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Dear David

## **A STRATEGY TO DEFINE AND PREVENT THE DISCONNECTION OF VULNERABLE CUSTOMERS**

National Grid Transco welcomes the opportunity to respond to The Energy Retail Association's proposed strategy to prevent the disconnection of vulnerable customers. Whilst it is recognised that Transco's statutory obligations only extend as far as defining standards of service for priority consumers we agree that the protection of vulnerable customers is a vital social objective in its own right.

Transco as a Gas Transporter is obliged to maintain a register of details provided by suppliers of their priority customers. Priority customers are defined in the gas supplier licence as domestic customers who are of pensionable age, disabled or chronically sick. We note that the proposed definition of vulnerable customers would not impact on Transco's statutory obligations in this area but would provide an additional layer of protection for at risk customer groups. Having regard of this we fully support ERA's recommended definition of vulnerable customers in the context of disconnection.

We acknowledge that in the past companies may have been wary of falling foul of the Data Protection Act by providing customer information to third party agencies, even if representatives of the company felt it was in the customers best interest. In the light of this we welcome the guidance given by the Information Commissioner on the applicability of the Data Protection Act in situations where disconnection of vulnerable customers is likely. We regard ERA's proposed 'Vulnerable customer safety net' as a valuable step forward in the protection of vulnerable customers who would otherwise be at risk of disconnection and feel that by supporting this Ofgem are fulfilling their primary role to protect the interests of consumers.

While Transco is not able to be an active participant in the recommended arrangements we will strive to communicate any implemented arrangements to relevant employees who could be affected.

If you have any questions on the matter please contact Jon Clay on 01926 655586 in the first instance

Yours sincerely

**By email**

Paul Rogers

cc Russell Hamblin-Boone