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Rebecca Langford
Consumer Policy
Ofgem
9 Millbank
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Dear Rebecca,

Review of the Priority Services Register

Scottish and Southern Energy Power Distribution welcome the opportunity to respond to Ofgem's Review of the Priority Services Register. We are fully committed to understanding and assisting with the different needs of all of our customers and have set out comprehensive plans for the RIIO-ED1 period that enable us to continue to ensure that all of our customers are given equal access to the information and services that they require, providing peace of mind and additional support where needed.

Our mission during RIIO-ED1 is:

- To provide a safe reliable supply of electricity
- To understand the different needs of our stakeholders and customers
- To reach out to a diverse audience and provide accessible services.

Our vision, by 2023, is that our fair, accessible and responsive service will champion the needs and welfare of every customer whilst providing a safe, reliable supply of electricity.

In line with this, we fully support Ofgem's review of the Priority Services Register and believe that an industry review is essential to ensure the register is utilised to its full potential and customer interests are safeguarded.

Answers to the specific questions set out in the consultation are provided in Appendix I.

If you have any questions on our view or would like to discuss this further then please do not hesitate to contact me.

Yours sincerely,

Gwen MacIntyre
Regulation, Networks

Appendix I

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

Yes.

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 prescribing a minimum set of services is sensible. We are generally supportive of the proposed set of services and indeed already provide the majority of these. However, we note that some of the services proposed for customers with communication needs appear to be more relevant to suppliers than DNOs (for example providing usage information and account summary information) and would need to ensure that the final set is tailored to be relevant to DNOs.

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.

Any relevant costs have been provided in our RIIO-ED1 Business Plan.

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 agree with extending the definition of vulnerable customer and this is something that we have already committed in our Business Plan to doing. In our experience there can be a wide number of reasons as to why a customer could be considered as vulnerable, particularly during a supply interruption. For example we already include households with a child under 12 months old on our

register. We would like to continue to have discretion in categorising customers as vulnerable based on their individual circumstances.

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?

Yes. Please see our answers to question 4 above.

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

We agree that DNOs, GDNs and suppliers should share information about customers' needs and that this would ensure a coordinated approach. However there would need to be some controls in place on the system to ensure that changes to an individual's circumstances were appropriately updated. As noted in our answer to question 4 above, we would also like to retain the discretion to denote customers as vulnerable for supply interruptions.

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?

Whilst we are not opposed to the principle of sharing this information with other fuel providers, we are not sure how this could work effectively in practice.

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 minimum details should be stipulated. These should include customer name, address, contact number (where available) and reason for vulnerability. It is important to include the reason for vulnerability to avoid repeat contact with the customer to establish this.

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?

Minimum 'needs codes' would be helpful to facilitate the sharing of information. We consider that these would be established voluntarily by energy companies through an industry working group, which could perhaps be a subgroup of the existing Customer Safeguarding Workgroup.

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?

Yes this would seem sensible. In line with our question 6 above we believe the simplest way would be for the previous supplier to provide this information to the new supplier at the point of the customer switching.

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

A single cross-industry brand would be helpful for raising awareness and ensuring customers recognise the services provided.

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

A guidance document would be helpful but should focus on minimum requirements and not constrain energy companies to the different ways they may wish to approach helping their vulnerable customers.

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

We actively identify eligible customers by promoting our PSR service on phone calls with customers, at public meetings, in press releases, social media and through our PSR leaflet which details the key benefits of our free service. The leaflet has also been distributed by trusted intermediaries who we identified as having regular contact and strong relationships with customers who could benefit from registration.

This includes making them available to every GP surgery; to every hospital (concentrating on units such as renal, pulmonary, remote monitoring and midwifery units) as well as through resilience and emergency planning partners in our licensed areas. We are evaluating this approach and an ongoing communication campaign will be developed as part of our evolving vulnerability strategy. This approach has proved hugely successful.

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 have already committed to providing looking back reports on our engagement with customers each year. These will be independently assured. Information on the services we have provided to our vulnerable customers could be provided as part of these annual reports and should be measured against the minimum standards.