



Jonathan Blagrove,
Ofgem,
9 Millbank,
London,
SW1P 3GE

22nd June 2016

Dear Jonathan,

Statutory Consultation on the Priority Services Register

Thank you for the opportunity to comment on the above consultation. Bristol Energy is a new entrant supplier with a mission to deliver social good to energy users in Bristol and beyond. We are therefore keen that the changes to the priority services register obligations are clear.

We welcome the decision to move to a more principle based approach to identifying customers in need and supporting them in their access to our services. We believe this is a positive step forward.

We disagree with the definition of personal characteristic as we feel that definition (c) "characteristics identified by the licensee as being relevant due to the nature of the Priority Services" should be sufficient and should not require the additional references of customers of pensionable age or children under five as not all of these will require additional support. Indeed a significant proportion will not and is thus enforcing obligations where none are needed.

If Ofgem insists including these two definitions of personal characteristics then we feel that "pensionable age" is an ambiguous definition. Whilst this may have been clear cut several years ago, people are now retiring at many different stages in life. The state pension age is also moving and thus would require agents to be up to date on the current state pensionable age. We therefore propose, if Ofgem wishes to retain elderly people as eligible regardless of their need, then it should be done on the basis of an age (e.g. Seventy or older) than the ambiguous definition of "pensionable age". Alternatively "pensionable Age" should be defined in the licence.

I hope this information is sufficient. If you have any queries, please do not hesitate to contact me.

Kind regards,

A handwritten signature in black ink that reads "Chris Welby".

Chris Welby
Head of Regulation

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