

Bhavika Mithani
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By email only to: bhavika.mithani@ofgem.gov.uk

11 February 2016

Dear Bhavika

Priority Services Register Review – Final Proposals

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a collective response on behalf of UK Power Networks' three licensed distribution companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. Our response is not confidential and can be published on your website.

We are supportive of the decisions in the priority services register sphere and we have set out our answers to your specific questions in the appendix to this letter. If you have any questions, please do not hesitate to contact Paul Measday in the first instance.

Yours sincerely



James Hope
Head of Regulation and Regulatory Finance
UK Power Networks

Copy Paul Measday, Regulatory Reporting & Compliance Manager, UK Power Networks

Appendix

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

We are supportive of the final proposals regarding eligibility and customer identification as they affect DNOs. We believe that clause 10.3 of the draft DNO licence condition could be improved as there is a possibility that the current wording could be misinterpreted as meaning that customers only become PSR customers because of their interaction with the DNO. Alternative wording which overcomes this is set out below:

10.3 The licensee must set up and maintain practices and procedures to identify Domestic Customers who may be eligible to become PSR customers and to offer to add them to the Priority Services Register. Such practices and procedures must only apply to a licensee's direct interactions with its customers.

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

We are supportive of the final proposals regarding PSR services as they affect DNOs and the associated licence condition.

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?

We are supportive of the final proposals regarding recording and sharing information about customers in vulnerable situations as they affect DNOs. It is however worth noting that as drafted the licence condition means that if a customer does not give informed consent for a DNO to pass their details to their supplier (paragraph 10.7) then the consistency of information (i.e. whether a customer is a PSR customer) between DNOs and suppliers will diverge. The drafting in the supply licence will also have the same result.

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?

We are supportive of the final proposals regarding raising awareness of the PSR as they affect DNOs.

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

We are supportive of the final proposals regarding the use of existing mechanisms to monitor performance in this area.