

15 February 2016

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

Dear Bhavika

### **Review of the Priority Services Register – Final Proposals**

I am writing on behalf of Energy Networks Association (ENA). ENA is the industry body for UK and Ireland's gas and electricity transmission and distribution networks, essentially, the 'wires and pipes' that deliver this vital service to our homes and businesses.

ENA and its members welcome Ofgem's Final Proposals for its Review of the Priority Services Register (PSR). We are supportive of Ofgem's aim to ensure that its non-financial provisions for vulnerable customers are better targeted and provide effective protections.

ENA responded to Ofgem's consultations on both its Initial Proposals and Update/Next Steps and have continued to engage with Ofgem in the run up to the publication of these final proposals. This has predominantly been through bilateral meetings and via the Customer Safeguarding Working Group (CSWG), which has now been renamed Safeguarding Customers Working Group.

With regard to the final proposals, the key points from our members are summarised below

- **Eligibility**
  - We support the proposals for changes to eligibility and agree that they will ensure that PSR support is better targeted at customer in vulnerable situations.
- **Services**
  - ENA members support the proposals with regard to the provision of services to vulnerable customers and look forward to working with Ofgem as these proposals develop.
- **Customer Identification and Data Sharing**
  - We welcome the proposals for data recording and sharing and are pleased that the work of the CSWG on the development of Needs Codes has been highlighted in the consultation document. We will continue to work with Ofgem and lead the industry as this work develops. We also feel that an increased emphasis should be put on maintaining and updating existing Priority Services Registers.

- **Raising Awareness of Service and Take Up**
  - ENA members would like further clarification of the proposal made in section 4.7 of the final proposals document that states companies should make reasonable steps to inform domestic companies of the statement in relation to the PSR at least once a year, especially in light of the recent changes to the “Notice of Rights” obligations.
- **Compliance and Monitoring**
  - ENA members agree that Ofgem should use the Stakeholder Engagement Incentive to allow it to monitor the networks performance under the proposals for PSR. Although our Gas Distribution (GDN) Members would like to see clearer guidance as to how this will be set out under the Discretionary Reward Scheme.
- **Proposed Changes to Licence Conditions**
  - ENA members welcomed the engagement from Ofgem during the drafting of the changes to the licence conditions for the Electricity Distribution and the Gas Transmission licences.
  - The proposed Gas and Electricity Supplier Licence conditions need to be amended to reflect the addition of children under 5 where vulnerability is present in the household, to the core group eligible for safety related services
  - Our GDN members would like to mirror the reference in the Electricity Licence that they are also “free to offer services to Domestic Customers that exceed those required by the licence condition” as with Distribution Network Operators (DNOs)
  - To facilitate the sharing of vulnerable customer data, we feel that all companies who are required to maintain a Priority Services Register should have, in their license conditions, a requirement to register a customer, when they have been referred from the relevant supplier or network (DNO or GDN). In the proposed amendments, this has only been included in the DNO license conditions, which might restrict the sharing of data with gas and electricity suppliers, as it is beneficial for the customer and GDNs to be able to register the customer immediately with their relevant supplier.

We hope that you have found these comments useful and we look forward to engaging with Ofgem via our CSWG throughout the year as we further develop the proposals for the PSR.

Should you wish to discuss any of these points further, please contact Clare Cantle-Jones, Regulation and Policy Manager on ([clare.cantle-jones@energynetworks.org](mailto:clare.cantle-jones@energynetworks.org))

Yours sincerely



David Smith  
**Chief Executive**