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15th July 2016

Priority Services Register Review: Statutory Consultation

Dear Jonathan,

Wales & West Utilities Limited (WWU) is a licensed Gas Distribution Network (GDN) providing Gas Transportation services for all major shippers in the UK. We cover 1/6th of the UK land mass and transport gas to over 2.5 million supply points.

We fully support the proposals and draft licence conditions set out in the Statutory Consultation and are pleased to see the changes made in response to comments provided in our response to the Final Proposals dated 18th February 2016.

However, we note a number of areas in the licence conditions that we feel require updates or further clarification:

Supplier Licence Condition 26:

- Does not state that people who live with children aged 5 years and under should be included as PSR customers, unlike the other licence conditions for electricity and gas distribution. This needs to be updated.
- Does not clearly state the requirement for the supplier to register a customer on the PSR when they have been referred from a relevant distributor or gas transporter. This could prevent us from sharing data with gas and electricity suppliers.

Gas Transporter Licence Condition SS CD13 clause 6:

- Should be amended to reflect the fact that the eligible customer must provide their informed consent before GDNs can give the relevant supplier and/or relevant distributor their details; not all eligible customers wish to be included on the Priority Service Register.

Shipper Licence

- We note that Ofgem have not proposed modifying the Gas Shipper licence. As flows in gas from Suppliers to Transporters go through Shippers, if the Shipper

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does not have an obligation to pass the information on then it may not get passed on.

Safeguarding the needs of our vulnerable customers is one of our key concerns and as such we are supportive of Ofgem's aim to ensure that its non-financial provisions for vulnerable customers are better targeted and provide effective protections.

We have a dedicated Priority Customer Team in place to deliver our Vulnerable Customer Strategy. This is under continual review and development to support everyone in the business in identifying and responding to the individual needs of our vulnerable customers.

Should you wish to discuss any aspect of this response, please contact

Yours sincerely



Steve Edwards

Director of Regulation and Commercial

Wales & West Utilities

Steven.J.Edwards@wwutilities.co.uk.

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