

# **The increasing use of Trustpilot by UK retail energy suppliers**

**Stephen Littlechild\*\*** Emeritus Professor, University of Birmingham; Fellow, Cambridge Judge Business School; and Associate, Energy Policy Research Group at Cambridge.

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## **Abstract**

UK retail energy suppliers significantly increased their use of Trustpilot over 2019-20. The larger ones, especially, have followed the medium suppliers and increased their TrustScores. Companies explain that inviting Trustpilot reviews also enables them to improve customer service. Appendices explore how far rankings would be affected by alternative possible ways of calculating TrustScores. They also show how companies advising customers on energy suppliers score highly on Trustpilot while voluntary and regulatory organisations do not.

Key words: online reviews, Trustpilot, retail energy market.

JEL classifications: L15, L84, L94

## **1. Introduction**

Trustpilot is a relatively new but rapidly growing consumer review website. It is by far the most used review website in the UK residential energy sector. Littlechild (2021a) provides some background on consumer reviews and relevant academic literature, and some insight into how Trustpilot works, how it is used in four UK consumer sectors (supermarkets, banking, mobile phones and retail energy supply), and how this usage has grown from 2019 to 2020. Trustpilot is used more actively in the energy sector than in those other three sectors. It is also used most actively by significant challenger companies, those with market shares around 8 to 12%, rather than by smaller companies with shares of 7% or less, and used least actively by large companies with market shares of 14 to 28%. Nonetheless, usage is growing in all size groups.

The present paper looks in more detail at the use of Trustpilot by UK retail energy suppliers. At this relatively early stage, the emphasis is on describing and understanding what is happening, and what suppliers and customers are doing, rather than formulating and testing hypotheses.

The paper shows first that use of Trustpilot has increased from 2019 to 2020, both by customers and by suppliers, particularly by Large suppliers. The main aim is to examine in more detail how a range of particular companies have used (or not used) Trustpilot. These companies are the new and fast-growing Medium (now Large) supplier Octopus Energy, two white label supermarket supplier brands, Small new entrant Engie, and the six former-incumbent Large energy suppliers. Over the last two years, all but one of these companies have eventually invited customer reviews, with generally favourable ratings, and have significantly increased their TrustScores.

Some Appendices explore a number of related or interesting topics. Appendix One provides Trustpilot usage data in April 2019. Appendix Two finds that suppliers that were forced to exit the market do not seem to have had different scores or review volumes. Given some concerns

about whether invited reviews give an accurate picture of customers' views, Appendix Three explores three alternative ways of using the customer review scores, and notes the extent to which that would modify the ranking of energy suppliers. Appendix Four finds that UK energy consultants and energy switching sites are high scoring and relatively active on Trustpilot. Appendix Five finds the opposite situation with charitable and regulatory organisations.

Littlechild (2021b) proposes using the average of four very different kinds of customer satisfaction ratings (provided by Ofgem, Citizens Advice, the Consumers Association via Which? magazine, and Trustpilot) as a means of constructing, analyzing and publicizing an Overall Customer Satisfaction (OCS) score for UK energy suppliers.

## **2. Use of Trustpilot by retail energy suppliers**

### **2.1 Usage in 2019**

Appendix 1 Table A1 shows Trustpilot usage data from 8 April 2019 for 26 energy suppliers studied elsewhere (Littlechild 2021b) that were sufficiently established and sizeable to have been reviewed and rated by both Citizens Advice and Which? magazine. The mean TrustScore was 6.2 out of 10, classed by Trustpilot as Average, the median was 7.0 Good. The range of TrustScores was extensive: from 0.3 to 9.6. The average number of reviews per energy supplier was 6348 (mean), 3529 (median). The total number of reviews to that date per energy supplier ranged from 556 (Engie) to over 35,000 (Shell Energy, formerly First Utility).

All these energy suppliers had claimed their Trustpilot profiles – that is, acknowledged that the reviews refer to it, after which the company can customise the profile page (e.g. to describe the business, select its category or categories and sub-categories of activity, and display promotion boxes or guarantee boxes), respond to existing reviews, send invitations to customers to provide reviews, and challenge or “flag” inappropriate reviews. There is no Trustpilot charge for this. Trustpilot also offers a variety of additional paid services “to collect, respond, analyze, and showcase reviews to help improve all your sales and marketing efforts”. As of April 2019, all but four of the energy suppliers subscribed to some Trustpilot services.

All but five companies were collecting (asking customers for) reviews, and all but five responded to some or all of these reviews. So these 26 energy suppliers and their customers were, in general, quite attuned to the use of Trustpilot, more so than companies in three other sectors (Littlechild 2021a).

### **2.2 Usage and size of supplier in April 2019**

Table 2 groups the 26 suppliers explicitly by size. Large suppliers have a median TrustScore of only 1.25. Medium and Small Plus suppliers have medians of 7.95 and 7.75 respectively, and Small Minus suppliers a median of 5.8. Thus, setting aside the Large (former incumbent) suppliers with very low TrustScores, the TrustScores for other suppliers seemed to increase with size of company, and in that sense were higher for more successful suppliers that had grown the most. However, although a linear regression of TrustScore against actual supplier size (see below) for the 20 non-Large suppliers suggested a positive relationship, it was not statistically significant (t-statistic 1.4).

**Table 2 TrustScores, size of supplier and number of reviews, 8 April 2019**

| Size of supplier | Number of customer accounts per supplier | Number of suppliers | Mean TrustScore (out of 10) | Median TrustScore (out of 10) | Mean Number of Reviews | Median Number of Reviews |
|------------------|--|---------------------|-----------------------------|-------------------------------|------------------------|--------------------------|
| Large L          | 3m – 12 m                                | 6                   | 1.95                        | 1.25                          | 2,369                  | 2,096                    |
| Medium M         | 300k – 3m                                | 10                  | 7.7                         | 7.95                          | 12,055                 | 8,057                    |
| Small Plus S+    | 150-300k                                 | 8                   | 7.6                         | 7.75                          | 2,865                  | 1,897                    |
| Small Minus S-   | 11- 100k                                 | 2                   | 5.8                         | 5.8                           | 5,408                  | 5,408                    |
| All suppliers    |  | 26                  | 6.2                         | 7.0                           | 6,348                  | 3,529                    |

Table 2 also shows the mean and median number of reviews. Medium suppliers had received by far the most reviews: median over 8,000 reviews per supplier, compared with around 2,000 for Large suppliers (most of which suppliers were not actively collecting/inviting reviews at the time) and just under 2,000 for Small Plus suppliers. Thus, the new suppliers that had grown substantially and successfully also tended to have a large number of reviews.<sup>1</sup>

Four Medium energy suppliers - Bulb, Ovo, Avro Energy and Shell Energy - averaged nearly 23,000 reviews each. This was more than double the number of reviews of even the most reviewed bank, and approximately three times the number of reviews of the most reviewed mobile phone provider and supermarket (Littlechid 2021a).

There was no obvious relationship between number of reviews and TrustScore: more striking was the diversity in number of reviews. Nor was the number of reviews directly or even roughly proportionate to number of customers. For example, SSE was the third largest supplier by number of customers, but had the second lowest number of reviews.

### **2.3 Usage and size of supplier in June 2020**

Table 3 shows comparable and additional data for 18 June 2020, for 54 energy suppliers covering 56 internet domains (two domains each were active for SSE and Scottish Power). The suppliers are categorised in the previous four sizes plus a fifth Very Small size.<sup>2</sup> What are the main findings?

Large suppliers have lower median TrustScore (3.7) than Medium and Small suppliers (4.2), but the difference is not as great as it was in the previous year. Very Small suppliers have a slightly higher TrustScore (4.5). The median number of reviews to date of Medium suppliers is now only about three times as high as for Large suppliers (as opposed to six times in 2019), but is still

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<sup>1</sup> The two Small Minus suppliers had high numbers of reviews (over 5,000) but the sample was too small to be indicative. Flow had been acquired by Cooperative Energy the previous year, when it had 130,000 customers, hence some 38.6 reviews per thousand customers. Solarplicity had to leave the market in August 2019, at which point it had only 7,500 customers, but in first quarter 2019 it had between 50,000 and 150,000 customers, hence some 38.6 to 115.9 reviews per thousand customers. Many of the later reviews were critical of the company's inadequate service and lack of contactability, and later of the process whereby customers were transferred to another supplier.

<sup>2</sup> Sizes are given before the incorporation of Co-operative Energy and Engie into Octopus Energy and SSE into Ovo. The sizes of Very Small suppliers are rather speculative.

about six times as many as for Small suppliers. As will be seen, Large suppliers are catching up by actively inviting reviews.

Not surprisingly, smaller suppliers tend to claim their Trustpilot domains later than larger ones that entered the market earlier. The June 2017 median date of claiming for the Large suppliers actually reflects four domains claimed very early (in 2014-15) and four only recently (in 2019-20).

**Table 3 TrustScores, size of energy supplier and other data, 18 June 2020**

| Size of energy supplier           | Large   | Medium  | Small Plus | Small Minus | Very Small |
|-----------------------------------|---------|---------|------------|-------------|------------|
| # Customer a/cs                   | over 3m | 300k-3m | 150k-300k  | 11k-100k    | 1k-10k     |
| # Suppliers                       | 8       | 13      | 12         | 14          | 9          |
| Median TrustScore (out of 5)      | 3.7     | 4.2     | 4.2        | 4.2         | 4.5        |
| Median # Reviews to date          | 6,601   | 21,855  | 3,544      | 1,308       | 106        |
| Median Date Claimed               | Jun-17  | Oct-15  | Jul-17     | Dec-17      | Feb-19     |
| % Subscribing                     | 75%     | 92%     | 100%       | 71%         | 44%        |
| % Asking for reviews              | 63%     | 92%     | 92%        | 71%         | 33%        |
| Median % response rate            | 34%     | 14%     | 93%        | 79%         | 78%        |
| Median # Flagged last 12 mos      | 12      | 17      | 8          | 3           | 1          |
| Median # Reviews last 12 mos      | 4016    | 4637    | 1487       | 583         | 103        |
| Flag rate per 1k reviews          | 3.0     | 4.9     | 11.8       | 3.9         | 9.3        |
| Median # Customers/supplier (k)   | 5163    | 627     | 161        | 51          | 5          |
| Median 12mos Reviews/1k customers | 0.9     | 6.5     | 7.9        | 10.0        | 34.3       |

All but one of the Medium suppliers, and all of the Small Plus suppliers, subscribe to Trustpilot services. Although it is not apparent from Table 3, all but one of the Large suppliers now subscribes too.<sup>3</sup> The rate of subscription is lower for Small Minus and especially Very Small suppliers. There are similar findings with respect to the proportion of suppliers actively inviting reviews, which is highest for the Medium and Small Plus suppliers. In contrast, as regards response to customer reviews, the median Large supplier response rate is about one third of reviews, the median Medium supplier rate is less than one sixth, whereas the median Small Plus supplier response rate is over 90%, and the median Small Minus and Very Small supplier response rates are about three quarters.

Over time, Trustpilot has been providing more information. Thus, Table 3 indicates the extent to which companies challenged or “flagged” reviews that they regarded as inappropriate. This is not frequent: the median is about one per month (12 per year) for Large suppliers, half as many again for Medium suppliers and down to one per year for Very Small suppliers. As a proportion of reviews received, Small Plus suppliers are the most active in flagging inappropriate reviews: their median rate is about 12 per thousand reviews, compared to only about 3 per thousand reviews for Large suppliers.

<sup>3</sup> Scottish Power subscribes via both domains, SSE subscribes via one domain but not the other, and nPower does not subscribe.

Finally, over the 12 months leading up to 18 June 2020, the median number of reviews per thousand customers is inversely related to size of supplier. The median Large supplier received one review per thousand customers, which gradually increased for smaller suppliers, and the median Very Small supplier received 34 reviews per thousand customers. (The sizes of the Very Small suppliers are rather conjectural, but even if they were twice the assumed sizes, the median review rate per customer would still be higher than for larger suppliers.)

Taken with earlier findings, the implications are that Trustpilot is becoming an increasingly significant part of the competitive landscape in the domestic energy supply sector; that the now-Medium suppliers have hitherto made most use of Trustpilot and Large suppliers least use; that most Large suppliers are now taking steps to catch up; that significant proportions of Small and Very Small suppliers also make active use of Trustpilot with the extent generally increasing with size of supplier; but that nonetheless the Very Small suppliers attract the largest number of reviews per thousand customers, and as a group obtain the highest median TrustScore in the sector.

### **3. Use of Trustpilot by various Medium, Small and White Label energy suppliers**

#### **3.1 Variation in growth of number of Trustpilot reviews**

Not only does the number of Trustpilot reviews per company vary considerably, so does the growth rate in number of reviews over time. This section looks at this in more detail, taking advantage of a somewhat longer set of data. (Current TrustScores are available online but in general scores for previous dates are not available.) This first subsection looks briefly at the big picture. Subsequent subsections examine the policies of several particular energy suppliers, to understand why they have (or in one case has not) adopted a policy of inviting reviews. In several cases the policy is explained by a leading executive.

Over the two months from 5 February to 8 April 2019, the median growth rate in number of reviews among the 26 energy suppliers discussed earlier was 22.5% for Medium suppliers, compared to 10% for Large suppliers, 16% for Small Plus suppliers and 6% for the two Small Minus suppliers. A handful of suppliers were notable for review growth rates of 30% or more in these two months, viz Bulb 30%, Together Energy 35%, Green Network Energy 36%, Octopus Energy 40%, EDF 40% and Co-op Energy 42%. Most remarkable of all was the growth rate of 639% at Engie.

A larger group of 47 energy suppliers was tracked over the two year period 6 May 2018 to 8 May 2020. This group excludes just over a dozen suppliers that had gone out of business during this period and four new suppliers that had no reviews recorded in May 2018, but includes some suppliers that had been taken over in the last few months but still retained their separate identity, at least in the minds of reviewers. Over that two year period, the median increase was nearly seven-fold (6.8). The range was considerable: lowest increase 60% (1.6), first decile doubled (2.1) number of reviews, first quartile trebled (3.0), third quartile nearly twenty-fold increase (19.2), and ninth decile well over a hundred-fold increase (130.3). The highest increase was over a thousand-fold, but admittedly by the company ESB Energy which happened to have just one review on 6 May 2018.

### 3.2 Use of Trustpilot by Octopus Energy

Octopus Energy was one of the fastest-growing new suppliers. It entered the market in 2016, immediately claimed its Trustpilot site (before any reviews were received), and subscribed to Trustpilot services. It grew very quickly: by Q3 2018 Ofgem was categorising it as a Medium-sized supplier, defined as having a market share over 1% (over 0.5m customer accounts), and by Q2 2020 it had about 2.7m customer accounts. In early April 2019 Octopus Energy had the fifth highest number of Trustpilot reviews (8959) and was third equal in growth in number of reviews (40%) over February to April 2019. In April 2019 it had the joint-highest TrustScore in the sector (9.6/10 with Bulb Energy). It was keen to get customer engagement and feedback, including via Trustpilot reviews.

“We don't use Collect Trustpilot Reviews but we do include links to Trustpilot in many of our communications so customers know that's where to give reviews. Because we have very high levels of engagement on emails (driven by transparency, respect for inboxes, and things like Wheel of Fortune) many customers are aware of Trustpilot and give reviews there.”<sup>4</sup>

Octopus Energy has explained further the role and importance of Trustpilot in providing customer feedback.

“Trustpilot is vital for us. The fact that customers are able to rate any aspect of their experience (the process of signing up, the handling of a service interaction, pricing, communications) in a way which is unfiltered is hugely helpful for us as managers to know what people say about us, and to find and address issues. It's much more meaningful than other ratings for the following reasons:

1. Assessments like Citizens Advice are based on metrics which may only be a proxy for customer satisfaction - and indeed may be a poor proxy. For example, waiting time is a terrible metric - it's easy to answer a call quickly - and then put the customer on hold for ages, or have them speak to an unhelpful brick wall. Being signed up to the Energy Switching Guarantee (or not) is meaningless to customers, and BS18477 may be an excellent standard but it is possible to provide great service to vulnerable customers without it.
2. Many surveys rely on consumers remembering which energy company they are with. [But] even in a high-touch category like shampoo (customers buy it every couple of weeks, and many care enormously about the brand) they'd often misremember what brand they used.
3. Most important: Customers give verbatims - so you know exactly what you are getting right or wrong and can address it. That's the reason we do well - every negative review is reviewed by management and we accordingly make changes to what our company does for customers, so many changes in our bills, statements, price communications, online account, staff training, internal processes, etc.

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<sup>4</sup> To explain, “The Wheel of Fortune is a fantastic Octopus innovation in customer engagement. For 20 years energy companies have treated meter readings as a cost reduction exercise. We saw it as the opportunity to drive a positive monthly engagement.” Octopus Energy, personal communication, 2 April 2019. The Octopus twitter link describes the Wheel of Fortune as follows. “Introducing...WHEEL! 🎰 OF! 🔥 FORTUNE! 🎯 Submit a meter reading and spin the wheel for a chance to win juicy credit prizes! 🏆🎁 Will it be £5? £50? Even £500??? 🎁🏆 Congrats [Name], our first lucky winner. He submitted his first readings and bagged himself a fiver!”

4. It's public and continuous - so rather than a one-off big bang, we get ongoing feedback, and can react quickly. Because it's public, it really motivates our team.” (Octopus Energy, personal communication, 2 April 2019)

### **3.3 Use of Trustpilot by Octopus Energy for M&S Energy**

Now consider the experiences and policies of two new White Label energy suppliers, who have taken different approaches from their previous suppliers (and contrast with the approaches of the two parent organizations).

Marks and Spencer Energy (M&S Energy) is a White Label product, initially supplied by SSE. From January 2017 to 6 July 2018 it had only seven reviews: two customers gave it 2 out of 5 stars (Poor), five gave it 1 star (Bad). Its Trustpilot site was unclaimed. One would have thought it an embarrassment to the parent company, except that the Trustpilot site of Marks and Spencer itself was unclaimed and its TrustScore was Bad. (The site was not claimed until September 2020.)

On 29 September 2018 Marks and Spencer transferred the White Label account to Octopus Energy. M&S Energy immediately claimed – took responsibility for - its Trustpilot account. A month later, Octopus wrote on Trustpilot to those seven customer reviewers that had previously been upset. M&S Energy subscribed to Trustpilot and invited reviews. And Octopus Energy evidently transformed the customer relationship – or at least encouraged satisfied customers to record their views. As of 20 March 2019 – six months later - M&S Energy had 108 new reviews: 5 customers scored it 4 stars (Great), the other 103 scored it the maximum of 5 stars (Excellent). M&S Energy had risen to a TrustScore of 9.6 (out of 10), equal to the then-highest TrustScore (achieved by Octopus Energy itself and Bulb).

A year later, on 18 June 2020, M&S Energy had 1232 reviews, of which 1044 were received in the previous 12 months, and it responded to 1% of these, those few where there was a tangible concern. Its TrustScore was 4.9 out of 5, highest among 64 domestic suppliers.

### **3.4 Use of Trustpilot by Powershop for Sainsbury's Energy**

Sainsbury's Energy, a White Label product, was initially supplied by British Gas. From August 2017 to February 2019 it had 50 reviews on Trustpilot, averaging less than one per week. Over three quarters of them gave the minimum one out of five stars (Bad). Sainsbury's Energy TrustScore was very low at 1.4 out of 10.<sup>5</sup> The Trustpilot site was unclaimed. On 5 February 2019 Sainsbury's decided to exit the energy market and transferred its customers to British Gas.

On 23 April 2019 Sainsbury's changed its mind, and announced that it was relaunching its energy tariff, this time in conjunction with nPower. Since nPower had one of the lowest TrustScores in the sector (0.5 out of 10), and was (and still is) a non-subscriber to Trustpilot, a significant improvement in the TrustScore of Sainsbury's Energy might have seemed unlikely.

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<sup>5</sup> Surprisingly, this was below the TrustScore of British Gas itself, which was around 2.5 out of 10, although British Gas would no doubt argue that the quality of service provided was no lower. Perhaps Sainsbury's Energy customers had higher customer service expectations? As explained below, a few months later British Gas itself began to use Trustpilot more actively by inviting reviews.

However, nPower was to provide supply to Sainsbury's via a subsidiary company associated with Powershop, a new small supplier with a novel approach.<sup>6</sup> It was therefore uncertain how Sainsbury's Energy TrustScore would develop.

Sainsbury's Energy immediately claimed its Trustpilot account in May 2019 and subscribed to Trustpilot. However, it did not immediately invite reviews, partly because there were still a number of issues to deal with related to the previous regime, and partly because staff were not yet trained to implement the measures that would be needed. Over the next nine months Sainsbury's Energy received only six reviews, a fraction of the previous rate, which itself was low. All six of these reviews were still one star Bad, and by January 2020 Sainsbury's Energy TrustScore was only 1.4 (now out of 5).

Sainsbury's Energy was now ready to begin inviting reviews. In the first trial (3 – 28 February 2020), customer service staff concluded inbound telephone calls by inviting the customer to review the company on Trustpilot. The response rate was under 1%. A dozen reviews were filed in the last two weeks of February 2020, an average of one per day. But three reviews were four star, the other nine were five star. The TrustScore shot up from 1.4 to 3.1. "This initial experience brought home the importance of a great customer handling team that could turn an angry complaining customer into an appreciative one, and a potential one star review into a five star one." (Powershop)

The second part of the trial (11 May – 30 June 2020) included Powershop as well as Sainsbury's Energy customers. The response rate improved but was still under 1%. Nonetheless this led to a further 50 or so reviews, again mostly yielding five stars. The TrustScore rose to 4.1 by 18 June.

The third part of the trial (4 – 11 August 2020) involved email invitations to customers who had opted to receive marketing communications and who had been with Powershop or Sainsbury's Energy for up to 3 months.<sup>7</sup> "The primary aim was to build a better TrustScore to ensure that new customers felt confident switching to us. A secondary aim was picking up feedback and nuances that may have been lost from our other feedback mechanisms. An example of the latter was a concern about smart meter incompatibility, which we investigated and were able to address via communications with customers, additional wording on the website and in FAQs." The response rate was markedly higher, at around 3.5%, yielding another three dozen reviews in the second week in August 2020, again mostly five star, bringing the TrustScore up to 4.4 on 13 August 2020. The company also began to reply to reviews as part of its aim to demonstrate concern for customers. For the future, the aim is to invite reviews at a given time interval (from

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<sup>6</sup> Powershop and Sainsbury's Energy accounts are managed under licence by PSE energy UK Ltd, which is 100% owned by npower and uses software called Flux that is 100% owned by the New Zealand company Meridian Energy. As of 31 May 2019 Powershop had a TrustScore of 6.3/10 based on 239 reviews. But Powershop was something of a 'Marmite' supplier, insofar as it offered "a new way of buying energy" (via discounted powerpacks) which customers seemed to love or hate. Trustpilot rankings showed that 53% of customers rated Powershop Excellent and 32% rated it Bad, leaving only 15% of customers in-between. Along with EDF at 14%, this was a lower proportion "in-between" than for any other supplier with a TrustScore between 2.0 and 8.0.

<sup>7</sup> Ideally, Powershop would have used an automated email platform from the start, so that it could take advantage of Trustpilot tools that integrate with such systems and also consider the best time to issue invitations to review. But Powershop did not then have a GDPR-compliant [General Data Protection Regulation] email platform in place, being in the process of procuring one at the time.

customers who have opted to receive marketing) using the automated Trustpilot invitation mechanism.

These high TrustScores of the two White Labels stand in stark contrast to those of the parent companies, which do not engage with customers in this way. Marks & Spencer, which has never claimed its Trustpilot domain, improved slightly from 2.7 out of 10 (Bad) in 2019 to 2.3 out of 5 (Poor) in 2020. Sainsbury's, which claimed its domain in February 2017, has not been active on it and remains classed as Bad (initially 2.0 out of 10 now 1.7 out of 5).

### **3.5 Use of Trustpilot by Engie**

In early 2019 Engie exhibited a dramatic increase in Trustpilot reviews (639% growth in two months) and in its TrustScore. The background is that during 2017 and 2018 its Trustpilot reviews were very mixed. In contrast, on 27 June 2018 Engie was ranked second equal by Citizens Advice in its home energy customer service league table, based on performance and interviews during first quarter 2018. The company was also getting strong performance reviews through its own customer surveys. Engie decided that more active engagement with Trustpilot was important in order to ensure that its TrustScore better reflected these other metrics. Accordingly, the company started actively collecting reviews from its customers (via the paid service with Trustpilot). The aim was to more directly gear the company's customer service plan to the Citizens Advice requirements, but also to make sure that this good work was not undermined by a TrustScore that was not a fair reflection of the quality of service the company actually provided.

Comments on Engie's Trustpilot site suggest that the customer service team responded actively. There was also systematic encouragement to a random sample of new customers, and to customers interacting with the supplier's contact centre, to report their views. The number of Trustpilot reviews increased over six-fold in two months, from 87 to 556. By 8 April 2019 79% of the reviews were Excellent, and the TrustScore increased from 6.9 out of 10 on 6 February 2019 to 9.2 on 8 April. The company regarded this as a more accurate reflection of the quality of service being delivered through its contact centre, plus new customers being happy with the switch to ENGIE.

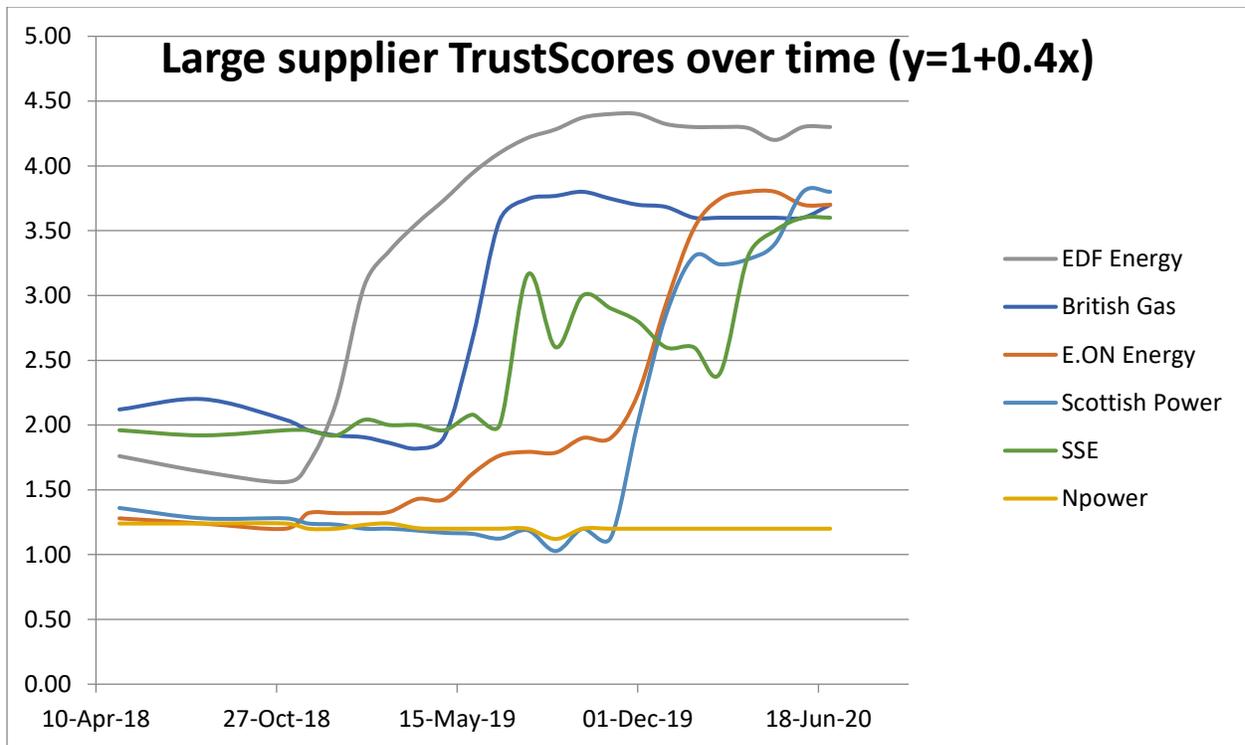
## **4. Use of Trustpilot by the six Large suppliers**

The above cases suggest that a significant turnaround in TrustScore can be achieved by new suppliers with relatively small numbers of customers. But is it realistic for a long-established Large supplier with many customers and a low existing TrustScore based on a significant number of Bad reviews, and no doubt an established way of doing things, to contemplate raising its game with respect to customer service and use of Trustpilot? As of mid-2019, the answer would have been Don't Know. But a year later, the answer is a clear Yes. And need it take a long time? The answer is No: a Large supplier can raise its a star grading by one or two levels within a matter of months, and one such supplier even went from Bad to Excellent in one year.

Figure 1 shows the TrustScores of the six Large suppliers over about two years from 6 May 2018 to 1 July 2020.<sup>8</sup> Figure 2 shows the number of reviews they received over the same period.

Throughout most of 2018, none of these suppliers invited reviews, and the reviews they received were almost entirely critical, with TrustScores in the range 1.2 to 2.2, ranking British Gas and SSE as Poor, the other four suppliers as downright Bad. This does not necessarily mean that their service was less satisfactory than that of other companies: as they and others have pointed out, they tend to have a higher proportion of more vulnerable customers that are more likely to report problems. It was only gradually that it seemed to these suppliers worth doing something about the Trustpilot situation.<sup>9</sup> By July 2020, EDF’s TrustScore stood at 4.3 (Excellent), four other Large suppliers were in the range 3.6 to 3.8 (borderline Average to Great), and Npower was still at 1.2 (Bad).

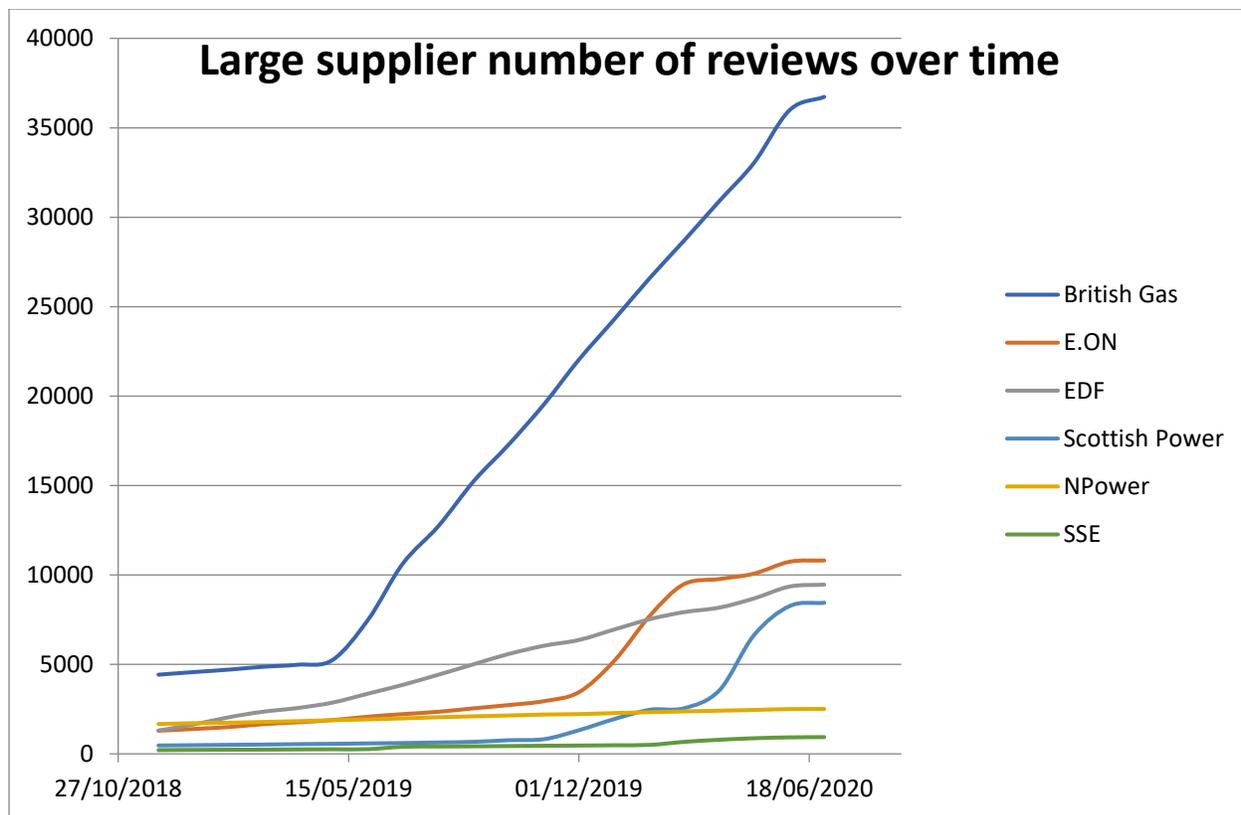
**Figure 1 Large supplier TrustScores over time**



**Figure 2 Large supplier number of Trustpilot reviews over time**

<sup>8</sup> As noted above, the TrustScores for the period before 1 September 2019 (range from 0 to 10) have been adjusted to the subsequent range (from 1 to 5) by the formula  $y = 1 + 0.4x$ . The Scores and numbers of reviews for Scottish Power and SSE are for their (preferred) .co.uk domains, which differ from their .com domains.

<sup>9</sup> “I don’t think large companies were reluctant to use Trustpilot, it just wasn’t a priority. It takes some effort to engage with it effectively and it is only one of a number of ways in which customer service is measured. But clearly it was felt by most large companies that it was increasingly being used as a reference by customers and the poor comparison with some of the medium and newer suppliers was not felt to be an accurate reflection of the levels of service being provided. So the large suppliers started to approach Trustpilot in the same way as the smaller suppliers to ‘even the score.’” (Contact at Large supplier, email 15 July 2020)



#### 4.1 EDF

EDF took action first. During the second half of 2018, its (adjusted) TrustScore was declining from around 1.7 to 1.6 (Bad) and getting worse. The company decided to take a more active role in inviting reviews. Inspection of its Trustpilot site suggests that the first four invited reviews (though not then labeled as such) arrived in October 2018, though they did not increase in number until the end of the year. The total number of reviews went from 1202 on 6 November 2018 to 1790 on 6 February 2019, an increase of about 50% in three months. EDF's (adjusted) TrustScore increased to 3: better than Bad but still Poor. Two months later the number of reviews had increased by a further 40%, one of the highest increases over that period, and the TrustScore rose to 3.5. (At that time the nearly 2400 Trustpilot reviews of EDF were largely divided between Bad (39%) and Excellent (45%) and since the later reviews were mostly Excellent, the past reviews must have been mainly Bad.) All reviews now got a personal response from EDF, which was not always the case previously. By 22 July 2019 the TrustScore was up to 4.1, which was Good (now Great) and a year later, as of 18 June 2020, EDF's TrustScore was 4.3, just into the Excellent category, based on 9122 reviews, and the company had responded to 99% of its reviews over the previous 12 months. More active invitation and collection of reviews had thus paid off. This was presumably backed up by better customer management in order to get the desired improvement in ratings.

#### 4.2 British Gas

British Gas's (adjusted) TrustScore had declined from 2.2 in August 2018 to 1.8 in early 2019. Like EDF, it then subscribed to Trustpilot's services and put substantial effort into collecting reviews. The first invited review arrived on 13 June 2019. The number of reviews increased from about 7500 at the beginning of June to over 10,600 at the beginning of July, an increase of over 40% in one month, and the TrustScore went up to 3.6. The number of reviews has continued to increase at the same remarkable rate (about a seven-fold increase in a year) but BG's TrustScore has held at about the same level (3.6 to 3.8), on the borderline between Average and Great.

### **4.3 E.ON**

E.ON was an early mover in inviting reviews: its number of reviews increased by two thirds over the latter part of 2018, a greater proportionate increase than for any other Large supplier. But this had little impact in 2018: its (adjusted) TrustScore stayed down at around 1.3 (Bad). During the first five months of 2019 E.ON increased the number of its reviews faster than any Large supplier except EDF, and this was reflected in its TrustScore gradually rising to 1.8 (Poor) by August 2019, and to 2.2 (but still Poor) by the end of the year. Then a rapid burst of invitations (a 50% increase in the number of reviews in each of the first two months of 2020) saw its TrustScore shoot up to 2.9 (Average) in January and 3.8 (Great) by March. The TrustScore has since remained at around 3.7-3.8, Average-Great borderline, with only a modest increase in number of reviews.

### **4.4 SSE**

SSE was the fourth Large supplier to make active use of Trustpilot. It has always had the fewest reviews of the Large suppliers, and from early 2018 to early 2019 its (adjusted) TrustScore of around 2 was Poor but nonetheless the second highest of the Large suppliers. It had 10% Excellent reviews, but 81% Bad. It did not respond to customer reviews, nor challenge any of the (often critical) reviews. Not that there were many reviews: an average of 9 per month during the first half of 2019. However, by spring 2019 the TrustScores of both EDF and British Gas had soared far above SSE, and E.ON was heading upwards too. SSE decided to subscribe to Trustpilot and to invite reviews. The first invited review was posted on 22 July 2019. In the next ten days nearly 150 more reviews arrived, most (but not all) awarding 5 stars. SSE's TrustScore rose from 2 (Poor) on 1 July 2019 to 3.2 (Average) a month later. After that invitations seem to have ceased, the number of reviews fell back to about 15 per month, and the TrustScore gradually declined to 2.4 (Poor) by March 2020. There was then another set of manual invitations since 370 reviews were posted in the next three months and the TrustScore rose to 3.6 (at the high end of Average) by mid-2020. (And with another 850 or so manually invited reviews in July to September, the TrustScore had risen to 4.0 by 16 September 2020.)

### **4.5 Scottish Power**

Fifth and last to move was Scottish Power. By the end of 2018 its (adjusted) TrustScore was down to 1.2. (Its unadjusted TrustScore at 0.3 out of 10 was the lowest of all large suppliers – indeed possibly of all suppliers.) As of mid-2019 it had only 2% Excellent reviews and 95% Bad reviews. It did not respond to reviews and challenged none of its 314 reviews. Then in April 2019 it decided to subscribe to Trustpilot services and invite reviews. But it took time to make

arrangements and train staff. The number of reviews gradually increased as the year progressed: averaging about 17 reviews per month from early 2018 to early 2019, then about 30 per month in mid-2019, up to 500 in November, over 600 in December 2019, 1000 in March 2020, over 1600 in May and a peak of over 3000 in April 2020. Scottish Power's TrustScore responded: from 1.1 (Bad) in November 2019 to 2.0 (Poor) in December, 2.85 (Average) in January 2020, 3.3 in February and to 3.8 (Great) by June 2020.

#### **4.6 NPower**

Sixth large supplier NPower has taken little interest in Trustpilot. As of July 2020 it had 3% Excellent reviews, 4% Great, Average or Poor, and 94% Bad. It does increasingly respond to reviews, in fact to no less than 37% in the year to July 2020. But it does not subscribe to Trustpilot and has not challenged any of the 582 reviews in the last year. Its TrustScore has remained at 1.2 out of 5 (Bad) ever since the change in scoring. Npower's policy is thus analogous to that of some long-established supermarkets, banks and mobile phone providers discussed above. This does not necessarily imply that the market is not competitive, or that these companies have market power and do not need to appeal to customers. Rather, these companies, now fewer in number, do not believe that inviting Trustpilot reviews is the most useful vehicle for competing effectively.

#### **4.7 Company thinking about competition and social media**

Company policies presumably reflect conscious commercial decisions. Did the Large suppliers engage with Trustpilot primarily to understand better, and respond more quickly, to what customers think? Or was it primarily to improve their marketing in an increasingly popular advertising medium? What do executives of Large companies themselves say about Trustpilot? Herewith a few more observations, in addition to those cited above.

Inviting and responding to customer reviews is costly and may or may not be cost-effective.<sup>10</sup> And it requires continual monitoring over time.<sup>11</sup> If achieving a high TrustScore is primarily a way of attracting new customers rather than retaining existing ones, then aiming at high scores may be a more economic strategy for new entrants that wish to grow, or for incumbents wishing to replace customers that have left. It may be a less economic strategy for some larger more established companies who may be resigned to losing market share (and who may also take the view that dissatisfied customers are likely to be more expensive to serve and hence not worth the cost of trying to keep).

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<sup>10</sup> "The reasons for not responding are a mixture of there being little merit and some risk in responding, and an expedient use of resource. We cannot reply on individual specifics for anonymity reason and a key reason for not doing generic responses is that if they are more than platitudes then it needs a team of skilled people to do so – better to have these people serving customers." (Contact at a supplier, email 28 March 2019)

<sup>11</sup> Keeping the Trustpilot rating at a high level requires "engaging with Trustpilot properly, replying promptly and in a consistent, personalised and relevant way to reviews, and also *inviting* reviews consistently. In the same way as analysing complaints is important to improving customer service, the same is true of Trustpilot, carrying out analysis of trends and root causes based on Trustpilot data. It is noticeable that, if you take your eye off the ball in terms of responses, your scores will fall." (Contact at a Large supplier, email to author, 17 July 2020)

However, as explained above, inviting customers to review a company is not just a means to get a higher TrustScore. Analysing Trustpilot complaints is a means of better identifying and addressing customer concerns.<sup>12</sup> And of motivating staff.<sup>13</sup> Inviting and responding to reviews demonstrates sensitivity to customers.<sup>14</sup>

Competition is sometimes characterised as a rivalrous discovery process taking place over time. The present analysis of both energy suppliers and other companies indicates that different companies have recognised the significance and potential of Trustpilot at different times, and many have copied others.<sup>15</sup> Why was EDF the first of the six Large suppliers to use it actively, and Npower the last? Perhaps because EDF has been the most keen and able to maintain market share, and Npower the least keen and able.<sup>16</sup> Indeed, Npower is now leaving the market.<sup>17</sup>

Attracting customers necessitates good service, and a perception of good service, as well as a low price. Achieving a satisfactory TrustScore, and analysing customer reviews, are increasingly seen as critical for most energy suppliers, established suppliers as well as new.

## **5. Some further explorations of Trustpilot and TrustScores**

Various questions arose in the course of this research. Briefly:

- Can anything be said about the use of Trustpilot by those energy suppliers that have gone bankrupt and defaulted in the last two years?

Table A2 in Appendix Two suggests not: some of them have low TrustScores but others score quite well, some have few reviews but others have many.

- Do TrustScores adequately reflect “true” customer views?

Appendix Three explores three alternative criteria: excluding 5-star reviews, using only 1-star reviews, and excluding 1-star and 5-star reviews. None of the alternative rankings explored is

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<sup>12</sup> “It is very common for CEOs to be very close to complaints, including individual ones, as they can cut through their own organisations to understand what is going on. Unfortunately, complaints are actually also a way of finding systemic errors in billing systems.” (Contact at a Large supplier, email to author, 9 July 2020) “We are of course looking into new areas of improvements, and that’s why our teams are looking into analysing repeated patterns that could solve some of our customers’ pain points.” (Contact at a Large supplier, email to author, 24 July 2019)

<sup>13</sup> “We are also using it as a way to inspire and provide feedback for our employees, we share the trustpilot reviews internally and while we were still in the office we even had scrolling screens showing the latest reviews, good and bad.” (Contact at a Large supplier, email to author, 15 July 2020)

<sup>14</sup> “An active email invitation campaign [was] key to improve our former ratings and demonstrate publicly our commitment and passion for the work our teams do.” (Contact at a Large supplier, email to author, n.d.)

<sup>15</sup> “If a senior person starts tracking a measure it starts getting managed. I suspect that a senior person started being interested in Trustpilot at EDF before the other large suppliers. So EDF started to engage with it, and once it did so, senior people in the other large suppliers noticed and started asking questions.” (Contact at a Large supplier, email to author, 16 July 2020). “If I were to speculate, I would guess that we didn’t use it at first because we didn’t realise how much it was used and how useful a channel/process it is for getting feedback at relatively low cost. In short, I would guess that the mindset went from ‘why should we do it’ to ‘why wouldn’t we’.” (Contact at a Large supplier, email to author, 17 July 2020)

<sup>16</sup> Ofgem segmental accounts show that EDF customer account numbers fell by only 4% from 2009 to 2019, and Npower numbers fell by 44%, with the other four large suppliers ranging between 10% and 35%.

<sup>17</sup> Npower and SSE had planned to merge but this was called off in December 2018. In May 2020 it was announced that E.ON would take over Npower’s domestic and small business retail supply customers.

self-evidently “right” or better than the present TrustScore. Indeed, the ability to attract good reviews by invitation is arguably a merit in itself. If TrustScores tend to favour those suppliers that make an effort to communicate with customers and are successful in doing so, is that really so bad?

- How do energy consultants (including Price Comparison Websites and switching services) fare on Trustpilot?

~Appendix Four shows that, remarkably, all these organisations had TrustScores of 7.0 out of 10 (Good) or better, and nearly two-thirds scored 9 or more (Excellent). However, their pattern of Trustpilot usage and attitude to reviews is remarkably mixed. Nearly half do not subscribe to Trustpilot. Over a quarter do not collect (invite) reviews, and over a third do not respond to reviews. Only a third have more than 1000 reviews.

- How do charitable and regulatory bodies fare on Trustpilot?

Appendix Five examines the situation for five charitable and regulatory organisations that advise energy customers or regulate energy suppliers and four other Ombudsman services. All had very low TrustScores, classified by Trustpilot as Bad. Six claimed their Trustpilot site, none subscribed to Trustpilot, three responded to some reviews, six did not. None invited customer reviews as a means of improving its understanding of what customers want, its ability to respond to them, or its quality of service as perceived by other customers.

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## **References**

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## **Appendix 1 Use of Trustpilot by energy suppliers in April 2019**

Table A1 shows Trustpilot usage data from 8 April 2019 for 26 energy suppliers studied elsewhere (Littlechild 2021b) that were sufficiently established and sizeable to have been reviewed and rated by both Citizens Advice and Which? magazine. The mean TrustScore was 6.2 out of 10, classed by Trustpilot as Average, the median was 7.0 Good.<sup>18</sup> The range of

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<sup>18</sup> Trustpilot categorises a review as Bad, Poor, Average, Good/Great or Excellent according as the reviewer gives 1,2,3,4 or 5 stars. Until September 2019, Trustpilot categorised a company in the same terms according as the TrustScore (from 0 to 10) was 0.0 – 2.9 (Bad), 3.0 – 4.9 (Poor), 5.0 - 6.9 (Average), 7.0 - 8.9 (Good), 9.0 – 10.0

TrustScores was more extensive: from 0.3 to 9.6. The average number of reviews per energy supplier was 6348 (mean), 3529 (median). The total number of reviews to that date per energy supplier ranged from 556 (Engie) to over 35,000 (Shell Energy, formerly First Utility).

**Table A1 Trustpilot reviews of energy suppliers, 8 April 2019**

| Size of supplier | Supplier             | Trust Score | Number of Reviews | Claimed? | Subscribes? | Asks?       | Responds ?         |
|------------------|----------------------|-------------|-------------------|----------|-------------|-------------|--------------------|
| M                | Bulb                 | 9.6 E       | 14,747            | Yes      | Yes         | Yes         | Some               |
| M                | Octopus Energy       | 9.6 E       | 8,959             | Yes      | Yes         | Yes         | Some               |
| S+               | So Energy            | 9.4 E       | 1,960             | Yes      | Yes         | Yes         | Some               |
| S+               | Engie                | 9.2 E       | 556               | Yes      | Yes         | Yes         | Yes                |
| M                | Avro Energy          | 9.1 E       | 16,774            | Yes      | Yes         | Yes         | No                 |
| S+               | Tonik Energy         | 8.9 G       | 2,803             | Yes      | Yes         | Yes         | Some               |
| M                | Ovo                  | 8.5 G       | 25,017            | Yes      | Yes         | Yes         | Some               |
| M                | Utility Warehouse    | 8.0 G       | 7,155             | Yes      | Yes         | Yes         | Some               |
| S+               | Robin Hood Energy    | 8.0 G       | 1,833             | Yes      | Yes         | Yes         | Yes                |
| M                | Green Network Energy | 7.9 G       | 2,391             | Yes      | Yes         | Yes         | Yes                |
| S+               | Bristol Energy       | 7.5 G       | 852               | Yes      | Yes         | Yes         | Some               |
| S-               | Flow                 | 7.4 G       | 5,021             | Yes      | Yes         | Yes         | Yes                |
| S-               | iSupply              | 7.1 G       | 6,224             | Yes      | Yes         | Yes         | Yes                |
| M                | Shell Energy         | 6.9 A       | 35,136            | Yes      | Yes         | Yes         | Yes                |
| L                | EDF                  | 6.3 A       | 2,397             | Yes      | Yes         | Yes         | Yes                |
| M                | Co-op Energy         | 6.3 A       | 909               | Yes      | Yes         | Yes         | Some               |
| S+               | Ecotricity           | 6.2 A       | 772               | Yes      | No          | No          | Some               |
| M                | Utilita              | 6.1 A       | 5,782             | Yes      | Yes         | Yes         | Yes                |
| M                | Green Star Energy    | 5.0 A       | 3,682             | Yes      | Yes         | Yes         | Yes                |
| S+               | Together Energy      | 4.8 P       | 3,961             | Yes      | Yes         | Yes         | No                 |
| S-               | Solarplicity         | 4.2 P       | 5,794             | Yes      | Yes         | Yes         | Yes                |
| L                | British Gas          | 2.1 B       | 4,904             | Yes      | Yes         | Yes         | Yes                |
| L                | SSE                  | 1.4 B       | 590               | Yes      | No          | No          | No                 |
| L                | E.On Energy          | 1.1 B       | 1,681             | Yes      | Yes         | No          | Yes                |
| L                | nPower               | 0.5 B       | 1,795             | Yes      | No          | No          | No                 |
| L                | Scottish Power       | 0.3 B       | 2,848             | Yes      | No          | No          | No                 |
|                  | <b>Mean</b>          | 6.2 A       | 6,348             | 100% Yes | 85% Yes     | 81%*<br>Yes | 81% Yes<br>or Some |
|                  | <b>Median</b>        | 7.0 G       | 3,529             |          |             |             |                    |

All these energy suppliers had claimed their Trustpilot profiles – that is, acknowledged that the reviews refer to it, after which the company can customise the profile page (e.g. to describe the business, select its category or categories and sub-categories of activity, and display promotion boxes or guarantee boxes), respond to existing reviews, send invitations to customers to provide reviews, and challenge or “flag” inappropriate reviews. There is no Trustpilot charge for this. If a company does not claim a profile, it cannot do any of these things.

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(Excellent). Since September 2019, the classification (from 1 to 5) is 1-1.7 (Bad), 1.8-2.7 (Poor), 2.8-3.7 (Average), 3.8-4.2 (Great), 4.3-5.0 (Excellent).

Trustpilot also offers a variety of additional paid services “to collect, respond, analyze, and showcase reviews to help improve all your sales and marketing efforts” and to obtain “more sophisticated insights about their customers that they [subscribing companies] can use to take action and thereby improve their business”.<sup>19</sup> These services include a facility for sending automatic review reminder emails, and analytics to track collection rates and changes in TrustScores. The level of the TrustScore and the date order of presentation of reviews on the profile page are independent of whether a company subscribes. Table A1 shows that as of April 2019, all but four of the energy suppliers subscribed to some Trustpilot services. (And three of these began to do so not long after 8 April.)

Trustpilot describes a company as “collecting” if it is sending out invitations to customers and actively collecting reviews of its own performance. Table A1 shows that all but five companies were collecting (asking for) reviews.<sup>20</sup> The final column of Table A1 shows that all but five of the suppliers responded to some or all of the reviews that customers sent in. So these 26 energy suppliers and their customers were, in general, quite attuned to the use of Trustpilot, more so than companies in three other sectors studied previously.

The first column of Table A1 notes the size of supplier.<sup>21</sup> The top 11 of the 26 suppliers – that is, those with the highest TrustScores - are Medium or Small Plus, and the bottom 5 suppliers are all Large. So although almost all of these companies actively use Trustpilot in certain respects, their ratings by customers are very different.

## **Appendix Two      Trustpilot scores for suppliers exiting the market**

The question has been raised: can anything be said about the use of Trustpilot by those energy suppliers that have gone bankrupt and defaulted in the last two years? Table A2 shows the 14 suppliers that exited the market via the Supplier of Last Resort method between February 2018 and March 2020, their number of customers, and their TrustScores in the month they exited.<sup>22</sup>

The TrustScores here cover broadly the full range; they are perhaps distinctive only in that they follow a sort of “Normal” distribution, which is not the case for other sets of energy suppliers, where the distribution of scores can vary considerably.<sup>23</sup>

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<sup>19</sup> “Companies can use feedback by taking and understanding where the customers’ engagement is and what the sentiment is, so they can basically fine-tune the marketing communications and focus on delivering more of what the customers want, based on the feedback that they had.” James Westlake, VP Trustpilot UK, Digital Marketing Magazine, posted in Digital Marketing Show Videos, 11 November 2015.

<sup>20</sup> One of the then-reported non-collectors, Octopus Energy, actively collected reviews using its own facilities instead of Trustpilot’s.

<sup>21</sup> Size categories in Table 4 are Large L, over 3000k customer accounts, Medium M 300 – 3000k accounts, Small Plus S+ 150-300k accounts, Small Minus S- 11 – 150k accounts, Very Small VS 1-10k accounts. Number of customer accounts is estimated from various sources including Ofgem data portal, Cornwall Insight Supplier Insight Service Reports, industry contacts and online information.

<sup>22</sup> Details of companies from Cornwall Insight. TrustScores and number of reviews from MWT but readjusting pre-September 2019 scores out of 10 to present basis out of 5. For the five suppliers that exited before December the Trustpilot details are for December 2018. The list excludes Cardiff Energy which had only 2 reviews.

<sup>23</sup> For these 14 suppliers that defaulted, the distribution of Star labels was 7% Bad, 21% Poor, 36% Average, 29% Great and 7% Excellent. For the 26 suppliers examined in Table 4 above, the corresponding distribution was 19%,

**Table A2 Trustpilot scores and reviews for suppliers exiting the market**

| Supplier         | Date of SOLR | TrustScore (out of 5) | Number of reviews | Number of customers | Reviews per thousand customers |
|------------------|--------------|-----------------------|-------------------|---------------------|--------------------------------|
| Future Energy    | Feb-18       | 2.1                   | 21                | 10,000              | 2                              |
| Iresa            | Jul-18       | 1.5                   | 1308              | 100,000             | 13                             |
| Usio             | Oct-18       | 3.6                   | 121               | 7,000               | 17                             |
| Extra Energy     | Nov-18       | 4.0                   | 6098              | 108,000             | 56                             |
| Spark            | Nov-18       | 3.8                   | 18712             | 290,000             | 65                             |
| Oneselect        | Dec-18       | 3.4                   | 1023              | 36,000              | 28                             |
| Economy Energy   | Jan-19       | 2.8                   | 10635             | 235,000             | 45                             |
| Ourpower         | Jan-19       | 2.3                   | 167               | 31,000              | 5                              |
| Brilliant Energy | Mar-19       | 3.8                   | 134               | 17,000              | 8                              |
| Solarplicity     | Aug-19       | 2.5                   | 7532              | 7,500               | 1004                           |
| Eversmart        | Sep-19       | 3.5                   | 1567              | 39,000              | 40                             |
| Toto Energy      | Oct-19       | 3.5                   | 15042             | 134,000             | 112                            |
| Breeze Energy    | Dec-19       | 3.8                   | 76                | 18,000              | 4                              |
| Gnergy           | Mar-20       | 4.7                   | 321               | 9,000               | 36                             |

The numbers of reviews, too, do not seem distinctive. It might be thought that those companies with fewer than 10 reviews per thousand customers did not invite reviews, but closer inspection of the Trustpilot sites reveals that some did – it was perhaps lack of time to accumulate reviews rather than want of trying to get them.<sup>24</sup> Toto Energy with over 1 in ten customers giving reviews certainly invited reviews, as did Solarplicity, albeit not to the extent of getting more reviews than customers.<sup>25</sup> Evidently these high review rates were not sufficient to offset the poor service provided towards the end, and may indeed have exacerbated the low TrustScores.

Some companies like Iresa, Ourpower and Eversmart seem to have exhibited a fall in service and in ratings before default, but others did not. Extra Energy, for example, received about 40 Bad reviews in the year or so after it defaulted, but was getting a broad mix of stars including many Excellent reviews just before that. The general conclusion is that TrustScore is not a good predictor of a company having to exit the market.

### **Appendix Three      Alternative calculations using Trustpilot scores**

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8%, 23%, 31% and 19%. But for the 65 energy supply domains observed on 18 June 2020 (see Table A4.3 in [ ]) the distribution was 6%, 5%, 18%, 29%, 42%.

<sup>24</sup> One reviewer of Ourpower says in January 2019, “I have only been a customer with this energy supplier for about a week, so it is too early for me to give this company an adequate review about my experiences with them”. The next reviewer says, “Stop sending me emails to review you before the switch has even happened”.

<sup>25</sup> The ratio for Solarplicity is based on the number of customers at the very end, but some months earlier it had between 50,000 and 150,000 customers, hence between 50 and 150 reviews per thousand customers.

There are concerns that companies can influence TrustScores by inviting or encouraging customers to give reviews at times when they might be inclined to give favourable reviews - for example, just after they have joined the company. (A five-star Excellent score has been observed for a review saying only “OK so far”.) This prompts the question: Is it possible to use TrustScore data to make alternative rankings of companies that are more reflective of “true” customer views, or at least less vulnerable to timing of invitations? This Appendix briefly reports how the ranking of energy suppliers would be affected if different criteria were used to calculate the TrustScore. Three possible alternative criteria are explored.

Suppose first that five-star Excellent reviews are regarded as devalued, and consider a benchmark ranking based on one to four stars only.

In Table A3a, column 1 lists 26 suppliers and columns 2 to 6 show, for each supplier, the percentage of Trustpilot reviews giving 5 to 1 stars (as of 7 June 2019). Columns 7 and 8 give the average score (adjusting for the previous percentages not always adding to 100) and rank of each supplier on this basis. Note that these averages are not time-discounted as are TrustScores. Columns 9 and 10 repeat this process for reviews giving 1 to 4 stars. The suppliers are listed in this order in Table A3a. Six of the top eight suppliers are Medium size. Then come five Small (or Very Small) suppliers, then a mix of sizes, with the bottom six places held by the six Large suppliers.

**Table A3a TrustScore rankings versus Non-Excellent rankings, 7 June 2019**

| Supplier   | 5*<br>% | 4*<br>% | 3*<br>% | 2*<br>% | 1*<br>% | Average<br>Score<br>(1*-5*) | Rank<br>Ave<br>(1-5) | Average<br>Score<br>(1*-4*) | Rank<br>Ave<br>(1-4) | Rank per<br>TrustScore<br>31 May<br>2019 | TrustScore<br>versus<br>Ave (1-4) |
|------------|---------|---------|---------|---------|---------|-----------------------------|----------------------|-----------------------------|----------------------|--|-----------------------------------|
| So Energy  | 85      | 11      | 2       | 1       | 1       | 95.6                        | 3                    | 88.3                        | 1                    | 4  | -3                                |
| Avro En    | 75      | 20      | 2       | 1       | 3       | 92.3                        | 5                    | 87.5                        | 2                    | 5  | -3                                |
| Engie      | 84      | 11      | 1       | 0       | 4       | 94.2                        | 4                    | 79.7                        | 3                    | 3  | 0                                 |
| Ovo        | 73      | 15      | 4       | 2       | 5       | 90.1                        | 7                    | 77.9                        | 4                    | 7  | -3                                |
| Bulb       | 91      | 6       | 1       | 1       | 2       | 96.2                        | 2                    | 77.5                        | 5                    | 1.5                                      | +3.5                              |
| Green N/W  | 58      | 22      | 8       | 4       | 8       | 83.6                        | 9                    | 76.2                        | 6                    | 8  | -2                                |
| Octopus    | 91      | 5       | 1       | 1       | 2       | 96.4                        | 1                    | 75.0                        | 7                    | 1.5                                      | +5.5                              |
| Shell (FU) | 46      | 25      | 10      | 5       | 13      | 77.4                        | 13                   | 72.2                        | 8                    | 11.5                                     | -3.5                              |
| Tonik En   | 78      | 12      | 2       | 3       | 6       | 90.3                        | 6                    | 71.7                        | 9                    | 6  | +3                                |
| Flow       | 58      | 21      | 5       | 4       | 12      | 81.8                        | 11                   | 70.8                        | 10                   | 13.5                                     | -3.5                              |
| R Hood En  | 65      | 16      | 5       | 3       | 11      | 84.2                        | 8                    | 68.6                        | 11                   | 9  | +2                                |
| iSupply    | 44      | 22      | 10      | 7       | 17      | 73.8                        | 14                   | 66.5                        | 12                   | 11.5                                     | +0.5                              |
| Bristol En | 58      | 18      | 4       | 3       | 17      | 79.4                        | 12                   | 63.7                        | 13                   | 13.5                                     | -0.5                              |
| Utility WH | 66      | 14      | 3       | 3       | 14      | 83.0                        | 10                   | 62.5                        | 14                   | 10                                       | +4                                |
| Co-op En   | 37      | 17      | 9       | 7       | 30      | 64.8                        | 18                   | 55.2                        | 15                   | 16                                       | -1                                |
| Ecotricity | 51      | 12      | 3       | 5       | 28      | 70.7                        | 15                   | 49.5                        | 16                   | 18                                       | -2                                |
| Green Star | 41      | 15      | 3       | 5       | 36      | 64.0                        | 19                   | 48.7                        | 17                   | 19                                       | -2                                |
| Utilita    | 48      | 9       | 6       | 5       | 31      | 67.7                        | 17                   | 46.6                        | 18                   | 17                                       | +1                                |
| Together   | 32      | 10      | 6       | 6       | 46      | 55.2                        | 20                   | 42.6                        | 19                   | 20                                       | -1                                |

|              |    |    |   |   |    |      |    |      |    |    |    |
|--------------|----|----|---|---|----|------|----|------|----|----|----|
| Solarplicity | 25 | 10 | 7 | 7 | 50 | 50.5 | 22 | 42.2 | 20 | 21 | -1 |
| EDF          | 52 | 7  | 3 | 4 | 33 | 68.3 | 16 | 41.5 | 21 | 15 | +6 |
| British Gas  | 31 | 9  | 5 | 6 | 49 | 53.4 | 21 | 40.6 | 22 | 22 | 0  |
| SSE          | 10 | 3  | 2 | 3 | 81 | 31.3 | 23 | 29.5 | 23 | 23 | 0  |
| E.On         | 7  | 2  | 2 | 3 | 87 | 28.1 | 24 | 28.5 | 24 | 24 | 0  |
| nPower       | 3  | 2  | 2 | 3 | 92 | 24.9 | 25 | 28.3 | 25 | 25 | 0  |
| Scot Power   | 2  | 1  | 1 | 2 | 95 | 23.0 | 26 | 26.8 | 26 | 26 | 0  |

Column 11 is the TrustScore ranking as of 31 May 2019. The final column 12 is the difference between these two rankings – in effect, extent to which a supplier has been ‘pulled up or down’ by ranking suppliers according to TrustScores rather than according to the average non-Excellent Trustpilot rating. Interestingly, there is much less difference between these two sets of rankings than between the previous two. Five suppliers (Bulb, Octopus, Tonik, Utility Warehouse and EDF) are ‘pulled up’ by TrustScores, by between 3 and 6 places (median 4 places). Five suppliers (So, Avro, Ovo, Shell and Flow) are ‘pulled down’ by 3 to 3.5 places (median 3 places). Five of the six Large energy suppliers are at the bottom of both rankings, neither pulled up or down.

These calculations are not at all definitive, but they suggest that suppliers can indeed influence their rankings upwards by encouraging customers to give reviews when they are likely to be favourable. Medium suppliers have generally benefited from this (Bulb and Octopus, also Tonik, are ‘pulled up’ significantly in both calculations). Most of the Large suppliers have not benefited in this way, and have been significantly ‘pulled down’ on one of the calculations.

Suppose, second, that the criterion is the number and frequency of Trustpilot one-star Bad reviews.

The first column of Table A3b lists the 26 suppliers discussed above, the second column lists the number of days that it has taken for that supplier to attract its 20 most recent One-star (Bad) Trustpilot reviews (as of 5 June 2019). This ranges from one day for Solarplicity to 269 days for Engie, with a median of 21 days, but needs to be standardised for number of customers.

**Table A3b TrustScore rankings versus Bad Review rankings, 5 June 2019**

| Supplier          | Days to reach last 20 1* reviews | Number of non-PPM customer accounts excl SVT3+ | Standardised Days per 1m customers | Rank per standardised 1* star reviews | Rank per TrustScore 31 May 2019 | Advantage TrustScore versus 1* reviews |
|-------------------|----------------------------------|--|------------------------------------|---------------------------------------|---------------------------------|--|
| Engie             | 269                              | 150  | 40.4                               | 1.0                                   | 3.0                             | -2.0                                   |
| SSE               | 25                               | 1597   | 39.9                               | 2.0                                   | 23.0                            | -21.0                                  |
| EDF               | 19                               | 1956   | 37.2                               | 3.0                                   | 15.0                            | -12.0                                  |
| So Energy         | 153                              | 150  | 23.0                               | 4.0                                   | 4.0                             | 0.0                                    |
| Robin Hood Energy | 138                              | 150  | 20.7                               | 5.0                                   | 9.0                             | -4.0                                   |
| British Gas       | 5                                | 3337   | 16.7                               | 6.0                                   | 22.0                            | -16.0                                  |

|                        |    |      |      |      |      |       |
|------------------------|----|------|------|------|------|-------|
| E.On Energy            | 6  | 2114 | 12.7 | 7.0  | 24.0 | -17.0 |
| nPower                 | 8  | 1504 | 12.0 | 8.0  | 25.0 | -17.0 |
| Scottish Power         | 6  | 1975 | 11.9 | 9.0  | 26.0 | -17.0 |
| Co-op Energy           | 32 | 340  | 10.9 | 10.0 | 16.0 | -6.0  |
| Octopus Energy         | 24 | 449  | 10.8 | 11.0 | 1.5  | 9.5   |
| Tonik Energy           | 69 | 150  | 10.4 | 12.0 | 6.0  | 6.0   |
| Bristol Energy         | 68 | 150  | 10.2 | 13.0 | 13.5 | -0.5  |
| Utility Warehouse      | 21 | 362  | 7.6  | 14.0 | 10.0 | 4.0   |
| Bulb                   | 8  | 845  | 6.8  | 15.0 | 1.5  | 13.5  |
| Ovo                    | 8  | 832  | 6.7  | 16.0 | 7.0  | 9.0   |
| Avro                   | 32 | 200  | 6.4  | 17.0 | 5.0  | 12.0  |
| Green Network Energy   | 22 | 200  | 4.4  | 18.0 | 8.0  | 10.0  |
| Ecotricity             | 41 | 100  | 4.1  | 19.0 | 18.0 | 1.0   |
| Shell (First Utility ) | 6  | 678  | 4.1  | 20.0 | 11.5 | 8.5   |
| Flow                   | 33 | 100  | 3.3  | 21.0 | 13.5 | 7.5   |
| Utilita                | 7  | 450  | 3.2  | 22.0 | 17.0 | 5.0   |
| iSupply                | 21 | 150  | 3.2  | 23.0 | 11.5 | 11.5  |
| Green Star Energy      | 2  | 222  | 0.4  | 24.0 | 19.0 | 5.0   |
| Together Energy        | 2  | 150  | 0.3  | 25.0 | 20.0 | 5.0   |
| Solarplicity           | 1  | 100  | 0.1  | 26.0 | 21.0 | 5.0   |

Column 3 lists the estimated number of customer accounts of that supplier as of December 2018. For the Large and Medium suppliers these data are taken from Ofgem tables<sup>26</sup>, plus the author's own rough estimates for the small and very small suppliers. The Ofgem estimates exclude PPM customers subject to the tariff cap, but most complaints in reviews of most suppliers seem not to relate particularly to PPM. The Table excludes exclude customers who have been on SVTs for more than three years (with the six Large suppliers and also Utility Warehouse), on the grounds that such customers are unlikely to be the source of many serious complaints. It is possible that, since December 2018, the Large suppliers have slightly fewer customers and some of the Medium and Small suppliers have more (particularly Ovo).

Column 4 standardises the time to attract 20 Bad reviews to that of the same supplier with a hypothetical 1 million such customers. The range is now 0.1 days for standardised Solarplicity to 40 days for standardised Engie, with a median of about 9 days.

Column 5 ranks the suppliers on this standardised basis. Column 6 ranks the suppliers on the basis of TrustScores on 31 May 2019. The final Column 7 is the difference between these two rankings. In effect, it indicates the extent to which a supplier has been 'pulled up or down' by ranking suppliers according to TrustScores rather than according to standardised Bad scores.

Table A3b suggests that the six Large energy suppliers have been pulled down – relative to a standardised Bad score benchmark - by between 12 and 21 places (median 17 places) as a result of this ranking. SSE has been particularly disadvantaged. In contrast, five Medium suppliers and

<sup>26</sup> <https://www.ofgem.gov.uk/data-portal/number-non-price-protected-domestic-customer-accounts-supplier-standard-variable-fixed-and-other-tariffs-gb>

two Small suppliers have been pulled up by between 8.5 and 13.5 places (median 10 places). The remaining 13 suppliers have been pulled up slightly on average (range from down 6 places to up 7.5 places, median up 4 places). Interestingly, Engie, a supplier that put particular effort into inviting reviews, is nonetheless still pulled down slightly by the TrustScore process.

Suppose, third, that one-star reviews should also be excluded, as well as five-star ones, on the grounds that many of them reflect an intemperate response.

An analogous calculation suggests that Engie, Avro Energy and So Energy would come top of such a non-extreme ranking, while the Large suppliers would take up six of the bottom nine positions, along with Utilita, Together Energy and Solarplicity. Tonik Energy and Octopus Energy would be ‘pulled up’ by TrustScores relative to this benchmark, and Bristol Energy, Flow and Green Star Energy would be ‘pulled down’.

#### **Appendix Four Trustpilot reviews of energy consultants and switching sites**

Table A4 shows 33 energy advisory organisations with more than 30 reviews each in June 2019. In the first group (a) – those advising residential customers - are six Price Comparison Websites accredited by Ofgem,<sup>27</sup> plus four automatic energy switching services<sup>28</sup> (other accredited PCWs and other autoswitching services either did not have Trustpilot pages or had few reviews), plus one company (Split The Bills) that provides a bill management service. The second group (b) comprises 22 companies believed to be energy consultancies advising business customers.

Table A4 is notable insofar as all these organisations had (unadjusted) TrustScores of 7.0 out of 10 (Good) or better. Nearly two-thirds of these organisations scored 9 or more (Excellent). This compares to 20% of energy suppliers, 15% of mobile phone providers, 10% of banks, and none of the supermarkets. Possibly a distinguishing feature of Table A3 is that this is a new market, and none of the companies is an incumbent from an earlier era. They are probably all relatively newly established, and they and their customers are very familiar with online communication.

Nonetheless, the pattern of Trustpilot usage and attitude to reviews is remarkably mixed. All of them have claimed their Trustpilot sites but whereas nearly three-quarters of these advisory organisations collect (invite) reviews, over a quarter do not. Just over half subscribe to Trustpilot, nearly half do not. One third of them routinely respond to reviews, over one third do not, and a quarter of them respond only to some reviews. Only 8 of these organisations have more than 1000 reviews. Two of the organisations acknowledge providing incentives to give reviews, indicated by an (I), but (at 714 and 79 reviews) they do not have the largest numbers of reviews, nor (at 9.5 and 8.6) anything like the best scores in this category. There are no obvious determinants of the levels of TrustScores in Table A4, and regression analysis using dummy variables does not reveal any.

#### **Table A4 Trustpilot reviews of other energy advisory organisations, 1 June 2019**

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<sup>27</sup> Uswitch, Energylinx, Energyhelpline, SimplySwitch, Quotezone, Moneysupermarket.

<sup>28</sup> Migrate, Flipper, Lookaftermybills, Switchd.

| Organisation                       | TrustScore    | Number of reviews | Use of Trustpilot | Subscribes? | Responds to reviews? |
|------------------------------------|---------------|-------------------|-------------------|-------------|----------------------|
| (a) Advising residential customers |               |                   |                   |             |                      |
| Uswitch                            | 9.4 Excellent | 3520              | Collects          | Yes         | Yes                  |
| Energylinx                         | 9.2 Excellent | 260               | Collects          | Yes         | Yes                  |
| Migrate                            | 9.2 Excellent | 119               | Collects          | No          | No                   |
| Flipper                            | 9.0 Excellent | 2588              | Collects          | Yes         | Yes                  |
| Energyhelpline                     | 9.0 Excellent | 2458              | Collects          | Yes         | Yes                  |
| Lookaftermybills                   | 9.0 Excellent | 2141              | Claimed           | Yes         | Some                 |
| Quotezone                          | 8.9 Great     | 213               | Claimed           | No          | No                   |
| Switchd                            | 8.9 Great     | 72                | Collects          | No          | Some                 |
| SimplySwitch                       | 8.7 Great     | 4184              | Collects          | Yes         | Some                 |
| Money Supermarket                  | 8.6 Great     | 568               | Collects          | Yes         | Yes                  |
| Split The Bills                    | 7.1 Good      | 1839              | Collects          | Yes         | Some                 |
| (b) Advising business customers    |               |                   |                   |             |                      |
| Switch My Business                 | 9.8 Excellent | 1629              | Collects          | Yes         | Some (few)           |
| Energy Advice Line                 | 9.8 Excellent | 697               | Collects          | Yes         | Yes                  |
| UCR Consultants                    | 9.8 Excellent | 107               | Collects          | No          | Yes                  |
| Utility Bidder                     | 9.7 Excellent | 858               | Collects          | Yes         | Some (few)           |
| BEC Consultants                    | 9.7 Excellent | 118               | Collects          | No          | Yes                  |
| Energy Pig                         | 9.6 Excellent | 117               | Collects          | No          | Yes                  |
| Guild Energy                       | 9.6 Excellent | 83                | Collects          | Yes         | No                   |
| EDJ services                       | 9.6 Excellent | 56                | Collects          | No          | No                   |
| Moneypug                           | 9.5 Excellent | 714 (I)           | Claimed           | No          | No                   |
| Can Solutions Ltd                  | 9.4 Excellent | 153               | Collects          | Yes         | Yes                  |
| Love Energy Savings                | 9.3 Excellent | 8970              | Collects          | Yes         | Some                 |
| BAS Energy                         | 9.2 Excellent | 196               | Claimed           | Yes         | Some                 |
| Smarter Business                   | 9.1 Excellent | 111               | Claimed           | Yes         | Some                 |
| The EPC Man                        | 9.0 Excellent | 82                | Collects          | No          | Some                 |
| Homeshift                          | 8.9 Great     | 252               | Collects          | No          | Some                 |
| A&M Energy Solutions               | 8.8 Great     | 112               | Collects          | Yes         | Yes                  |
| Energy Price Finder                | 8.6 Great     | 578               | Claimed           | No          | No                   |
| Quotemyenergy                      | 8.6 Great     | 79 (I)            | Claimed           | No          | No                   |
| ICE Comms                          | 8.5 Great     | 596               | Collects          | No          | Some                 |
| Watt Utilities                     | 8.4 Great     | 201               | Claimed           | Yes         | No                   |
| Utility Hive                       | 8.3 Great     | 58                | Claimed           | No          | Some                 |
| Free Price Compare                 | 7.1 Good      | 84                | Collects          | No          | Some                 |

## Appendix Five Trustpilot reviews of charitable and regulatory organisations

Table A5 shows the (original and adjusted) TrustScores for (a) five charitable and regulatory organisations that advise energy customers or regulate energy suppliers, and (b) four other Ombudsman services, as of 1 June 2019 (and on the right updated to 3 July 2020).

In 2019, all these organisations had very low (unadjusted) TrustScores, ranging from 2.4 down to 0.9 out of 10. (The arrows go from the original TrustScores to the adjusted TrustScores.) All were classified as Bad. Six claimed their Trustpilot site, three did not. None subscribed to Trustpilot. Three responded to some reviews, six did not.

**Table A5 Trustpilot reviews of charitable and regulatory organisations**

| Organisation                             | 1 June 2019 |     |           |          |          | 3 July 2020 |      |     |          |
|--|-------------|-----|-----------|----------|----------|-------------|------|-----|----------|
|  | Trust Score |     | # reviews | Claimed? | Replies? | Trust Score |      | #   | Replies? |
| Citizens Advice                          | 2.4 →2.0    | Bad | 43        | No       | No       | 2.1         | Poor | 99  | No       |
| Which?                                   | 1.7 →1.7    | Bad | 138       | Yes      | Yes      | 2           | Poor | 244 | 98%      |
| Ofgem                                    | 1.6 →1.6    | Bad | 31        | No       | No       | 1.4         | Bad  | 49  | No       |
| Age UK                                   | 1.4 →1.6    | Bad | 36        | Yes      | No       | 1.4         | Bad  | 74  | 100%     |
| Ombudsman Services:Energy                | 1.1 →1.4    | Bad | 374       | Yes      | Yes      | 1.6         | Bad  | 589 | 76%      |
| Ofcom                                    |             |     | 7         | No       | No       | 1.9         | Poor | 20  | No       |
|  |             |     |           |          |          |             |      |     |          |
| Legal Ombudsman                          | 1.3 →1.5    | Bad | 49        | No       | No       | 1.3         | Bad  | 107 | No       |
| Parliamentary & Health Service Ombudsman | 1.2 →1.5    | Bad | 45        | Yes      | No       | 1.3         | Bad  | 106 | No       |
| Financial Ombudsman                      | 0.9 →1.4    | Bad | 322       | Yes      | No       | 1.4         | Bad  | 579 | No       |
| The Motor Ombudsman                      | 0.9 →1.4    | Bad | 160       | Yes      | Some     | 1.5         | Bad  | 248 | 55%      |

Citizens Advice had a TrustScore of 2.4. Eight of 43 reviewers scored it Excellent but 27 (nearly two thirds) gave only 1 star (Bad). The reviews seem to reflect experience locally in the “network of 316 independent charities throughout the United Kingdom” rather than experience of Head Office. The main complaints seem to be about failure to answer the phone and/or call waiting times, lack of qualifications of many staff (though some are deemed excellent), and lack of assistance or support for the complainant.<sup>29</sup> The Citizens Advice Trustpilot site was unclaimed, hence there was no response to any of these reviews.

Which? had a TrustScore of 1.7 based on 138 reviews (8% rated it Excellent, 64% Bad). Which? had been responding to reviews since mid-2018. Of the 80 reviews since that time, over half related to subscriptions to Which?, including as to marketing tactics and particularly complaints about the difficulty in unsubscribing from Which?

<sup>29</sup> There is also a very cogent review by a volunteer adviser for the organisation acknowledging that there are good and bad advisers, and supervisors, but suggesting that “... the real weakness of the CA is its business model. How can any organisation deliver excellent service when each of its offices are independent organisations? There is no central strategy for innovation, standards, training protocols, management style expectations, learning programmes etc etc. Like many charities, business wise it is in the dark ages. So think of us highly motivated and thoroughly committed volunteers - it isn't us who are the problem but the way CA is organised and some of us have little choice about this, despite a hugely costly centralised executive team. Here is where real change must lie.” Trustpilot review of Citizens Advice by cilly filly, 5 February 2019.

Age UK (the country's largest charity working with older people) had a TrustScore of 1.4 based on 36 reviews (2 rated it Excellent, 31 rated it Bad). It has not offered an energy product since 2016, when its two year fixed price tariff with E.On was found to be somewhat out of the market, but it still offers advice on getting the best energy deal. Several Trustpilot reviews imply a lack of customer service, while nearly a half related to excessive charges for its insurance policies. Age UK had claimed its Trustpilot site, but had not responded to any of the reviews.<sup>30</sup>

Ombudsman Services, which handles unresolved energy and communications complaints, had a TrustScore of 1.1 (based on 22 Excellent reviews and 333 Bad). The comparably low scores for four other Ombudsman organisations suggest that this is a thankless task. Ombudsman Services responded very courteously to all reviews, and was quite active in flagging inappropriate reviews (12 out of 97 since 1 January 2019). The Motor Ombudsman was also active, flagging 20 out of 138 reviews, and also responded to some reviews. There must be many users who have had satisfactory outcomes from all these Ombudsman services whose voices are simply not heard, but apparently these organisations made no attempt to invite these users to provide reviews.

Ofgem, too, has a Trustpilot site.<sup>31</sup> 31 reviews of Ofgem yielded 1 Excellent rating, 1 Average, 2 Poor and 27 Bad, and a TrustScore of 1.6. In June 2019 this was higher than four of the Large suppliers (SSE, E.On, Scottish Power and nPower) and the Ombudsman services, but lower than almost all the other energy suppliers, all the PCWs, Citizens Advice and Which? Ofgem has not claimed its Trustpilot website and hence has not sought to explain itself to these aggrieved customers.

About half the reviewers complained about Ofgem's lack of action and failure to keep prices down. No doubt some of these comments are unreasonable or uninformed, and reflect a lack of understanding of Ofgem's precise duties and the limits of its powers. Nonetheless, many reviewers hold Ofgem responsible for inadequate measures to prevent energy price increases.

Over a quarter of the reviewers in 2019 had another sore point: they complained about Ofgem's supplier of last resort policy, particularly transferring customers of Oneselect (in December 2018) to another supplier (Together Energy) whose customer service they did not regard as adequate. There seems some substance in this.<sup>32</sup>

The right-hand side of Table A5 gives some updated TrustScores and number of reviews from 3 July 2020. Which? shows the most significant improvement, and is now Poor rather than Bad.

The extent of the gap in TrustScores between these non-commercial organisations and the commercial ones seems remarkable. It is perhaps not surprising to those used to dealing with

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<sup>30</sup> Its performance stood in contrast to that of its onetime trading company Age UK Mobility Aids, which from November 2014 to January 2017 attracted 133 reviews of which 85% were Excellent. A third age-related company is the commercial financial adviser Age Partnership, which in June 2019 had 4877 reviews of which 90% were Excellent. (These latter two companies are not shown here.)

<sup>31</sup> Surprisingly, there are no Trustpilot sites for Ofwat or the Office of Rail and Road. Ofcom had only 7 reviews (1 Excellent and 6 Bad) as at June 2019.

<sup>32</sup> Which?, Citizens Advice and Trustpilot all ranked Together Energy about seventh from bottom of the 26 suppliers studied in this paper. Its TrustScore had fallen from 5.4 to 4.4 from February to June 2019 (the biggest fall of any supplier in that time), and its Trustpilot site included complaints about this transfer.

customers on Trustpilot. None of these non-commercial organisations has yet invited customer reviews as a means of improving its understanding of what customers want, its ability to respond to them, or its quality of service as perceived by other customers.

It might be argued that the users of these non-commercial services do not see Trustpilot as the place to comment on these services, and that the providers of these services do not see Trustpilot as the place to respond. But the corollary is that these non-commercial services are no longer seeking to appeal to those customers that use the internet. This might be a tenable line for Citizens Advice and Age UK, but is it a tenable line for Which? and Ofgem?