



Consultation on Review of the Priority Services Register

An Ofgem consultation paper

Introduction

1. The Consumer Council for Water is the statutory consumer organisation representing water and sewerage consumers in England and Wales. The Consumer Council for Water has four regional committees in England and a committee for Wales.
2. We welcome the opportunity to respond to Ofgem's proposals in respect of the provision of extra services for people who need them and the updating of the energy sector's Priority Service Registers (PSR).
3. Our response is limited to our experience and knowledge of the equivalent registers in the water sector - Special Assistance Registers. Customers on the register can access a variety of non- financial services such as password protection schemes, meter re-siting, an out reader or a regular meter reading service and communication services for those with hearing and visual impairments.
4. In some instances we have responded to provide information only on the current situation in the water industry which may help to inform any further work around the proposal, especially in relation to cross-utility sharing of information.

Background

5. In the water industry there has been a steady increase in the numbers registered on water and sewerage companies' Special Assistance Registers since 2008. This is when CCWater began to work with companies to raise consumers' awareness of the availability of the registers and the specific services accessed through them. Since that time there has been a 116% increase in the numbers registered to 223,758 in 2013
6. However we accept that the numbers eligible for the services are likely to be much greater, especially in view of the Department for Work and Pensions' assertion that 11 million people have a limiting long term illness, impairment or disability.
7. Similarly our annual tracking survey of water customers' views, 'Water Matters', shows a rise in awareness of the services from 20% in 2011 to 31% in 2013. However, only a small percentage of consumers take up the service and the numbers unaware of the service who say they would like to know more remain fairly constant around 10%.¹
8. This demonstrates the need for continuing action to increase awareness of the services, so that those who need them can not only access but

¹ <http://www.ccwater.org.uk/wp-content/uploads/2014/05/Water-Matters-household-customers-views-on-their-water-and-sewerage-services-20131.pdf>

benefit from them. Several of the Ofgem proposals could contribute to raising awareness, especially cross utility activities.

Availability of services

9. We believe that widening the availability of the PSR services to others, in addition to the specific pre defined groups of pensionable age, disabled or chronically sick, will streamline the service in the energy sector with that which is already provided within the water industry.
10. The existing guidance to the water industry specifically allows for any customer who needs the services to be able to register whether or not they belong to defined groups. Greater commonality in the approach offered across the utilities will be advantageous in raising awareness of the services and allow for more cross utility promotion and awareness raising activities.

Cross utility sharing

11. Cross utility sharing of information about consumers needs is proposed in the consultation. We support this as it would improve the availability of these services to those that require them without consumers needing to take multiple actions to obtain the additional services from all utilities. Specifically in the water industry, the services would be retained without the need to re-register when a change of address results in a different water or sewerage company supplying the customer. Cross utility sharing may also result in an increase in the numbers who will be able to access the services. However, when we have previously suggested cross utility sharing to water companies they have responded by citing data protection difficulties. The Information Commissioner's Office will have a view as to the validity of this concern and we expect this will be exposed by the consultation proposal to explore this option with relevant regulators.
12. An alternative more immediate short term approach that we have encouraged is reciprocal signposting of the services between the energy and water companies. This signposting of the fact that similar services may be available in other utilities and recommending that the applicant contact the utility direct, should be on application forms and all literature related to the services, including websites. It should be extended to all other utilities as a 'least cost' interim measure as leaflets etc become due for reprint and while any data protection issues are resolved.
13. If the barriers to cross utility sharing, including the need for clarification on data protection issues, can be resolved, sharing of information about consumers will still require careful handling to make sure that consumers are aware of the information being shared, with whom and

for what purpose. Obtaining consumers informed permission to share their information will help in exposing these issues, but customers will also need reassurance as to how their data is being stored and accessed.

14. Should cross industry sharing of information become a viable option the suggestion of developing a common set of 'needs codes' and a standard format for data sharing through a working group seems appropriate and will hopefully make the process more effective and efficient.

Branding

15. The proposal suggests a single cross industry brand to raise awareness in the energy sector of the services. It appears from the evidence available to us that single branding is something that works well in raising consumer awareness.
16. In 2008 CCWater worked with the water industry to create a single brand - WaterSure - for a measured water tariff available for those on certain benefits and with either a large family or someone in their family suffering from certain medical conditions likely to increase water use. Since the introduction of the common branding Water Sure take up has increased by 426% to 85,318. If there is to be cross utility sharing of information the option of cross utility branding should also be explored.

Enquiries

Enquiries about this consultation response and requests for further information should be addressed to:

Barbara Leech
Policy Manager
Consumer Council for Water
Second Floor, Bondgate House, 90 Bondgate, Darlington DL3 7JY

Tel: 01325 728034

Email: barbara.leech@ccwater.org.uk

September 2014