

Energy Coordination Act 1994

Gas Trading Licence Performance Reporting Handbook

May 2014

Economic Regulation Authority



WESTERN AUSTRALIA

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1 Background

The Economic Regulation Authority (**Authority**) is responsible for administering the gas licensing scheme under the *Energy Coordination Act 1994 (Act)*. A business licensed by the Authority is required to comply with a range of obligations prescribed by the Act and its associated regulations and codes.

Under section 11M of the Act, the Authority may determine licence terms and conditions, including requiring a licensee to provide to the Authority specified information in relation to the licence. Clause 16.1 of gas trading licences states:

The licensee must provide to the Authority any information that the Authority may require in connection with its functions under the Act in the time, manner and form specified by the Authority.

Prior to 2014, the specification of the performance data to be provided by gas trading licensees was specified in section 16.1 of the Gas Compliance Reporting Manual (**Manual**). The Authority has decided to remove the indicators from the Manual and use this Handbook as the sole source of information about retailer's performance reporting obligations.

2 Purpose of this Handbook

This document has been developed to inform licensees about the non-financial performance data that is to be provided to the Authority for the year ending 30 June 2014.

It is important that there is a shared understanding amongst all stakeholders of the information that is to be reported by gas trading licensees, including the definitions to be applied to the performance indicators and the Authority's expectations as to the manner in which the information should be presented. Consistent with this objective, the Authority has issued this guide to inform gas trading licensees about:

- the performance indicators that licensees are required to report against;
- the definitions to be applied to the performance indicators in the performance reports;
- how to calculate the performance data (where applicable); and
- how and when the data is to be provided to the Authority.

Where reference is made to other documents within this Handbook, the Authority recommends that the licensee familiarises themselves with these documents in order to obtain a fuller understanding of the reporting context. Of particular interest are the Gas Compendium¹ and the **2007 SCONRRR Report**,² which have been incorporated into the regulatory reporting framework developed by the Authority for gas trading licensees.

¹ Compendium of Gas Customer Licence Obligations, which is available on the Authority's website: <http://www.erawa.com.au/licensing/gas-licensing/compendium/>

² National Energy Retail Performance Indicators, Utility Regulators Forum, Steering Committee on National Regulatory Reporting Requirements – Retail Working Group, May 2007. A copy can be obtained on the Authority's website: <http://www.erawa.com.au/licensing/gas-licensing/regulatory-guidelines/>

3 Performance Reporting Tools

The Authority has issued a Microsoft Excel workbook called the Performance Reporting Datasheet – Gas Trading Licensees (**Retail Datasheet**). It is mandatory for licensees to annually provide a completed Retail Datasheet to the Authority. The Retail Datasheet can be found on the Authority’s website.³

The Retail Datasheet has six sections:

- Customers and Customer Information;
- Affordability;
- Disconnections for Non-Payment;
- Reconnections;
- Complaints; and
- Call Centre Performance.

4 Completing the Retail Datasheet

The Retail Datasheet contains a series of tables in the format shown in Table 1 below.⁴

Table 1: Example datasheet format

| Indicator No. | Reference | Description | Basis of Reporting | | Comments |
|---------------|---------------------------|---|--------------------|------------|----------|
| | | | Number | Percentage | |
| R 1 | Compendium clause 13.6(a) | Total number of residential customer accounts | | | |

When completing the tables in the Retail Datasheet it is important that the structure of the data entry cells is not modified by inserting, deleting or re-ordering rows/columns. A number of cells contain values that are calculated from data that has been entered into other cells. These cells have been shaded yellow for identification purposes.

Only enter data into the cells that are not shaded grey or yellow.

If it is necessary to add a comment in relation to an indicator, add the comment in the space provided.

Referring to the example in Table 1:

- The No. column contains the unique reference number for the indicator. In this case the indicator is in the Customers table.
- The reference column identifies the document from which the indicator has been derived, if applicable. In this case, it is the Gas Compendium.
- The description provides a short form explanation of what the indicator is intended to measure.

³ <http://www.erawa.com.au/licensing/gas-licensing/regulatory-guidelines/>

⁴ Note that the Compensation Payments worksheet replaces the Percentage column with a Value (\$) column to report dollar amounts paid in compensation.

- The basis of reporting offers 2 options:
 - Number (this is used to enter any numerical value).
 - Percentage (in most cases, this is automatically generated from numerical data entered into other cells)
- The data entry cells have been formatted to align with the required degree of accuracy, (i.e. number of decimal places) appropriate for each indicator.

If it is not possible to provide the required data for an indicator then the cell should be left blank and a comment added in the “Comments” cell to explain why the data cannot be provided.

The “Comments” cell should also be used to add explanatory notes where there has been significant change in values from previous reporting periods, or where the licensee feels that additional context to the data provided is necessary.

5 Submission of Completed Datasheets to the Authority

The Authority requires the following licensees to lodge a completed Retail Datasheet:

- Alinta Sales Pty Ltd
- Electricity Generation and Retail Corporation (t/a Synergy)
- Esperance Gas Distribution Company⁵
- Perth Energy Pty Ltd
- Wesfarmers Kleenheat Gas Pty Ltd

It is mandatory for licensees to provide a completed Retail Datasheet to the Authority by 30 September for the year ending 30 June.

The completed Datasheet is to be provided to the Authority electronically by email at: records@erawa.com.au

The document can also be submitted on a USB memory stick or CD-ROM:

By post at: PO Box 8469, PERTH BC WA 6849

By hand at: Level 4, Albert Facey House, 469 Wellington Street, PERTH WA 6000

It is important to note that compliance with clause 16.1 of the licence will not be achieved until an electronic copy of the Retail Datasheet has been received by the Authority.

⁵ The licence held by WorleyParsons Asset Management Pty Ltd was transferred to Esperance Gas Distribution Company (EGDC) on 14 March 2014. EGDC is required to provide performance data for the whole of the 2013/14 reporting year.

6 Customers and Customer Information

Purpose

To report on the number of small use customers that are supplied by a retailer. The number of customers is also used as a normaliser for other performance indicators.

Reported Indicators

| No. | Indicator |
|-----|--|
| R 1 | Total number of residential customer accounts |
| R 2 | Total number of residential customer accounts covered by the Gas Moratorium (Alinta Sales only) ⁶ |
| R 3 | Total number of business customer accounts |
| R 4 | Total number of business customer accounts covered by the Gas Moratorium (Alinta Sales only) ⁷ |

Definitions

Customer means a small use customer account.⁸

Small use customer means a customer who consumes less than 1 terajoule of gas per annum.

Business customer means a small use customer who is not a residential customer.

Residential customer means a small use customer who receives a domestic/residential tariff.

Notes:

Accounts that are supplied on a combined residential/non-residential tariff are deemed to be non-residential accounts.

The total number of customers in any of the categories in the above table is the number of active accounts on 30 June.

The customers in R2 are a sub-set of the total residential customers in R1; similarly, R4 is a sub-set of R3.

⁶ This indicator is only applicable to Alinta Sales for the gas supply areas that are subject to the 2007 Gas Market Moratorium

⁷ This indicator is only applicable to Alinta Sales for the gas supply areas that are subject to the 2007 Gas Market Moratorium

⁸ A customer account may include billing for more than one supply address. This means that, for some retailers, the number of accounts may be less than the number of supply addresses.

7 Affordability

Purpose

To report on the proportion of the retailer's customers who:

- received bills outside of the timeframes prescribed in the Compendium;
- have entered into an instalment payment arrangement to pay account arrears and continued usage;
- have been granted more time to pay a bill; or
- have had a direct debit plan/facility terminated as a result of payment defaults.

Reported Indicators

| No. | Indicator |
|------|---|
| R 5 | Total number of residential customer accounts that have been issued with a bill outside the prescribed timeframes and where the delay is due to the retailer |
| R 6 | Percentage of residential customer accounts that have been issued with a bill outside the prescribed timeframes and where the delay is due to the retailer |
| R 7 | Total number of residential customer accounts that have been issued with a bill outside the prescribed timeframes and where the delay is due to the retailer not receiving the billing data from the distributor |
| R 8 | Percentage of residential customer accounts that have been issued with a bill outside the prescribed timeframes prescribed and where the delay is due to the retailer not receiving the billing data from the distributor |
| R 9 | Total number of residential customer accounts that are subject to an instalment plan |
| R 10 | Percentage of residential customer accounts that are subject to an instalment plan |
| R 11 | Total number of residential customer accounts that have been granted additional time to pay a bill |
| R 12 | Percentage of residential customer accounts that have been granted additional time to pay a bill |
| R 13 | Total number of residential customer accounts that have been placed on a shortened billing cycle |
| R 14 | Percentage of residential customer accounts that have been placed on a shortened billing cycle |
| R 15 | Total number of business customer accounts that have been issued with a bill outside the prescribed timeframes |
| R 16 | Percentage of business customer accounts that have been issued with a bill outside the prescribed timeframes |
| R 17 | Total number of business customer accounts that are subject to an instalment plan |
| R 18 | Percentage of business customer accounts that are subject to an instalment plan |
| R 19 | Total number of business customer accounts that have been granted additional time to pay a bill |
| R 20 | Percentage of business customer accounts that have been granted additional time to pay a bill |
| R 21 | Total number of business customer accounts that have been placed on a shortened billing cycle |
| R 22 | Percentage of business customer accounts that have been placed on a shortened billing cycle |
| R 23 | Total number of residential customer accounts that have lodged security deposits in relation to the residential customer account |
| R 24 | Percentage of residential customer accounts that have lodged security deposits in relation to the residential customer account |

| No. | Indicator |
|------|---|
| R 25 | Total number of business customer accounts that have lodged security deposits |
| R 26 | Percentage of business customer accounts that have lodged security deposits |
| R 27 | Total number of residential customer accounts that have had direct debit plans terminated |
| R 28 | Percentage of residential customer accounts that have had direct debit plans terminated |
| R 29 | Total number of business customer accounts that have had direct debit plans terminated |
| R 30 | Percentage of business customer accounts that have had direct debit plans terminated |

Definitions

Direct debit plan termination means a direct debit plan terminated as a result of a default or non payment in 2 or more successive payment periods. The retailer should include terminations due to administrative oversight and mismanagement by the customer resulting in non-payment, and the termination of Centrepay payments.

Instalment plan means an arrangement between a retailer and a customer for the customer to pay arrears or in advance and continued usage on their account according to an agreed payment schedule (generally involving payment of at least 3 instalments) taking into account their capacity to pay. It does not include customers using a payment plan as a matter of convenience or for flexible budgeting purposes.

Shortened billing cycle means a billing period that is shorter than the regular recurrent period in which a **customer account** of that type is billed by the retailer.

Security deposit means the lodgement of a refundable advance by a customer to secure connection or reconnection to supply.

Notes:

Each of the affordability indicators are measured on a per customer basis. This means that if a customer satisfies an indicator criterion (e.g. being placed on an instalment plan) more than once during a reporting year then the customer is only counted once.

The percentage values in the above table are calculated by taking the total number of customers who meet each of the criteria and dividing them by the total number of customers in the relevant category (residential or business) expressed as a percentage. For example:

$$R12 = 100 \times R11 / R1$$

The terms budget instalment plan, instalment payment plan and instalment plan all have the same meaning for the purposes of interpreting the definitions in this handbook.

The reader is referred to the notes on page 47 of the 2007 SCNRRR Report for further definitional information related to instalment payment plans and direct debit terminations.

8 Disconnections for Non-Payment

Purpose

To report on:

- the proportion of the retailer's customers who have been disconnected for failure to pay a bill; and
- the proportion of the total disconnections that involve specific groups such as instalment plan customers and customers who are in receipt of a concession.

Reported Indicators

| No. | Indicator |
|------|--|
| R 31 | Total number of residential customer accounts disconnected for failure to pay a bill |
| R 32 | Percentage of residential customer accounts disconnected for failure to pay a bill |
| R 33 | Total number of business customer accounts disconnected for failure to pay a bill |
| R 34 | Percentage of business customer accounts disconnected for failure to pay a bill |
| R 35 | Total number of residential customer accounts disconnected that were previously the subject of an instalment payment plan |
| R 36 | Percentage of residential customer accounts disconnected that were previously the subject of an instalment payment plan |
| R 37 | Total number of residential customer accounts disconnected at the same supply address at least 1 other occasion during this or the previous reporting year |
| R 38 | Percentage of residential customer accounts disconnected at the same supply address at least 1 other occasion during this or the previous reporting year |
| R 39 | Total number of residential customer accounts disconnected while receiving a concession |
| R 40 | Percentage of residential customer accounts disconnected while receiving a concession |

Definitions

Concession means a concession, rebate, subsidy or grant related to the supply of electricity available to residential customers only.

Disconnection for failure to pay means a customer whose supply was disconnected for failure to pay a bill.

Disconnection of a customer account that was previously the subject of an instalment plan means the **disconnection** of a residential customer who is, or who was within the **reporting year**, or the **previous reporting year**, on an **instalment plan**.

Disconnection of a customer receiving a concession means the **disconnection** of a residential customer who was receiving a **concession** at the time of disconnection.

Previous reporting year means the **reporting year** immediately preceding the **reporting year** covered by the performance report, i.e. 2011/12 for the performance report covering the 2012/13 **reporting year**.

Reporting year means a year commencing on 1 July and ending on 30 June.

Notes:

While the definitions in the above table refer to percentages, the actual measure is the number of disconnections per 100 customers, which is then converted to an equivalent percentage.

If a customer account is the subject of more than one disconnection during the reporting period then each disconnection should be reported separately. The purpose of the indicators is to measure the number of disconnection events rather than the number of customer accounts that have been disconnected.

It is possible for a customer disconnection to count towards more than one disconnection indicator, e.g., a customer who has been disconnected within the previous 24 months, and who was receiving a concession at the time of disconnection.

The reader is referred to the notes on pages 48 and 49 of the 2007 SCONRRR Report for further definitional information related to disconnections and reconnections.

Worked example

As at 30 June 2013, Retailer A has 100,000 residential customers, 5,000 business customers and 500 pre-payment meter customers.

During the 2012/13 reporting year the disconnections for failure to pay a bill involved:

- 500 residential disconnections involving 400 residential customers.
- 40 business customer disconnections involving 35 business customers.

Calculation of disconnection indicators:

- $R32 = 100 \times 500 / 100,000 = 0.5\%$
- $R34 = 100 \times 40 / 5,000 = 0.8\%$

Additional residential disconnection indicators:

Of the 500 residential customer disconnections in 2012/13:

- 180 disconnections involved customers who were on instalment plans at the time they were disconnected;
- 150 disconnections involved customers who had been disconnected on at least one other occasion during 2011/12 or 2012/13; and
- 275 disconnections involved customers who were receiving a concession when they were disconnected.

This gives the following values for the additional residential disconnection indicators:

- $R36 = 180 / 500 = 36.0\%$
- $R38 = 150 / 500 = 30.0\%$
- $R40 = 275 / 500 = 55.0\%$

9 Reconnections

Purpose

To report on:

- the proportion of the retailer's customers who have been reconnected within 7 days after being disconnected for failure to pay a bill;
- the proportion of the retailer's customers who have been reconnected after being disconnected for failure to pay a bill (including those who were reconnected within 7 days);
- the proportion of the total disconnections that involve specific groups of residential customers, such as instalment plan customers and customers who are in receipt of a concession; and
- the proportion of customers who were not reconnected within the prescribed timeframes.

Reported Indicators

| No. | Indicator |
|------|---|
| R 41 | Total number of residential customer accounts that the retailer has requested to be reconnected at the same supply address and in the same name within 7 days of requesting the customer account to be disconnected |
| R 42 | Percentage of residential customer accounts that the retailer has requested to be reconnected at the same supply address and in the same name within 7 days of requesting the customer account to be disconnected |
| R 43 | Total number of business customer accounts that the retailer has requested to be reconnected at the same supply address and in the same name within 7 days of requesting the customer account to be disconnected |
| R 44 | Percentage of business customer accounts that the retailer has requested to be reconnected at the same supply address and in the same name within 7 days of requesting the customer account to be disconnected |
| R 45 | Total number of residential customer accounts reconnected that were previously subject of an instalment payment plan |
| R 46 | Percentage of residential customer accounts reconnected that were previously subject of an instalment payment plan |
| R 47 | Total number of residential customer accounts that were reconnected on at least 1 other occasion during this or the previous reporting year |
| R 48 | Percentage of residential customer accounts that were reconnected on at least 1 other occasion during this or the previous reporting year |
| R 49 | Total number of residential customers who have been reconnected and who, immediately prior to disconnection, were receiving a concession |
| R 50 | Percentage of residential customers who have been reconnected and who, immediately prior to disconnection, were receiving a concession |
| R 51 | Total number of residential customer accounts that the retailer has requested to be reconnected at the same supply address and in the same name after previously requesting the customer account be disconnected |
| R 52 | Total number of residential customer accounts that the retailer has requested to be reconnected that were not reconnected within the prescribed timeframe |
| R 53 | Percentage of residential customer accounts that the retailer has requested to be reconnected that were not reconnected within the prescribed timeframe |
| R 54 | Total number of residential customer accounts that the retailer has requested to be reconnected at the same supply address and in the same name after previously requesting the customer account be disconnected |

| | |
|------|--|
| R 55 | Total number of business customer accounts that the retailer has requested to be reconnected that were not reconnected within the prescribed timeframe |
| R 56 | Percentage of business customer accounts that the retailer has requested to be reconnected that were not reconnected within the prescribed timeframe |

Reconnection means the restoration of supply at the same supply address and in the same name.

Reconnection of a customer previously on an instalment plan means the reconnection of a residential customer who is included in indicator R35.

Reconnection of a customer that has been reconnected on at least 1 other occasion means the reconnection of a customer who is included in indicator R37.

Reconnection of a customer that is the subject of a concession means the reconnection of a customer who is included in indicator R39.

Reconnection within the prescribed timeframe means the reconnection occurred within the applicable time period specified in Part 8 of the Compendium.

Notes:

The reader is referred to the notes on pages 48 and 49 of the 2007 SCORRRR Report for further definitional information related to disconnections and reconnections.

Worked example

This example continues the worked example from the previous section involving Retailer A:

Number of residential customer reconnections within 7 days = 250

Number of residential customer reconnections (R51) = 420 (10 were late)

Number of business customer reconnections within 7 days = 15

Number of business customer reconnections (R54) = 30 (0 were late)

Number of customer reconnections involving customers on instalment plans = 60

Number of customer reconnections involving customers previously disconnected = 30

Number of customer reconnections involving customers on concessions = 125

Calculation of reconnection indicators:

- $R42 = 100 \times 250 / 500 = 50.0\%$
- $R44 = 100 \times 15 / 40 = 37.5\%$
- $R46 = 100 \times 60 / 500 = 12.0\%$
- $R48 = 100 \times 30 / 500 = 6.0\%$
- $R50 = 100 \times 125 / 500 = 25\%$
- $R53 = 100 \times 10 / 420 = 2.4\%$
- $R56 = 100 \times 0 / 30 = 0.0\%$

10 Complaints

Purpose

To report on the level of satisfaction with the retailer's service and to provide information about the level of customer complaints in relation to specified complaint categories.

Reported Indicators

| No. | Indicator |
|------|--|
| R 57 | Total number of complaints received from residential customers |
| R 58 | Total number of complaints received from business customers |
| R 59 | Total number of the residential customer complaints that relate to billing/credit complaints |
| R 60 | Total number of the residential customer complaints that relate to transfer complaints |
| R 61 | Total number of the residential customer complaints that relate to marketing complaints (including complaints made directly to a retailer) |
| R 62 | Total number of the residential customer complaints that relate to other complaints |
| R 63 | Total number of customer complaints from residential customers concluded within 15 business days |
| R 64 | Percentage of customer complaints from residential customers concluded within 15 business days |
| R 65 | Total number of customer complaints from residential customers concluded within 20 business days |
| R 66 | Percentage of customer complaints from residential customers concluded within 20 business days |
| R 67 | Total number of complaints from business customers concluded within 15 business days |
| R 68 | Percentage of complaints from business customers concluded within 15 business days |
| R 69 | Total number of complaints from business customers concluded within 20 business days |
| R 70 | Percentage of complaints from business customers concluded within 20 business days |

Definitions

Billing/credit complaints includes billing errors, incorrect billing of fees and charges, failure to receive relevant government rebates, high billing, credit collection, **disconnection** and **reconnection**, and restriction due to billing discrepancy.

Complaint means an expression of dissatisfaction made to an organisation, related to its products or services, or the complaints-handling process itself where a response or resolution is explicitly or implicitly expected.⁹

Notes:

- Complaints may be received via a variety of media, including telephone, mail, facsimile, email or in person.

⁹ The reader is referred to the detailed discussion of complaints, with examples, in Appendix 1 of the 2007 SCONRRR Report. This document draws on the guidelines for complaints handling in Standard AS ISO 10002-2006 Customer satisfaction – Guidelines for complaints handling in organisations.

- More than one complaint can be made per customer contact. If a customer makes a complaint about a billing matter and a transfer matter in the same communication, then 2 complaints should be recorded.

Marketing complaints includes advertising campaigns, contract terms, sales techniques and misleading conduct.

Other complaints include poor service, privacy considerations, failure to respond to complaints, and health and safety issues.

Transfer complaints includes failure to transfer customer within a certain time period, disruption of supply due to transfer and billing problems directly associated with the transfer (e.g., delay in billing, double billing).

11 Call Centre Performance

Purpose

To report on the level of service provided to customers who contact the retailer by telephone.¹⁰

Reported Indicators

| No. | Indicator |
|------|---|
| R 71 | Total number of telephone calls to a call centre of the retailer |
| R 72 | Total number of telephone calls to a call centre answered by a call centre operator within 30 seconds |
| R 73 | Percentage of telephone calls to a call centre answered by a call centre operator within 30 seconds |
| R 74 | Average duration (in seconds) before a call is answered by a call centre operator |
| R 75 | Total number of telephone calls that are unanswered |
| R 76 | Percentage of calls that are unanswered |

Definitions

Call centre means dedicated centre that has the purpose of receiving and transmitting telephone calls in relation to customer service operations of the retailer or distributor, as relevant, and consists of call centre staff (operators) and 1 or more information technology and communications systems designed to handle customer service calls and record call centre performance information.

Calls answered by a call centre operator within 30 seconds means the number of calls to call centre operators that were answered within 30 seconds (in the case of an IVR¹¹ system the measurement period commences at the time that the customer selects an option indicating they wish to speak with a call centre operator).

Total number of telephone calls to a call centre means the total number of calls received by the call centre staff (in the case of an IVR system the measurement only includes the calls where the customer has selected an option indicating they wish to speak with a call centre operator).^{12 13}

Call that is unanswered means where the customer has terminated the call before it was answered by a call centre operator (calls to an IVR system that are terminated by the customer prior to selecting an option indicating they wish to speak with a call centre operator are not included).

¹⁰ Reporting against these indicators is mandatory for retailers who operate a call centre that is capable of automatically recording some or all of the responsiveness indicators. Retailers who have other systems to handle customer calls may report on those responsiveness indicators that they record on a voluntary basis.

¹¹ Interactive Voice Response – equipment that allows a call centre telephone system to detect voice and keypad tone signals and then respond with pre-recorded or dynamically generated audio to further direct callers to the service they require.

¹² This indicator excludes all calls that do not require operator attention, including IVR calls where the customer does not select an option indicating they wish to speak with a call centre operator, and calls that were terminated **before** an option to speak with a call centre operator was selected.

¹³ Calls to third parties, such as contractors or marketing agents acting on behalf of the retailer, are not to be included. However, calls received by a contractor that is providing all or part of the retailer's customer service operations, i.e., an outsourced call centre, are to be included.

Calculations

The “average duration before call answered by operator” is calculated as:

$$\frac{\sum(\text{answer wait times})}{\text{total number of calls answered by an operator}}$$

Note:

- This measure only includes calls that are answered by call centre staff.
- For IVR systems, the measurement period commences at the time that the customer selects an option indicating they wish to speak to a call centre operator.
- For non-IVR systems, the measurement period commences when the call is received by the switchboard and ends when the call is answered by a call centre operator.
- Calls that are unanswered are excluded from the calculation of this indicator.

Worked example

Retailer A operates a single call centre with integrated IVR technology with a single 13 number for customers to call. During the reporting year the following call data was recorded:

Total calls to the 13 number = 467,450

Number of calls to the call centre = 265,328¹⁴

Number of calls answered within 30 seconds = 221,846

Number of calls that were unanswered = 4,921

Sum of wait times for answered calls = 217,006 minutes

Calculation of indicators:

- R71 = 265,328
- R72 = 221,846
- R73 = $100 \times 221,846 / 265,328 = 83.6\%$
- R74 = $60 \times 217,006 / (265,328 - 4,921)$ seconds = 50 seconds
- R75 = 4,921
- R76 = $100 \times 4,921 / 265,328 = 1.9\%$

¹⁴ The customer has selected an option indicating they wish to speak with a call centre operator.