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22 September 2014

Dear Rebecca,

Review of Priority Services Register

We are pleased to be able to contribute to this piece of work and our responses to the specific questions you have asked in your consultation are attached.

We are supportive of the principle of us providing appropriate services to vulnerable customers but do have some concerns as to how this gets codified as obligations in our licence. Our concern is that making services an obligation changes our mindset in terms of the services we can offer. Where we provide the service on a voluntary basis we do not have the same concerns where they need to be provided in all situations.

Our other main concern is the timescales for the rollout of some of the initiatives. Sensibly some will need to be put in place first, such as a common set of data requirements before the sharing can be facilitated.

As always, if you require any further information, please do not hesitate to contact me.

Yours sincerely,

Brian Hoy
Head of Market Regulation

APPENDIX- RESPONSE TO SPECIFIC QUESTIONS

CHAPTER: Two

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

We support this principle.

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?

We agree that the proposed list of required services represents a sensible baseline of services that we should provide as a DNO. It is important that the services are not so prescriptive that we cannot enhance them as they should be seen as a baseline provision. We would not restrict the provision of these services to customers that are on our PSR and would utilize them where they would be helpful to any customer who is vulnerable.

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.

We provide a service via the British Red Cross who will contact customers who are off supply and who will issue 'vulnerable packs' when appropriate. Vulnerable packs contain analogue phones, contact numbers, hand warmers, torches, thermal hats and gloves, flashes, thermal mugs, blankets. We liaise with Air Liquide UK who supply oxygen backup cylinders for customers who are oxygen dependent.

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 fully support the concept of the provision of appropriate services when they will benefit customers however we are less convinced of the benefits of identifying all customers who may be vulnerable. Our approach is to take a broad definition of vulnerability using the BSI definitions. This includes many transitory situations of vulnerability and do not always seem to be best covered by inclusion on a register. We would therefore prefer to manage these situations as they occur rather than create a status on a register that can soon become inappropriate.

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 believe that the first priority should be to improve the data available on the most vulnerable customers and to improve the information flows between suppliers and DNOs. The information we receive now from Suppliers is poor and we believe it would be detrimental to the service we provide if a wider register is introduced at present. Once we have confidence that the core data is improved then we think it would be appropriate to consider extension of the register.

CHAPTER: Three

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

We are supportive of this principle and have been working with other industry parties to improve this.

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

There are obvious issues with the sharing of data and consideration should be given to the requirements under the Data Protection Act 1998, and the protection of customers. It is

important the customers are given assurances if their trust in the energy companies is maintained and increased and also that the customer's informed consent to share data is sought at all times.

Consideration should be given to a central data store of customer vulnerability data that the utilities, charities, alternative fuel providers and other interested parties can access and provide data to, which may mitigate concerns on relation to data security and integrity.

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?

Yes this is essential to facilitate data sharing.

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?

We support this in principle but recognize that there are some challenges in the detail. Customers can be vulnerable to difference aspects of energy provision and therefore some codes will have more relevance to DNOs for example, than to Suppliers.

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

We support this principle but do not agree that a DNO should act as the 'hub' for transferring the information. It would seem more appropriate for this information to flow directly from Supplier to Supplier. In the majority of instances it is the Supplier that has the direct relationship with the customer and therefore more appropriate for them to receive the information and decide what data validation they wish to undertake.

CHAPTER: Four

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

A single brand would have advantages for awareness campaigns but may have difficulties where there are differences in provisions.

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

We agree that this would be helpful. The appropriate trade associations could input into this task.

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

We would expect Suppliers to take the lead in this as they have the direct contact with their customers on a regular basis.

CHAPTER: Five

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 take very seriously our obligations but are not sure how this proposal sits with Ofgem's approach to Data Assurance. The approach outlined in the Data Assurance Guidance is risk based rather than having mandatory audits for most activities and it is unclear how this sits with that approach.