

Review of the Priority Services Register

Consultation

Publication date: 30 June 2014

Response deadline: 22 September
2014

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Overview:

Gas and electricity are essential services. Providing extra services to people who need them to access the market and stay safe remain critically important.

This consultation seeks views on proposals that require suppliers, electricity distribution network operators and gas distribution networks to:

- provide additional non-financial services to energy consumers who are more likely than a typical consumer to experience problems with communication, safety and supply;
- take reasonable steps to identify people who would benefit from these services;
- share consumer information with each other and other utility companies, using vulnerability indicators agreed between them;
- raise awareness of services, including developing a single cross-industry brand; and
- conduct annual independent audits of their performance and publish findings yearly.

Context

Light, power and heating are essential services for our society. Different customers have different needs or interests, and some consumers are significantly less able than others to protect or represent their own interests in the energy market.

In 2013 we published our Consumer Vulnerability Strategy (CVS). The Strategy sets out our approach to identifying and tackling consumer vulnerability in the energy market. It recognises that vulnerability is about the situations consumers are in, rather than about the individual per se. Risk factors stem from personal circumstances as well as from the energy market itself, and vulnerability can be transitory as individual consumers' circumstances change.

The Strategy shows energy companies how to identify and respond to vulnerability through the design and delivery of their products and services. Alongside the Strategy we published a detailed work plan, which included a commitment to review the Priority Services Register (PSR) to ensure support to access the market is available and meets the needs of consumers in vulnerable situations.

Associated documents

Consumer Vulnerability Strategy

<https://www.ofgem.gov.uk/publications-and-updates/consumer-vulnerability-strategy>

Statutory consultation on the Standards of Conduct, Ofgem, May 2013

<https://www.ofgem.gov.uk/publications-and-updates/proposed-licence-modification-slc-1-and-insertion-new-slc-25c>

Social Obligations 2012 annual report

<https://www.ofgem.gov.uk/publications-and-updates/domestic-suppliers-social-obligations-2012-annual-report>

Electricity distribution stakeholder engagement incentive

<https://www.ofgem.gov.uk/electricity/distribution-networks/network-price-controls/customer-service>

Gas distribution stakeholder engagement incentive

<https://www.ofgem.gov.uk/gas/distribution-networks/network-price-controls/customer-service>

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Executive Summary

Energy companies provide help for consumers in vulnerable situations. These consumers can face difficulties in accessing services and information to manage their energy supply, or need additional help when there is an interruption to their supply.

Under their licences, suppliers and electricity distributors (DNOs)¹ must maintain a 'Priority Services Register' (PSR) – and put consumers from certain eligible groups on the register when they request it. The eligible groups are people of pensionable age, disabled people and those who are chronically sick. Suppliers must offer non-financial help to these customers. Distributors also have obligations to those who need electricity for medical reasons and those with special communication needs.

In light of our Consumer Vulnerability Strategy (CVS)² we are reviewing our approach, to ensure consumer protection in this area remains effective.

We are particularly interested in looking at how companies put our approach to consumer vulnerability into practice so that help is given to those who need it, and services are designed to meet the future needs of consumers after smart meters have been rolled out.

Why review the current PSR arrangements?

Our research suggests that consumers support the idea of additional services for those who need them. But the current PSR and services need a clearer objective and should be better targeted. They also need updating to align them with our Consumer Vulnerability Strategy and to reflect advances in technology such as the roll-out of smart metering.

Most consumers are not aware of the PSR or associated services and most eligible consumers are not on a register. Companies are not obliged to identify and register all eligible customers. But conversely, not all eligible customers need priority services right now. Other customers not eligible may have needs that could be addressed by priority services, and customers that aren't eligible now may become so in future.

We think extra services for energy customers are important, especially as electricity and gas are essential services for health and wellbeing, and we want to make sure that the right services reach the right people.

This means companies need to know who would benefit most from extra assistance and how to get in touch with them. Following last year's storms, there was some concern expressed about the quality of information DNOs received from suppliers, in particular the lack of customers' contact details. We have also found problems with

¹ Distribution Network Operators (DNOs) responsible for providing electricity to homes through wires. Gas Distribution Network companies (GDNs), responsible providing gas to homes through pipes, are not currently required to maintain a register.

² Ofgem Consumer Vulnerability Strategy, July 2013 <https://www.ofgem.gov.uk/ofgem-publications/75550/consumer-vulnerability-strategy.pdf>

the codes used to communicate why a consumer is on the PSR, and the codes used in gas and electricity are different.

Similar priority registers and services exist in the water and telecoms industries and there is an opportunity to share information across utilities so that it's easier to find customers who need assistance. But at the moment this doesn't happen. Customers may be on a register in one sector but not in another, despite having the same needs.

Customer awareness of the PSR is low. As a result, customers are unlikely to seek out the services themselves. The information and literature suppliers use about the services have different branding and titles. To help ensure that the people who may need the services are able to find out them, we think there is a benefit in developing a cross-industry brand.

We will also improve our monitoring of how suppliers deliver these services.

What we're consulting on

Our proposals aim to ensure equal outcomes for consumers. By this we mean that consumers should not be disadvantaged or receive a worse service because of their situation. They will improve peace of mind of customers who may need additional support to stay or feel safe, particularly when their supply is interrupted.

We propose to ask suppliers, electricity distribution network operators (DNOs) and gas distribution networks (GDNs) to:

- provide additional non-financial services to energy consumers who are more likely than a typical consumer to experience problems in communication, safety and supply
- identify people who would benefit from these services
- improve information about why a consumer is on the register
- share consumer information with each other and water companies, using vulnerability indicators agreed between them
- raise awareness of services, including developing a single cross-industry brand
- independently audit their performance and publish findings yearly.

Next steps

In each section we have set out our objectives for the work stream, key questions we would like readers to consider, the issues we have identified in the current arrangements and our proposals. We ask readers to respond to this consultation by **22 September 2014** using the contact details on the front page of this document.

1. Background

- 1.1. This section summarises how the PSR works currently, which services are provided to consumers, and what consumers think about it. We also summarise how we suggest changing how consumers with additional support needs are identified, in a way that reflects our Consumer Vulnerability Strategy.

The Priority Services Register

- 1.2 The current Priority Service arrangements require suppliers³ and electricity Distribution Network Operators⁴ (DNOs) but not Gas Distribution Networks (GDNs) to keep registers of disabled and chronically sick customers and customers of pensionable age. Suppliers must share information about customers on their register with GDNs and information about customers who need advance notice of interruptions with DNOs.
- 1.3 Companies have to provide specified non-financial services to customers who are:
- of pensionable age
 - disabled
 - chronically sick
 - deaf
 - hearing impaired
 - blind or partially sighted.
- 1.4 Suppliers must publish information about their obligations to maintain a PSR, to provide services and how to join the list. They must make this information readily accessible on their website, and tell customers once a year about it.

Consumer Vulnerability Strategy

- 1.5 Our Consumer Vulnerability Strategy recognises that a number of factors can make a customer vulnerable and affect how they can protect their interests. It also says that sometimes suppliers and distributors should have enforceable requirements to deliver specific actions for consumers in vulnerable positions.

³ Supply licence: condition 26

⁴ Electricity distribution licence: standard condition 10

PSR research

- 1.6 Our research showed that awareness of PSR services is low. Only 24 per cent of consumers are aware of any non-financial support provided by energy companies to customers in vulnerable situations, and only around one in ten customers can mention a PSR service without being prompted.⁵ Due to customers' low expectations of energy companies, and low awareness of additional services offered, customers are unlikely to spontaneously seek out services.⁶ Research suggests that for many this is not forthcoming.
- 1.7 Additionally, social grades DE⁷ are much less likely to be aware of non-financial support (18 per cent), compared to 31 per cent in social grades AB. Overall, fewer than one in ten (9 per cent) of all energy customers can name at least one PSR service without being prompted. The remainder of consumers who said they were aware of non-financial support named "energy saving help", "financial help" or "gas safety checks" which are not PSR services. Only 6 per cent of those eligible for PSR believe they are actually on a PSR.
- 1.8 As energy is an essential service, it is vital that we continue to get energy companies to provide additional non-financial services to customers that need them.
- 1.9 We think that additional services provided by energy companies should, as far as possible, ensure equal outcomes for consumers. By this we mean that consumers should not be disadvantaged or receive a worse service because of their situation.

Our proposals

- 1.10 Our proposals for the review of the PSR concentrate on non-financial vulnerability that affects customers' safety, ability to access services and ability to communicate with energy companies. There are four objectives for our review:

⁵ Ipsos MORI: Research into the Priority Services Register and non-financial support for vulnerable energy consumers, June 2013.

<https://www.ofgem.gov.uk/ofgem-publications/75553/quant-psr-research-mori-consumer-vulnerability-strategy-june-2013.pdf>

⁶ Vulnerable Consumers and the Priority Services Register: A report prepared for Ofgem by Britain Thinks, June 2013. <https://www.ofgem.gov.uk/ofgem-publications/75552/vulnerable-consumers-and-priority-services-register-june-2013-bt.pdf>

⁷ DE - semi-skilled & unskilled manual occupations. State pensioners, casual or lowest grade workers unemployed (state benefits) AB - Higher & intermediate managerial, administrative, professional occupations.



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- ensure that customers in vulnerable positions receive **equal access** (non-financial) to existing energy company non-financial products and services
- ensure that suppliers and distributors have **access to accurate information** held about customers' circumstances and additional needs
- **provide 'peace of mind' and additional support** for customers to stay safe, particularly when their supply is interrupted
- **improve customers' experience** of services.

1.11 To meet these objectives we want to replace current arrangements with licence conditions which are more clearly focused on the outcomes that we want to achieve. This consultation seeks views on our proposals. Our review and this consultation comprises four main areas:

- Delivering services that provide equal outcomes to customers
- Sharing information between energy companies, and with other utility companies
- Improving consumer awareness of the services
- Monitoring energy company performance.

2. Delivering services that provide equal outcomes for customers

Chapter summary

This chapter seek views on proposals to require energy companies to make available and deliver services that provide equal outcomes for customers. It also seeks views on proposals to require energy companies to take steps to identify customers who would benefit from the services they make available.

Question box

Question 1: Do you agree that energy companies should be required to offer non-financial services with the aim of equalising outcomes for customers?

Question 2: Do you agree that we should continue to prescribe a minimum set of services? Do you support the proposed list of services? What additional services, if any, do you think energy companies should be required to provide?

Question 3: If applicable, what services do you currently provide and what are the current costs of providing services (please break down by service)? What financial impact do you think widening eligibility in the way we have proposed will have? Please provide evidence to support your answer.

Question 4: Do you agree that we should move away from requiring energy companies to provide services to disabled, chronically sick and pensionable age customers to an approach which requires energy companies to take reasonable steps to identify and provide appropriate services to any customer with safety, access or communication needs?

Question 5: Do you agree that energy companies should be required to maintain a wider register of consumers that they have identified as being in a vulnerable situation?

The current approach to identifying eligible customers

2.1. The PSR exists as a list of customers who:

- through being of pensionable age, disabled or chronically sick require information or advice on the priority services
- have special communication needs, or

- depend on electricity for medical reasons and therefore require advance notice of planned interruptions of electricity.
- 2.2. Electricity and gas suppliers and DNOs are required to maintain registers of consumers that are of pensionable age, disabled or chronically sick who have asked to be added. Gas distributors are not required to maintain their own registers but receive details of customers on gas suppliers' PSRs.

Issues identified with the current arrangements

- 2.3. We consider that the current obligations to hold a register are confused and lack a clear purpose. While groups eligible to be included on the register are defined, there is no requirement on energy companies to identify people that should be on their register. Customers usually have to self-refer or somebody must refer them which restricts take-up. As a result only a small proportion of those eligible are listed on a PSR. For example, there are 11 million people in GB with a limiting long term illness, impairment or disability⁸ while only 2.9 million households registered on electricity distributors' PSRs at the end of March 2014.
- 2.4. As eligibility for the register and services are defined by characteristics or specified groups, eg pensionable age, disabled, chronically sick, there is not always a clear match between those that are eligible and those that need an additional service. We are keen that all customers who have safety, access and communication needs are able to access the relevant services.

Requirement to offer services and the services offered

- 2.5. There are various legal requirements to offer specified services to particular groups of people. The Equality Act 2010 ("EA") requires companies to make reasonable adjustments for disabled people. Additionally, gas and electricity suppliers, DNOs and GDNs are required by their licences to offer specified sets of services to the following groups of customers:
- disabled, chronically sick and pensionable age customers
 - blind, partially sighted, deaf and hearing impaired customers.
- 2.6. Services are designed to address needs and each has its own eligibility criteria. DNOs and GDNs are additionally incentivised to identify and respond to customer needs by the RIIO Social Obligations stakeholder engagement incentive.

⁸ <http://odi.dwp.gov.uk/disability-statistics-and-research/disability-facts-and-figures.php#g>

2.7. The services energy companies are required to provide free of charge are set out in tables 1, 2 and 3 below. Details including the number of customers receiving the services are available in our Social Obligations Annual Report.⁹

Table 1: Current services for customers with safety concerns or whose safety may be put at risk by an interruption to their supply

Service	Customers eligible	Energy companies
Password scheme – to help customers identify energy company representatives	<ul style="list-style-type: none"> • Disabled • chronically sick • pensionable age 	<ul style="list-style-type: none"> • Suppliers • DNOs • GDNs
Free gas appliance safety check	<ul style="list-style-type: none"> • Disabled • chronically sick • pensionable age • children under 5 <p>Must receive means tested benefits and own their own home.</p>	<ul style="list-style-type: none"> • Gas suppliers
Advice <ul style="list-style-type: none"> • precautions to take in the event of an interruption • information about how to make contact with the company if their supply is interrupted. Information about <ul style="list-style-type: none"> • planned interruptions • help available and planned restoration during planned and unplanned interruptions 	<ul style="list-style-type: none"> • Disabled • chronically sick • pensionable age <p>At risk if the supply of electricity to their home is interrupted</p>	<ul style="list-style-type: none"> • DNOs
Alternative heating and cooking facilities for certain types/lengths of	<ul style="list-style-type: none"> • Disabled • chronically sick 	<ul style="list-style-type: none"> • GDNs

⁹ Social Obligations Annual Report for 2012 – associated document Monitoring social obligations: 2012 annual data report <https://www.ofgem.gov.uk/publications-and-updates/domestic-suppliers-social-obligations-2012-annual-report>

interruption	<ul style="list-style-type: none"> • pensionable age 	
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Table 2: Current services for customers with access needs

Service	Customers eligible	Energy companies
Quarterly meter readings	<ul style="list-style-type: none"> • Disabled • chronically sick • pensionable age <p>If nobody in the household can read the meter.</p>	<ul style="list-style-type: none"> • Suppliers
Moving a prepayment meter	<ul style="list-style-type: none"> • Disabled • chronically sick • pensionable age <p>If they cannot make payments through their meter due to infirmity.</p>	<ul style="list-style-type: none"> • Suppliers

Table 3: Current services for customers with communication needs

Service	Customers eligible	Energy companies
Accessible <ul style="list-style-type: none"> • Bill • statement of account • other information relating to a service provided to the customer 	<ul style="list-style-type: none"> • Blind • partially sighted • deaf • hearing impaired 	<ul style="list-style-type: none"> • Suppliers
Redirection of bill/statement of account to a nominated person	<ul style="list-style-type: none"> • Disabled • chronically sick, pensionable age 	<ul style="list-style-type: none"> • Suppliers
Facilities to complain	<ul style="list-style-type: none"> • Blind • partially sighted • deaf • hearing impaired 	<ul style="list-style-type: none"> • Suppliers • DNOs • GDNs

	In position of the appropriate equipment.	
<p>Provide information about the PSR in a manner or format that is suitable for that customer’s special communication needs.</p> <p>Provide assistance to customers for whom English is not their first language.</p>	<ul style="list-style-type: none"> • Blind • partially sighted • deaf • hearing impaired 	<ul style="list-style-type: none"> • GDNs • DNOs

Issues identified with the current arrangements

- 2.8. Suppliers are only required to offer support services to consumers that belong to specified groups, eg disabled, chronically sick, pensionable age consumers. Requirements to provide additional support services to customers sit across the energy company licences and in the Electricity and Gas Acts.¹⁰ There is no easily accessible guidance document that details the assistance that companies must provide and the numbers of particular services provided by individual companies varies considerably.
- 2.9. In addition to the current specified groups we can envisage scenarios where customers from outside of these groups may need the services. For example:
- somebody that lives in an area they consider unsafe may not wish to answer the door to strangers and may benefit from the password scheme; or
 - an accident could leave somebody temporarily unable to read their meter to obtain accurate bills. For a period of time they may benefit from quarterly meter readings; or
 - a fuel poor family may require more assistance than others during a prolonged outage because of financial constraints.
- 2.10. The services that energy companies are required to provide need to evolve to reflect advances in technology, for example the smart meter roll-out and next generation text relay.
- 2.11. By prescribing the services that suppliers must provide, the current arrangements do not incentivise energy suppliers to identify and respond to

¹⁰ Electricity and Gas Acts include a requirement that companies move customers’ meters free of charge or replace it with one that can be specially adapted free of charge if it cannot be accessed due to disability.

their customers' needs. Information provided by suppliers to PSR customers about the services available is usually generic and much of it will not be relevant to the individual customer's situation. An example of this generic approach is where a customer requiring large print bills is provided with a standard 'welcome pack' in a 10-point font, and that same welcome pack also includes a device for helping customers with dexterity problems to use plugs.

Our proposal

- 2.12. Providing support services to people who need them is critical. Eligibility for such services should not be limited to customers who are of pensionable age, chronically sick or disabled. This is supported by our research which showed that customers would support eligibility for services being based on need. We propose that such services should be made available to any customer identified as needing them.
- 2.13. We recognise that the Equality Act 2010 already places obligations on energy companies to make reasonable adjustments for disabled people and that there are potential overlaps between the services we require energy companies to provide and these obligations. However, given our statutory duties to have regard to the interests of consumers, we do not think it would be appropriate to wholly rely on the broad provisions of the Equality Act. We also recognise that a broader customer group may need help to access energy companies' services. The Act requires individuals to pursue cases through the courts, whereas our licence conditions give us the ability to enforce companies' compliance.
- 2.14. We want the provision of services to be judged by outcomes for customers. We propose to introduce a requirement that puts the onus on suppliers to deliver services which, so far as possible, result in them being in the same position as a typical consumer. This would require energy companies to review their existing processes and services, and also take this approach when developing new ones.
- 2.15. As a minimum, this would entail:
 - Communication - companies to consider their interactions with their customers and altering their processes or developing additional non-financial services with an aim to ensure, as far as is possible, that customers with communication needs are equally as able to communicate with them and access their communications as somebody without those needs.
 - Designing services and processes in a way that equalises consumers' experience.
 - Consumer circumstances - considering how customers' circumstances may result in them being more likely to experience safety issues or concerns related to their gas or electricity supply or be more likely than average to



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suffer detriment due to loss of supply. Developing non-financial services to remove any barriers or additional risks they face.

Question 1: Do you agree that energy companies should be required to offer non-financial services with the aim of equalising outcomes for customers?

Our proposal - details for each service

- 2.16. While we intend this to be an outcomes based requirement, it is important that customers know what they can expect from energy companies. We therefore propose to retain a set of services which must, as a minimum, be provided by energy companies in meeting their obligations. Such a requirement will ensure that customers receive a minimum level of protection.
- 2.17. We have considered the interactions a typical customer will have with their energy supplier and the basic services consumers may need to receive equal access. In some instances, we are proposing to specify the customers to whom the services should be offered. But this is a minimum, and energy companies will be expected to offer wider services to customers where they identify need and doing so is reasonably practicable.
- 2.18. This minimum set of services is based on the ones currently provided by energy companies. Companies should also capture and share best practice around the provision of services. We are minded to prescribe the services in tables 4 to 6 below (changes shown in *italics*):

Table 4: Proposed required services for customers with safety needs

Proposed service	Customers eligible	Energy Companies
<p>Advice about</p> <ul style="list-style-type: none"> precautions to take in the event of an interruption <p>Information about</p> <ul style="list-style-type: none"> how to make contact with the company if their supply is interrupted planned interruptions help available and planned restoration during planned and unplanned interruptions. 	<p><i>Consumers who may be:</i></p> <ul style="list-style-type: none"> <i>more likely than a typical consumer to average to experience safety issues or have concerns about safety.</i> <i>at greater risk of suffering detriment than the typical consumer if the supply of electricity/gas</i> 	<ul style="list-style-type: none"> DNOs GDNs

	<i>to their home is interrupted.</i>	
Alternative heating and cooking facilities for certain types/lengths of interruption	<ul style="list-style-type: none"> • Disabled • chronically sick • pensionable age • <i>and consumers more likely than a typical consumer to experience to need heating cooking facilities for health and well-being.</i> 	GDNs
Password scheme	<p><i>Consumers who may be:</i></p> <ul style="list-style-type: none"> • <i>more likely than a typical consumer to average to experience safety issues or have concerns about safety.</i> 	<ul style="list-style-type: none"> • Suppliers • DNOs • GDNs
Free gas appliance safety check	<ul style="list-style-type: none"> • Disabled • chronically sick • pensionable age • children under 5 <p>Must receive means tested benefits and own their own home.</p>	<ul style="list-style-type: none"> • Gas suppliers

2.19. We are proposing to mandate that energy companies provide these services, because we consider they remain essential to ensure that customers at risk during interruptions, or concerned about their safety, receive these protections.

2.20. We are proposing to mandate that DNOs advise and inform consumers about what to do in the event of an interruption. But we are not proposing to

mandate the types of response they provide. The RIIO-ED1¹¹ Social Obligations Stakeholder Engagement incentive framework gives networks the incentives to react to the needs of vulnerable customers.

- 2.21. We are proposing to require licensees to offer the password scheme to any customer who feels they need more security to verify a caller’s identity.
- 2.22. We are not proposing to alter the eligibility requirements for free gas appliance safety checks. Current eligibility criteria are based on evidence from HSE and focus on those likely to be at an increased risk from gas appliances, and in particular at increased risk of carbon monoxide poisoning. We consider that it remains appropriate to prioritise those most at risk from carbon monoxide.

Table 5: Proposed required services for customers with access needs

Proposed service	Customers eligible	Energy Companies
Meter readings - Quarterly meter readings or alternative arrangements to access and submit quarterly meter readings, eg smart meter.	<i>Households with nobody who can read and submit meter readings</i>	<ul style="list-style-type: none"> Suppliers
Re-siting of a PPM free of charge	<i>Households where it is not safe or reasonably practicable for consumers to access the PPM in its current position</i>	<ul style="list-style-type: none"> Suppliers
Knock and wait – when visiting the customers home wait longer for a response before leaving.	<i>If customers’ circumstances mean that they may require longer than the typical consumer to open their door.</i>	<ul style="list-style-type: none"> Suppliers DNOs GDNs

¹¹ RIIO-ED1 price control sets the outputs, and associated revenues that DNOs need to deliver for their consumers.



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- 2.23. We are proposing to mandate that energy companies provide these services because we consider them essential to customers' access. For example, customers that cannot read their meter need to access meter readings so they can understand their usage and check the accuracy of their bills. A knock and wait service is currently offered voluntarily by at least one large supplier. We consider this service important to ensure customers' can receive visits from energy companies, avoiding missed appointments.
- 2.24. While the requirement to re-site PPM meters free of charge is similar to the requirement in SLC 28.1A, we are proposing to keep it as we think it prevents a customer self-disconnecting because they are unable to access their pre-payment meter.

Table 6: Proposed required services for customers with communication needs

Proposed service	Customers eligible	Energy companies
<p><i>Ensure information related to the energy companies dealings with consumers are provided by means that are accessible to the consumer including but not limited to</i></p> <ul style="list-style-type: none"> ○ <i>usage information – including where appropriate near real-time information</i> ○ <i>bill, account and annual summary information</i> ○ <i>PSR</i> ○ <i>information about any other service provided to the customer</i> 	<p><i>Customers who may find it harder than the typical customer to communicate with the licensee or access the licensee services</i></p>	<ul style="list-style-type: none"> • <i>Suppliers</i> • <i>DNOs</i> • <i>GDNs</i>
<p><i>On request redirect all communications associated with a customers' account to a nominated person (with the nominated person's permission).</i></p>		
<p><i>Provide an accessible means by which the customer can contact the company to access information, query or complain about any service provided. Including but not limited to:</i></p> <ul style="list-style-type: none"> ○ <i>actual usage information – in particular information needed to switch supplier or manage their energy use</i> 		

- o *bill, account and annual summary information.*

- 2.25. Energy companies are currently required to provide blind, partially sighted, deaf and hearing impaired customers with information about their services in a format that is accessible to the customer. It is essential that consumers can access communications from energy companies. As far as is reasonably practicable we will expect energy companies to ensure that their communications are available in formats accessible by all consumers.
- 2.26. We do not consider that customers with communications needs should be put at a disadvantage when trying to access information from their supplier or query their bill. We propose to expand current requirements to provide accessible means to complain to require licensees to provide accessible means for customers to contact them. The requirement also applies to smart related data, including near-real time data available on energy displays.
- 2.27. Where customers are not in a position to manage their own affairs, either temporarily or permanently, we consider the current bill/statement of account redirection service remains essential. We think it should be available to all customers and cover all energy company communications.

Question 2: Do you agree that we should continue to prescribe a minimum set of services? Do you support the proposed list of services? What additional services, if any, do you think energy companies should be required to provide?

Question 3: If applicable, what services do you currently provide and what are the current costs of providing services (please break down by service)? What financial impact do you think widening eligibility in the way we have proposed will have? Please provide evidence to support your answer.

- 2.28 We propose that the current approach is changed to move away to specific customer groups, to an approach which requires energy companies to take reasonable steps to identify any customer with safety, access and communication needs and to offer services more widely.
- 2.29 We propose to introduce licence conditions which amend the existing obligations, requiring all energy companies, including GDNs, to take reasonable steps to identify consumers who:
- find it harder than the typical person to communicate with the energy company or access their services
 - are more likely than the typical person to experience safety issues or have concerns about safety, or

- are more likely than the typical person to suffer detriment due to loss of supply.

2.30 We propose that companies show that they have taken reasonable steps to identify customers' needs through the development of policies and processes. For example they could:

- consider whether there are any groups of consumers who all have a common need and take steps to identify those customers. An example is that a company may conclude that all blind or partially sighted customers will have additional communication needs or that all households with infants are more likely than the typical household to suffer detriment on loss of supply
- train their customer service staff to use interactions with individual customers to identify and understand their specific needs
- raise awareness of help available and encourage customers to contact them if they need additional support
- explore opportunities to use data sharing/matching to identify customers with needs and encourage referrals from third parties.

2.31 In addition we are aware that a number of energy companies use 'flags' in their systems to record information about consumers they have identified as being in a vulnerable situation, and that these flags cover a broad set of vulnerable situations.

2.32 Some customers currently on PSRs may not have additional needs; others with significant needs may have alternative support systems in place which mean they do not require assistance from their energy company.¹² We do not expect that this change in policy will result in support being withdrawn from any customer who currently receives it.

2.33 Where appropriate, energy companies must continue to keep a record of customers' circumstances and the additional services they need. This will allow them to ensure that customers receive the support services they need, to fulfil obligations related to the sharing of this information, and for the reporting to Ofgem, covered in the next sections.

Question 4: Do you agree that we should move away from requiring energy companies to provide services to disabled, chronically sick and pensionable age customers to an approach which requires energy companies to take reasonable steps to identify and provide appropriate services to any customer with safety, access or communication needs?

¹² Vulnerable Consumers and the Priority Services Register: A report prepared for Ofgem by Britain Thinks, June 2013.



Review of the Priority Services Register

Question 5: Do you agree that energy companies should be required to maintain a wider register of consumers that they have identified as being in a vulnerable situation?

3. Sharing information

Chapter Summary

This chapter seeks views on proposals to require energy companies to share customer information with each other and utility companies, using vulnerability indicators agreed between them.

Question box

Question 6: Do you agree that suppliers, DNOs and GDNs should share information about customers' needs with: a) each other? b) other utilities?

Question 7: Should energy companies be required to share information about customers' needs with other fuel providers such as LPG and heating oil distributors. How could the transfer of this information work? What are the benefits and risks of sharing the information?

Question 8: Do you agree that we should stipulate the minimum details that we expect energy companies to share, for example that names and phone numbers must be shared where they are available? Is there any other information that should be shared and for what purposes?

Question 9: Do you agree that energy companies should agree common minimum 'needs codes' to facilitate the sharing of information? Should we require energy companies to agree these codes? How might this work and what mechanisms are already in place to facilitate this? What role would Ofgem need to have in this process?

Question 10: Should information about a customer's needs be shared with their new supplier when they switch? What is the best way to facilitate the sharing of this information?

Current requirements to share information

- 3.1 Electricity suppliers are only required to share PSR information about customers who have agreed a password or require advance notice of any interruption because of chronic sickness or disability with DNOs. They share this information via industry data flows.¹³ These flows transfer a contact

¹³ Meter Registration Agreement (MRA) data flow D0225 (Customer Special Needs).

- name, address details and a code used to define the reason the customer is included in the flow.
- 3.2 DNOs must share information about customers they have added to their PSR with electricity suppliers. There are no industry data flows to transfer this information.
 - 3.3 Gas suppliers are required to share information about any customer on their PSR with GDNs. They also do this via industry data flows which use a code to define the reason the customer is included in the flow.¹⁴ There is no requirement that GDNs share information about customer needs they have identified with gas suppliers.

Issues identified with the current arrangements

- 3.4 It is critical that DNOs and GDNs know if customers attached to their networks have special communication needs or are at particular risk if their supply is interrupted. However, very few customers are aware that there is a difference between the company that supplies their energy and the company that distributes it. Customers are therefore unlikely to contact their DNO or GDN to discuss their situation.¹⁵
- 3.5 Reports from both Ofgem¹⁶ and DECC¹⁷ following the storms in winter 2013-14 highlighted issues raised by electricity DNOs on the lack of access to accurate customer details such as telephone contact details and DECC called for industry action to address this.
- 3.6 Similar issues affect the information about gas customers. GDNs may have contact with a customer, for example during an interruption, but there is currently no requirement that they record or share information about their needs with the customers' supplier or DNO.
- 3.7 The codes used in data flows to communicate why a customer is on the PSR (table 7 below) differ between gas and electricity and some, for example a code using the term 'confused', are outdated. The special needs categories used in the codes do not always match descriptions used by individual companies which can result in the customers' situation being communicated using the code 'other'. This information is difficult for companies to interpret.

¹⁴ Supply Point Administration Agreement (SPAA) data flows S83 and S84 which provide '*Consumer specific details for use in emergencies and by Meter Reading Agencies*'.

¹⁵ Vulnerable Consumers and the Priority Services Register: A report prepared for Ofgem by Britain Thinks, June 2013.

¹⁶ <https://www.ofgem.gov.uk/ofgem-publications/86460/finaldecember2013stormsreview.pdf>

¹⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/287012/DECC_-_Festive_disruption_review_-_Final_2_.pdf

Table 7 – Codes used by licensees to communicate why a customer is on the PSR

Electricity	Gas
A code used to define the type of special condition:	A code used to define the type of special condition:
01 Nebuliser	03 - SEUC Unclassified
02 Heart/Lung machine	04 - Aged 60+
03 Kidney Dialysis	05 - Blind
04 Oxygen Concentrator	06 - Braille User
05 Ventilator	07 - Poor Sight
06 Apnoea monitor	08 - Deaf
07 Other Medical dependency on electricity	09 - Poor Hearing
08 Blind	10 - Poor Speech
09 Partial sighted	11 - Poor Sense of Smell
10 Deaf	12 - Arthritic Hands
11 Hearing Impaired	13 - Arthritic All
12 Stair Lift	14 - Poor Walking
13 Bath Hoist	15 - Wheelchair
14 Elderly (60+)	16 - Bedridden
15 Disabled	17 - Mental Handicap
16 Speech Difficulties	18 - Confused
17 Foreign Language Speaker	19 - Serious Illness
18 Learning Difficulties	20 - Other
19 Restricted Movement	21 - Heart Condition
20 Dementia	22 - Breathing Difficulty
21 Other	

3.8 Information about a customer’s needs is held on individual company registers. If a customer switches supplier, there is no process for information about their additional needs or the PSR services they receive, to be shared with their new supplier. Similar registers exist in water and telecoms, but data is not shared between utilities, so customers may be on a register in one sector but not another despite having the same needs.

Our proposals

Who should share information?

Information should be shared in both directions between suppliers, DNOs and GDNs

3.9 We consider that it is essential that DNOs and GDNs know who is connected to their network so they can provide services that respond to their customers’ needs, particularly when their supply is interrupted.

- 3.10 While we are very mindful of the need for data privacy, our research has found that, for most customers the sharing of information about their needs for this purpose between energy companies is relatively uncontroversial. Requiring the two-way sharing of information between energy companies will ensure that all energy companies have access to information held about their customers' needs, effectively creating a single record of their needs.
- 3.11 Suppliers have more direct and regular communication with their customers so tend to be in a better position than DNOs and GDNs to identify customers' needs. But during an interruption, DNOs and GDNs, and their response partners, may be in a unique position to identify vulnerability, or a change in consumer circumstances, that the supplier may not be aware of.
- 3.12 We therefore propose to require suppliers to share information they identify about these needs with DNOs and GDNs, and to require DNOs and GDNs to share information about customers they have identified with suppliers
- 3.13 We also consider that this record should transfer with customers when they switch supplier to ensure that they continue to receive the assistance they need. We therefore propose to introduce licence requirements that energy companies share this information when a customer switches supplier.

Sharing information with other utilities

- 3.14 We are minded to require energy companies, in addition to complying with the proposed licence requirement to share information, to agree a means of sharing information about customers' needs with other utilities, particularly water companies. We seek views on how best to facilitate the sharing of this information. We are also keen to explore, with relevant regulators, the possibility of utility companies sharing information about customers they have identified as having additional needs.
- 3.15 Information sharing about customers' needs with heating oil and LPG companies has been raised by the All-Party Parliamentary Group on Off-gas grid and ministerial roundtables on this issue. We are proposing to explore this further because it is not clear:
- how the data could be shared or whether firms would have systems to comply with relevant legal requirements outside of our regulation;
 - how these firms will benefit from receiving information from energy companies or what they would do with it. These firms typically have more contact with consumers during the delivery process and are arguably better placed than energy companies to identify vulnerability.

Question 6: Do you agree that suppliers, DNOs and GDNs should share information about customers' needs with: a) each other? b) other utilities?

Question 7: Should energy companies be required to share information about customer needs with other fuel providers such as LPG and heating oil distributors. How could the transfer of this information work? What are the benefits and risks of sharing the information?

What information should be shared between suppliers, DNOs and GDNs and how should it be shared?

- 3.16 The quality of the information shared between suppliers, DNOs and GDNs needs to improve. Given the transient nature of vulnerability, accurate consumer information needs to be shared on a frequent and regular basis to allow energy companies to contact the customer in an emergency and target assistance services. As we are proposing to expand the groups of customers suppliers share information about it is also vital that DNOs are easily and quickly able to identify customers reliant on electricity for medical reasons and with special communication needs in an outage so they can prioritise their response.
- 3.17 We note that parties to the Master Registration Agreement¹⁸, which sets out the procedures in relation to change of supplier, recently voted to approve a modification (proposed by Western Power Distribution) to include contact information in the electricity data flows. However we are not aware of plans for a similar modification for gas. We therefore propose to set the minimum customer details energy companies must share:
- Customer contact name
 - Customer phone number (where available)
 - Customer email address (where available)
 - Address
 - Details of nominated person (if nominated)
 - Details of password agreed (if agreed)
 - Details of the customers' needs
- 3.18 We think that requiring energy companies to share customers' names and contact numbers via licence conditions will reduce concerns regarding compliance with data protection legislation, although considerations around seeking consent should also be addressed.
- 3.19 To achieve effective sharing of information between energy companies and with other utilities we consider it is necessary to develop a common set of 'needs codes' and a standard format for data sharing. This will result in a single customer record being shared and updated and make sharing information more effective.

¹⁸ <http://mrasco.com/>

- 3.20 We propose to set up a working group to agree the information to be shared between suppliers, DNOs, GDNs and other utilities and how it will be shared. We will expect this group to develop the common 'needs codes' to be used to share information about customers' additional needs in a common format and in reporting to us. We will expect to have a role in agreeing the codes to be used and propose to set a date by which energy companies must have developed and be sharing information using the codes.

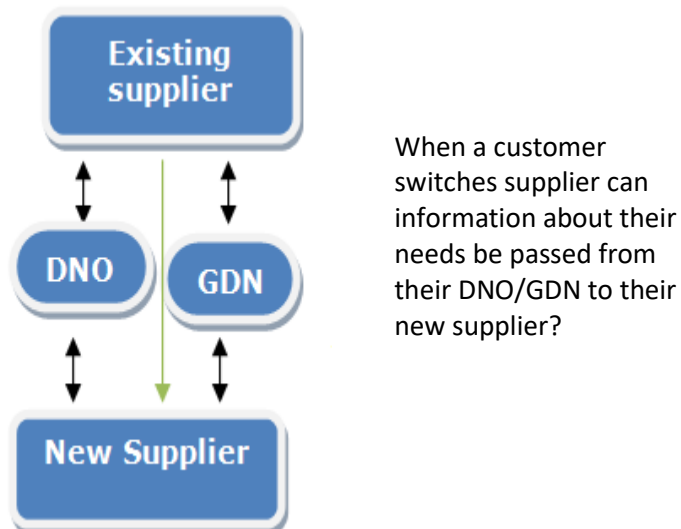
Question 8: Do you agree that we should stipulate the minimum details that we expect energy companies to share, for example that names and phone numbers must be shared where they are available? Is there any other information that should be shared and for what purposes?

Question 9: Do you agree that energy companies should agree common minimum 'needs codes' to facilitate the sharing of information? Should we require energy companies to agree these codes? How might this work and what mechanisms are already in place to facilitate this? What role would Ofgem need to have in this process? What would be an appropriate date by which energy companies must have developed and be sharing information using the codes?

How should information be shared on change of supplier?

- 3.21 We are keen to explore whether sharing data between suppliers and DNOs could help facilitate the transfer of relevant information about vulnerable circumstances when customers change supplier. This would involve the DNO and GDNs passing the information held to the customers' new supplier. If this is not possible, we propose to require suppliers, via licence conditions, to transfer this information in the change of supplier process.

Figure 1: Sharing information between suppliers, DNOs and GDNs



When a customer switches supplier can information about their needs be passed from their DNO/GDN to their new supplier?

Question 10: Should information about a customer's needs be shared with their new supplier when they switch? What is the best way to facilitate the sharing of this information?

Seeking consent

- 3.22 We recognise that energy companies have concerns that data protection legislation prevents them from sharing contact information and sensitive information about customers' circumstances. While it remains for each company to assure itself that it is compliant with the Data Protection Act, it is our view that energy companies can share sensitive information about customers' circumstances where they have obtained customers' permission in the first instance to share the information and should set up mechanisms to acquire and facilitate consent. Additionally, licence requirements provide energy companies with 'gateways' that can be used to share this information.
- 3.23 We consider that our proposals to require energy companies within licence conditions to share information about customers they have identified as having needs will allow energy companies to share this information and remain compliant with data protection legislation. We therefore propose to require energy companies to explain the purpose of sharing information to customers and to seek informed consent.

4. Improving awareness

Chapter Summary

This chapter seeks views on proposals to improve awareness of what help is available, including creating a single cross-industry brand.

Question box

Question 11: Do you agree that a single cross-industry brand will raise awareness of priority services?

Question 12: Do you agree that a guidance document would help advice providers and raise awareness? Who should produce this document?

Question 13: What more can be done to raise awareness of priority services?

Current requirements to tell customers about the PSR

- 4.1. Licensees are currently required to prepare and publish a statement on their website telling customers about their obligations to provide services to disabled, chronically sick and pensionable age consumers. They are required to take steps to tell each of their domestic customers about these obligations at least once a year, as well as telling customers when they are added to a priority service register.

Issues identified with the current arrangements

- 4.2. Awareness of the PSR and associated services is low with only 24 per cent of customers aware of any non-financial support provided by energy companies to customers in vulnerable situations, while only around one in 10 of all energy customers can mention a PSR service without being prompted.¹⁹ Due to low expectations of energy companies and low awareness of additional services offered, customers are unlikely to seek out services proactively. Instead they are reliant on suppliers actively identifying need and offering services.
- 4.3. Information about priority services is not always easy to find on supplier websites, some smaller suppliers have been found not to include information about priority services on their website. Supplier information and literature

¹⁹ Ipsos MORI: Research into the Priority Services Register and non-financial support for vulnerable energy consumers, June 2013.

offering the services have different brands and titles. Given the type of the services, and who they are offered to, means that different brands may be causing some detriment. The low level of knowledge and take-up of services the positive case for brand differentiation is not clear.

Our proposals

- 4.4. We want to ensure that customers and third party advisors are aware of services available, so they can request a service or refer the customer. We consider that increased awareness can improve trust and make customers more open to discussing their situation.
- 4.5. To improve awareness amongst consumers and advisors, we propose that a single cross-industry brand should be developed to make communication of the help available easier. We seek views on how this brand can be developed and whether it is necessary to require licensees to develop and put into use a single brand name by a set date.

Question 11: Do you agree that a single cross-industry brand will raise awareness of priority services?

- 4.6 We propose to retain requirements that licensees prepare and publish a statement telling customers about their obligations in this area. We also propose to require licensees to take reasonable steps to inform each of its domestic customers at least once a year that services are available to assist customers. In line with guidance produced by Ofwat²⁰, we propose that licensees should also tell customers about schemes in other sectors.
- 4.7 We propose to monitor energy companies' approaches to raising overall customer awareness of the provision of these types of services and the awareness of the individual services offered.
- 4.8 Additionally, an easy to access guidance document could be also be developed which details the services energy companies are required to provide to consumers, which could be used by industry or third parties. The document could be limited to information about additional services or include information about customers wider rights. We consider that this will assist advice providers in understanding customers' rights and increase referrals for services. It will also raise awareness of obligations among new market entrants, aiding compliance.

²⁰http://www.ofwat.gov.uk/consumerissues/rightsresponsibilities/specialassistance/gud_pro_specialassists ept08.pdf



Review of the Priority Services Register

Question 12: Do you agree that a guidance document would help advice providers and raise awareness? Who should produce this document?

Question 13: What more can be done to raise awareness of priority services?

5. Monitoring

Chapter Summary

This chapter seeks views on how we will monitor energy companies' compliance with the proposed new requirements, including our proposal to require energy companies to undertake annual audits.

Question box

Question 14: Do you agree that supplier independent audits are the best way of monitoring companies' compliance with our proposed obligations? Do you have views on the approach the audit should take and what it should cover?

- 5.1 We currently monitor suppliers' priority services registers through annual social obligations reporting at 31 December each year. This reporting includes overall numbers of customers on suppliers' registers and the number of customers that receive specific services.
- 5.2 Our team monitoring the performance of DNOs, monitor DNO PSR numbers annually at 31 March. In addition to this, the gas distribution Discretionary Reward Scheme and electricity distribution Stakeholder Engagement Incentive can be used to incentivise network companies to adopt best practice in their approaches to identifying and helping consumers in vulnerable situations.

Issues identified with current arrangements

- 5.3 Current monitoring does not provide us with any information about the quality of service PSR customers are receiving from suppliers. This reporting does not tell us why customers are on the register or the quality of service they receive. Suppliers can boost numbers by adding easily identified customers to their register, eg adding all customers over 60 regardless of whether they need a service. The reporting relates to specific services, eg, the number of customers that receive large print bills so does not capture all services companies provide to customers.

Our proposals

- 5.4 We are proposing to update the current social obligations reporting requirements to. We are considering:
 - combining the reporting of electricity and gas where a customer is dual fuel so we have a better understanding of the number of households with needs (noting that some customers with separate gas and electricity suppliers may be counted twice);



Review of the Priority Services Register

- include the overall number households identified as having a need
- include the number of households identified as having a particular need (using special needs codes developed for sharing customer information)
- to better reflect the services we will require suppliers to offer.

5.5 We are also proposing to require suppliers to undertake annual self-funded audits looking at how they identify vulnerabilities and develop and target services. We propose that the audits are independent and undertaken by an auditor approved by Ofgem. The full findings would be shared with Ofgem and Citizens Advice. The audits will test that energy companies have systems and processes in place to meet the requirements of the licence condition and that those systems and processes are being followed.

5.6 We are proposing to initially require suppliers to undertake audits for two years with the first audit six months after new licence requirements are introduced. After two years we will review this requirement to see whether it remains proportionate. Whether we continue to require audits will depend on suppliers' performance in the first two years of the scheme.

5.7 We are mindful that any audit of DNO and GDN compliance will need to fit with the existing price control framework. We propose that we should require GDNs and DNOs to undertake an initial audit six months after the new licence requirements go live to test that they are complying with their new obligations. We are also proposing to require DNOs and GDNs to undertake annual self-funded audits looking at how they identify vulnerabilities and develop and target services and submit information through their regular price control reporting. The full findings would be shared with Ofgem and the Citizens Advice.

5.8 In addition to this, the existing gas distribution Discretionary Reward Scheme and stakeholder engagement incentive arrangements incentivise best practice.

Question 14: Do you agree that supplier independent audits are the best way of monitoring companies' compliance with our proposed obligations? Do you have views on the approach the audit should take and what it should cover?

Appendices

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2	Feedback Questionnaire	(38)

Appendix 1 - Consultation response and questions

- 1.1. If you're interested in anything in this document, we'd like to hear your views.
- 1.2. We especially welcome responses to the specific questions which are at the beginning of each chapter heading and replicated below.
 - Please respond by 22 September 2014, preferably by email to Rebecca.Langford@Ofgem.gov.uk, or by post to:
Rebecca Langford
Consumer Policy Manager
Ofgem, 9 Millbank, London, SW1P 3GE
- 1.3. Unless marked confidential, all responses will be published by placing them in our library and on its website www.ofgem.gov.uk. Respondents may request that their response is kept confidential. We will respect this request, subject to any obligations to disclose information, for example, under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004.
- 1.4. Respondents who wish to have their responses remain confidential should clearly mark the document/s to that effect and include the reasons for confidentiality. It would be helpful if responses could be submitted both electronically and in writing. Respondents are asked to put any confidential material in the appendices to their responses.
- 1.5. Next steps: Having considered the responses to this consultation, we intend to publish our Decision and related licence condition changes. Any questions on this document should, in the first instance, be directed to Rebecca Langford using the above contact details.

CHAPTER: One

No questions in this chapter.

CHAPTER: Two

Question 1: Do you agree that energy companies should be required to offer non-financial services with the aim of equalising outcomes for customers?

Question 2: Do you agree that we should continue to prescribe a minimum set of services? Do you support the proposed list of services? What additional services, if any, do you think energy companies should be required to provide?

Question 3: If applicable, what services do you currently provide and what are the current costs of providing services (please break down by service). What financial impact do you think widening eligibility in the way we have proposed will have? Please provide evidence to support your answer.

Question 4: Do you agree that we should move away from requiring energy companies to provide services to disabled, chronically sick and pensionable age customers to an approach which requires energy companies to take reasonable steps to identify and provide appropriate services to any customer with safety, access or communication needs?

Question 5: Do you agree that energy companies should be required to maintain a wider register of consumers that they have identified as being in a vulnerable situation?

CHAPTER: Three

Question 6: Do you agree that suppliers, DNOs and GDNs should share information about customers' needs with: a) each other? b) other utilities?

Question 7: Should energy companies be required to share information about customers' needs with other fuel providers such as LPG, heating oil distributors. How could the transfer of this information work? What are the benefits and risks of sharing the information?

Question 8: Do you agree that we should stipulate the minimum details that we expect energy companies to share, for example that names and phone numbers must be shared where they are available? Is there any other information that should be shared and for what purposes?

Question 9: Do you agree that energy companies should agree common minimum 'needs codes' to facilitate the sharing of information? Should we require energy companies to agree these codes? How might this work and what mechanisms are already in place to facilitate this? What role would Ofgem need to have in this process?

Question 10: Should information about a customers' needs be shared with their new supplier when they switch? What is the best way to facilitate the sharing of this information?

CHAPTER: Four

Question 11: Do you agree that a single cross-industry brand will raise awareness of priority services?

Question 12: Do you agree that a guidance document would help advice providers and raise awareness? Who should produce this document?

Question 13: What more can be done to raise awareness of priority services?

CHAPTER: Five

Question 14: Do you agree that supplier independent audits are the best way of monitoring companies' compliance with our proposed obligations? Do you have views on the approach the audit should take and what it should cover?

Appendix 2 - Feedback Questionnaire

1.1. Ofgem believes that consultation is at the heart of good policy development. We are keen to consider any comments or complaints about how we've conducted this consultation. We would also like to get your answers to the following questions:

1. Do you have any comments about the overall process adopted for this consultation?
2. Do you have any comments about the overall tone and content of the report?
3. Was the report easy to read and understand? Could it have been better written?
4. To what extent did the report's conclusions provide a balanced view?
5. To what extent did the report make reasoned recommendations for improvement?
6. Please add any further comments.

1.2. Please send your comments to:

Andrew MacFaul
Consultation Co-ordinator
Ofgem
9 Millbank
London
SW1P 3GE
andrew.macfaul@ofgem.gov.uk