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Dear Bhavika,

Re: Priority Services Register (PSR) Review – Final Proposals

National Grid welcomes the opportunity to respond to the final proposals published on the 17th December 2015 in relation to the Priority Services Register (PSR). This response is made on a non-confidential basis on behalf of National Grid Gas Distribution (NGGD).

We have welcomed the opportunity to lead the Customer Safeguarding Working Group and were pleased to see that the collaborative approach and outputs of the group has been recognised throughout your final proposals document.

The work carried out by Ofgem in reaching the final proposals has been fully consultative and National Grid supports the findings. The proposed eligibility and identification improvements will help support companies throughout the industry to play their respective parts in delivering equal outcomes in relation to safety, access and communications. Likewise, a single set of needs codes will provide consistency, allowing two-way data sharing and improving the process so that, with the correct informed consent, data can flow effectively between energy companies meaning that customers only need to register once. Consistency in categorisation will allow specific and tailored responses to be designed to improve interactions with customers and households.

The requirement that Gas Distribution Network (GDN) companies help customers to register when at the doorstep, allows for the most effective use of our 'once in a life-time' interaction but benefits the customer for all future essential service interactions. By enabling GDNs to pass customer information, with informed consent into Electricity Distribution Network Operators (DNO) PSR's that already exist, provides a simple, repeatable and achievable process.

We support the new single set of needs codes being made available through the gas data flows, post Nexus implementation and the post implementation period, and are keen to watch the change request progress through the Issues Resolution Expert Group (IREG) process to understand any valuable lessons to aid the speedy development once UK Link changes are possible. It should be noted however that timescales to this project are based upon the successful and timely delivery of Nexus.

National Grid is also very supportive of the work initiated by both Ofgem and Ofwat to understand what opportunities are possible, both in the near future and beyond, around 'sign-posting' or making customers aware of relative utility registers. As detailed at the roundtable event held on 6th October

2015 and in subsequent discussions, we are looking at ways, in conjunction with other CSWG members, to progress this collaborative working to improve the services offered. An example of this could be the potential opportunity to have a single application process for those in critical debt situations, taking current practices and making them easier for customers to help themselves across the different utilities.

Finally we would like to thank Ofgem for their continued support of the work being carried out via the CSWG and look forward to continuing building upon the foundations now laid via this consultation process.

Further to the general comments above, National Grid has provided detailed responses to the specific consultation questions in the annex attached to this letter.

If you have any queries please contact Jo Giles, Strategy Implementation Manager – Social Programmes on 07775 413482 or at jo.giles@nationalgrid.com.

Yours sincerely,

[By email]

Paul Rogers

Stakeholder Delivery Manager

Appendix – Response to consultation questions:

Q1. Do you agree with our final proposals for enhancing eligibility and customer identification and the associated proposed licence conditions?

NGGD supports the suggested extensions to the current categorisation aimed at ensuring a more inclusive and holistic approach towards customers in vulnerable situations as well as focussing on the actions required for a specific Customer as opposed to the vulnerability itself. We support the improvements to the current registration model so that the onus is placed upon GDNs to advise, support and register the Customer once informed consent is obtained.

We are pleased to see that core eligibility groups will remain to allow a minimum level of support during network interruptions, however like many members of the CSWG, we endeavour to go beyond this principles based approach.

We have already begun to take steps to ensure that our colleagues will have the support needed to take all reasonable steps in identifying eligible customers whilst on both the virtual and physical doorstep. Allowing people to pick up on tell-tell signs, but also by using information available to us to also set trigger points to help provide extended services such as fuel poor and CO advice.

We are encouraged by the new needs codes including more specific age related categories such as '75 and over'. Through our interactions with Age UK we believe that this code will encourage a greater registration take-up, which will allow us to make adjustments in our interactions to allow for frailty, age-associated cognitive decline and other age related symptoms which are less specific and recognised under the code of 'pensionable age'. It can also allow the industry, through the CSWG approach, to raise awareness in smarter ways such as through partnering opportunities with BBC licencing so that they send documentation sign-posting the PSR at the same time as the statutory free TV licence.

Q2. Do you agree with our final proposals for amending the PSR services and the associated proposed licence conditions?

NGGD believe that a principles based approach will allow for greater innovation and creativity in developing services that result in good customer service outcomes being achieved.

We are fully supportive of the findings through Ofgem's review and are committed to reviewing the services we already offer, looking for improvements to provide equal outcomes to all customers, especially those who need additional support around safety, access and communication.

We would, however, like to reiterate our concern with the GDN licence condition detailing arrangements in respect of meters. With industry-wide change around the provision and installation of Smart Meters, there is a future need to review how Smart meter moves will be managed based upon who will be providing this service. We are aware that you have made note to this concern within the final proposal and would like to offer our support in helping to progress this.

This concern also extends to the current process, where GDNs upon finding a fault with a non-smart meter are able to repair/replace it – keeping customers safe and warm. However at this current point in time, due to a number of unknowns, these supporting actions may no longer be deliverable by GDNs, although we are actively working with the industry to resolve these issues. Whilst there is much work progressing to enable the successful roll out of Smart metering we urge that business as usual situations, including the immediate replacement of faulty Smart meters, are considered to prevent customers being left in vulnerable situations during an off gas situation. These issues will be especially relevant for customers who may find contacting the relevant parties to progress the replacement/repair of a new Smart meter difficult or daunting.

Smart metering provides other potential opportunities to improve how the industry links its services to the PSR needs codes. The opportunities include making a judgement on whether a Smart meter is the correct choice for all customers prior to offering the new technology, or even as part of the installation criteria; for example where digital displays cause distress or drives the wrong customer behaviours leading to the risk of under heating their home or that pre-payment for people who do not have the access or knowledge of how to use the internet to make convenient payments.

To help address these CSWG, through their Best Practice sub-group, has started working on a joint industry approach to understand what can be done to reduce risks and encourage consistency across the industry. Outputs from the 'SMART about Vulnerable' meetings are available via the ENA and have seen input from across both CSWG and Smart metering members including SEGB.

A final area for consideration, in relation to the licence conditions, is to ensure that any amendment to Standard Condition 17/Standard Special Condition D13 of the Gas Transporters licence provide consistency for households regardless of whether they are located on an iGT or GDN.

Q3. Do you agree with our final proposals for recording and sharing information about customers in vulnerable situations and the associated proposed licence conditions?

NGGD are fully supportive of the final proposal and are pleased to see that the GDN licence condition changes include the requirement for seeking informed consent. We also support the two phased approach when implementing the industry-wide needs codes which will allow for the implementation of Nexus as a preceding system project. This will enable Nexus to deliver first with a post 6 month implementation period before any system changes are made within the gas side of the industry. We would be happy to continue providing regular updates to Ofgem via the CSWG on how this and the wider changes progress.

We welcome that at the point of final implementation of the proposals further opportunities and steps will be considered on how data sharing can then progressed with other utilities, providing a wider cast safety-net for those most vulnerable in society.

Q4. Do you agree with our final proposals for raising awareness of the priority services, including any specific suggestions for energy companies to improve awareness?

NGGD are fully supportive of the developments and creation of materials detailing the PSR jointly across the industry which will provide consistent messaging and increase the ease of registration. Such documentation will help support the CSWG multi-agency approach being developed through working with referral schemes, meaning single documents can be shared via GP surgeries, libraries, neighbourhood watch and hospital discharge processes.

To supplement this, through the development of the Needs Codes Actions it will be possible to, against each needs code, consider what opportunities there are to increase awareness through both a national and local approach. An example would be *Female Presence Required* providing potential to work with Victim First associations to raise awareness of the PSR and password scheme.

Through the CSWG Stakeholder and Communications sub-group, opportunities to connect with parties such as 'comparison' websites will also help provide a trusted link into the PSR in the future.

Awareness through standard internet tools and social media are opportunities that NGGD will be exploring further as we help our customers and colleagues alike build their awareness of the PSR and the services available.

Q5. Do you agree with our final proposals for the approach to monitoring energy company performance in this area?

There is ample scope within the incentive programmes to reward collaborative working and innovation in the area of Safeguarding.

Further clarification is required on how the GDN spend of £1.8 million in the first year for implementation of systems, is likely to be calculated – whether this is in line with previous RIIO fixed variables or otherwise.