



Network Planning & Regulation

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Date:
18th February 2016

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Dear Bhavika,

Priority Services Register Review – Final Proposals

Thank you for the recent Final Proposals document setting out Ofgem's latest thinking on its review of the Priority Services Register (PSR) and seeking feedback on the proposals and the draft Licence condition SLC10.

The attached response is provided on behalf of SP Energy Networks. We would welcome the opportunity to discuss any aspect of our response further. In the meantime, please do not hesitate to contact us should you have any queries regarding the points in this letter.

Yours sincerely,

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Priority Services Register Review – Final Proposals

1.2. The specific questions are:

Question 1: Do you agree with our final proposals for enhancing eligibility and customer identification and the associated proposed licence conditions?

SPEN agree that we should be taking reasonable steps to identify eligible PSR customers, via customer interactions and targeted promotional activity.

In relation to the final proposals for eligibility, SPEN agree that the onus should be on Suppliers and DNOs to identify vulnerable customers and offer appropriate services.

We also agree that we should offer services to vulnerable customers based on their individual needs. At present, this is a model that SPEN follow. During a planned or unplanned outage, we treat each PSR customer individually and ensure that they are contacted and their needs are met, whatever the requirements may be.

We also have a strategy defined by data to help understand our target audience and the locations in which we should focus our proactive efforts.

With regards to the list of 'Needs Codes' by which the PSR operates; we will continue to participate in the industry working groups to define an agreed list which will meet Ofgem's expectations but also ensure that there is no impact on customer privacy and that the list is able to be met operationally.

Please see specific comments below on the core groups commented by Ofgem.

Pensionable age aged 75 years and over

SPEN agree with Ofgem's view not to amend the current pensionable age 60+ to over 75. We believe that there may be pensioners aged 60 – 74 that may consider themselves vulnerable due to their age and should not be excluded. Currently our Register is made up of 40% of pensioners. However due to the fact that DNOs do not routinely capture date of birth, we are unable to determine how many elderly residents we would need to contact and either remove or retain on the register if a move was made to increase pensionable age to over 75. This could potentially cause distress and result in a negative service experience for the customer.

In addition, amending the categories posed a significant data management issue. Potentially DNOs and Suppliers may have ended up in a situation whereby those customers that fell into the 60+ category until a supplier moves them over or a contact was made to the DNO, as no date of birth is captured by DNO.

Families with children under 5

SPEN agree with Ofgem's view to include families with children under 5 as a core eligible group. We currently capture this information in the 'Other' category although we are working on a permanent IT solution to ensure that this information is separated out. We expect these changes to go live in June 2016.

We do not agree that by capturing this information as a separate field will increase PSR numbers to unmanageable volumes. We currently capture as a matter of process so the reality is that it is only being recorded in a different manner.

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Pregnant women

SPEN agree with Ofgem view that pregnant women should be excluded from the list – unless they specify that they feel vulnerable or may like extra assistance in which case we would automatically add them to the PSR.

Pregnancy by nature is a transient and is also a sensitive issue. We were uncomfortable capturing this data in the event of causing distress or upset at a later date if anything was to go wrong with the pregnancy.

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

SPEN agree with the final proposals for amending the PSR services. We currently provide information in various formats for customers with additional communication requirements.

With regards to the specific outcomes, please see comments below:

Formalising Knock and Wait

SPEN currently offer a knock and wait service, captured in the 'Other' category. We agree with Ofgem's view not to formalise this process through regulation and instead, leave it up to each company to administer.

Our Engineers are experienced in the field and can recognise and record signs of vulnerability on site. Where knock and wait service requested or noted on PSR record, Engineers will use common sense to determine the appropriate length of time to wait at entry to the premise.

Quarterly meter reads and GDNs providing information to customers in advance of supply outages are Supplier / GDN issues.

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

While SPEN agree with the outlined approach, there are several key considerations.

Phase 1

SPEN agree that two way data sharing is vital between DNO and Supplier and will support such a development by voting to accept such a Change Proposal at MRA Development Board.

In relation to the 'Needs Codes'; as per the recent rejection of WPD sponsored CP at MDB, which SPEN were minded to accept, there were wider concerns regarding codes and the fact a Privacy Impact Assessment hadn't been carried out. Until a general agreed consensus is reached on the proposed codes, any CP that is raised will likely be rejected at the MDB meeting.

An industry sponsored CP will need to be raised at MDB and then Impact Assessed before it will be voted on at the MRA Development Board. There will then be a 6 month development freeze, meaning that any implementation date will likely not be reached before late 2016 if the CP is accepted. This indicative timescale will need to be considered in reaching any final decisions.

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Phase 2

Given the impact of Project Nexus, SPEN think it is wise to defer any changes until post-delivery in June 2017, however we will support ongoing Working Group best practice sharing and development of Privacy Impact Assessments for new needs codes. As per previous discussions we don't believe it is practical or possible to share data between gas and electricity companies via DTC Data flows.

Question 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?

SPEN agree with the final proposals on raising awareness of the Priority Services Register and will continue to refer to the term 'Priority Services' when engaging with customers and third parties.

We will continue to consider customer needs and circumstances and look to develop more innovative ways to increase customer awareness and promote take-up of PSR services.

We will continue to prepare and set out statements on their obligations under the PSR, in plain and intelligible language and make available on our website.

In relation to informing our Domestic Customers of the statement and how to find it at least once a year – this is something that we currently do and will continue to do so.

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

SPEN agree that the most effective way to measure the Network companies is through the existing Stakeholder Engagement Incentives. Given the recent work that has been carried out on the Consumer Vulnerability element, we feel that there is now a defined and consistent methodology by which Ofgem can effectively assess performance.

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Standard Condition 10 of the Electricity Distribution Licence – Working Draft

In relation to the draft Standard Licence Condition 10 of the Electricity Distribution Licence, SPEN are overall supportive of the amended drafting with the following comment to note.

- 1. 10.7: (ii) if (and only if) it has the informed consent of the PSR Customer, give the Relevant Supplier such details of that customer and his or her reasons for being included on the register, in such form and at such intervals, as are relevant to the performance of that supplier's obligations under the Supply Licence.**

SPEN believe that this clause should mirror the existing Supplier PSR consent process. As currently drafted, there may be differing interpretations.

Utilising this wording could potentially expose DNOs to a situation where a customer registers on a DNO PSR but refuses to consent to sharing of their data with their Supplier. In this instance, if we move towards two way data sharing dataflows via the Data Transfer Catalogue we would also need to build this in to the flow specification which currently doesn't exist.

SPEN feel that this process is currently in existence from Supplier to DNO, therefore we should mirror the existing arrangements to ensure consistency.

- 2. "Disability" is not currently defined in SLC10**

An agreed approach as to what constitutes a disability should be utilised to ensure a consistent approach across DNOs.

Under the Equality Act 2010, a person is deemed to be disabled if they have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities. This includes individuals diagnosed with HIV infection, cancer or multiple sclerosis. As such conditions may be sensitive in nature; we seek to understand if a common sense approach should be used by DNOs, or, if a defined list should be agreed utilising the Equality Act.

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