

Improving the Customer Complaint Journey

December 2019

1. Executive Summary

Customer expectations of the speed and quality of service they receive are higher than ever before. Across all markets, 86% of customers expect a better service compared with 5 years ago¹, and the proportion of customers who record experiencing a problem is at its highest ever level.² The expansion of digital technology has given people a greater range of ways to make a complaint, and companies are increasingly expected to be flexible and responsive to customers' preferred communication channels.

The effective handling of complaints is crucial to building trust with customers. A positive complaint experience can transform the relationship between customer and company. The Institute of Customer Service has found that complaints that receive excellent satisfaction scores (a 9 or 10 out of 10) are likely to boost overall customer satisfaction.³

Customer trust will be key to the aspirations of stakeholders across the energy sector in the next decade. The Government's vision for the future energy retail market is one where "innovation brings greater choice to consumers...where a combination of healthy competition and appropriate safeguards ensures that all consumers pay a competitive price...and consumers in vulnerable situations in particular are properly protected."⁴ Furthermore, the level of take-up of new products such as smart meters and Time of Use tariffs will be a key factor in the UK meeting its net zero target. Whether or not customers choose to engage with the sector during the transition to a smart, flexible energy system is going to depend to a large extent on how far customers have trust in their supplier and the energy industry.

It is in this context that the Government has outlined that the challenge for government, regulators and businesses is to work together to rethink the structure of the energy system, with an emphasis on facilitating innovation while protecting consumers.⁵ Ofgem's strategic narrative has similarly highlighted the need for agile consumer protection in a changing market.⁶ BEIS and Ofgem's review of the future energy retail market has concluded that "the current regulatory framework – designed to address the challenges of several decades ago – is now constraining helpful innovation". The review has summarised the need to remove further barriers in order to accelerate the rate of innovation, and sought the views of suppliers on how this could be achieved.

The purpose of this paper is to provide a coordinated industry view of how the regulations around complaints handling could be improved in order to foster innovation and an increased focus on customer outcomes. It outlines the commitment of Energy UK members to work with Ofgem, BEIS and other stakeholders to trial potential changes and monitor their impact on customer outcomes. It highlights how industry would maximise the opportunity created by a review of the regulations by undertaking wider work to improve the customer complaint experience. Finally, it provides further analysis on behalf of suppliers to inform the current review of the timing of signposting to the Energy Ombudsman. It is structured according to the following themes:

a) A regulatory framework that drives a focus on customer outcomes

The regulations around complaints handling, developed in 2008, increasingly stand out as an anomaly in a regulatory environment that has recognised the benefits of a principles-based approach. During recent years, Ofgem has engaged with industry to reform the licence so that the burden of proof is on industry to demonstrate it is treating its customers well, thereby encouraging innovation while maintaining customer protections. The level of detail in the Complaints Handling Standards (CHS) has a greater emphasis on companies delivering specific outputs rather than customer outcomes.

¹ Huntswood, Complaints Outlook 2016 (December 2015)

² The Institute of Customer Service, UK Customer Satisfaction Index (January 2019)

³ The Institute of Customer Service, UK Customer Satisfaction Index (January 2019)

⁴ Ofgem and BEIS, *Flexible and responsive energy retail markets* (July 2019)

⁵ Ofgem and BEIS, *Flexible and responsive energy retail markets* (July 2019)

⁶ Ofgem, *Our strategic narrative for 2019-23* (July 2019)

There is an opportunity to review and update the CHS in line with the move to a principles-based approach. For example, prescription on company outputs such as datasets to be published on company websites could be replaced by a sharper focus on customer outcomes. This provides a strong foundation that can challenge and empower suppliers to ensure they are taking a customer-centric approach to the handling of complaints. It puts the responsibility on suppliers to ensure that their actions are responsive to customer expectations and the circumstances of each case. Suppliers are committed to working with Ofgem to undertake customer trials to test potential changes to the CHS in order to ensure that facilitating greater innovation does not in any way weaken customer protection.

b) A regulatory framework that fosters competition between suppliers

There is a growing awareness of the importance of competition between energy suppliers based not just on price, but also on service levels, particularly since the introduction of a price cap. There has been a shift from thinking that “electricity is electricity, and all suppliers are pretty much the same” to an understanding that suppliers vary greatly in their service levels.⁷ It is crucial that the right frameworks are in place for suppliers to compete with each other to provide high quality customer service. BEIS and Ofgem have highlighted that, in today’s energy market, “effective competition between suppliers, operating in a market with minimal distortions, is the best driver of value for consumers”.⁸

There is some ambiguity in both how the CHS should be interpreted, and to what extent suppliers are obliged to follow the letter of some of its specific provisions in every scenario (even where doing so may result in customer detriment). The drafting of the regulations predated the expansion in the use of social media as a customer communications channel, which has created uncertainty and inconsistency across industry in how complaints through these varied platforms should be handled and recorded. This will affect the comparability of data on supplier complaints performance that influences customer service league tables. Furthermore, some suppliers have credited their delivery of excellent customer service performance to a relentless focus on customer outcomes. In contrast, companies that have previously been investigated for the quality of their complaints handling have felt compelled to stick assiduously to the letter of the rules in the CHS, which can place a greater focus on a supplier’s internal operations. This creates a barrier, whether real or perceived, to suppliers competing on a level playing field.

The Government and Ofgem have set out their ambition to improve clarity and regulatory certainty for firms that will lower the cost of compliance and free resources for innovation or to invest in improved support for services elsewhere. An updated regulatory framework for complaints handling would bring clarity regarding the handling of complaints through social media, while also creating an opportunity to future-proof the regulation ahead of further technological changes as the energy transition unfolds.

c) Maximising the opportunities created by a shift to a more customer-centric regulatory framework

A review of the complaint regulations would provide a platform to bring together stakeholders and fully utilise the opportunities created from a more customer-centric framework. In addition to supporting Ofgem to trial the impact of regulatory changes, Energy UK and suppliers would undertake further activity to ensure its potential benefits are realised. For example, a collective effort to identify the types of complaints that typically take a long time to resolve, due to factors such as industry process timescales, could improve customer communication through the development of consistent, simple customer-facing messaging that will help customers to understand an approximate resolution time for complex issues. It would also facilitate the promotion of the existing voluntary guidance regarding the style and content of supplier signposting to the Energy Ombudsman to a wider range of suppliers (currently only around 1 in 5 suppliers are signed up).

d) Analysis on the timing of signposting to the Ombudsman

The final section outlines the findings of an Energy UK RFI with its members that provides additional analysis to inform the current review of the 8-week rule for signposting to the Energy Ombudsman.

⁷ S Littlechild, Savings available in the retail energy market and the Overall Customer Service score (February 2019)

⁸ BEIS and Ofgem, *Flexible and Responsive Energy Retail Markets* (July 2019)

2. Background and approach

The content of this paper has been developed through two industry workshops that explored the key issues and opportunities for improving the customer experience of the complaints handling process. An initial discussion paper to inform the workshops was developed based on RFI responses from suppliers and Citizens Advice, in addition to a literature review of published research on the customer experience of complaint handling in energy. The workshops obtained the input of key stakeholders – BEIS, Ofgem, Citizens Advice, the Extra Help Unit, the Energy Ombudsman, Resolver, Huntswood and suppliers.

The conclusions drawn below have been further shaped by a series of supplier RFIs to more closely examine specific aspects of the customer complaint journey, such as the timing of complaint resolution and the factors that can cause some complaints to have a long resolution time. A map of the current customer complaint journey was developed in partnership with Huntswood in order to provide a common point of reference for understanding the customer complaint journey.

The consensus across stakeholders was that there is a need for coordinated action to improve the customer experience of the complaints process. BEIS and Ofgem have highlighted the importance of industry articulating how it would maximise the opportunities created by any review of the regulatory framework, and how suppliers would support consideration of potential changes through customer trials. Suppliers were also challenged to demonstrate their commitment to improving customer service through their own initiatives, such as the forthcoming Vulnerability Commitment, which acts on the findings of an independent review of the treatment of customers in vulnerable circumstances in the energy sector.⁹ The analysis below has been shaped by the stakeholder engagement outlined above, but represents the views of Energy UK only.

Regulatory framework

The [Complaints Handling Standards](#) came into effect on 1 October 2008, and together with the stipulations of the [Consumers, Estate Agents and Redress \(CEAR\) Act 2007](#), provides the statutory framework for how complaints should be handled by energy companies, and the respective role for advice bodies, consumer advocates and ADR schemes. These regulations have not been formally reviewed since they were developed more than a decade ago.

The CEAR Act stipulates that Ofgem is required to make regulations to prescribe standards for complaints handling by energy suppliers. It also places a requirement on energy suppliers to belong to redress schemes to ensure the resolution of complaints and the award of compensation where required. The CHS applies to both domestic and microbusiness customers. It includes requirements for each supplier relating to its complaints handling procedure, recording complaints, signposting customers to redress, maintaining sufficient resource for complaints handling, and publication of information on complaints. The CHS defines a complaint as:

“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.”

In June 2016, Ofgem outlined its plans to rely more on principles in the way it regulates the domestic electricity and gas supply markets. The regulator explained that, “to fulfil our role effectively, we need to reduce the amount of prescription we use and increase our reliance on principles”. This new approach included looking at how principles could replace prescriptive rules at each stage of the customer journey, as well as engaging proactively with suppliers to assist the shift of culture within the industry. Ofgem stated its aim was “to create a shorter, clearer and more accessible domestic supply licence that shifts away from prescriptive rules, where appropriate, and better utilises broad and narrow principles”.¹⁰

⁹ The Commission for Customers in Vulnerable Circumstances, *Final Report* (May 2019)

¹⁰ Ofgem open letter, *The future of retail market regulation* (2 June 2016)

3. Themes and Proposals

Theme A: The importance of a regulatory framework that drives a focus on customer outcomes.

Since the CHS was implemented in 2008, there has been a shift by the regulator towards the use of principles-based regulation. Ofgem has highlighted that this approach can deliver better outcomes for consumers, “puts greater responsibility on suppliers to understand and deliver what is right and fair for their customers” and enables comprehensive consumer protection. The stated benefits of this model also include improved future-proofing of regulation and facilitating innovation.¹¹ There is an opportunity to review the ten-page document outlining the regulations for complaints handling to ensure it is framed in this way and delivers these benefits.

Some specific examples from the current regulations demonstrate the potential for improvement. First, the CHS stipulates that energy suppliers must publish an annual consumer complaints report on their website. There is a wealth of published information on complaints performance by organisations such as Ofgem, Which? and Citizens Advice. Industry data highlights that very few customers view the reports published on suppliers’ websites. At a time when suppliers are under pressure to demonstrate how they are working efficiently in order to deliver value for their customers, it appears unlikely that this required output is driving the most effective use of suppliers’ resource.

A second example is how the CHS sets the parameters for suppliers to signpost customers to external sources of support during the early stages of their complaint. There is no question that this is an essential part of the customer complaint journey and that signposting should take place at an early stage. A principles-based, customer-centric approach would put the responsibility on suppliers to signpost customers in a timely manner in accordance with the nature of the complaint and an understanding of customer preferences for the point at which they would like to be directed to external sources of support.

The current regulation reflects the fact that the CHS was drafted prior to the shift to a principles-based approach. The regulation states that, where a consumer complaint has not been become a resolved complaint by the end of the first working day after it was first received, a supplier must contact the customer as soon as reasonably practicable to direct them to their complaints handling procedure (and offer a copy of this free of charge). This procedure will outline details of the full process, including how to seek redress through the Energy Ombudsman. Ofgem has previously elaborated on the regulations and suggested that it may be more robust to provide this signposting in writing. This is commonly referred to as the “Day +1 letter”.

This prescriptive rule inhibits the ability of suppliers to make an informed decision of the most appropriate point to signpost customers to external support during the early stages of their complaint. This has a particularly significant impact in practice on those complaints that are resolved by suppliers in a matter of days. It can leave customers with the impression that suppliers are not taking ownership of their complaint; cause customer confusion as to the status of the complaint; and put unnecessary pressure on external parties such as the Ombudsman.

The evidence from customer feedback suggests it is crucial that suppliers demonstrate their ownership of a customer complaint. Customer satisfaction with the overall complaints process declines with the number of times that a complaint is referred to an alternative organisation – from 90% being extremely satisfied with the outcome of their complaint where it is resolved at the initial stage to 66% of those who are referred once before the complaint is resolved.¹² The best outcome of a complaint when considering customer satisfaction is that it is resolved in a timely manner by their supplier at the initial stage. Signposting customers to seek advice or redress from external parties at the end of the first working day after their complaint has been received may be unlikely to instill a customer with confidence that their supplier is taking ownership of resolving the issue.

There is a typical customer expectation that suppliers should be getting on with resolving their complaint at this early stage, and that they will find the details of third parties themselves if needed. One supplier

¹¹ Ofgem, Why a principles-based approach to regulation? Available at: <https://www.ofgem.gov.uk/gas/retail-market/market-review-and-reform/future-retail-market-regulation?page=2#block-views-publications-and-updates-block> (Accessed: July 2019)

¹² Citizens Advice, *Understanding consumer experiences of complaint handling* (June 2016)

asked its customers to rank 16 factors in order of importance when making a complaint to a service provider. “Signposting to independent help and advice” was ranked by customers as the least important factor. This was notable as nearly one in five of those surveyed had used a third party to support them with a complaint. Customers felt confident in being able to find third party contact details if needed - only 5% said they didn’t know how to contact a third party. Citizens Advice has similarly found that the majority of third-party referrals come through internet search engines¹³ and that, while there is no reliable picture of awareness of ombudsmen in general, a recent survey put awareness of “ombudsman schemes” at 77%.¹⁴ This is a further indication of the potential benefit of having greater flexibility around when to signpost external sources of support during the early stages of a complaint.

The rigid timing of the current requirement for the initial signposting letter can also result in customer confusion, particularly for customers who prefer paper-based written communication. A supplier is required to issue the letter on D+1 but may then verbally confirm with the customer on D+2 or D+3 that their complaint has been resolved and closed. The customer will subsequently receive a letter informing them of how to seek advice and redress to support the resolution of their complaint. This can understandably cause doubt in the customer’s mind and further inconvenience. Confusion can also arise from customers seeing the contact details for the Energy Ombudsman in the D+1 letter and contacting them too early in the process. Citizens Advice’s review of the customer journey through the complaints process identified that a significant number of consumers go to the Ombudsman too soon, with the associated inconvenience, frustration and costs that this entails.¹⁵

Both the above issues can arise at whichever point the signposting requirement is set, but the intention should be to minimise their frequency as far as possible. The fixed timeframe of D+1 means that more customers are likely to be affected by these scenarios than under a more flexible, outcomes-based framework. Energy UK analysed data provided by ten suppliers for the calendar year 2017 that examined the volume of customers who had their complaint resolved within 10 working days and yet were directed to the full complaints handling procedure during the course of its resolution:

Volume of complaints resolved by D+1:	1,621,584
Volume of complaints resolved by D+3:	1,776,282
Volume of complaints resolved by D+5:	1,873,503
Volume of complaints resolved by D+10:	2,038,267

This small sample alone identified over 400,000 complainants who were signposted to their supplier’s full complaints procedure at D+1 and then had their issue resolved shortly afterwards.

A third example highlights a further area where a principles-based approach could achieve improved customer outcomes. Currently, a customer service advisor who is trained to understand and follow the CHS is under pressure to approach customer interactions from a perspective of complying with its prescribed outputs, rather than focusing first and foremost on the customer outcome. There can be a tension between the two. Ofgem has highlighted that it is mindful that “too many principles focused on internal operations could lead to a compliance culture that does not result in suppliers taking responsibility for putting consumers at the heart of their business”.¹⁶

This is seen in the number of cases where suppliers log a complaint even where a customer does not think they have complained or has even (unprompted) expressly stated that they do not want to make a complaint. GfK noted that “some customers who had made a low-level complaint which was registered as an expression of dissatisfaction by the supplier” were not included in its survey as “the customer did not feel they had made a complaint. These could have been customers whose complaint was resolved more quickly, perhaps on first contact”.¹⁷

¹³ Citizens Advice, *Confusion, gaps and overlaps* (April 2017)
¹⁴ Citizens Advice, *Confusion, gaps and overlaps* (April 2017)
¹⁵ Citizens Advice, *Mapping the energy customer journey: the consumer perspective* – presentation at Energy UK workshop (October 2018)
¹⁶ Ofgem open letter, *The future of retail market regulation* (2 June 2016)
¹⁷ GfK, *Complaints to Energy Companies* (August 2014)

A regulatory approach that is focused on customer outcomes can empower customer service staff to be outcome-led in their thinking and approach. It could help reduce the tension that can exist between taking action that helps customer satisfaction and taking action that complies with regulatory prescription. This approach aligns with Ofgem's emphasis on supplier recognition of consumers' characteristics and preferences. The resource currently being used, for example, to log complaints against a customer's wishes could in turn be more effectively deployed to support other customers.

Proposed solution: A review of the complaint handling regulations, similar to Ofgem's recent project to reform the rules around customer communications, offers the opportunity to create a more customer-centric regulatory framework. Energy UK members are committed to undertaking Ofgem-approved customer trials to test the impact of changes in areas such as the timing of signposting.

This would empower suppliers to focus their efforts on providing each customer with a timely and personalised response. With regard to the examples cited above, suppliers would work with Ofgem to ensure that the shift to a principles-based approach maintains and improves existing standards of customer protection.

For example, the current requirement to send a D+1 letter could be replaced with a principle requiring suppliers to signpost to external support at an appropriate early stage, with a backstop deadline for doing so to provide an additional safeguard. This alteration would tie in with Ofgem's continuing shift towards a principles-based regulatory approach where it is "comfortable with suppliers delivering positive consumer outcomes in different ways, except where a 'one-size-fits-all' approach is needed".¹⁸

The nuanced nature of customer expectations further highlights the benefits of moving to a principles-based approach. Citizens Advice has summarised that customer expectations of resolution time can vary significantly:

*"Given the widely varying circumstances of complaints, some acknowledge an expectation that their complaint may take a significant amount of time to resolve – 18 per cent expect the complaint to take more than six months, whilst others expect things to be resolved very quickly – 21 per cent expect it to be resolved within less than a day. The median level of expectation is that consumers expect their complaints to be resolved in less than one month however the average resolution time is up to three months."*¹⁹

GfK's qualitative research suggests that suppliers operating within a more customer-centric framework could be particularly beneficial to satisfaction if this opportunity is used to help customers feel like they are being treated as an individual through "personalised communications and feeling listened to".²⁰

To be cautious, however, it could be useful to maintain a backstop to require suppliers to send the initial signposting communication within the first two weeks. Huntswood has found that 85% of people expect some form of reply within 48 hours²¹, and 90% expect firms to resolve their complaint within two weeks.²² This accords with GfK's findings that a small majority of customers were satisfied with the handling of their complaint where it was resolved within 14 days.²³ Signposting to external sources of support becomes of greater importance where customer expectations of resolution time are at a higher risk of not being met.

Looking beyond D+1 as a rigid benchmark could also create an opportunity to enhance the quality of data on suppliers' complaint handling performance and equip Ofgem with greater insight to inform the regulator's risk-based, structured monitoring approach. Under the current requirements, suppliers report to Ofgem on complaints resolved by the end of the next working day, and complaints resolved within eight weeks. The dataset of complaints resolved by the end of D+1 will capture a significant number of issues that are resolved immediately. For example, a customer may have called their energy supplier to

¹⁸ Ofgem open letter, *The future of retail market regulation* (2 June 2016)

¹⁹ Citizens Advice, *Understanding consumer experiences of complaint handling* (June 2016)

²⁰ GfK, *Complaints to Energy Companies* (August 2014)

²¹ Huntswood, *Complaints Outlook 2016* (December 2015)

²² Huntswood, *Complaints Outlook 2019* (July 2019)

²³ GfK, *Complaints to Energy Companies* (August 2014)

say that they are not content with their bill as it is based on an estimated reading, and that they would like to give a meter reading in order to get an accurate bill. The company can immediately fix the issue by using the actual reading but will need to log a complaint as the customer expressed dissatisfaction with the original bill.

Changing the reporting requirements from complaints resolved by the end of D+1 to complaints resolved by the end of Day 0 would provide greater transparency of performance about which complaints are quick fixes that are raised and resolved immediately, and those that take longer and require further action by the supplier. Visibility of the breakdown of complaints not solved on Day 0 would help Ofgem to have a clearer understanding of the volume and nature of more complex customer complaints that need an additional or special action, and suppliers' ability to manage and resolve such action.

Theme B: A regulatory framework that fosters competition between suppliers.

The energy market has changed fundamentally since 2008. Customers now have a choice of around 60 suppliers in the domestic retail market. This has increased the need for a clear, consistent and comparable picture of suppliers' performance to help customers choose a supplier based on the quality of their service. This is particularly important in the context of a price cap. It has been shown that while customers can still make substantial savings relative to the default tariff cap, these are significantly less than the level of savings regularly cited in the media and can often be linked to a tariff with certain restrictions.²⁴ Additionally, poor customer service performance has signaled several supplier failures in the last two years, resulting in Supplier of Last Resort processes which can be difficult for customers, and costly for the industry.

The volume of complaints that a supplier receives, and the quality of its complaints handling, are relied upon as sources of performance data by several customer service indicators. The Citizens Advice energy supplier rating utilises a range of indicators to rank suppliers, including the number of complaints made to third party organisations. Which? publishes an annual review of suppliers based upon a series of metrics including customers' perceptions of the complaints handling process. Ofgem publishes data on the volume of complaints received by each large supplier, medium-sized supplier and a selection of small-sized suppliers.²⁵ Updating the regulations can provide clarity around what constitutes a complaint and ensure that suppliers are competing on a level playing field.

One area of ambiguity relates to the handling and recording of complaints through social media²⁶ channels. The development of digital communication platforms has transformed the complaints landscape in the last decade. There are now 45 million social media users in the UK, comprising two-thirds of the population.²⁷ This has created a large increase in the volume of customer contact through these channels. One medium-sized supplier recently highlighted that 30,000 customers had contacted it through social media in the past six months.²⁸ The Energy Ombudsman's Consumer Action Monitor report has found that 55% of consumers take to social media to share the problems that they experience when dealing with businesses.²⁹

The regulations outline the need for companies to allow complaints to be made orally or in writing (including by email) but do not make reference to social media.³⁰ A customer tweeting about their energy supplier by including their Twitter handle in a post is a more indirect form of communication than contacting the company by phone or email. Suppliers have highlighted that it can be challenging to identify whether the customer expects a response, and whether this should be recorded as a complaint under the CHS. The potential impact of this is indicated by recent research of consumer perceptions of the energy market showing that social media was the least successful contact method used by

²⁴ S Littlechild, *Savings available in the retail energy market and the Overall Customer Service score* (February 2019)

²⁵ Ofgem, Compare supplier performance on complaints. Available at: <https://www.ofgem.gov.uk/consumers/energy-supplier-comparison-data/compare-supplier-performance-complaints> (Accessed: July 2019)

²⁶ Defined by the Cambridge Dictionary as: "Websites and computer programs that allow people to communicate and share information on the internet using a computer or mobile phone."

²⁷ Utility Week, *Social rules* (May 2019)

²⁸ Utility Week, *Social rules* (May 2019)

²⁹ Ombudsman Services, *Consumer Action Monitor* (June 2019)

³⁰ Ofgem, *The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008*

customers in the first quarter of 2019.³¹ It seems probable that suppliers are taking different approaches to recording complaints made through social media, which affects the accuracy of published complaints data as an indicator of performance.

The circumstances under which a complaint can be classified as resolved is a further area of uncertainty. A “resolved complaint” is defined as a complaint where “there remains no outstanding action to be taken by the regulated provider and which has been resolved to the satisfaction of the relevant consumer”.³² It is unclear from this definition whether a supplier can mark a complaint as resolved if there is no response from the customer to confirm their satisfaction with the action that has been taken.

Proposed solution: An updated, principles-based and outcome-focused regulatory framework could be transformative in clarifying expectations of suppliers and ensuring competition exists on a level playing field. Energy UK members are committed to constructively engaging with Ofgem in the development of principles and also new requirements around the handling and recording of complaints made through social media.

From a customer perspective, this will ensure that there is a clear and consistent understanding of how energy companies should respond to complaints made through social media. A coordinated, deliberate effort to establish principles for effective handling of social media complaints is likely to be preferable to each individual supplier determining this independently. Reducing regulatory uncertainty could also improve the efficiency of the sector in keeping costs for customers as low as possible. Where the rules are unclear, companies can overinvest time and resource seeking to interpret what is required of them. Addressing this waste can be a particular challenge for new market entrants with small compliance teams, which an updated regulatory framework could help address.

An exercise to review and update the CHS would support all suppliers to know what is expected of them and to operate within a consistent framework. It has been commented that some new market entrants have achieved excellent customer service performance though a relentless focus on customer outcomes. In contrast, suppliers that have previously been investigated for the quality of their complaints handling are more likely to feel compelled to stick assiduously to the exact letter of the rules set out in the CHS, even in scenarios where this can put customer satisfaction at risk.

For example, a customer may call a supplier and make an expression of dissatisfaction, followed by an unprompted comment that they do not wish to raise a complaint. Some suppliers may feel that it is the right thing to do by the customer, and in line with the broad principles underpinning the supply licence, to respect the customer’s wishes and not record a complaint. In contrast, some other suppliers may feel that they need to stick to the letter of the regulation set out in the CHS by recording a complaint and completing the associated actions, even where this causes customer dissatisfaction. An outcomes-based regulatory framework for complaints handling would create alignment with the broader regulatory framework for suppliers and eliminate this risk of an unlevel playing field.

This is pertinent at a time when the Government is considering introducing a cross-sectoral regulatory regime for third party intermediaries, which would most likely be focused on principles rather than prescriptive rules. An updated CHS could mean that, regardless of whether customers choose to engage in the energy market through a TPI or directly with a supplier, their service provider will be operating within a principles-based, customer-oriented regulatory regime.

Theme C: Maximising the opportunities created by a shift to a more customer-centric regulatory framework.

Updating the regulatory framework will not automatically create an enhanced focus on customer outcomes across the sector. It is important that there is a proactive approach to ensure that the potential benefits of a principles-based approach are realised. BEIS and Ofgem have urged industry to consider how the momentum and opportunity created by a potential review could be used to drive wider improvements to the customer complaint experience.

³¹ Accent, *Household Consumer Perceptions of the Energy Market, Wave 2* (April 2019)

³² Ofgem, *The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008*

Proposed solution: Energy UK members are committed to ensuring that a review of the complaint regulations is used as a springboard for further activity to improve customer satisfaction. This would include bringing together suppliers and stakeholders, in a similar way to the recent Citizens Advice “hackathon” event, to engage with the updated regulations and explore how to fully realise the opportunity to embed a more customer-centric culture. The platform created by a review could also be used to explore wider opportunities to improve the customer complaint experience, which are outlined below.

Raising the standard of signposting to Citizens Advice and the Energy Ombudsman

Quadrangle found that the start of the complaint process worked well for most complainants. Contact details for the company were easily found, and staff were seen as professional and avoided difficult to understand jargon. It is the subsequent stage – understanding the process from that point onwards – that customers find to be harder work.³³ The Consumer Green Paper on modernising consumer markets has outlined that if competition is to work for consumers, then they must feel confident in their rights, and must be able to seek redress easily when things go wrong.³⁴ Effective signposting to Citizens Advice and the Energy Ombudsman can make all the difference if a customer feels they need additional support when pursuing their complaint.

The Citizens Advice Consumer Service (CACS) can be a valuable resource in supporting customers to navigate the complaints process. 71% of users described their problem as ‘mostly’, ‘completely’ or ‘partly resolved’ between 5 and 25 weeks after calling the helpline.³⁵ Furthermore, CACS can in turn help individual suppliers to understand and improve their customer service by sharing a breakdown of themes that their customers have raised when seeking advice. A customer taking a complaint to CACS can be an indication that their supplier has demonstrated insufficient ownership of resolving their complaint. For this reason, the volume of a supplier’s customers contacting CACS is one of the metrics used to score a supplier’s performance on the Citizens Advice energy supplier rating.

Consistent, good quality signposting to Citizens Advice is therefore important both to customers and to there being a level playing field for suppliers competing to prove the quality of their customer service. However, a Citizens Advice review of supplier and stakeholder websites has found that signposting to its advice role is inconsistent or incomplete, if mentioned at all. The design and wording relating to its statutory role “varies hugely” on suppliers’ complaints literature and letters, leaving consumers “largely in the dark or confused”.³⁶ Citizens Advice has found a perception that in some cases “staff at smaller energy companies fear referring to Citizens Advice means getting in trouble”.³⁷ A lack of awareness of the support available through Citizens Advice can in turn result in customers simply waiting until they are eligible to take their complaint to the Ombudsman.

The quality and consistency of signposting to the Energy Ombudsman at the eight week or deadlock stage also varies significantly across suppliers. The Energy Ombudsman recently reported that, while around 8 in 10 of the cases it has received from large suppliers have been properly signposted, the equivalent figure for smaller suppliers is 1 in 10.³⁸

Energy UK members are committed to raising standards of signposting to both Citizens Advice and the Energy Ombudsman. For example, one idea that has been suggested is for a penalty to be applied to the energy supplier rating score of any supplier that has not responded to concerns raised by Citizens Advice about the quality of its signposting. This could mitigate the risk of a supplier achieving a better score on the rating as a result of not signposting properly to Citizens Advice.

³³ Quadrangle, *Customer satisfaction with energy supplier complaints handling* (September 2016)

³⁴ BEIS, *Modernising Consumer Markets: Consumer Green Paper* (April 2018)

³⁵ Citizens Advice, *Mapping the energy customer journey: the consumer perspective* – presentation at Energy UK workshop (October 2018)

³⁶ Ibid

³⁷ Ibid

³⁸ Matt Vickers presentation at Energy Ombudsman Conference (June 2019)

The platform created by a review of the complaint regulations could also be used to promote more suppliers to sign up to voluntary guidance developed by the Energy Ombudsman and Energy UK to improve signposting to the Ombudsman. This voluntary guidance on the style and content of signposting letters at the eight week and deadlock stage was developed in response to concerns raised by Ofgem and GfK in December 2013 that only a small proportion of consumers eligible to take their complaint to the Ombudsman actually did so.³⁹ The GfK research recommended “greater personalisation of the 8-week letters to avoid them being perceived as generic or standardised”, which would decrease their impact.⁴⁰ GfK summarised that “tailored communications signalled to the participant that their complaint was being properly addressed.”⁴¹

The guidance itself has recently been updated to reflect the shift to principles-based regulation, and Energy UK would seek to use the forum for engagement created by the CHS review to extend its coverage to more suppliers in the market and increase awareness of research-based good practice.

Improving communication around complaints that take longer to resolve

Quadrangle’s recent research highlighted key contributors to dissatisfaction were: the length of time taken to resolve the issue; not being kept up to date with the progress of the complaint; and suppliers not providing complainants with a clear view of how long the resolution will take.⁴²

Energy is a complex sector and the resolution of a complaint can include installing or removing infrastructure in a customer’s home (which requires their permission), or reliance upon a third party (e.g. another supplier or the DCC). A customer is unlikely to have an awareness of the steps that will be required to resolve a complex issue such as a meter mix-up, which can result in disappointment if a customer’s expectations around speed of resolution are not met.

A collaborative approach to identifying the most complex complaint types that typically require longer resolution times could help to better inform customers of the reasons for a lengthier resolution time, and manage their expectations. There will not always be a one size fits all solution, given the different factors that can affect a complaint resolution time. However, simple, customer-facing messaging across suppliers, Citizens Advice and the Energy Ombudsman to help customers understand approximate timeframes for the resolution of specific complaint types could help to address the disconnect between a customer’s expectations and the actual resolution date, therefore improving customer satisfaction.

Theme D: Analysis on the timing of signposting to the Ombudsman

Complainants are currently eligible to refer their complaint to the Energy Ombudsman after eight weeks (or earlier if the supplier has deadlocked their complaint). A customer referral to an ombudsman provides an opportunity for both the supplier, and the sector as a whole, to regain the trust of the customer. As with other aspects of the customer complaint journey, the suitability of this benchmark has attracted scrutiny on account of the length of time since it was introduced and the technological development that has taken place subsequently.

Ofgem is currently undertaking an RFI to explore this further and has previously expressed the view that, given the development of e-correspondence, “there is merit in exploring shorter deadlock periods”, noting that one supplier refers customers after six weeks.⁴³ Ofgem is developing its understanding of the potential benefits and costs associated with such a change, including for suppliers to train customer service staff, update external communications and change reporting systems. Money Saving Expert has also asserted that the 8-week rule should be looked at afresh given that it was created “in a non-digital age”.⁴⁴

³⁹ Ofgem and GfK, *Complaints to Ombudsman Services: Energy* (Dec 2013)

⁴⁰ Ibid

⁴¹ GfK, *Complaints to Energy Companies* (August 2014)

⁴² Quadrangle, *Customer satisfaction with energy supplier complaints handling* (June 2018)

⁴³ Ofgem, *Response to government’s consumer green paper: Modernising Consumer Markets* (July 2018)

⁴⁴ Money Saving Expert, *Sharper Teeth: The Consumer Need for Ombudsman Reform* (November 2017)

Money Saving Expert's review looked at the role of ombudsmen across all sectors rather than examining recommendations for individual sectors in detail. It is therefore important to consider its application to the energy sector. One of the key reasons the review identified for the need to reduce the eligibility period was that people in vulnerable circumstances, for example due to issues relating to payday loans, credit brokers, or black marks on credit files, could be left in crisis due to the need to wait 8 weeks to escalate an urgent complaint.

A distinctive strength of the energy sector, compared to many of the other sectors that were reviewed, is that there is a well-established mechanism in place to ensure that customers in vulnerable circumstances can have their complaint expedited where necessary. The Extra Help Unit (EHU) plays a vital role in providing support to customers where it is not reasonable to expect that person to pursue the complaint on their own. This covers a range of scenarios, including (but not limited to) the types of crisis situation referred to in the Money Saving Expert review. The EHU's capability to provide advocacy on behalf of customers, compared to the neutral arbitration role of the Ombudsman, means it can often be best-placed to assist a customer in this situation. The EHU are likely to remain best placed to support most customers in a crisis situation, regardless of the time at which their complaint becomes eligible for escalation to the Ombudsman.

The broader potential benefit cited for moving the Ombudsman eligibility point earlier in the process is that it could reduce complaint resolution times by influencing suppliers to accelerate the resolution of customer complaints. It has been suggested that this could make the customer complaint journey quicker and simpler for customers. Energy UK undertook some further analysis to consider how this sector-wide recommendation would apply in the energy sector. Two key areas were considered: the extent to which a reduction to the 8-week rule would accelerate the resolution of complaints; and consequently, the wider impacts that might arise from reducing the 8-week rule.

In order to understand how far the proposed change could accelerate complaint resolution times, Energy UK asked suppliers to undertake an analysis of the most common categories of complaints that had a lengthy resolution time, and the reasons why the complaint had taken this period of time to resolve. This required a more detailed analysis beyond simply capturing the complaint category. The complaints categories used by suppliers in recording complaints are based on the complainant's perspective of what the complaint is about, in line with Ofgem's guidance. This can reduce the reliability of the data at a category level as the customer's initial view of what the complaint is about can differ from the supplier's informed analysis of the root cause once the complaint is fully understood.

For example, a customer may state they are unhappy with a member of customer service staff because their complaint has not been quickly resolved, when the root cause of the complaint may lie in the length of time needed for the technical solution to fix the issue, which is outside of the operative's control. A lot of complaints will have a customer service aspect and so it is necessary to drill down into the fundamental cause of the complaint.

The RFI identified three significant categories of complaints regularly cited by suppliers as key causes of complaints with a lengthier resolution time, but which were partially or entirely outside of their control to resolve more quickly.

First, a significant number are reopened complaints. If a customer finds it necessary to complain again about the same issue, the complaint needs to be immediately reopened and will therefore be an aged complaint straight away. One supplier noted that more than half their complaints exceeding 4 weeks did so because they were linked complaints – while on average, they took 13 days to close, the date range involved in linking the complaints inflated the age of the complaint. Some reopened complaints will be relatively straightforward to resolve quickly, despite showing up in the raw data as complaints with a lengthy resolution time.

Second, a number of the complaint resolution times were determined by timescales for industry processes. This is a prominent factor in the resolution time for complaints linked to a change of supplier. When a customer changes their supplier, the gaining and losing supplier need to follow industry processes to agree the customer's meter reading (and therefore usage) at the point of the switch. For example, a losing supplier should receive a closing Change of Supplier reading from the customer's new supplier within 10 working days of the switch. The losing supplier may not receive this information

but is only able to implement an escalation procedure after 30 calendar days. This can prevent a losing supplier from being able to confirm a customer's final bill and promptly resolve an associated complaint.

Other industry processes also have lengthy timescales. For example, it can take up to six weeks for a supplier to receive an Ofgem Meter Accuracy Test for gas. In the situation where a customer is erroneously transferred to another supplier, while this incidence is typically identified within 20 working days, a resolution will then require the chosen supplier to re-register the customer, which will take up to a further 21 days in line with the industry switching process.

Third, complaints with a longer resolution time can relate to a reliance on the involvement of third parties. For example, there are a number of issues for which an appropriate next step will entail a supplier relying on the customer to complete an action. This can involve the need to arrange an appointment to access the customer's home, which is required in cases such as where a new connection is needed, a meter is faulty, or if there are crossed meters (customers whose meter details or readings have become mixed with neighbouring properties). A crossed meter issue may have gone unnoticed for months or even years, and therefore require significant time to investigate.

The process of making an appointment must factor in suitability, eligibility and availability of both a supplier's skilled resource and times that matched customer's availability. This will require a lead-in time, which can be particularly pronounced for microbusiness customers, as their availability may be restricted by the need to find a convenient time to power down their sites. In the case of complaints related to crossed meters, it can be necessary to make appointments for multiple properties, further extending the process.

Once a customer appointment has been completed, there will typically be further actions needed before the complaint can be closed. Most suppliers will expect their customer service agents to ensure that all actions are wrapped up so that the customer can be given reassurance that the matter has been fully resolved. For example, this can involve issuing a new bill after a meter inspection appointment, and ensuring that all third-party systems, such as ECOES and Xoserve, are updated. Where the accuracy of a meter has been called into question, this will usually entail an investigation over a period of time to monitor and analyse the usage of the meter.

There are other third parties that influence complaint resolution times. For example, each Distribution Network Operator (DNO) operates a Meter Point Administration Service (MPAS) for a specific area of the UK. In some cases, a complaint will highlight a need for the MPAS to amend or change a meter point address, or for the DNO to raise a new Meter Point Administration Number. A supplier will be most likely to await confirmation that the change has been processed before being able to confirm with certainty to the customer that their issue has been fully resolved.

Where the complaint relates to a change of tenancy, the supplier can be reliant on both the incoming and departing tenants agreeing on the dates they were responsible for the property. In cases where this is not possible, the supplier may request a copy of the lease, which will then need to be validated. This can be further complicated where third parties, such as landlord, are unwilling to provide details of tenants due to GDPR concerns.

A supplier seeking to resolve a complaint can also be reliant on the action of other suppliers. A supplier that has erroneously gained the supply of a customer as the result of an erroneous transfer can need to wait on the previous supplier (who the supply is being transferred back to) to initiate the transfer back.

The results of the RFI highlight the breadth and prevalence of complaint types that would be difficult or impossible for suppliers to resolve more quickly if the 8-week rule was adjusted. While it seems a fair assumption that some complaints might be resolved more quickly if the Ombudsman eligibility criteria was changed, there are clearly a large number that could not be expedited. In this context, it is important to consider some of the wider impacts that might arise from reducing the 8-week rule.

An earlier referral point would increase the proportion of complainants eligible to take their complaint to the Energy Ombudsman and therefore would be expected to increase the number of customers taking their case to ADR. It is necessary to explore the potential consequences for customers' experience of the complaints process, and for the sector as a whole.

In analysing the impact on customers, a key consideration is that a complaint journey where a customer is referred to another organisation is typically associated with lower satisfaction. An early referral point, when considered in light of the evidence above about the volume of complaints that are difficult or impossible to resolve more quickly than currently, could result in the Ombudsman becoming involved in more complaints where the issue is in the process of being resolved between customer and supplier. Money Saving Expert has highlighted, “Ombudsman are not a first port of call, they are a place to go when things have not been resolved by talking to the business or organisation in question first, so the internal complaints procedure needs to have been exhausted”.⁴⁵

The adverse impact of putting the role of the Ombudsman too early in the process could be that these complex complaints are inadvertently outsourced to the Ombudsman. This would result in the Ombudsman’s resource being diverted towards dealing with complaints that are in progress, rather than its traditional remit as “a final referee between the complainant and the body being complained about”.⁴⁶ Given the time required to open and investigate an Ombudsman case, a greater volume of Ombudsman complaints would be expected to increase the average length of the customer complaint journey in the energy sector. The size of these risks would be commensurate with the scale of any reduction in the 8-week rule, with a significant reduction likely to result in a greater number of complaints being affected.

The speed of resolution once a complaint reaches the Energy Ombudsman will also be influential in determining how far any change to the 8-week rule delivers a quicker and easier complaint journey. The customer benefit would only be realised if complaints referred to the Ombudsman at an earlier point were to be consistently resolved in a timeframe that meets customer expectations. Customers signposted to the Ombudsman at a point at which their complaint was close to resolution with their supplier could otherwise be frustrated to have found themselves steered towards a process that extends the length of their complaint and increases the effort required of them to reach a resolution.

Approved ADR entities in regulated sectors are expected to issue a decision on an escalated case within 90 days. Customers, however, typically expect a complaint escalated to an ADR scheme to be resolved more quickly than the 90-day target. Citizens Advice found that, in general, customers find that complaining to an ADR scheme takes too long “and tended to mention it even when expressing overall satisfaction with their experiences”. Seven out of ten consumers said that their expectation was that an ADR scheme should resolve their complaint within a month.⁴⁷

BEIS also examined this issue as part of its research informing the Green Paper on modernising consumer markets, and identified that “large shares of all respondents mentioned that the (ADR) process took longer than anticipated”. 31% of consumers that used ADR said the process took longer than expected.⁴⁸

There are wider potential consequences for the sector that could arise from an earlier referral point that increases the number of customers taking their case to ADR. It would be crucial to understand the Energy Ombudsman’s resource and capacity to deal with an increase in complaints arising from an earlier referral point, and how this could impact the customer experience. In contrast to other sectors such as telecoms, there is currently only a single Ombudsman operating in the energy sector, which would need to pick up all of the increase in demand.

Recent trends in the energy retail market have also highlighted that a small number of energy companies, often on the cusp of becoming insolvent, have been responsible for a disproportionately large volume of Ombudsman complaints. Many of these companies have had a poor track record of paying case fees. This resulted in the Energy Ombudsman accruing a significant volume of bad debt during 2019. Much of the cost of this bad debt will be mutualised across the sector and ultimately affect the cost paid by customers of other energy suppliers.

It is anticipated that issues associated with bad debt will continue as there is a consolidation of the energy market in the near future. Reducing the 8-week rule would be likely to result in an increased

⁴⁵ Money Saving Expert, *Sharper Teeth: The Consumer Need for Ombudsman Reform* (November 2017)

⁴⁶ Ibid

⁴⁷ Citizens Advice, *Confusion, gaps and overlaps* (April 2017)

⁴⁸ BEIS, *Resolving Consumer Disputes* (April 2018)

volume of complaints by customers of failing companies (a greater volume of which would be eligible to take their issue to the Energy Ombudsman) and potentially increase bad debt across the sector.

This illustrates the importance of ensuring that a review of the 8-week rule gives full consideration to the likely costs and benefits of any change. The energy sector appears to be the only sector to be currently considering a change to the rule further to the publication of the Money Saving Expert report. It is therefore important that a strong rationale is provided to show that any change is clearly the right thing to do. It would also be prudent to consider whether there are alternative means that could achieve the same customer outcome, for example through increased use of deadlock letters, or a principles-based approach requiring suppliers to provide the signposting letter at an appropriate time according to the nature of the issue and the communication method being used.

If the 8-week rule were to be changed, it would be crucial to prioritise the delivery of wider actions that will help to address some of the risks outlined above. For example, the speed of investigating and resolving an Ombudsman case depends on the actions of the Ombudsman, the supplier, and the customer. There are some mechanisms currently in place in the energy sector to ensure actions are completed in a timely manner. Specifically, there are defined expectations around the speed of a supplier's response to information requests from the Ombudsman. Suppliers are held to account for Service Level Agreements to provide evidence, proposals or complete remedies.

There are not currently any equivalent targets in place for the Energy Ombudsman. This can result in uncertainty for suppliers and customers as to when they will receive an update or response. Any review of the 8-week rule should therefore prioritise the simultaneous development of reciprocal SLAs for the speed of the Ombudsman's response. This would ensure there is mutual accountability for progressing a complaint quickly, which could benefit both resolution times and the quality of the relationship between the two parties. This would also be consistent with the ways of working between suppliers and the Extra Help Unit, which has SLAs for responding to suppliers, and reports on key performance indicators around dealing with complaints. Reporting on the average resolution time of cases escalated to the Ombudsman would provide further transparency and increased accountability for a good customer experience.

Exploring the opportunity for an improved relationship and accountabilities between the Energy Ombudsman and energy suppliers should also include making life easier for customers who contact the Energy Ombudsman before they are eligible to do so. Where this contact is online it is relatively seamless to point a customer in the right direction through a digital response. However, if this contact is by phone the customer experience can become more disjointed. The phone remains the most popular contact method for complaining: 30% of customers phoned their supplier in the year to September 2018, compared to 14% who used email and 10% who used live chat.⁴⁹ Reliance on the phone is also particularly prominent among certain profiles of customers, such as the over-65s, six in ten of whom do not use the internet.⁵⁰

Under the current arrangements, a customer calling the Energy Ombudsman before their complaint is eligible for consideration will be advised that they should call either their supplier or Citizens Advice. This increases the effort required by the customer to reach the right contact, who will have to finish the conversation, find a new number and make a further call. Ipsos' research has highlighted that regardless of the outcome of the complaint, it is the amount of effort that a customer feels they need to put in during the process that is a key driver of satisfaction.⁵¹

A better outcome could be achieved through a more bespoke approach that looks at how customers in this scenario could be offered to be directly connected to their supplier or Citizens Advice. This could include the option of a warm transfer directly to an energy supplier's complaints handling team, provided that the supplier could demonstrate the capability to resource this effectively.

A number of energy suppliers are keen to support a pilot of a warm transfer option for customers who phone the Energy Ombudsman before they are eligible to take their complaint to ADR, with the aim of

⁴⁹ Which?, Energy survey results 2018. Available at: <https://www.which.co.uk/reviews/energy-companies/article/best-and-worst-energy-companies/which-energysurvey-results> (Accessed: May 2019)

⁵⁰ Ofgem, *Vulnerable consumers in the energy market* (June 2018)

⁵¹ Ipsos Loyalty, *Get fair or fail* (January 2018)

reducing customer effort and minimising the risk of complaints stagnating. The use of a pilot would enable all parties to identify the appropriate checks that need to be in place to ensure that participating suppliers and Citizens Advice possess the required resource to accommodate this option.

4. Next Steps

The aim of this paper has been to provide a streamlined industry perspective of how a review of the complaints handling regulations could be used to foster innovation and a sharpened focus on customer outcomes. Energy UK and its members are committed to working with Ofgem, BEIS and other stakeholders to discuss these proposals further and to explore how industry can support the delivery of customer-centred reforms.

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