

Jonathan Blagrove  
Consumer Vulnerability Strategy  
Ofgem  
9 Millbank  
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SW1P 3GE

Your ref

Our Ref

Date

15 July 2016

Contact / Extension

0141 614 1581

Dear Jonathan,

## **PRIORITY SERVICES REGISTER REVIEW: STATUTORY CONSULTATION**

Thank you for the opportunity to comment on the revised proposals for the Priority Services Register (PSR) and the draft licence condition. This response is on behalf of SP Energy Networks (SPEN).

SP Energy Networks are overall supportive of the proposed changes relating to consumer vulnerability and Priority Services revisions. We have participated extensively in all the Working Groups and responded to previous Ofgem PSR consultations at every opportunity. We are happy that our comments have been taken into consideration.

Please see the following points below in relation to the proposals for the statutory consultation. Should you require clarification on any of these points, we would be happy to discuss these with you in further detail.

### Eligibility and Customer Identification

We fully support the proposals in the statutory consultation that would impact Distribution Networks Operators. Should there be any changes to the core groups that would benefit from priority services, we would make the necessary changes within our business to support this in accordance with the MRA Governance process.

In relation to supporting households and not only the named customer, this is something that we fully support and already have implemented within our business. We would never only support the sole named customer but instead assess the vulnerability of the household and all occupants when making any recommendations for additional support or services.

With regards to changing the DNO Licence Condition for identifying vulnerable customers, we support this change and have already trained our contact centre and front line staff accordingly. However we recognise that this is a constantly evolving area and will continue

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to understand if there are any gaps in our training processes and work with the relevant third parties to understand how we can address these.

### Priority Services

We welcome the proposals for Priority Services as laid out in the statutory consultation.

We have re-reviewed the services outlined in the December 2015 consultation and also in the proposed eligibility and services model consultation again as a matter of course and from a DNO perspective we are happy with those that have been proposed.

With regards to situations where customers may not speak English, we already have a Language Line for contact centre interactions and Language Cards for customer contacts in the field. We will continue to revise these as necessary. Should we be made aware of requirement arising from an interaction with a customer who does not speak English, we will always resolve this on an individual basis and our staff are empowered to do so.

### Data Recording and Sharing

We consider the work that has taken place over the last 18 months in relation to data recording and sharing to be progressing well. We believe that the implementation timescale of June 2017 for revised needs codes and two way data sharing is broadly achievable as long as change proposals, impact assessments and votes all pass through MDB Governance without any issues. There is also a non-negotiable 6 month embargo on implementation following a vote to accept changes to allow all companies to make the required system changes.

We will continue to support the ongoing development work with Priority Services although we are mindful that any changes must be justified via the appropriate cost benefit analysis to ensure that the end consumer is getting true value for money.

With regards to data sharing across utility providers, while a central mechanism by which to share data would be the most effective way to manage and record vulnerability, the cost implications mean that this is most likely out with the scope of the current price control. Such costs would not have been included within companies' business plans as these were not foreseeable at the time.

The development by Citizens Advice of a tool to help customers sign up to Priority Services across energy and water is not something that we were aware of. Whilst we may be supportive of such an initiative, it is vital that all industry participants are engaged to develop an effective automated and robust solution that will benefit both customer and company.

### Awareness of priority services

SPEN are happy that we will continue to use the term “Priority Services” to ensure consistency and will continue to promote through innovative awareness campaigns and collaborative media where possible.

### Compliance and Performance Monitoring

We fully support the view that DNO performance is assessed via the existing SECV Incentive and we will continue to work with Ofgem following the publication of the revised guidance.

### Licence Drafting

Licence condition section SLC10.12 requires that we must take all reasonable steps to inform Domestic Customers, at least once a year, of the existence of our PSR statement and how to obtain them. Although this is not a new obligation, the new Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015 no longer include an obligation on suppliers to send the Notice of Right (NOR) information (both their own and that of the distributors) to every domestic customer once a year.

As DNOs have previously achieved compliance with SLC10.2 by inserting an appropriate paragraph in the NoR sent to suppliers for them to send on to domestic customers, we are no longer able to meet this obligation as we have previously.

Currently, we make our PSR statements clearly visible on our website and actively promote these via social media and stakeholder engagement. Therefore, we suggest that Ofgem provides DNOs with written confirmation that such activities are deemed to satisfy the requirements of SLC10.2. It is our view that suppliers should still have the obligation to inform domestic customers and this obligation should not have been removed from their regulations.

At section 10.4, we propose the following drafting:

*PSR Customers are Domestic Customers who:*

- (a) are disabled or chronically sick, or*
- (b) are of Pensionable Age and require additional services related to their safety and communication needs; or*
- (c) live with children aged under 5 in a vulnerable situation and require additional services related to their safety and communication needs; or*
- (d) due to otherwise being in a vulnerable situation, require additional services related to their safety and communication needs; and*
- (e) have either:*
  - (i) personally asked the licensee to add their name to the Priority Services Register, or*
  - (ii) had a person acting on their behalf ask for their name to be added to the Priority Services Register with the persons informed consent, or*
  - (iii) had a Relevant Supplier, Gas Supplier or Gas Transporter ask for their name to be added to the Priority Services Register*

'Gas Transporter' to be defined in licence definitions.

Should you wish to discuss any of the above points, please contact Suzie Taylor (suzanne.taylor@spenergynetworks.co.uk) on 0141 614 1787.

Yours sincerely,



Stephanie Rogan  
Licence Development