

### Guidance

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#### **Overview:**

This is a guidance document for suppliers serving domestic and microbusiness customers. It explains how they must submit customer complaint information to us as required by our enduring request for information pursuant Standard Licence Condition 5 of the gas and electricity supply licenses.

The guidance describes the requested data and how to submit it. It includes templates and clarification notes to ensure that all suppliers report accurately and consistently. This document replaces all previous templates and related guidance.



### Context

One of our duties as a regulator is to routinely monitor the state of the market. Complaints are a critical source of information on the quality of service provided by energy suppliers to their customers. We need to monitor customer complaints in an accurate and timely manner to understand the problems that are affecting consumers and the actions that could help protect their interests.

Monitoring complaints is increasingly important as regulation becomes more based on principle rather than prescriptive rules. Additionally, greater transparency on complaints and complaints handling can provide an important incentive to suppliers to improve their performance.

Suppliers have been submitting customer complaints data to us and Citizens Advice (including Citizen Advice's predecessors) since the inception of the Complaint Handling Standards Regulations from 1 October 2008.

We have recently reviewed this data and identified the need for enhancing and streamlining it, as well as for providing additional guidance to suppliers to ensure consistent and accurate reporting.

### Associated documents

State of the energy markets 2017 (October 2017)

Retail energy markets in 2016 (August 2016)

Compare supplier performance on complaints

Future retail market regulation

Supply license guides

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### Executive Summary

As part of our monitoring duties we need to monitor customer complaints in an accurate and timely manner. This helps us better understand the problems consumers may face in the retail energy market and the actions we could take to protect their interests.

This document provides guidance to energy suppliers on how to submit monthly and quarterly complaint information as required by our enduring request for information pursuant Standard License Condition 5. The requirement applies to all active licensed suppliers of electricity and/or gas to domestic customers and/or microbusinesses.

We have revised our reporting arrangements for monitoring complaints. The main changes include:

- Enhanced and streamlined data requirements we have identified the need for additions, in particular the classification of complaints by type, as well as the removal of certain information items that are already held by Citizens Advice and the Ombudsman.
- More targeted monthly and quarterly templates we will no longer require the same information at different time periods; the new monthly templates focus on highlighting emerging trends and issues, whereas the new quarterly templates aim at understanding how suppliers handle their complaints 'end-to-end'.
- Clearer guidelines to suppliers for the completion of templates we have identified areas where greater clarity will be helpful to ensure greater consistency of reporting across suppliers and with the data suppliers publish on their websites.

The changes have been subject to consultation including with suppliers, Citizens Advice and the Energy Ombudsman.

This guidance is published on 30 January and suppliers must start recording complaints in accordance with it from 1 July 2018. We understand this will provide sufficient implementation time to embed the new reporting arrangements into suppliers' systems.

The first monthly submission is due by 28 August 2018, covering July 2018 complaints data. The first quarterly submission is due by 28 October 2018, covering Q3 2018 complaints data. In the meanwhile, suppliers who are already submitting complaint information should continue to do so through the existing templates.

This document replaces all previous guidance and templates related with complaints information submission.

## 1. Introduction

#### Purpose of this guidance

1.1. This guidance concerns the information that suppliers submit to us on customer complaints.

1.2. Its main purpose is to ensure that suppliers report accurately and consistently the requested enduring complaint information for domestic and microbusiness customers. It also provides practical information on how and when submissions have to be made, and how they should relate to suppliers' own complaint publications.

1.3. We are keen to get your views on this guidance. You can email us at <u>Complaints Data@ofgem.gov.uk</u>. Feedback will be used to inform future updating of the guidance.

#### Background and relevant regulation

1.4. An amendment to the Gas and Electricity Acts by virtue of Schedule 5 of the Consumers, Estate Agents and Redress Act 2007 (CEARA) requires the Authority to collect information from licence holders relating to complaints handling standards.<sup>1</sup>

1.5. Suppliers have been voluntarily submitting customer complaints data to us and Citizens Advice (including Citizen Advice's predecessors) since the inception of the Complaint Handling Regulation Standards Regulations (CHR)<sup>2</sup> from 1 October 2008.

1.6. Suppliers also agreed to publish quarterly data on domestic customer complaints on their websites. The six large suppliers have done this since 1 October 2012, and some other suppliers from 1 April 2013.

1.7. We use complaints data for internal monitoring purposes and to increase transparency around supplier performance. We currently publish quarterly domestic complaints data on our <u>website</u>. Citizens Advice also uses this complaints data for

<sup>&</sup>lt;sup>1</sup> http://www.legislation.gov.uk/ukpga/2007/17/contents.

<sup>&</sup>lt;sup>2</sup> 'The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008' (CHRs) prescribe standards for handling consumer complaints by regulated providers and for supplying information to consumers about the prescribed standards, as well as complying with those standards (<u>http://www.legislation.gov.uk/uksi/2008/1898/contents/made)</u>. CHR 11 requires suppliers to prepare and publish an annual report covering their complaints handing procedure, with details of the consumer complaints they have received from domestic customers over that particular period.



monitoring, but does not currently publish it. However, this may change in the future.

1.8. In October-December 2015, we reviewed suppliers' direct domestic complaints data jointly with Citizens Advice. This review found some differences in suppliers' approaches to reporting some statistics, which indicated the need to improve consistency of complaints data recording across suppliers, as well as reduce discrepancies between the complaints information submitted to us and that published on suppliers' webpages.

1.9. In 2016, through the work following the Lucerna Review, Ofgem, the Energy Ombudsman and Citizens Advice agreed to a more coordinated framework to monitor the whole customer complaint journey. As part of this review we identified a number of gaps in the complaint data reported by suppliers. In particular, suppliers do not submit information on complaint type to us and Citizens Advice. This is a gap that limits our ability to monitor issues presenting across the market, compare performance between suppliers and understand the drivers of the vast majority of complaints that are not escalated further to the Ombudsman. Moreover, although suppliers provide information on the number of complaints they solve within one day or 8 weeks, they do not report on the average time it takes them to resolve these complaints. This information will improve our understanding on how effectively they handle complaints.

1.10. Throughout 2017 we held consultations with suppliers on the changes to the complaint reporting<sup>3</sup>. The new guidance and templates reflect all relevant feedback received, in particular in relation with the implementation times, the new complaint classification by type and the new indicator on the average resolution time of complaints.

<sup>&</sup>lt;sup>3</sup> Two consultation rounds took place, respectively, in June/July 2017 and October/November 2017.

## 2. General guidance

#### **Chapter Summary**

This chapter contains general guidelines on the scope, timing and publication of complaints information.

#### **Definition of complaint**

2.1. As stated in the CHR<sup>4</sup>, a "complaint" is defined 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".

- 2.2. We note that the above definition:
- does not pose any time-related restrictions in what is deemed as a "complaint"; for instance, even though an expression of dissatisfaction might be dealt with at the time of contact and is thereafter considered as "closed" and does not require any further communication between parties, it still needs to be registered as a "complaint";
- includes not only products and services but also customer service standards, i.e. "the manner" in which a complaint was handled;
- applies to all complaints received by a supplier that do related to their products, services or the manner in which they have dealt with a complaint, even if the complainant is not supplied by them; and
- does not apply to complaints related with products and services offered by other suppliers.

2.3. In line with the CHR's definition of complaint as an expression of dissatisfaction made at the point of contact, suppliers must record and categorise complaints on receipt and report them to us accordingly. For some indicative examples on what may constitute a "complaint" in practice please refer to Table 1 in Chapter 3 of this guidance.

<sup>&</sup>lt;sup>4</sup> <u>http://www.legislation.gov.uk/uksi/2008/1898/made</u>



#### Who the guidance applies to

2.4. This guidance applies to all active licensed suppliers of electricity and/or gas to domestic customers and/or microbusinesses.

2.5. A non-domestic customer is defined as a microbusiness if they meet one of the following criteria, as established in existing gas and electricity standard licence conditions:

- employs fewer than 10 employees (or their full time equivalent) and has an annual turnover or balance sheet no greater than €2 million; or
- uses no more than 100,000 kWh of electricity per year; or
- uses no more than 293,000 kWh of gas per year.

2.6. The data must cover information on behalf of any white label providers currently operating under suppliers' respective licences. We do not require a separate submission of white label complaint data, but this may change in the future.

2.7. We will review the guidance from time to time to make sure it remains relevant. Wherever appropriate, we will consult on changes to the guidance.

#### Submitting the data, deadlines and data accuracy

2.8. Monthly returns must be submitted no later than the 28th day of the following month (eg no later than 28 January for December returns) or the first working day after the 28<sup>th</sup> if the 28<sup>th</sup> falls on a public holiday.

2.9. Quarterly returns must be submitted no later than the 28th day of the month following the end of the quarter ie, no later than 28 January, 28 April, 28 July, and 28 October, or the first working day after the 28<sup>th</sup> if the 28<sup>th</sup> falls on a public holiday.

2.10. Suppliers must start recording complaints under this guidance from 1 July 2018. The first monthly submission is due by 28 August 2018, covering July 2018 complaints data. The first quarterly submission is due by 28 October 2018, covering Q3 2018 complaints data. In the meanwhile, suppliers who are already submitting complaint information should continue to do so through the existing templates.

2.11. The requested information must be submitted by completing the Excel templates in CSV file format, as attached to the formal request under Standard License Condition 5 (SLC 5) sent to your company (a copy of these templates is also attached for reference in Annex 1 of this Guidance). The completed templates must be sent to: <u>Complaints Data@ofgem.gov.uk</u>.



2.12. Please do not hesitate to contact us at <u>Complaints Data@ofgem.gov.uk</u> if you have questions about this guidance, the submission of the requested data or if you have not yet received our formal request under SLC 5.

2.13. If you are a new supplier entering the market, you must get in touch with us at <u>Complaints Data@ofgem.gov.uk</u> so that we can send you the formal enduring information request and the related templates to submit complaints data under SLC 5.

2.14. We also ask suppliers to submit the same complaint data, under the new templates and guidance, to Citizens Advice at: <u>dataunit@citizensadvice.org.uk</u>.

2.15. We expect suppliers to ensure that the submitted data, alongside the data they publish on their websites, is accurate and conforms to this guidance. While we carry out spot-checks of the data provided in complaints reporting, it does not audit the data. This is the responsibility of suppliers.

#### Suppliers' complaint publications

2.16. While most suppliers publish quarterly complaints data in a timely manner, some suppliers do so with a delay.

2.17. To ensure that consumers and other stakeholders have access to timely data, we expect suppliers to ensure complaints data is published promptly. We think it's reasonable to expect that quarterly complaints data is published on suppliers' websites within one week of submitting it to Ofgem and Citizens Advice.

#### **Our complaint publications**

2.18. We currently publish a selection of the domestic complaints data for the six large suppliers and a number of small and medium sized suppliers on our <u>website</u> on a quarterly basis.

2.19. We would seek suppliers' representations if we decided to publish additional complaint statistics or amend the existing ones. In 2017 we agreed a coordinated complaint publication strategy with Citizens Advice and the Ombudsman to publish complaints data on a quarterly basis, at the end of the following months: November, February, May, August.

## 3. Guidance on completing monthly returns

#### Chapter Summary

This chapter explains in detail what information suppliers must submit on a monthly basis. It includes indicative examples of the required complaint types.

3.1. The purpose of the monthly templates is to collect information that allows for frequent monitoring of complaint trends and early spotting of possible issues. These templates focus on received complaints and aim to highlight their complexity and underlying reasons.

3.2. These are the sections included in the new monthly templates, which suppliers must submit separately for domestic and microbusiness customers:

- A. Total number of complaints received, broken down by complaints resolved and unresolved by the end of the first working day and showing separately the repeat complaints received
- B. Total number of complaints received broken down by type (new section relative to the existing requirements)
- C. Number of customer accounts at the end of the month (to be provided separately for gas and electricity), which is instrumental to the calculation of the number of complaints received per 100,000 customer accounts or 10,000 customer accounts if the supplier has less than 100,000 customers.

3.3. All the above data is already included in the current returns, with the exception of section B, which has new contents, as explained below.

3.4. Appendix 1 shows the monthly return templates for domestic and microbusiness customers.

#### **Section A**

3.5. Section (A) includes items A1-A4.

3.6. Item A1 'Total number of complaints received' must result from adding up data item A2 'Complaints received during the relevant reporting month that were resolved by the end of the first working day after the complaint was received' and data item A3 'Complaints that were not resolved by the end of the first working day after the complaints that took



longer than one working day to resolve, including those that remained unresolved by the end of the relevant reporting month.

3.7. The total number of complaints received must include data on complaints made by consumers or by persons acting on behalf of such consumers as per CHR 2. In particular, reported data must include complaints made on consumers' behalf by Citizens Advice Consumer Service (CACS) and Citizens Advice Extra Help Unit (EHU), where contacts were made in relation to new complaints. In order to avoid duplications, Citizens Advice's referrals must not be included in received complaints in those cases where the customer had also raised the same complaint directly with the supplier, and vice versa. Complaints received must not include data on the number of cases taken by the Ombudsman, as they would duplicate the complaints originally sent by the complainant to the supplier.

3.8. The total number of complaints received must include 'Repeat complaints', i.e. those complaints that the supplier recorded as resolved, but that the complainant subsequently contacted the supplier about, which indicates that it is not resolved, as per CHR 4(6)(a). Suppliers must also report the number of repeat complaints separately as data item A4. For the purpose of reporting under this guidance, there is no distinction between re-opened and repeat complaints.

#### Section B

3.9. Section (B) 'Complaints received by type' is made of items B5-B23 in the domestic template and items B5-B22 in the microbusiness template. This is a breakdown of received complaints into the main motives that led customers to raise these complaints. In order to make the classification as comparable as possible across suppliers, the template provides 18 categories that suppliers must use for reporting complaints to us. Table 1 provides explanations and detailed examples of the complaints that suppliers must include under each category. Most of these categories, such as billing, customer service, payments and switching, are broadly in line with those traditionally published by suppliers on their websites, as well as with those used by Citizens Advice and the Ombudsman to classify the complaints they receive directly from consumers. We have also included newer complaint types that relate to smart meters, prepayment and intermediaries, so to capture more topical issues that consumers may face in the energy market.

3.10. Item B23 (B22 in the microbusiness template) is the sum (automatically calculated) of items B5-B22 (B5-B21 in the microbusiness template) and must equal to item A1 'Complaints received'. In those cases where, as part of a single contact with the supplier, the customer complains on matters that fall under different complaint types, the supplier will have to identify the most relevant complaint type(s) as separate complaint(s). Suppliers must keep record of any other additional subsidiary complaint types raised during the same contact.

3.11. Given the difficulty to foresee all possible circumstances/issues that may motivate a complaint, the template also includes a residual category B22 'other' (B21 in the microbusiness template), which must cover, with an appropriate explanation,



only those complaints that do not fit within any of the specified categories. We may consider removing this category in the future, in the light of suppliers' submissions.

3.12. We will initially use complaint types data only for internal monitoring purposes. We will work with suppliers to understand any issues in implementing the new complaints categories consistently across the industry.

3.13. As shown in Appendix 1 the monthly templates for domestic and microbusiness customers contain the same complaint types, except for 'Feed-In Tariffs', which only appears as item B10 in the domestic template. The reason is that non-domestic suppliers have told us they cannot easily identify whether feed-in tariff complaints come from microbusinesses or other larger non-domestic customers.

Section B - Complaint types	<b>Description and examples of complaints under each</b> <b>category</b> (these are just examples, not sub-categories, and should not be considered as an exhaustive list of all possible complaint types).
B5 - Debt and debt related disconnections – non prepayment (PPM) related	Any disconnection and debt repayment/management/collection issues that are not related with a prepayment meter <b>Examples:</b> Disconnection – Remote disconnection – On-site disconnection – Unsuitable or unaffordable payment scheme to cover debt – Debt recovery practices – Unsuitable repayment methods/scheme – Disconnection not following due process – Vulnerable consumers disconnected – Debt management and debt collection issues - Payment issues linked with debt collection activities
B6 - Debt and debt related disconnections – prepayment (PPM) related	Any disconnection and debt repayment/management/collection issues that are related with a prepayment meter <b>Examples:</b> Disconnection/forced PPM without proper process – Disconnection/forced PPM in error – PPM warrant issues – PPM self-disconnection - Any of the issues mentioned in B5 that is related with PPM
B7 - Sales & Marketing – sales directly between supplier and customer	Any issues related with selling and marketing activities carried out by the supplier or directly outsourced via a supplier's subcontractor <b>Examples:</b> Mis-selling: face to face – Mis-selling: telephone – Mis-selling: online – Fraud – Contract renewal – Mis-information – Inappropriate sales agent behaviour – Marketing activity – Sale related request not actioned – Sales attempt during meter installation - Too few tariffs available -Too many tariffs available

#### Table 1. Indicative examples of complaint types\*

Section B - Complaint types	<b>Description and examples of complaints under each</b> <b>category</b> (these are just examples, not sub-categories, and should not be considered as an exhaustive list of all possible
	complaint types).
	<ul> <li>Customer told they "must" install a smart meter – Inaccurate information/sale practices related with installation of smart credit meters and smart PPM</li> </ul>
B8 - Sales & Marketing – sales via a third party	Any issues related with selling and marketing activities carried out through third party intermediaries (direct outsourcing or subcontracting of sale staff has to be included under B7)
	<b>Examples:</b> Misrepresentation - Complaints about price comparison website provider - Same categories as in B7, but related to the behaviour of third party intermediaries and brokers
B9 - Customer service	Any issues emerging with the services offered by the supplier and when the customer contacts the supplier
	<b>Examples:</b> Complaint not registered – Failure to keep appointment, including installation appointments among others – Phone queue too long – Incorrect action taken – Quality of customer service – Difficulty of contacting supplier –Request not actioned – Inappropriate staff behaviour - Issues with booking smart meter installation – Digital service issues including: Online account issues – App not responsive – Access to suppliers' webpage not working/webpage crashing – Data protection complaints when supplier address complaints presented by someone who is not the customer account holder and account cannot be accessed for data protection reasons
B10 - Feed-In Tariffs (included only in the domestic template)	Any issues related with the Feed-In Tariff system, including registration, payment and other implementation aspects
only in the domestic template)	<b>Examples:</b> FIT payment not provided – Delay in payment – Delay in registration – Delay in transfer – Incorrect FIT rate – Incorrect registration information – Registration not completed – Miscalculation of payment – Disputed meter reading
B11 - Payment issues	Any issues related with the payment method used by the customer, including the set-up, how it works and how it can be changed, for all payment types
	<b>Examples:</b> Failure to set up or reassess Direct Debit – Direct Debit set at incorrect level – Missing payments – Unsuitable payment method – Security deposits – Guaranteed Standards of Service payment not provided –Unauthorised Direct Debit withdrawal - Unallocated payments

Section B - Complaint types	<b>Description and examples of complaints under each</b> <b>category</b> (these are just examples, not sub-categories, and should not be considered as an exhaustive list of all possible complaint types).
B12 - Pricing	Any complaints related with price increases that the supplier may have announced or that may have come into effect
	<b>Examples:</b> Discontent with price increase notification – Price increase considered unfair – Customer has been rolled over on a more expensive tariff
B13 - Billing and meter reading issues unrelated with meter type	Any issues related with the layout and information displayed on bills/annual statements, including among others incorrect bills that may be due to meter reading issues, as well as bill frequency and back billing problems
	<b>Examples:</b> Disputed bill, customer not responsible – Issues with standing charges - Disputed gas or electricity usage –Disputed exit fee – Disputed other charges – Billing delays - Failure to issue refund/credit - Final bill not received - Frequency of bills - Incorrect opening/closing of meter reading - Estimated billing/readings - Incorrect tariffs - Warm Home Discount - Clarity of bill and/or annual statement – VAT set at incorrect rate – Billed to incorrect meter – Incorrect account details – Incorrect tariff - Disputed liability – Bill format – Incorrect classification of usage/premises (business vs domestic) – Billed to incorrect MPRN/MPAN – Disputed balance – Failure to use valid readings – No attempts to obtain valid readings - Estimated readings – Transposed meter readings – Suspected meter interference - Billed to incorrect meter readings – Failure to apply or incorrect application of the Code/Charter on back billing – No account set up –Back billing issues – Final account reconciliation
B14 - Billing and meter reading issues related with smart meters	Any issues defined as in B13 but observed after smart meter installation <b>Examples:</b> Disputed in-home display fees (microbusiness only) – In-home display not matching bill - Smart meter inaccurate bill – Smart meter bill unclear - Significant increase in bill after smart installation – Back-dated bill after smart meter installation – No bills received after smart meter installation - Any billing issues mentioned in B13 that emerged after smart meter installation
B15 - Switching issues unrelated with meter type	Any issues related with the process of switching to a new supplier, including reliability and speed of the process, bearing no relationship with the meter type
	<b>Examples:</b> Incorrect opening or closing reading on transfer – Erroneous transfer – Breach of obligations under Erroneous Transfer Charter - Transfer delay - Cancelled contract not actioned – Problem arising from contracts –

Section B - Complaint types	<b>Description and examples of complaints under each</b> <b>category</b> (these are just examples, not sub-categories, and should not be considered as an exhaustive list of all possible complaint types).
	Lack of information about transfer – Objection by losing supplier on grounds of debt – Objection by losing supplier on grounds of contract terms – Supplier objection reasons unknown - New supplier unable to supply – Transfer windows – Failure to correctly apply for transfer - Supply not transferred to new supplier
B16 - Switching issues related with smart/advanced credit meters	Any issues defined as in B15 but related with a smart credit meter <b>Examples:</b> Smart meter not sending meter readings after transfer – In-home display problem after transfer – Cannot switch due to smart meter – Loss of smart functionality after switch has taken place - any of the issues mentioned in B15 that emerged after smart
B17 - Switching issues related with smart/advanced prepayment meters	<ul> <li>meter installation</li> <li>Any issues defined as in B15 but related with a prepayment smart meter</li> <li><b>Examples:</b> Loss of Pay-as-You-Go function after transfer – Loss of credit upon switching supplier – Unable to top-up after switching – Any of the issues mentioned in B15 or B16 that emerged after smart PPM installation</li></ul>
B18 - Meter installation/exchange or meter not working – classic credit meter	Any issues arising with the installation/exchange or meter not working for classic credit meters <b>Examples:</b> Meter not recording accurately – Meter provision or exchange – Disputed meter tampering – Appliance condemned during meter installation – Appliance/equipment failure after meter installation failed installation (engineer did not have correct equipment) – Meter position/installation – Poor quality installation – Failed installation due to lack of access to meter - No right of entry – Privacy breach – Health & Safety concerns
B19 - Meter installation/exchange or meter not working – smart or advanced credit meter	Any issues arising with the installation/exchange or meter not working for smart credit meters <b>Examples:</b> Smart meter position/installation – In-home display not provided at time of installation - Waiting for promised installation – Condemned appliances - Damage to property during smart installation - Failed installation (no WAN) – Failed installation (no HAN) – Use of smart meter data – Customer does not want smart meter – Smart meter not sending smart readings – Loss of smart meter communications – Smart meter working in a `dumb' mode

Section B - Complaint types	<b>Description and examples of complaints under each</b> <b>category</b> (these are just examples, not sub-categories, and should not be considered as an exhaustive list of all possible complaint types).
	<ul> <li>any of the issues mentioned in B18 that apply to smart or advanced credit meters</li> </ul>
B20 - Meter installation/exchange or meter not working – classic prepayment meter	Any issues arising with the installation/exchange or meter not working for classic prepayment meters <b>Examples:</b> Installation of prepayment in error – Delay in issuing key card – Key card not issued – Key card not working –Inability to credit pre-payment meter due to meter fault - Prepayment interface device issue – Difficulty charting PPM card – Unable to credit PPM – PPM misdirected or unallocated payments - any of the issues mentioned in B18 that emerged at/after installation of a classic prepayment meter
B21 - Meter installation/exchange or meter not working – smart or advanced prepayment meter	Any issues arising with the installation/exchange or meter not working for smart or advanced prepayment meters <b>Examples:</b> Company refusing to install smart meter – Customer does not want smart meter – Use of smart meter data – In-home display not working – Smart meters not sending meter readings – Loss of smart meter communications – Smart meter working in a 'dumb' mode - Damage to property during smart meter installation – Smart Pay as Yo Go problems – customer forced onto prepayment smart meter – Consumers not aware of how to top- up/not given explanations – any of the issues mentioned in B18 and B20 that emerged at/after installation of smart prepayment meters
B22 - Other	Complaint types that do not fit in any of the specified categories (suppliers will have to provide explanations)

\*The numbering of complaint types used in the above table is based on the domestic monthly template, which is identical to the microbusiness template except for item B10.

3.14. For the purpose of this reporting and to the extent to which the complaint is meter type related, the meter types referred to in Table 1 are defined as follows:

- Classic credit meter refers to customer accounts using a non-smart meter for which payment is not on pay-as-you-go basis, such as for instance direct debit, cash, credit card and standing order;
- Classic prepayment meter refers to customer accounts using a non-smart meter that allows consumers to pay as they go for their energy, for example through a token, key or card;

- Smart/advanced credit meter refers to customer accounts using a credit meter which has two-way communications allowing remote retrieval of meter reads and remote configuration of its operational parameters and for which payment is not on pay-as-you-go basis. Smart meters must comply with SMETS 1 or SMETS 2 specifications. The meter may also be advanced if it has only some smart functionalities.
- Smart/advanced prepayment meter refers to customers using a smart or advanced meter that allows consumers to pay as they go for their energy.
- Cases where the customer has a non-SMETS compliant smart meter or a smart meter working in dumb mode should also be included in smart related complaints to the extent that the issue raised by the customer refers to existing or supposed smart functionalities. For instance, the customer may be complaining about the fact that their smart meter is working in dumb mode when they expected otherwise.

#### **Section C**

3.15. Section (C) 'Customer accounts' includes items C24-C28 (C23-C27 in the microbusiness template). C24 'Number of electricity customer accounts at the end of the month' and C25 'Number of gas customer accounts at the end of the month' refer to the number of customer accounts. The number of customer accounts is instrumental to calculate complaint statistics that take into account the supplier size. For monthly returns, as the number of received complaints is referred to a given month, consistency requires that the number of customer accounts used for the weighting be also referred to the same month. If a supplier serves a customer with both electricity and gas, such a customer must be recorded as one electricity account and one gas account.

3.16. For domestic complaints the definition of the 'Customer accounts' items must be consistent with that used by suppliers under the Social Obligations Reporting requirement, as set out in Standard Licence Condition 32 of the gas and electricity supply licences. Item C26 'Total number of domestic electricity and gas accounts' is calculated automatically. Item C27 'Number of complaints received per 100,000 customer accounts' is also calculated automatically in the template, using the total number of customer accounts, rather than the number of unique customers or supply points. If a supplier has less than 100,000 customer accounts the alternative measure of 'Number of complaints received per 10,000 customer accounts' must be used, which is calculated automatically in item C28.

## 4. Guidance on completing quarterly returns

#### Chapter Summary

This chapter explains in detail what information suppliers must submit on a quarterly basis.

4.1. The purpose of the quarterly templates is to collect information that allows for monitoring how suppliers handle customer complaints. This includes the availability of different channels for the submission of complaints and queries, the speed with which complaints are resolved and the compliance with complaint handling rules, such as sending letters signposting the Ombudsman at 8 weeks or after a deadlock situation has been reached.

4.2. These are the sections included in the new quarterly templates, which suppliers must submit separately for domestic and microbusiness customers:

- A. Number of any contacts received during the quarter, including both enquiries and complaints, by communication channel
- B. Number of complaints received during the quarter by communication channel
- C. Number of complaints resolved during the quarter, resulting from the sum of complaints resolved by the end of the first working day, within 8 weeks and beyond 8 weeks, and average resolution time for all complaints resolved during the quarter
- D. Ombudsman information, including the number of deadlock letters and letters sent signposting the Ombudsman at 8 weeks
- E. Number of customer accounts at the end of the quarter (to be provided separately for gas and electricity), which is instrumental to the calculation of the number of complaints received per 100,000 customer accounts or 10,000 customer accounts if the supplier has less than 100,000 customers.

4.3. All the above data is already included in the current returns, with the exception of section C, which has new contents, as explained below.

4.4. Appendix 1 shows the quarterly return templates for domestic and microbusiness customers.



#### Sections A and B

4.5. As under existing templates, in these sections we require that suppliers disaggregate both contacts and complaints by communication channel.

4.6. Items A1-A5 concern information about contacts. For the purpose of this guidance these are defined as the overall number of enquiries and complaints received during the quarter. Contact is any interaction with the consumer that has required the supplier to take action. For example, answering a phone call or responding to an email would be considered a contact, whereas the submission of a meter reading online/automatically over the phone would not.

4.7. Contacts have to be broken down into five categories (telephone calls, letters, online petitions and various forms of electronic submissions including emails/webforms/webchats/social medias). Item A1 is calculated automatically as the sum of A2-A5 items.

4.8. Items B6-B10 concern information about complaints only, to be broken down into four categories (telephone calls, letters and various types of electronic formats).

4.9. Please note that item B6 'Total complaints received' is calculated automatically and must be consistent with the result from adding up item A1 'Complaints received' from the three monthly templates referred to the relevant quarter. For example, item B6 for Q1 must equal to the sum of item A1 across the monthly returns for January, February and March.

#### Section C

4.10. In line with the CHR, a resolved complaint means a "consumer complaint in respect of which there remains no outstanding action to be taken by the regulated provider and which has been resolved to the satisfaction of the relevant consumer who made that consumer complaint or on whose behalf that consumer complaint was made".

4.11. Section (C) 'Complaints resolved', covering items C11-C15, must refer to the total number of complaints resolved during the relevant reporting quarter, irrespective of when they were received. If a complaint was received in a previous quarter and resolved in the reporting quarter, suppliers must include it in the number of resolved complaints submitted for the reporting quarter. Moreover, it also has to include repeat complaints resolved. If a supplier records a complaint as 'resolved', but subsequent contact from the complainant indicates that it is not resolved, the supplier must change the complaint's status to 'repeat' or 'reopened'. The period for resolving such a complaint has to be calculated as the difference between the date the original complaint was made and the date it was fully resolved to the customer's satisfaction. For the purpose of reporting under this guidance, there is no distinction between re-opened and repeat complaints. Please note that complaints for which



deadlock letters and letters sent signposting the Ombudsman at 8 weeks have been sent to customers must not be included in the number of resolved complaints.

4.12. After the data review, we revised the timescales for reporting complaints resolved, linking them to the 56-day (eight-week) period, at which unresolved complaints have to be sent to the Ombudsman, which aligns to the information that suppliers are already publishing on their webpage. Table 2 below summarises these changes to the templates.

## Table 2. Changes to the 'Complaints resolved' data items in the new quarterly templates

Current templates	New templates
Data item 9: Complaints resolved (sum of lines 10, 11, 12, and 13)	Data item C11: Complaints resolved (calculated automatically as the sum of items C13 and C14)
Data item 10: Complaints resolved by	Data item C12: Complaints resolved by
the end of the first working day after the	the end of the first working day after the
complaint was received (D+1) (subset of	complaint was received (D+1) (subset of
data item 9)	data item C11)
Data item 11: Complaints resolved	Data item C13: Complaints resolved
between date complaint received (D+1)	between date complaint received and 56
and 31 calendar days (subset of data	calendar days (eight weeks) (subset of
item 9)	data item C11)
Data item 12: Complaints resolved	Data item C14: Complaints resolved
between +32 days and 93 calendar days	after 56 calendar days (eight weeks)
(subset of data item 9)	(subset of data item C11)
Data item 13: Complaints resolved in +94 calendar days (subset of data item 9)	-

4.13. Data item C15 'Average resolution time for all complaints resolved during the quarter' is new and must be calculated in days as the statistical median of the resolution times for all complaints that a supplier resolved during the relevant reporting quarter, irrespective of when the complaints was received. For resolved repeat complaints the calculation has to include the time between the date the original complaint was made and the date it was fully resolved to the customer's satisfaction.

4.14. Item C15 is aimed at providing a more precise statistics of the length of the customer complaint journey for every supplier. We understand that the inclusion of cases that have been escalated through the Extra Help Unit and Citizens Advice Consumer Service will also impact upon this and the other speed of resolution statistics in section C.



#### **Section D**

4.15. In Section D we require that suppliers specify the number of letters sent during the quarter to signpost the Ombudsman, respectively:

- for complaints that had not been solved within 8 weeks (item D16); and
- for complaints that reached a deadlock situation (item D17).

#### Section E

4.16. Item E18 refers to 'Number of electricity customer accounts at the end of the quarter' and E19 refers to 'Number of gas customer accounts at the end of the quarter". If a supplier serves customer with both electricity and gas, such a customer must be recorded as one electricity account and one gas account.

4.17. For domestic complaints this data has to be consistent with the data submitted by suppliers under the Social Obligations Reporting requirement, as set out in Standard Licence Condition 32 of the gas and electricity supply licences. Item E20 'Total number of domestic electricity and gas accounts' is calculated automatically. Item E21 'Number of complaints received per 100,000 customer accounts' is calculated automatically in the template, using the total number of customer accounts, rather than the number of unique customers or supply points. Suppliers should use this indicator in the complaints section of their websites (see section 9). If a supplier has less than 100,000 customer accounts we will use the alternative measure of 'Number of complaints received per 10,000 customer accounts'. If a supplier has less than 100,000 customer accounts the alternative measure of 'Number of complaints received per 10,000 customer accounts' should be used, which is calculated automatically in Item E22.

# 5. Consistency with the complaint data published on suppliers' website

#### **Chapter Summary**

This chapter provides guidelines to ensure that there is consistency between suppliers' own complaint publications and their submissions under this guidance.

5.1. Suppliers currently publish the following quarterly domestic complaints' indicators on their websites:

- Number of complaints received;
- Number of complaints received per 100,000 or 10,000 customer accounts if the supplier has less that 100,000 customer accounts;
- Number of complaints resolved;
- Number of complaints resolved per 100,000 or 10,000 customer accounts if the supplier has less that 100,000 customer accounts;
- Percentage of complaints resolved by the end of the next working day;
- Percentage of complaints resolved within eight weeks.

5.2. Our review showed that in some cases there were discrepancies between the submitted data and that published on suppliers' websites. In some cases this was due to a different methodology used by suppliers when publishing data on their websites. To ensure data consistency, we expect that suppliers publish the data on their websites as it is submitted to us under this guidance. In particular:

- The number of complaints received in a given quarter should be published using data item B6 'Total complaints received' in the quarterly template, which is in turn consistent with the sum of item A1 'Complaints received' in the monthly returns submitted for the same quarter (see Appendix 1).
- The number of complaints received per 100,000 or 10,000 customer accounts should be published using the number of customer accounts, rather than the number of unique customers or supply points. This should be calculated using item B6 'Total complaints received' and item E20 'Total number of electricity and gas accounts' in the quarterly template (see Appendix 1)

- The number of complaints resolved should be published using item C11 'Complaints resolved' in the quarterly complaints template.
- The number of complaints resolved per 100,000 or 10,000 customer accounts should be published using the number of customer accounts, rather than the number of unique customers or supply points. This corresponds to data item E21 'Complaints resolved per 100,000 customer accounts' or E22 'Complaints resolved per 10,000 customer accounts' in the quarterly complaints template.
- The percentage of complaints resolved by the end of the first working day' should be published as a proportion of complaints resolved during the reporting quarter. This corresponds to data item C12 "Complaints resolved by the end of the first working day after the complaint was received (D+1) - Percentage of total" in the quarterly complaints template.
- The percentage of complaints resolved within eight weeks should be reported using data item C13 'Direct complaints resolved between date complaint received and eight weeks Percentage of total' in the quarterly complaints template.
- The published data should cover information on behalf of any white label providers currently operating under suppliers' respective licences, irrespective of whether white label providers may publish this information separately.

5.3. Suppliers also currently publish the first five top complaint reasons on their websites. At the time of issuing this guidance we do not require any change in this publication to adapt to the new categorisation of complaint types introduced in the monthly returns. As indicated in Chapter 3 we will seek representations from suppliers if we decide to change the complaint statistics we publish on regular basis on our website.



# Appendix 1 – Monthly and quarterly templates

Suppliers must submit all requested information by completing the electronic version in CSV format of monthly and quarterly templates. The templates copied below are for reference only and may change from time to time. The actual information that suppliers must provide will be specified in the formal information request to individual suppliers, under Standard Licence Condition 5 of the gas and electricity supply licenses.

Suppliers serving both domestic and microbusiness customers must submit all templates. Suppliers serving only domestic or microbusiness customers must submit only those templates that apply to their customer base.

Suppliers must include only numerical values in the electronic templates. Any additional text explanations must be included in the email accompanying the data submission.

Company name	xxx		
Month	xxx		
Year	XXX		
Complaints number	Data item	Value	Percentage of total received (calculated automatically)
A1	Total number of complaints received (calculated automatically)	0	
A2	Complaints resolved by the end of the first working day after the complaint was received (D+1)	0	0%
A3	Complaints unresolved by the end of the first working day after which the complaint was first received	0	0%
A4	Repeat complaints received	0	0%
B5	Debt & Debt-related Disconnections - non-prepayment related	0	0%
B6	Debt & Debt-related Disconnections - prepayment related	0	0%
B7	Sales and marketing - sales directly between supplier and customer	0	0%
B8	Sales and marketing - sales via a third party	0	0%
B9	Customer Service	0	0%
B10	Feed-in Tariffs	0	0%
B11	Payment issues	0	0%
B12	Pricing	0	0%
B13	Billing & Meter reading issues - unrelated with meter type	0	0%
B14	Billing & Meter reading issues - smart meter related	0	0%
B15	Switching issues - unrelated with meter type	0	0%
B16	Switching issues - related with smart/advanced credit meters	0	0%
B17	Switching issues - related with smart/advanced prepayment meters	0	0%
B18	Meter installation/exchange or meter not working - classic credit meter	0	0%
B19	Meter installation/exchange or meter not working - smart or advanced credit meter	0	0%
B20	Meter installation/exchange or meter not working - classic prepayment meter	0	0%
B21	Meter installation/exchange or meter not working - smart or advanced prepayment meter	0	0%
B22	Other	0	0%
B23	Total number of complaints received as sum of complaint categories (calculated automatically)	0	0%
C24	Number of domestic electricity customer accounts at the end of the month	0	0%
C25	Number of domestic gas customer accounts at the end of the month	0	0%
C26	Total number of domestic electricity and gas accounts (calculated automatically)	0	
C27	Complaints received per 100,000 customer accounts (calculated automatically)	#DIV/0!	
C28	Complaints received per 10,000 customer accounts (calculated automatically)	#DIV/0!	

#### Monthly template – domestic complaints

Company name	XXX		
Month covered in this return:	xxx		
Year	xoox		
Complaints number	Data item	Value	Percentage of total received (calculated automatically)
A1	Total number of complaints received (calculated automatically)	0	
A2	Complaints resolved by the end of the first working day after the complaint was received (D+1)	0	0%
A3	Complaints unresolved by the end of the first working day after which the complaint was first received	0	0%
A4	Repeat complaints received	0	0%
B5	Debt & Debt-related Disconnections - non-prepayment related	0	0%
B6	Debt & Debt-related Disconnections - prepayment related	0	0%
B7	Sales and marketing - sales directly between supplier and customer	0	0%
B8	Sales and marketing - sales via a third party	0	0%
B9	Customer Service	0	0%
B10	Payment issues	0	0%
B11	Pricing	0	0%
B12	Billing & Meter reading issues - unrelated with meter type	0	0%
B13	Billing & Meter reading issues - smart meter related	0	0%
B14	Switching issues - unrelated with meter type	0	0%
B15	Switching issues - related with smart/advanced credit meters	0	0%
B16	Switching issues - related with smart/advanced prepayment meters	0	0%
B17	Meter installation/exchange or meter not working - classic credit meter	0	0%
B18	Meter installation/exchange or meter not working - smart or advanced credit meter	0	0%
B19	Meter installation/exchange or meter not working - classic prepayment meter	0	0%
B20	Meter installation/exchange or meter not working - smart or advanced prepayment meter	0	0%
B21	Other	0	0%
B22	Total number of complaints received as sum of complaint categories (calculated automatically)	0	0%
C23	Number of microbusiness customer accounts at the end of the month	0	0%
C24	Number of microbusiness gas customer accounts at the end of the month	0	0%
C25	Total number of microbusiness electricity and gas accounts (calculated automatically)	0	
C26	Complaints received per 100,000 customer accounts (calculated automatically)	#DIV/0!	
C27	Complaints received per 10,000 customer accounts (calculated automatically)	#DIV/0!	

#### Monthly template – microbusiness complaints

#### **Quarterly template – domestic complaints**

Company name	XXX		
Quarter	XXX		
Year	XXX		
Complaints number	Data item	Value	%
A1	Total agent handled contacts received (calculated automatically)	0	
A2	Agent handled telephone calls	0	
43	Agent handled letters	0	
٩4	Agent handled emails/webforms/webchat/social media	0	
A5	Online petitions received	0	
B6	Total complaints received (calculated automatically)	0	
37	Complaints received by telephone	0	
38	Complaints received by email/webform/webchat/social media	0	
B9	Complaints received by letter	0	
B10	Complaints received by other format e.g face to face, fax	0	
C11	Complaints resolved (calculated automatically)	0	
C12	Complaints resolved by the end of the first working day after the complaint was received (D+1)	0	0%
C13	Complaints resolved between date complaint received and 56 calendar days (eight weeks)	0	0%
C14	Complaints resolved after 56 calendar days (eight weeks)	0	0%
C15	Average resolution time (in calendar days) for all complaints resolved	0	
016	Number of letters sent signposting the Ombudsman at 8 weeks	0	
D17	Number of deadlock letters issued	0	
E18	Number of domestic electricity customer accounts at the end of the quarter	0	
E19	Number of domestic gas customer accounts at the end of the quarter	0	
E20	Total number of domestic electricity and gas accounts (calculated automatically)	0	
21	Complaints resolved per 100,000 customer accounts (calculated automatically)	0	
E22	Complaints resolved per 10,000 customer accounts (calculated automatically)	0	

#### **Quarterly template – microbusiness complaints**

Company name	XXX		
Quarter	XXX		
Year	xxx		
Complaints number	Data item	Value	%
A1	Total agent handled contacts received (calculated automatically)	0	
A2	Agent handled telephone calls	0	
A3	Agent handled letters	0	
A4	Agent handled emails/webforms/webchat/social media	0	
A5	Online petitions received	0	
B6	Total complaints received (calculated automatically)	0	
B7	Complaints received by telephone	0	
B8	Complaints received by email/webform/webchat/social media	0	
B9	Complaints received by letter	0	
B10	Complaints received by other format e.g face to face, fax	0	
C11	Complaints resolved (calculated automatically)	0	
C12	Complaints resolved by the end of the first working day after the complaint was received (D+1)	0	0%
C13	Complaints resolved between date complaint received and 56 calendar days (eight weeks)	0	0%
C14	Complaints resolved after 56 calendar days (eight weeks)	0	0%
C15	Average resolution time (in calendar days) for all complaints resolved	0	
D16	Number of letters sent signposting the Ombudsman at 8 weeks	0	
D17	Number of deadlock letters issued	0	
E18	Number of microbusiness electricity customer accounts at the end of the quarter	0	
E19	Number of microbusiness gas customer accounts at the end of the quarter	0	
E20	Total number of microbusiness electricity and gas accounts (calculated automatically)	0	
E21	Complaints resolved per 100,000 customer accounts (calculated automatically)	0	
E22	Complaints resolved per 10,000 customer accounts (calculated automatically)	0	