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Our ref

Your ref

Date

-

3 December 2012

Dear Claire

Proposals for a new Consumer Vulnerability Strategy

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc. Western Power Distribution "WPD" is the electricity network provider for South Wales, South West England and the Midlands.

In general we support an approach that encourages electricity distributors to give greater consideration to the needs of vulnerable customers by looking at ways to identify vulnerability and signpost assistance. As part of the development of our Well Justified Business Plan for RIIO-ED1 we will be considering the area of vulnerable customers and our wider social obligations such as fuel poverty.

However the DNOs main focus should continue to be those customers who depend on electricity for medical reasons, especially in the event of prolonged power interruptions. We are also mindful of our responsibilities to comply with the Disability Discrimination Act in providing accessible services. In addition any sharing of data about vulnerable customers must comply with the requirements of the Information Commissioner.

Please see below responses to the specific questions raised in Ofgem's consultation.

Question 1: Do our proposed Strategy themes provide an accurate reflection of the work Ofgem should be doing to help protect consumers in vulnerable positions?

Yes. We support Ofgem's recognition that there are both minimum regulatory obligations and opportunities for companies to innovate and develop best practice beyond regulatory obligations. We agree that it is also important to work with trusted third parties.

Question 2: Do you agree that our proposed perspective on vulnerability? Are there other factors or features of energy markets that could present issues that we have not covered? We would be happy to work with Ofgem and third parties to understand how WPD can respond to Ofgem's dynamic perspective on vulnerability.

Question 3: What is your view on whether the BSI Standard on inclusive services could provide a practical approach to adopting our perspective on vulnerability. We would support consideration of the BSI Standard on inclusive services to provide a practical approach to responding to consumer vulnerability.

Question 4: What are your views on other approaches suppliers and distributors could take to adopt our proposed perspective on vulnerability? We are considering other approaches as part of the development of our Well Justified Business Plan.

Question 5: What are your views on our plans for developing a Consumer Vulnerability Network and are there additional organisations that we should engage? We feel the development of an up-to-date Consumer Vulnerability Network would be very useful, especially in identifying partners we can work with to help support customers on wider issues associated with vulnerability.

Question 6: What are your views on our proposed annual workplan for 2013/14? We have no specific comments.

Question 7: Do you believe that there are other areas that we should be specifically addressing in the workplan for 2013/14. We have no specific comments.

If you or someone from your team would like to discuss this further please do not hesitate to contact me.

Yours sincerely



ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager