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15/2/16
Ecotricity Reference No: 580
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The Renewable Energy Company Ltd (Ecotricity) **Feedback on the PSR Final Proposals**

Dear Bhavika,

Ecotricity is an independent renewable energy generator and supplier, with around 170,000 gas and electricity customers. We consistently have the lowest rate of complaints in the industry and pride ourselves on our customer service.

We agree with the response made by Energy UK and add further responses to the questions below:

1) Do you agree with the final proposals to enhance eligibility and customer identification & the associated licence conditions?

A minimum set of services is sensible in respect of allocating priority services. However we have concerns that the eligibility criteria and Ofgem's expectations for suppliers' identification are too onerous. For example, children under 5 will obviously be a transitional category and additional monitoring will be required. Requiring suppliers to monitor the age of their customers children is a disproportionate measure. So long as customers are adequately and regularly informed of their entitlement and suppliers make reasonable endeavours to identify vulnerability, this should be sufficient.

2) Do you agree with our final proposals for amending the PSR services and the associated proposed licence conditions?

We believe that the standards required by the proposed licence conditions are largely achievable for suppliers. However, there's some inconsistency between the core eligible groups and the licence conditions. Children under 5 are included but are not referenced in the licence conditions.

3) Do you agree with our final proposals for recording and sharing information about customers in vulnerable situations and the associated proposed licence conditions?

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. Extensive systems changes will be required, so Ofgem's target date of June 2016 for implementation is too optimistic.

4) Do you agree with our final proposals for raising awareness of the priority services, including any specific suggestions for energy companies to improve awareness?

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. We support a publicity campaign led by Ofgem in tandem with Citizens Advice or another consumer organisation would be appropriate to raise awareness of PSR. Streamlining the branding as 'Priority Services' should hopefully improve uptake.

5) Do you agree with our final proposals for the approach to monitoring energy company performance in this area?

We have no concerns with Ofgem using SOC monitoring as a benchmark for PSR compliance. We value Ofgem's proposal to undertake a wider set of monitoring, focusing on the quality of suppliers' customer service.

Conclusion:

We are largely very supportive of Ofgem's final proposals for the Priority Services Register. The transition to principle based regulation has been given due consideration. However, we'd like to ask for clarification regarding monitoring eligibility. Additionally we ask Ofgem to recognise the IT requirements of suppliers and DNOs sharing customer data before establishing an implementation date.

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 Ryan Wilkins on 01453 769392 or ryan.wilkins@ecotricity.co.uk

Yours sincerely,



Emma Cook
Head of Regulation, Compliance & Projects