



Response to: Ofgem Non-domestic Customer Consultation

KEY POINTS

- Covered off in response to question 17 in page 2
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Responses to consultation questions

Our responses to the questions in the consultation are:

Q17. What are the views of Distribution Network Operators (DNOs), Independent Distribution Network Operators (IDNOs), Gas Distribution Networks (GDNs), and Independent Gas Transporters (IGTs) on the potential issues of targeting support to vulnerable end users supplied through non-domestic contracts?

1. Landlords of non-domestic dwelling and park homes passing over responsibility/failing to provide contingency, where risk management governance should have in place for such situations.
2. Difficulty in identifying non-domestic customers if one MPAN for example: the only person being paid is their 'landlord.' no record with supplier
3. Challenges in understanding where the priority categorisation sits within non-domestic – for example – treating a park home for the over 60's the same as a large profit-making organisation such as larger chain care homes that you would expect to have in place contingency
4. Challenge in providing support levels/ identifying small-scale care homes/supported living facilities where residents pay rent to a housing provider inclusive of bills so are not direct domestic customers but have additional needs and are still in a domestic-type property which might not have the capacity for their own contingency measures like generators
5. Issues of mixed non-domestic customer type – which could lead to issues in prioritising non-domestic over domestic PSM response, affecting service levels
6. Medical support such as end of life care – challenge of gaining a consistent approach across all DNO - risk based approach
7. Messaging to domestic customers on where the responsibility between landlord and DNO lies (for example we may provide communication updates only)
8. The ability to scale up when demand increases during seasonal demand
9. Challenges in mobilising a cross sector resilience response (LRF)