

Direct line: 020 7752 2200  
Fax line: 020 7752 2128

David Barnes  
Head of Social Issues  
Office of Gas and Electricity Markets  
9 Millbank  
London SW1P 3GE



4 June 2004

Dear David

**A Strategy to Define and Prevent the Disconnection of Vulnerable Customers**

Thank you for providing us with the opportunity to comment on the above consultation paper. This response is made on behalf of EDF Energy which includes the retail brands of London Energy, SWEB Energy, Seeboard Energy and VirginHome Energy.

As you know from previous correspondence we share your concerns for vulnerable customers. In the last few years we have dedicated considerable resource and effort to developing and implementing a strategy for vulnerable customers, which includes working closely with all interested parties, including Social Services, to ensure that the needs of vulnerable customers are met.

We also worked collaboratively with Ofgem, energywatch and other suppliers to develop a robust and flexible Debt and Disconnection strategy and welcomed the opportunity more recently presented to take an active role in helping the ERA develop these proposals on defining and dealing with vulnerable groups.

We support the proposed model for integrating a safety net procedure into suppliers' systems as this builds on best practice, such as our own, to ensure, as far as possible, that vulnerable customers are identified in cases of debt and that, where necessary, Social Services are informed. The Data Protection Act Guidance provided by the Information Commissioner is helpful on this issue and we are confident that we can continue to operate a safety net procedure in accordance with those guidelines.

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Registered in England and Wales  
Registered No. 2366582  
Registered Office:  
40 Grosvenor Place Victoria  
London SW1X 7EN

[www.edfenergy.com](http://www.edfenergy.com)

A copy of this response is also being sent to Russell Hamblin-Boone at the ERA. If you have any queries about this response, please contact Ann Neate directly on 01273 428464 or e-mail [ann.neate@edfenergy.com](mailto:ann.neate@edfenergy.com).

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Linford', with a long horizontal flourish extending to the right.

**Denis Linford**  
**Head of Regulation**