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Ecotricity Reference No.: 451
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The Renewable Energy Company Ltd (Ecotricity)
response on review of the priority services register

Dear Rebecca Langford

Ecotricity is an independent renewable energy generator and supplier, with over 137,000 gas and electricity customers. We pride ourselves on the professional, transparent and personalised customer service that we offer, which is consistently recognised by our customers and third party surveys.

We support, in principle Ofgem's intention of ensuring that the most vulnerable customers receive the service which is appropriate to their needs. We question, however, whether expanding the PSR register is the appropriate mechanism to achieve this. The biggest risk in expanding the register in the subjective manner proposed is that the register will grow exponentially and those in greatest need of a speedy response will not get it.

In addition, inclusion of more subjective data in the PSR is difficult to achieve unless suppliers use a 'tick-box' approach with customers. This is far from adequate from a customer service perspective and we would be reluctant to do it. In addition, Ofgem should note that customers are often unwilling to share what can be very personal data with their energy supplier. This is through no fault of the supplier but simply that a customer does not consider it necessary or appropriate to share that detail.

Suppliers should not, therefore, be 'required' to collect this data but rather 'allowed' to collect it to improve customer service offering.

Question 1: Do you agree that energy companies should be required to offer non-financial services with the aim of equalising outcomes for customers?

Question 4: Do you agree that we should move away from requiring energy companies to provide services to disabled, chronically sick and pensionable age customers to an approach which requires energy companies to take reasonable steps to identify and provide appropriate services to any customer with safety, access or communication needs?

We find it appropriate to provide a combined response to Questions 1 & 4 below.

We take it as a given that all customers should be treated fairly and equally. We adopt an ethical pricing policy offering only one tariff for all. Our Contact Centre Team gently and respectfully seek to determine whether a customer should benefit from being included on PSR. Following a conversation with the contact centre, we send the customer a PSR form for them to complete and return, following which we flag their records and data-flows (as appropriate).

In addition we endeavour to collect and record other data related to a customer's vulnerability where it could be beneficial for the customer that we hold this data.

We therefore understand and agree that suppliers should endeavour to confirm 'needs' information with customers. We do, however, believe that caution needs to be exercised here; customers are often reluctant to share 'needs' information with their energy supplier, even when they understand that there are potential benefits in them so doing.

Whilst we agree that suppliers should offer services with the effect of equalising outcomes for customers, it is not appropriate, relevant or necessary to 'require' suppliers to put customers in the position of a typical customer. This drafting is so wide-ranging as to ensure that a supplier will fail to meet its obligations in this respect. This approach, we consider, does not fit well with regulatory compliance requirements, which would be closely monitored. Suppliers should therefore be allowed to continue collecting vulnerability data, but without the licence condition 'requirement' to do this or equalise customer outcomes.

We consider that the PSR should remain focussed on key needs required to ensure that customers in greatest need receive a priority service when it matters most. If the scope of the PSR is to be extended to include any customer with a subjective list of needs; there will be a risk that those needing the quickest response will not get it. This is because the number of customers on the register is too great to deliver that quick response to all.

Question 2: Do you agree that we should continue to prescribe a minimum set of services? Do you support the proposed list of services? What additional services, if any, do you think energy companies should be required to provide?

A minimum set of services is sensible in respect of allocating priority services.

We consider passwords are an appropriate mechanism for priority customers; however, suppliers should not be restricted in their use, especially if a customer does not want this service. We use password protection for a number of customers.

Regarding the gas safety check requirement to include children under 5, we see no reason why children under 5 should be added as a category. This category of customer will obviously be transient and additional monitoring will be required. Requiring suppliers to monitor the age of their customers' children would be disproportionate.

We support the minimum requirements regarding meter access.

We ask that Ofgem clarify their position with respect to communication needs. In particular is a non-English speaker who has no other vulnerabilities considered as having a communication need? We

would not support a requirement to communicate in multiple languages where there is no vulnerability present.

Question 3: If applicable, what services do you currently provide and what are the current costs of providing services (please break down by service)? What financial impact do you think widening eligibility in the way we have proposed will have? Please provide evidence to support your answer.

As referred to in answer to Question 1, we take steps to collect the data from customers and flag both their account and the respective data-flow. We provide communication appropriate to the needs of blind, partially sighted, deaf or hearing impaired customers.

We believe that if Ofgem widens eligibility as proposed, there will be costs associated with system development needed to capture and hold the additional information. There may also be additions to contact centre call times: staff would have to spend longer with customers to accurately ascertain their needs.

We are unable to confirm costs at this stage without a full project scope.

Question 5: Do you agree that energy companies should be required to maintain a wider register of consumers that they have identified as being in a vulnerable situation?

We already monitor vulnerability of customers in order that we can support them appropriately. We do not adopt a 'tick-box' approach for collecting the data as we consider this inappropriate from a customer service perspective. Whilst we do manage to achieve a balance of identifying vulnerability without intruding too deeply into the lives of customers, Ofgem should bear in mind that suppliers are not care professionals. It should not therefore be a requirement that we identify and record all vulnerabilities as this could, we consider, place our staff in difficult situations through a licence condition requirement which has been drafted too widely.

Question 6: Do you agree that suppliers, DNOs and GDNs should share information about customers' needs with: a) each other? b) other utilities?

Question 7: Should energy companies be required to share information about customers' needs with other fuel providers such as LPG and heating oil distributors. How could the transfer of this information work? What are the benefits and risks of sharing the information?

We find it appropriate to provide a combined response to Questions 6 & 7 below.

We already share PSR data for customers on our register with both DNOs and GDNs. This is possible and relatively successful because the PSR is currently tightly defined and the 'needs' codes used are clear, albeit different for gas and electricity. We consider that for a customer to receive a priority service it is essential that this data continues to be shared and we support this. Widening the categories and increasing their subjectivity, as proposed earlier in this consultation, could make this process more difficult to manage.

We support the idea of sharing data with other utilities provided the appropriate permissions are given. This is the sort of data programme where regulator or government support in communicating this intention to customers would be useful. We consider that such a programme will require a detailed consultation exercise in order to manage it effectively.

We agree that off-grid customers need to be considered; however, we can envisage difficulties in keeping this data up to date given the number and variety of participants in the market.

Question 8: Do you agree that we should stipulate the minimum details that we expect energy companies to share, for example that names and phone numbers must be shared where they are available? Is there any other information that should be shared and for what purposes?

We agree that it makes sense to stipulate the minimum details that Ofgem expects to be shared. The data proposed also seems sensible and would be helpful for all parties, if it can be achieved. The personal data proposed, when linked with supply data, is however, subject to frequent change, which will create complexities when managing it.

Question 9: Do you agree that energy companies should agree common minimum 'needs codes' to facilitate the sharing of information? Should we require energy companies to agree these codes? How might this work and what mechanisms are already in place to facilitate this? What role would Ofgem need to have in this process?

Yes, a set of common minimum needs codes across gas and electricity would be helpful but not essential.

Question 10: Should information about a customer's needs be shared with their new supplier when they switch? What is the best way to facilitate the sharing of this information?

We can understand why Ofgem would consider this to be advantageous. However, when a customer switches to us, as a matter of good practice, we will always check the data received to ensure it is correct and accurate, and to confirm that the customer is happy for us to hold it. We do not envisage the benefit to be as great as suggested.

During a switch suppliers exchange supply data not customer data. Adding the latter will significantly increase the complexity of the switch and should not be under-estimated in terms of the cost and time required to ensure processes are adequate for this purpose.

Question 11: Do you agree that a single cross-industry brand will raise awareness of priority services?

Question 12: Do you agree that a guidance document would help advice providers and raise awareness? Who should produce this document?

Question 13: What more can be done to raise awareness of priority services?

We provide answers to questions 11, 12 and 13 below.

We agree that a single brand for PSR would be helpful for customers and suppliers, and that a guidance document for energy companies would assist any change in emphasis from the current arrangements. Ofgem would be best placed to produce the guidance document. A publicity campaign led by Ofgem in tandem with Citizens Advice or another consumer organisation would be appropriate to raise awareness of PSR.

Question 14: Do you agree that supplier independent audits are the best way of monitoring companies' compliance with our proposed obligations? Do you have views on the approach the audit should take and what it should cover?

We would appreciate some clarification from Ofgem as to why they consider an external audit would be required in these circumstances. Ofgem already receives information from suppliers through Social Obligation reporting and we consider that this is a more appropriate means of monitoring compliance.

In addition, if external audits are required, we argue they should be paid for by Ofgem through existing funding.

Conclusion

We support, in principle, Ofgem's intention of ensuring that the most vulnerable customers receive the service which is appropriate to their needs. We do not think that the PSR register is the appropriate mechanism to achieve this. We think it is appropriate that we collect and hold vulnerability data, but that such data should not be included in the PSR.

We support the idea of a minimum set of requirements for the PSR register and the proposal to share data with DNOs and GDNs, but we caution around expanding this data set too widely. In addition, whilst we support the proposal to share supply data with other utilities, we do consider that Government or regulator support in communicating this intention to customers would be useful.

Finally, we consider that it is unnecessary for external audits of PSR arrangements to be carried out. It would be more appropriate to enhance existing social obligation reporting arrangements.

Ecotricity welcomes the opportunity to respond and hope you take our comments on board. We also welcome any further contact in response to this submission. Please contact Melanie Durston (contact details above) or me on 01453 769366 or holly.tomlinson@ecotricity.co.uk.

Yours sincerely,

Emma Cook

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