

power capacity in place, two thirds on the ground and the remainder on residential and commercial roofs.

## **Update on complaints performance, by Professor Stephen Littlechild**

On Thursday Ofgem issued its Complaints Performance data for Q4 2022. It commented that complaints per 100,000 customers were up by 14% compared to the previous quarter. However, a significant proportion of this increase was accounted for by the 42% increase in complaints to British Gas (many of which may have been related to disputed customer transfers to prepayment meters?). Three other suppliers (Utilita, Octopus Energy and Utility Warehouse) also reported increases of around 25%, probably not for the same reason. This meant that complaints reported by the remaining suppliers were generally rather stable.

I have deferred reporting the impact on the OCS index because a relevant piece of information is not yet available: although Ofgem reports the complaints data for licensee Ovo Energy in aggregate, Ovo Energy itself has not yet reported the data for its three constituent subsidiaries (including SSE and Boost Power).

It seems opportune, then, to review again the reporting situation of these complaints data, following up some concerns voiced previously (in articles on OCS calculations in Energy Spectrum Issue 775 on 6 September 2021 and Issue 834 on 28 November 2022). One long-standing question is whether suppliers report statistics on a uniform basis. Ofgem defines a complaint as “any expression of dissatisfaction”, which may include “the manner” in which a complaint was handled. (Guidance, 30 January 2018 p 4)

Suppliers, as a whole, are reporting an average of 184 complaints per 10,000 customers in Q4 2022. Even medium-sized suppliers, who generally have fewer complaints than large suppliers, are reporting on average 122 complaints per 10,000 customers. Yet two small suppliers, who have both been in the market for over four years, are each reporting 10 or less complaints per 10,000 customers - that is, only one in every thousand of their customers expresses any dissatisfaction each quarter? Remarkable.

I am reluctant to suggest more regulatory intervention by Ofgem. Perhaps an industry body like Energy UK could facilitate some further industry discussion and agreement here?

Ofgem requires suppliers to provide it with the specified quarterly complaints returns by the end of the month following that quarter. Ofgem publishes these data about a month later. Ofgem also says: “We think it’s reasonable to expect suppliers to expect that quarterly complaints data is published on suppliers’ websites within one week of submitting it to Ofgem and Citizens advice.” (paragraph 2.17) That is, about three weeks before Ofgem publishes it. What is the present situation for the latest Q4 2022 complaints data? On Thursday 23 February 2023 Ofgem published these data for 16 suppliers who had provided data on time.

- Of these, eight suppliers – precisely one half - had published the same or related data on their own websites by the end of the next working day (viz. EDF, EON, Scottish Power, Shell, Utilita, Octopus, E and Good Energy).
- Three suppliers had not done so, though two of them (viz. British Gas and Ecotricity) publish all previous quarterly complaints data and the third (Green Energy UK) shows the previous quarter’s data.
- One supplier, Ovo Energy, has published separate data for its three subsidiary companies Ovo Energy, SSE and Boost Power for the last two quarters (although not for the aggregate licence holder as published by Ofgem) and not yet data for Q4 2022. Previously, Ovo Energy had not published current complaints data for some years.
- One supplier, Bulb Energy, used to publish these data but has not done so since Q1 2022.
- Three suppliers (Utility Warehouse, Foxglove Energy and So Energy) do not seem to publish these data.

If some suppliers are simply not publishing data that Ofgem considers they should, this seems a matter for Ofgem rather than Energy UK.

Finally, of the eight suppliers that had published the prescribed (or related) data, only three of them (E.ON, Shell and Utilita) published exactly the same data as on the Ofgem site. The other five suppliers published different data for one or two of the three parameters. EDF helpfully notes that it updates its eight weeks figure in the light of subsequent experience, but other suppliers have no comment. Do not the other differences call for some note of explanation somewhere? There is some work to do to ensure reasonable consistency in complaint recording and reporting. But the surviving energy suppliers generally have good stories to tell on customer complaints. There seems no reason to hide or fail to explain these data.