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Dear David

Consultation paper: A strategy to define and prevent the disconnection of vulnerable customers

I write in response to the recent consultation paper.

As a DNO, we recognise our responsibilities towards vulnerable customers and have put in place appropriate policies to ensure that our obligations are met with particular reference to Priority Services Registers. The PSR is an excellent concept that should allow us to provide a better service to vulnerable customers, but as we have indicated previously, ways need to be found to improve the ability of suppliers, Local Health Authorities, etc to populate the PSR.

Whilst this consultation paper is primarily aimed at suppliers, we welcome the clarification in the paper on the disclosure of information held by suppliers to other parties. The Information Commissioner's guidance to suppliers appears to be in the context of disconnection. It is unclear if that guidance extends to suppliers and other agencies being able to refer their customer's details to DNOs for the purpose of populating the PSR. It would be helpful to suppliers, DNOs and customers if that was the case and that issue should be clarified. We urge Ofgem to accept the recommendation of the ERA and issue their views as industry guidance.

I hope you find these comments helpful. We would be pleased to discuss them further if this would be of assistance.

Yours sincerely



Joe Ashe
Electricity Regulation Office Manager



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Official Partner