project-by-project basis. Prior to the coalition government, for over 15 years, the Energy Saving Trust ran national energy advice services as a grant-funded organisation.

In Scotland the Energy Saving Trust is a principal delivery partner of the Scottish Government for home energy efficiency. We run comprehensive local and national advice and support programmes.

Public engagement on energy is at the heart of our work. In total each year the Energy Saving Trust handles just under half a million energy efficiency advice calls on behalf of UK and Scottish governments. Energy Saving Trust has a unique relationship with the public around energy saving and renewable energy and our response reflects that.

**Question 1: Do you agree with our analysis that shows that publishing the SPR will promote the interests of consumers? Please support your answer.**

Energy Saving Trust agrees that there is merit in publishing the SPR. However we do not feel that it will directly influence the decision of consumers when switching, as stated within the consultation document. In our experience, those consumers who are minded to switch will look at cost and overall reputation of the company but not the level of detail proposed here. However there should be an indirect benefit to consumers if publishing the report drives up standards. Consumer groups will be interested in the detail that sits within the SPR and therefore have the opportunity to use this when lobbying for improvements to policy, again which should have an indirect impact on consumers.

**Question 2: Do you agree with this method of scoring and the definitions we are proposing? If not, what alternatives do you suggest?**

The proposed scoring matrix seems sensible, with some specific notifications.

- **Deadlines:** We would suggest that the severity rating is higher for missing statutory deadlines than administrative deadlines.
- **Governance:** It may be unfair to automatically penalise a supplier if their actions leads to a change in Ofgem's external guidance, if it has been found that the guidance was at fault.
- **Effect on industry / governance / public confidence:** Again it may be unfair to automatically penalise a supplier if their actions leads to a media story. A level of judgement and discretion is required here.

**Question 3: Do you agree with the data we plan to publish?**

Yes. The SPR in particular will be very beneficial for organisations involved in fuel poverty alleviation and climate change mitigation.

**Question 4: Do you agree with our proposed timings of publication?**

Yes. The proposed timings seem sensible.

**Question 5: Do you have any comments on the SPR webpage we propose?**

It would be helpful to have a table demonstrating the total scores, for reference. This will be useful to understand the relative performance of smaller suppliers who are not obligated against all schemes.