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Date
18 February 2016

Dear Bhavika

Priority Services Register Review – Final Proposals

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc.

Western Power Distribution (WPD) welcomes the opportunity to provide further feedback on Ofgem's Priority Services Register (PSR) Review. Below you will find WPD's response to the specific questions posed. WPD also contributed to, and supports, the ENA response to this consultation. This response is not confidential.

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

Yes we support the proposals for changes to eligibility and agree that they will ensure that PSR support is better targeted at customers in vulnerable situations.

As noted in our previous response to Ofgem's Review, we welcome the addition to the register of customers who live with 'children aged 5 and under'. We support the licence drafting which makes it clear this covers customers with children aged 5 and under who are 'in a vulnerable situation' and 'require additional services related to their access safety and communication needs'.

We also support Ofgem's proposal not to amend the 'pensionable age' core group to '75 years and above'. WPD will continue to work with the Customer Safeguarding Working Group) CSWG on the consistent set of 'needs codes' which could be drafted to capture this information.

We also support the remainder of the proposed licence drafting and were grateful for the opportunity to feed in to Ofgem's Licence Drafting Group in December.

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

Yes. We look forward to working with Ofgem and the wider industry as these proposals develop.

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?

Yes. We also agree that a common set of 'needs codes' and two way data sharing between Distributors and Suppliers would provide a more consistent service for customers. WPD recently submitted an MRA Change Proposal with the intention of moving this work forward and we will continue to work with Ofgem and the wider industry as this work develops.

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?

Yes. We agree that Networks should continue to publish statements covering PSR obligations and energy companies should develop innovative ways to increase customer awareness and promote the take-up of PSR services.

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

Yes. We support the proposal that Ofgem will continue to use the Stakeholder Engagement and Consumer Vulnerability Incentive to monitor performance under the proposals for PSR.

If there are any aspects of this letter that you would like to discuss further then please contact Alex Wilkes at awilkes@westernpower.co.uk or on 01332 827647.

Yours sincerely,



ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager