



## London HECA Forum Secretariat

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### Review of the Priority Services Register - consultation response

#### London HECA Forum

The London HECA Forum represents local authority energy and fuel poverty officers in Greater London. We have over 60 local authority members from across the 33 London boroughs and over 20 associate members from partner organisations involved in promoting energy efficiency within the capital. We welcome the opportunity to respond to this consultation on a review of the Priority Services Register.

#### 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?*

**Answer:** Yes. These services should be broadly consistent across energy companies, in line with our answer to Question 2.

**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?*

**Answer:** A minimum set of services should be prescribed and we broadly support those proposed but we would add the following points:

- A facility for all vulnerable customers, not just those with communication needs, to appoint a nominated person to assist with communications from energy companies.
- Guidelines on groups such as those who are broadly-drawn as being “more likely than a typical consumer to experience safety issues or have concerns about safety”, subject to our concerns about the nature of these groups (see answer to Question 4)

**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.*

**Answer:** Not applicable

**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?*

**Answer:** We are concerned that having such broadly-drawn, scenario based categories will leave a considerable amount of discretion with energy companies. This may then lead to customers failing to identify their own needs as they fall into a much more nebulous category than just being of pensionable age, disabled etc. It would also make it harder for agencies

such as local authorities to locate and refer people for priority services registers. Such categories may be poorly understood by members of the public and those assisting them. Unless there are very clear guidelines we would prefer to stick with clear categories such as those already employed. We would however argue that low income/fuel poor consumers should be added as a category of vulnerable customers. Such clients lack financial resilience and as such will be more vulnerable to the impacts of severe weather.

**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?*

**Answer:** We believe that all vulnerable consumers should be identified and added to energy companies' registers.

### **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?*

**Answer:** Yes. At point of sign-up, customers should be informed that they will be added to all relevant registers. We agree that the vast majority of customers will find data-sharing for this purpose to be uncontroversial.

**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?*

**Answer:** Such fuel providers, who can easily be affected by severe weather, should also be obliged to maintain priority services registers and to be proactive in locating vulnerable consumers. We see no functional reason to exclude them from the requirement, particularly as they often serve very isolated communities and households. Assuming that such companies are subject to data protection legislation, we see the benefits as outweighing any small risks.

**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?*

**Answer:** Yes, minimum details should be stipulated. These should include name, address, contact number, nominated person if required, password if required and basic details of vulnerability. Vulnerable consumers benefit from not having to have the same conversation with various different companies and would potentially benefit from having a single password across energy companies.

**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?*

**Answer:** Companies should agree common minimum 'needs codes' and these should be mandatory. Ofgem should monitor compliance.

**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?*

**Answer:** We agree that customers' priority status should be portable and transfer to their new suppliers when they switch. Details should be transferred as part of customers' account transfers.

#### **CHAPTER: Four**

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

**Answer:** Yes. Consistency will help to improve familiarity amongst customers and those working with them. Presumably 'Priority Services Register' would be the likely choice.

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

**Answer:** Yes. This document should be produced by Ofgem in consultation with stakeholders such as advice providers, the NHS and local authorities.

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

**Answer:** Suppliers should work with local authorities and social landlords, who typically have access to a significant amount of data on tenants or residents. In 2013/14 Islington Council referred over 1,100 people to their suppliers' priority services registers and 400 to the regional DNO. Financial support for such initiatives from suppliers and DNOs would assist greatly, particularly as financial constraints may be prohibitive otherwise. Suppliers and DNOs should also work with health and social care services and emergency services to locate at-risk customers.

#### **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?*

**Answer:** We agree that energy companies should be required to conduct independent audits.