

Manor House
Station Road
New Penshaw
DH4 7LA

Bhavika Mithani
Consumer Policy
Ofgem
9, Millbank
London
SW1P 3GE

14 May, 2015

Dear Bhavika,

Review of the Priority Services Register - Update and Next Steps

I am writing on behalf of Northern Powergrid (NPg), the Distribution Network Operator (DNO) operating across Yorkshire, North East England and North Lincolnshire. We welcome the opportunity to comment on the changes Ofgem propose to core eligibility for certain services on the Priority Services Register (PSR). We are supportive of any changes proposed to the PSR that will enhance the service our customers receive, at an efficient and reasonable cost. We developed our business plan for 2015-2023 with extensive feedback through our independently chaired Social Issues Expert Group and our Customer Service Expert Group; and we continue to engage and consult wider stakeholders as we develop our social offer including enhanced PSR services.

- 1. Do stakeholders agree that ‘families with children under 5’ should be added as a specified eligible “core” group to receive additional help during interrupted supply and for the provision of free gas appliance safety checks?**

We fully support that ‘families with children under 5’ should be added as a specified eligible “core” group to receive additional help during power cuts, and for the provision of free gas appliance safety checks. We understand the implications an interruption to power can have for families with young children.

We feel the vulnerability of this group is likely to be one of a temporary nature, and consider that it would be practical to request the age of the youngest child at the point of registration to ensure our records are as reliable as possible for targeting appropriate services on an on-going basis. We consider that further segmentation of this group to identify ‘families with children under one’ would also be beneficial, due to their feeding and heating requirements. Recording the age of the youngest child in a household would allow us to differentiate between the two segmentations, ensuring we can tailor our service accordingly.

Our 2015-2023 business plan details our commitment to adopt a broader view of vulnerability; developing more accurate information about our customers to identify those that are vulnerable, and understanding their needs. During the development of our plan in 2013, we identified households with ‘young babies’ as a vulnerable group; our training has been reviewed, and will continue to be regularly updated, to encourage our contact centre advisors and field teams to recognise vulnerability triggers, such as if they hear a young child in the background of a call, or during work at a domestic premises.

- 2. Do stakeholders agree that the specified eligibility covering elderly people for the services related to safety should be changed from ‘pensionable age’ to ‘75 and over’?**

NORTHERN POWERGRID

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We will have customers registered on our PSR as elderly who are of pensionable age and above, yet may not have any vulnerability other than perhaps their age. We have considered the wider evidence provided by Age UK, suggesting that the risk of detriment within this group through factors such as health and living alone *increases* with age. We support the suggestion that the specified eligibility covering elderly people for the services related to safety should be changed from 'pensionable age' to '75 and over' for customers registered on our PSR.

While we support the suggestion, we have concerns regarding the customers currently registered as 'elderly' without any other vulnerability, and also how we approach segmentation of the data we already hold. A large proportion of our PSR is registered as 'elderly' with no other special need code (approximately 48% of our overall PSR). We have not previously captured the age or date of birth of these customers. We have noted the comment in Ofgem's open letter, stating that '75 and over' is a relatively easily identified group due to the provision of free TV licences. A cross-referencing exercise would need to be carried out on our database, and there may be data sharing and IT implications to doing so, which would need to be explored.

Consideration needs to be given to those customers who are identified as being over pensionable age, but younger than 75, without the need for another PSR service. We are aware that these customers would not fall under the new needs-based requirements; we would need to consider carefully if, and then how, we communicate this change in arrangements whilst providing appropriate reassurance that our overarching approach to customer service will still be there to support them, and react to any specific issues of individual need should their personal circumstances change. With this in mind, we would propose that an additional 'code' is applied to every customer who falls into the current 'elderly' category. This code would define their age based on two ranges (65-74, and 75+). While we would prioritise those in the 75+ category, we would still have an awareness of those in the 65-74 age range, and could check on their well-being in individual circumstances (under certain conditions). When we add any customers in the lower age group to our register in the future, it would be important to ensure that they had some heightened need for additional support that did not fall into one of the other need codes; for example, living alone, or ill health that was not deemed to be a critical medical condition.

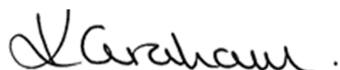
3. Do stakeholders consider that pregnant women should be added as a specified eligible "core" group receiving free gas safety checks?

We recognise that the risk of carbon monoxide poisoning exists from gas appliances. We acknowledge the evidence provided by the APPCOG, presenting the increased risk of carbon monoxide poisoning to pregnant women and their unborn children, and so accept that there is a benefit to this group receiving free gas safety checks. However, as an electricity network operator, we feel that if we were to add pregnant women as a specified eligible "core" group we would be unable to offer them any needs-based services until the point that their child was born and they could be registered as a 'family with children under 5'.

We agree with the requirement to acknowledge certain 'at risk' groups within the needs-based model, retaining "core" eligible groups in relation to safety, but feel that these "core" groups will be different for DNOs, Gas Distribution Networks (GDNs) and Suppliers. As a DNO, we are unable to support the addition of 'pregnant women' as a specified eligible group to the PSR, as we do not feel they are materially any more 'at risk' during a power cut than a person who is in full health and *not* pregnant.

I trust you find these comments useful. We would be happy to meet with you and the relevant members of your team to discuss them further or to respond to any questions that you may have.

Yours sincerely



Kelly Graham
Head of Customer Service