

## Proposal 2 - Business Plan Incentive Early Proposal: PSR Tell Us Once

Section	Submission
<i>Licensee name</i>	UK Power Networks Ltd. including three distribution license holding companies: Eastern Power Networks plc (EPN), London Power Networks plc (LPN), and South Eastern Power Networks plc (SPN).
<i>Proposal name</i>	PSR – Tell us Once
<i>Type of proposal</i>	<b>New or enhanced service</b> Stretching commitment Delivery accountability mechanism
<i>Proposal summary (max 200 words)</i>	<p><b>Situation:</b></p> <p>Customers in a range of vulnerable circumstances are currently signed up to, potentially separate, Priority Service Registers (PSRs) maintained by DNOs, energy suppliers and water companies.</p> <p><b>Complication:</b></p> <p>While progress has been made on data sharing between energy and water, this data sharing infrastructure is still incomplete, meaning that vulnerable customers must speak to several different utility companies to ensure their service needs are captured.</p> <p>Furthermore, each organisation is expected to contact customers on the PSR every two years to check their circumstances have not changed. Having to disclose sensitive personal data to three different utility companies every two years is onerous for the customer and an inefficient use of company resources which could be deployed to deliver services.</p> <p><b>What question are we trying to answer?</b></p> <p>How do we smooth this journey to avoid multiple interactions?</p> <p><b>Solution:</b></p> <p>This proposal seeks to create a ‘tell me once’ system for eligible PSR customers, with DNOs at the centre of an enhanced data sharing network which delivers a seamless service all.</p> <p>Stage 1 would ensure customers only need to disclose once;</p> <p>Stage 2 would enable them to revalidate once; and</p> <p>Stage 3 would allow full self-management of their data via a dedicated portal.</p>
<i>Which ED3 outcomes does the proposal support?</i>	Investing for the energy transition <b>Responsible and sustainable business</b> Smarter networks Resilient networks
<i>Which Consumer Interest Pillars does the proposal support?</i>	Low cost transition Fair prices <b>Quality and standards</b> Resilience
<i>Summary of key reason(s)/driver(s) for the proposal (Max 200 words)</i>	<p>Firstly, research has consistently found that vulnerable customers would prefer a ‘tell me once’ model for PSR sign-up and re-validation. This is advocated by all leading consumer bodies including Citizens Advice and the Consumer Council for Water.</p> <p>Secondly, a ‘tell me once’ approach would reduce the risk that customers do not disclose their support needs because they find the need for multiple disclosures/ revalidation too burdensome. This would increase the number of customers who are</p>

	<p>safeguarded in the event of a power outage, can benefit from accessible communications and receive other PSR-related services.</p> <p>Thirdly, it would speed up the PSR registration process. Currently, organisations can spend lengthy periods addressing mismatches in the data that they hold compared to data which has been shared with them by other companies, which can result in customers believing they have been added to the PSR when their data is actually still pending.</p> <p>Finally, it would be a more efficient use of company resources, potentially allowing vulnerable customer teams to spend more time on service delivery.</p>
<p><i>Summary of supporting evidence</i></p> <p><i>(Examples could include references to sector specific intelligence, innovation projects, ISG engagement, wider consumer research, endorsement from third parties)</i></p> <p><i>(Max 200 words)</i></p>	<p>Since 2018, the UK Regulators Network argued that “Customers in vulnerable situations should expect a seamless, stress-free experience from their utility company and should not have to have the same, potentially stressful, conversation regarding their vulnerable circumstance on repeated occasions.”</p> <p>Since then, research has consistently shown that customers want a ‘tell me once’ PSR, and that this would be a more efficient and effective approach. This was powerfully demonstrated in by a Money and Mental Health Policy Institute report in 2023 (<a href="https://www.moneyandmentalhealth.org/publications/too-much-information/">https://www.moneyandmentalhealth.org/publications/too-much-information/</a>).</p> <p>A ‘tell me once’ PSR is also advocated by leading consumer bodies including Citizens Advice and the Money Advice Trust. The Essential Services Access Network has recently adopted the <i>Future of the PSR</i> as a priority workstream, highlighting the importance of this issue across utilities. We expect further outputs following their next roundtable in January.</p> <p>While the benefits of a ‘tell me once’ PSR are clearly supported by robust research, the negative impacts of the current situation are also clearly evidenced. A recent Ofgem report (2023) noted that a high proportion of households are at risk of failing to be included on the PSR because of problems with the existing approach.</p>
<p><i>Summary of potential benefits</i></p> <p><i>(Max 200 words)</i></p>	<p>A ‘tell me once’ model can lead to the following benefits:</p> <ul style="list-style-type: none"> <li>• It would simplify the PSR registration process, leading to an improved customer experience.</li> <li>• It would reduce the need for customers to disclose sensitive personal information multiple times, including revalidation, which would be less onerous for customers.</li> <li>• It would increase the likelihood of customers signing up for the PSR, reducing the number of customers who are at risk of slipping through the safety net of the PSR, thereby improving the effectiveness of the mechanism.</li> <li>• It would reduce the number of customers whose PSR registrations are delayed because the information they have supplied to one utility does not match with data held by another one, resulting in customers believing that help will come in an emergency when in fact they are not fully registered.</li> <li>• It could improve the ability of customers to manage and control their own data, depending on how the solution was implemented.</li> <li>• It would be a more efficient and effective way to manage PSR data, freeing up resources for support service delivery instead of unnecessary and burdensome repeat contacts with vulnerable customers.</li> </ul>
<p><i>Where the proposal relates to a new or</i></p>	<p>PSR data sharing has progressed significantly since the start of RIIO-ED2, in ways that could not have been foreseen when the framework was established. For example,</p>

<p><i>enhanced service or to stretching commitments, explain why the proposal is not already business as usual or incentivised either through the existing RIIO-ED2 framework or under ED3 proposals that we are consulting on (Max 200 words)</i></p>	<p>data sharing between DNOs and water companies only commenced in 2023, and water company PSR data did not begin flowing to energy suppliers (via DNOs) until 2024. Water companies are also only now beginning to accept PSR data from energy suppliers through the same route. These developments have materially changed the operating environment and were not in place, or reasonably predictable, at the point RIIO-ED2 was determined.</p> <p>UKPN has played a leading role in this area. We were the first DNO to share historical PSR data with two water companies, and we have developed operational learnings on governance, customer permissions, and cross-utility coordination. With these foundations now established, this is the appropriate time to consolidate sector learning and move toward a genuine, multi-utility 'tell us once' PSR system that delivers a more consistent and efficient experience for customers in vulnerable circumstances.</p>
<p><i>Where the proposal relates to a new or enhanced service, explain why DNOs are best placed to undertake the activity described under the proposal (Max 200 words)</i></p>	<p>DNOs are at the heart of the current PSR data sharing nexus. Energy suppliers and water companies do not exchange PSR data directly with each other, they transmit the data they collect to the DNOs, for onward transmission. This positions DNOs uniquely to create a 'tell me once' PSR. Any changes to the PSR data that a DNO holds about a customer is transmitted on to that customer's energy supplier and water company, which means we are only a small number of steps away from realising that vision of a 'tell me once' (and 'revalidate my data once') PSR. The DNOs also already offer a portal (<a href="http://www.thePSR.co.uk">www.thePSR.co.uk</a>, which is managed by our industry body, the Energy Networks Association) which customers can use to register for their DNO's PSR. Increasing numbers of vulnerable customers are using that portal to sign up for the PSR, and we see this playing a key role in creating a seamless, 'tell me once' PSR experience for customers in vulnerable circumstances.</p>