

Vulnerable Customers & Codes of Practice Workgroup

SLC37 and 38 Discussion Note

A line by line review of SLCs 37 & 38 is attached. This highlights that:

- Almost all services required from suppliers would seem similar to obligations under the Disability Discrimination Act¹
 - The exceptions are password schemes, gas safety checks and electrical appliance adaptors.
- The PSR has twin purposes:
 - Gathering information to provide to distributors/transporters
 - An aid to promotion of supplier services

A 'first principles' review is also attached, as an alternative presentation of vulnerable customer requirements.

GTK
6.12.05

¹ And some also by the Electricity [and Gas] Acts

SLC 37 Services for Pensioners, Disabled or Chronically Sick

Gas	Elec	Purpose ²	Would suppliers do it anyway?	Does it work for customers ³ ?
2	2	on request, provide free of charge...	Yes – subject to obligation being a requirement of the DDA or good CSR or customer service	Maybe – ‘on request’ is efficient, but how do customers know?
2a		gas safety check... ...if not landlords obligation	No – relatively high cost (though may be part of trust fund or CSR offer for some customers)	No – few customers know Yes – suppliers highlight landlords obligation
2bi	2a	special controls and adaptors for appliances and meters [in gas, if owned by the licensee or transporter]	Yes – DDA [except customer owned appliances, though might as CSR offer for some customers]	Not really – customers unaware?
2bii, iii	2a	reposition meters	Yes – DDA [but not for ‘able-bodied’ elderly]	Yes – [assuming ask if seriously inconvenient]
2biv	2b	means of identifying agents [passwords]	Yes – good practice. Also fits with supplier support for ‘distraction burglary’ prevention	Yes.
2bv	2c	advice on use of gas or electricity, appliances & fittings	Yes (energy efficiency) and probably (other advice) – show energy expert ⁴	Yes – if think to ask
2bvi	2d	3 rd party billing	Yes – good credit management. Also DDA.	Yes
2bvii	2e	quarterly meter read	Not if comfortable with six-monthly or annual reads	Yes?
3a	3a	list (PSR) of those who require info [and in electricity, advance notice of interruption]	Maybe – would want customer data, but would each have different method	Maybe – encourages promotion to new customers
3b	3b	notify PSR exists, annually	No – would target promotion to when customer most responsive	No – campaigns more effective
3c	3c	give information on PSR about services [and in electricity, advance notice of interruption]	Yes – show good service Yes – Distributor GS 12 requires 2 days notice to any customer	Unclear – what is take-up of services of those on the PSR?
3d	3d	pass PSR on to transporter/distributor	Yes – DuoSA or UNC obligation	Maybe – untested? Are DNOs able to use?

² The procedure for agreeing the code (Para 1, and Para 4) is outside the scope of this note – it also applies to the other codes and is not planned for discussion until January 16th

³ Pensioner, disabled or chronically sick, though services may also be available to other customer groups (eg. passwords (2biv/2b) and advice (2bv/2c))

⁴ Also, currently, SLC25 requires suppliers to provide energy efficiency advice on request

SLC 38 Services for Blind or Deaf

	Purpose⁵	Would suppliers do it anyway?	Does it work for customers?
2a	Access to bill or other service for blind and partially sighted	Yes – DDA	Yes
2b	Access to bill or other service for deaf and hearing impaired	Yes – DDA	Yes

⁵ The procedure for agreeing the code (Para 1 and Para 3) is outside the scope of this note – it also applies to the other codes and is not planned for discussion until January 16th

First Principles – What are we trying to achieve?

If customer is unable to safeguard the personal welfare of the household:

- A. Priority allocation if there is a scarce resource such as distributor support if there is an outage or response to call-outs
- B. Alternative payment arrangements – 3rd party billing, DSS deductions, cash payment by a carer
- C. If there is a payment problem – find a suitable method of payment (no disconnection)
- D. Referral to energy efficiency help
- E. Seek safety advice and act on it (or landlord does)

What do we need/works best?

	Objective, <i>which customers</i>	Customer (or carer) should...	Suppliers should...	How best to achieve?
A	Priority allocation resource, <i>for vulnerable immobile, especially if frail</i>	Identify themselves	(a) Pass information to distributor/transporter.	(a) Licence obligation to do
			(b) Seek to identify customers	(b) Licence obligation to try; best practice review to reward innovation and performance (<i>stakeholder & brand pressure</i>)
B	Alternative payment arrangement, <i>for vulnerable financially Incapable</i>	Identify themselves + adopt payment method	Seek to identify customers, promote payment options	Best practice review to reward innovation and performance
C	No disconnection, <i>for any vulnerable</i>	Best if identify themselves, but suppliers make running and have backstops	Seek to identify customers, stepping up action if in credit management process	ERA protocol + best practice review
D	Energy efficiency, <i>for vulnerable low income</i>	Call a helpline, accept visit, act on advice	Promote calls, respond effectively	Best practice review to reward effective supplier activity, Home Heat Helpline
E	Safety, <i>for all customers</i>	Act on a promotion – be safe or call helpline and act on advice	Promote action, respond effectively to calls, arrange safety checks	Best practice review to reward effective supplier activity

