

Jonathan Blagrove
Senior Manager Consumer Vulnerability Strategy
Ofgem
9 Millbank
London
SW1P 3GE

Paul Rogers
Stakeholder Delivery Manager

paul.s.rogers@nationalgrid.com
Direct tel: 07775 821840

www.nationalgrid.com

14 July 2016

Dear Jonathan,

Re: Priority Services Register (PSR) Review – Statutory Consultation

National Grid welcomes the opportunity to respond to the statutory consultation published on the 13th June 2016 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).

The work carried out by Ofgem in reaching the final proposals/statutory consultation stages of the review has been fully consultative and National Grid supports the overall intent behind the changes to improve the PSR.

The requirement for companies to introduce practices and procedures to identify customers in vulnerable situations, and help those households register where it is practicable to do so, is a significant step to help shift the current responsibility for registering away from customers.

A principles-based approach, using a single set of industry-wide needs codes, will ensure companies deliver consistent and tailored services to aid safeguarding across their daily interactions. By encouraging innovative ways to raise awareness of a single branded PSR, including working with trusted partners directly and through referral schemes, it will provide greater assurances for customers; increasing trust in the PSR to help registration.

The inclusion of iGTs and other relevant licence holders will help to ensure that customers in vulnerable situations across all networks benefit from the improvements to safeguard them into the future and we believe that the revision of Standard Special Condition D13 within the GDN licence and Condition 17 in all GT licences (which is switched off in GDN licences) supports this aim.

The proposed changes in wording to the licence since Ofgem's December 2015 consultation, in relation to data protection and/or privacy, achieves the objective of future proofing these conditions. The Safeguarding Customers Working Group (SCWG) is currently developing a robust framework, in line with the Information Commission Officer's (ICO's) process of Privacy Impact Assessments (PIA) and following the eight principles of data sharing, to safeguard customers and provide greater confidence in how their PSR data will be used.

The requirement that Gas Distribution Network (GDN) companies help customers to register when at the doorstep allows for the most effective use of our relatively infrequent interactions and also benefits

the customer for all future essential service contacts. It should be noted however that this sharing of information is not through the established data exchanges employed by suppliers and DNOs. This simple introduction of customer registration starts a cycle and allows the 'data flows' already in existence to share the PSR data between parties where possible, within MRA and SPAA regulation, with minimal change.

We look forward to working with Ofgem, via the SCWG, in the coming months as we implement real positive changes to safeguard customers now and into the future.

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