



Meghna Tewari & Dennis Berg  
Ofgem  
10 South Colonnade  
Canary Wharf  
London E14 4PU

Head Office  
Inveralmond House  
200 Dunkeld Road  
Perth  
PH1 3AQ

8<sup>th</sup> August 2019

Sent by email to: [CDconsultations@ofgem.gov.uk](mailto:CDconsultations@ofgem.gov.uk)

[Cher-Rae.Fairlie@sse.com](mailto:Cher-Rae.Fairlie@sse.com)

Dear Meghna, Dennis

### **SSE response to Ofgem's Draft Consumer Vulnerability Strategy 2025 (CVS 2025)**

SSE welcomes the opportunity to provide views on the scope of this important consultation and has provided comments in relation to all relevant areas of activity covered by SSE, including energy supply and electricity distribution networks. Overall, SSE is supportive of the areas and outcomes Ofgem has highlighted with regards to protections for vulnerable consumers and is pleased to see alignment with the Commission for Customers in Vulnerable Circumstances (CCVC). However, while we are supportive of Ofgem's intent to strengthen protections for vulnerable consumers, we would welcome further clarification on several of Ofgem's proposals to enable us to provide better informed input.

Annex 1 contains our responses to the consultation questions. To aid the development of this important review, appendix 1 includes supplementary information on some of the key activities SSE undertakes to achieve the outcomes identified by Ofgem.

### **Summary of SSE Response**

- We have raised specific concerns relating to the types of support offered to customers struggling with their bills (outcomes 2A – 2D)
- We have made a number of recommendations on what can be done to support customers in the longer term, such as ensuring supplier performance is monitored effectively in all cases



- We believe that, should Ofgem conclude that any new interventions are required in the short term, the associated costs should be accurately accounted for in the Default Tariff Cap and Prepayment Safeguard Cap methodologies
- We broadly agree with Ofgem's proposals on its first year of strategy, however, we would welcome further clarification and engagement on these policy proposals
- We encourage Ofgem to ensure that proposals to change or introduce SLCs are accompanied by realistic timescales that enable suppliers to design, develop and implement system and process changes

We look forward to further engagement with you on this topic.

Yours Sincerely,

Cher-Rae Fairlie  
**Regulation Analyst**



## Annex 1: SSE response to Draft Consumer Vulnerability Strategy 2025 (CVS 2025)

### **1. Do you agree with the five priority themes and the outcomes Ofgem aim for?**

SSE is broadly supportive of the key priority themes and is pleased to see alignment with the recent Commission for Customers in Vulnerable Circumstances. While we note the intention of the Consumer Vulnerability Strategy is not to be a detailed delivery plan, we would welcome further information from Ofgem on the direction of several of its proposals, particularly the priority areas highlighted in year 1 of the strategy.

To aid with the development of this important review, we have included supplementary information on some of the activities SSE undertakes to achieve the outcomes identified by Ofgem. Please refer to Appendix 1 for details.

### **2. Do you agree with our approach on affordability?**

SSE agrees with Ofgem's approach to affordability. We acknowledge that some vulnerable customers who face particular barriers may require additional, ongoing support, particularly as we face future challenges around decarbonisation, decentralisation and digitalisation and once the default tariff price cap is lifted. We agree that Ofgem should carefully monitor the market, including the price cap, to consider the case for future targeted action on price protection. However, we do have concerns around Outcomes 2A-2D. A summary is provided below:

- There are situations where customers experiencing payment difficulties do not engage with suppliers or grant consent to use their data. Where this is the case, we regrettably are limited to the amount of support we can provide. While every effort is made to work with all relevant parties to try and resolve issues of consent and understand concerns, there must be a willingness from the customer to accept help. Further consideration should be given to possible government or wider partnership support in this area.
- While the cost of energy is one of the factors that impacts customers, the causes of vulnerability are multi-faceted and often transitory. As such, we believe it's important that a holistic and coordinated approach across multiple agencies is taken in considering and addressing this issue.
- We would like to highlight the benefits that can be achieved through an effective and sustainable approach to supporting customers through debt relief. SSE Energy Services (SSE ES) has a Priority Assistance Fund, delivered through the WHD scheme,

which provides customers with a range of tailored support and advice, in addition to support in clearing debt. The success of this scheme has been demonstrated consistently through the number of customers who remain debt free, and in this year's WHD report we noted that 92% of customers supported in scheme year 2017-18 remained debt free. We are concerned that WHD cap allocated for this support has been decreasing year on year as part of Government changes to the scheme; as set out above, we believe a wider, more holistic view needs to be taken.

- We note in outcome 2C Ofgem's objective of delivering affordable payment plans, along with more customers becoming debt free and a reduction in the overall debt levels. From experience as a supplier, while affordable repayment plans can be valuable in helping ensure debts are more manageable, they can also often prolong the amount of time over which the debt is repaid. These aims can therefore often be conflicting and will not necessarily align. This remains a challenge for SSE and while we remain committed to identifying and supporting customers through practical and financial support, external challenges for customers can make the ambition for debt reduction difficult.
- Please refer to question 4 for comments on Ability to Pay proposals.

### **3. What more could be done through energy regulation to assist consumers in vulnerable situations in the long term? How should any further measures be funded?**

We note the many positive initiatives undertaken to date and the significant contribution made by suppliers and distribution network operators in this area. SSE is fully committed to playing its part in helping customers in vulnerable situations. Given Ofgem is undertaking various related work streams in parallel with the CVS that should contribute to the assistance of consumers in vulnerable situations in the long term, SSE would recommend that Ofgem:

- **Examines the market for vulnerable consumers through its future of the retail market review.** As outlined in question 2, we acknowledge that some vulnerable customers face particular barriers to engaging in the market and may therefore require additional, ongoing support once the default tariff price cap is lifted. Should a safeguard price-protection remain in place, this must be fairly distributed across suppliers to ensure there is no disproportionate disadvantage for suppliers and a level playing field amongst market-participants.

**Ensures performance is monitored effectively in all cases.** SSE is supportive of a regulatory framework that provides appropriate focus and incentives in this area but

believes elements of this regulatory framework could be improved. For instance, the incentive framework in electricity distribution relies on an assessment process that lacks transparency and does not provide sufficiently detailed feedback to allow clear and targeted action to be taken. It is often difficult to reconcile Panel views with that of stakeholders and to understand what is viewed as good performance and why. Fundamentally, we are concerned this framework does not necessarily drive or reward what stakeholders or consumers would view as good performance. In terms of supply, improvements could be made to address the imbalance in compliance with vulnerable consumer protection SLCs (PSR, ability to pay). We would support a risk-based approach to intervention that would ensure poorly performing suppliers are targeted and ensure their customers receive fair treatment in line with those better performing suppliers in the market, but as above, it is essential that the framework and assessment process has real value and drives the right outcomes.

- **Ensures the costs associated with any new interventions are accurately accounted for in the Default Tariff Cap and Prepayment Safeguard Cap methodologies.** The headroom element of the price cap methodologies is already at capacity, for example as a result of increased mutualisation costs, and should not be used to absorb known policy costs. We recommend the relevant annexes should therefore be amended to capture new policy costs to ensure suppliers can recover these costs from their customer-base. Please refer to Ofgem's Decision Document on the Default Tariff Cap methodology for details.
- **Ensures the cost associated with any new interventions in relation to electricity networks are accurately accounted for.** We refer to the significant additional challenges faced in RIIO-2 associated with decarbonisation, digitalisation and decentralisation. It is essential that the cost of meeting these challenges is considered by all parties, including government and the full impact on consumers, particularly the vulnerable, is understood and appropriately addressed.
- **Completes its reform of market entry requirements.** SSE remains strongly supportive of improved assessments to ensure new entrants are suitable for market entry and Ofgem's aim to drive a up standards in the sector and minimise customers' and market participants' exposure to financial risk and poor customer service. Please refer to SSE's previous responses to Ofgem's consultations on the Supplier Licensing Review and New Application Regulations, Application forms and Guidance Document.
- **Develops a joined-up approach with Government.** SSE agrees with outcomes 5C and 5D and is pleased to see Ofgem's intentions to drive continuous improvements in this

area. We are supportive of a joined-up approach with Government in addressing consumer challenges, as we believe moving forward, this should help ensure policy is more aligned to challenges. We agree with Ofgem that improved data-sharing from the Department for Work and Pensions could help support the identification of households who are likely to be in vulnerable situations and therefore most benefit from the government's social programmes.

- **Improves the operation and effectiveness of the government social programmes.** We would encourage Ofgem to continue to support efforts that ensure changes to the ECO scheme are communicated with suppliers prior to implementation. Retrospective rule changes can be damaging to installers, where savings claimed in good faith are later reduced or deemed ineligible. Additionally, we consider it imperative that compliance processes and investigations occur as close to the point measures are notified to Ofgem. Such occurrences have put high financial pressure on the ECO supply chain, which has already seen a significant decline in recent years due to the risk of operating within ECO.
- **Creates a level-playing field.** We recommend Ofgem and BEIS remove supplier exemptions from providing WHD (but shift to fully data-matched scheme or allow to fulfil through trading, industry initiatives or payment of levy) alternatively, to replace WHD with market-wide vulnerable customer levy on consumption to ensure a level playing field for all suppliers; with the proceeds to be distributed by central agency with access to data to enable effective targeting of support.

#### **4 Do you agree with our proposals for the first year of the strategy?**

SSE broadly agrees with Ofgem's proposals on their first year of strategy, however, we would welcome further clarification and engagement on these policy proposals. We note that Ofgem intend to issue a policy consultation on self-disconnection soon after this consultation and we would highlight that any changes are likely to take time to implement and should be met with realistic timescales. Please see below SSE feedback on Ofgem's first year strategy:

##### *Consult on proposals for the future energy retail market*

SSE is supportive of Ofgem's proposals to consult on the future energy retail market in the first year of their strategy, however, would welcome further details on the review to provide a full response on the proposals. We note that Ofgem is looking to address price protection for some vulnerable customers through this review, which we welcome. Please refer to

questions 2 and 3 for our high-level view on price protections for vulnerable customers, though of course we would need to form a view based on the specific details of any proposal.

#### *Formalising Ability to Pay principles*

- Ofgem’s proposals are not clear. We would welcome further clarity on whether Ofgem intend to consult on a new set of principles or lift the principles directly from the guidance and insert in the licence.
- We welcome a principles-based approach that links back to Ofgem’s proposed consumer outcome in this area. However, we would urge Ofgem to strike the right balance to afford suppliers sufficient flexibility to encourage innovation in delivering the consumer outcome, while also ensuring there’s enough clarity and specificity in the principles to ensuring compliance and a consistent standard across the market.
- We anticipate that formalising ability to pay principles and governing under licence, will not in itself address the considerable challenges faced by suppliers when customers can’t or won’t pay for their energy and choose not to engage when considerable efforts are made to prompt them through our collections processes. Furthermore, in many cases we are unable to manage issues with unpaid bills through to an appropriate resolution due to restrictions in the licence (for example, where requirements prevent us installing a prepayment meter). This is a growing issue, which is causing debt to escalate for an increasing number of customers, and we therefore urge Ofgem to explore this in more detail as part of the upcoming policy review.
- There are limitations on our access to external data and information on customers’ financial circumstances. Ofgem should be mindful that while it’s right to consider a customer’s ability to pay, we won’t always have access to sufficient information or data about the customer. This means that currently our assessment relies on effective conversations being held with customers, which is a key part of the ability to pay principles. At present we are exploring how to enrich our processes in this space.

#### *Strengthen protections for consumers who self-disconnect from their prepayment meters*

SSE fully recognises the importance of mitigating loss of supply to ensure our customers’ wellbeing. While we understand the necessity to capture information around disconnected customers, we would urge Ofgem to allow enough time to implement any changes following consultation, as any changes are likely to take time to implement. We have outlined our key concerns below:

- SSE ES has processes in place to track payments from prepayment customers and, where we believe someone is self-disconnecting, we will reach out via letter. While our intention is to provide support and assistance to customers who self-disconnect, we have in the course of managing this process identified that a significant majority of self-disconnections are due to bulk purchases, low users, vacant property and seasonality. Furthermore, we do regrettably find that these communications can result in complaints if the customer becomes dissatisfied with incorrectly being identified as having self-disconnected, or assumes we are trying to get them to spend more. While we are fully supportive of having measures in place to protect and support customers, this process is costly to manage, potentially leads to unwelcome intrusions for customers and, as noted above, there are challenges associated with targeting support to customers in the most need.
- As this is a key area of concern, we urge Ofgem to strike the right balance to afford suppliers sufficient flexibility to encourage innovation in delivering the consumer outcome, while also ensuring there's enough clarity and specificity in the principles to ensuring compliance and a consistent standard across the market.
- We note that Citizens Advice have previously found that a minority of customers sought help after self-disconnecting. We will always sign-post to help those who are struggling with to top-up. However, without initial engagement to make an appropriate assessment, this remains a challenge for suppliers.
- Ofgem acknowledge that there are varied reasons why a self-disconnection may occur, one of which is customer choice. Our interpretation would include holiday homes or how and when a gas supply is used. While we agree that smart data will provide more insight into when self-disconnection occurs, it does not help suppliers understand why, until a customer engages.
- Self-rationing is more difficult for suppliers to monitor since there is no insight available of what an appropriate level of purchasing would be for the customer. This is complicated further by the trend of consumers reducing their energy consumption. Employing a method to identify, monitor and engage with prepayment customers who may self-ration will also target a considerable number of customers with circumstances that may not necessitate support. Consequently, such customers may find our attempts to be proactive in determining why their energy spend is low to be intrusive and this may generate customer complaints.



*Creating an analytical framework to consistently assess the impact of policies*

SSE is supportive of Ofgem developing an improved analytical framework for assessing impacts of policy proposals on particular groups of consumers and we welcome further information from Ofgem as it starts work to develop this area of work. We agree with the NAO's view that it is vital for regulators to be in a position to evaluate and report on their overall performance robustly.



## **Appendix 1: SSE Supplementary Information to aid the development of best practice**

To aid the development of best practice, we have included information on some of the activities SSE undertakes to achieve the outcomes highlighted by this review. While we understand the need to continually review and improve our processes through investments into a range of support to assist vulnerable customers, the scale and complexities surrounding vulnerability should not be underestimated both at present and in the foreseeable future. The scope of our current activities is a reflection of these challenges and our ongoing commitment to providing appropriate and adequate safeguards for vulnerable customers.

### **1. Improving identification of vulnerability and smart use of data**

*Outcome 1A: We want energy companies to act swiftly to provide support to the people who need it. To ensure they can do this, we want them to regularly maintain and proactively update the data they hold on their customers, including their Priority Services Register data.*

SSE ensures our customer service staff are trained to recognise various types of vulnerability triggers and risk factors, by actively listening to customers and reviewing customer accounts on all customer contact opportunities through means of telephone conversations, letters and emails and face to face interactions. Triggers will act as a flag to discuss the customer's needs and any additional support they may need, including registering customers on the PSR. With the advent of data sharing and co-promotion SSEN has created an easy to understand document explaining what services are available via the PSR across all utilities. This will help our partners promote the PSR more easily to customers. We're making the leaflet available to other utilities, so everyone can benefit from this simple new way of explaining the PSR.

During 2018-19 SSEN has procured a specialist fulfilment house service to increase our rate of data cleansing. Following consultations with our Inclusive Service Panels the process has been improved to ensure we meet our commitment of cleansing PSR records every 36 months, which we have surpassed. We plan to improve further and cleanse data on average every 24 months this coming year.

SSE is an active member of the Safeguarding Customers Working Group (SCWG). This is a joint-working group for Suppliers, Gas Distribution Networks (GDNs), Distribution Network Operators (DNOs) as well as non-industry relevant bodies. The main aim is to look at areas using a co-ordinated approach across the industry to benefit and safeguard customers in vulnerable situations. A recent example of work done within this group is the expansion of the PSR data-sharing project with the inclusion of water companies.



SSEN chairs the Shared Utilities Partnership comprising of two gas distribution networks, seven water companies and SSEN. The partnership aims to identify collaborative opportunities to support our shared customers. For instance, we are working on a three-way partnership with Wessex Water and Bournemouth Water to comprise waste, clean water and electricity. Through our established data sharing agreements we have been able to provide a one stop registration for customers of these 3 utility providers.

*Outcome 1B: We want to see evidence that there has been an improvement to support consumers to self-identify, for example through best practice guides that are easy to access and understand.*

SSE recognises the importance of consumers being able to self-identify and we ensure frontline staff are equipped to assist with vulnerability in an effective, appropriate and sensitive way. We have taken additional measures to ensure our customer service staff are provided with material, to help aid and identify vulnerabilities and to assist customers in self-identifying. In 2017 SSEN created a PSR Guidebook to help the wider business support PSR customers. During 2018 the guidebook was reviewed, content refreshed and relaunched across our contact centres with several key updates including an innovative PSR Wizard that guides advisers through the decision-making process of what help to offer customers. Listening to feedback from our Inclusive Service Panels and identifying a gap in our PSR category supporting customers with mental health, a targeted training was rolled out with 53 mental health first aiders being trained, resulting in an increase in mental health PSR registrations of 83% in the year.

We believe that effective engagement strategies are vital to help encourage customers self-identify vulnerability and uptake of the PSR. To encourage our customers to self-identify, we run several campaigns to assist customers in self-identifying their vulnerability. This is an area we have continued to develop through-out the years.

As an example of the types of campaigns, SSE Energy Services run through-out the year, during winter months we roll-out the Annual Winter Campaign. This campaign is designed to reinforce the message around recognising, recording and supporting vulnerability, especially during the winter when customers are most at risk. All customer service staff receive a campaign booklet and team briefing which provides information on how to recognise the triggers indicating a customer may be vulnerable. This includes services available on the PSR, signposting to third-parties, ability-to-pay and financial support. This campaign continues throughout the winter months and last year featured podcasts from third-parties including CLIC Sargent, Stepchange and EnergyUK. These podcasts provided an opportunity to raise awareness of some of the third parties we work with and reinforce the key messages of the campaign such as signposting/transferring our customers to third sector agencies when specialist help is required. With regards to best practice guides, we have been proactive in this space for a number of years and in 2015 we worked with Dementia Services Development



Centre (DSDC) Stirling University, who are recognised as world leaders in dementia to develop Helpful Hints on heating and lighting for people with dementia and their carers. Included within this published guide is an explanation of the priority services energy suppliers can provide. While this is one example of the guides we have created, we have also undertaken additional work to create two other best practice guides for SSE staff: A Mental Health Awareness guide developed with the Scottish Health Research Network, which was carried out through engagement sessions with customers who face mental health issues and a Supporting People with Dementia Guide, which we developed in conjunction with Stirling University and promoted to 2,600 staff as part of our recent roll out of Alzheimer's Society Dementia Friends Initiative.

We are a member of the cross sector National Mental Capacity Forum which is aiming to develop a number of best practice guides. Currently a Utilities Against Scams Guide is being developed in conjunction with Trading Standards.

National Energy Action and Energy Action Scotland have recently called for suppliers to align more closely with the health sector. We recognise the positive impact a closer relationship with health and social care could have for vulnerable customers and this year we exhibited at the annual NHS Scotland Conference to promote the PSR to health and social care colleagues across Scotland.

Earlier this year we implemented a new Extra Help and Support Guide which was developed in conjunction with our customers who attend our quarterly vulnerability forum. This guide meets the Plain English Campaign standard, it explains the services we provide and is provided to any customer in contact with our Customer Relations Department.

In addition, SSE provides information about the Priority Services Register and the associated services available to our customers on our public SSE websites which meets Web Content Accessibility Guidelines 2.1. AA standard.

## **2. Driving significant Improvements in Customer Service for Vulnerable groups**

**Outcome 3A: We want energy companies to have a corporate culture that focuses their efforts to identify and support consumers in vulnerable situations & Outcome 3B: We want industry have systems to better target and to tailor their customer service to consumers with specific needs.**

SSE is supportive of this outcome and this is an area we continue to develop internally. At SSE, we drive culture from board level, which results in accountabilities for delivery throughout the organisation. Senior Managers and Directors are engaged on issues, that affect both vulnerability and Treating Customers Fairly (TCF) through regular TCF Management Panel meetings, and ensure consideration of vulnerable customers as part of decision-making.



When SSE ES is changing and implementing new processes, projects or introducing new tariffs, SSE ES employees will complete a Treating Customers Fairly assessment to review how these changes will impact customers. This process ensures colleagues across the business are carefully considering vulnerability and whether any requirements for information or processes need to be considered or adapted.

It should be noted as part of SSE's commitment to continuous improvement, we regularly use consumer engagement to ensure our policies and services are delivered in a manner that is responsive to customer needs, particularly those in vulnerable situations. Along with consumer research, we receive information through a number of key channels, including calls coming directly to our customer service teams and through regular Treating Customers Fairly (TCF) customer forums held across the UK to discuss SSE performance and planned activities. Following review of our forums, SSE ES have set-up forums on key areas such as affordability, electric heating and smart. We additionally have a customer forum dedicated to vulnerability and how best to support customers in vulnerable situations, which is chaired by Gillian Cooper, Head of Energy at Citizens Advice.

This feedback we receive from our forums provides valuable insight into the experiences that customers have with SSE which then, in turn, allows us to develop a strategy that reflects changing customer needs as well as the external environment (examples noted under outcome 1B). SSE ES also recognises the value of listening to its employees who interact and receive feedback directly from customers. We are committed to giving our employees easy ways to highlight areas of our business where we could potentially do more for customers in order to treat them fairly. If a member of staff believes that a particular process or policy could be improved to deliver fairer treatment for customers (including where it relates to customers in vulnerable situations), they are able to escalate this through our dedicated internal online feedback portal, the 'Fairness Feed'.

SSE have also worked to ensure our services are far-reaching and tailored to customer's needs. As a result, SSE ES have introduced a number of tailored teams and adapted services:

#### *A dedicated Agency Line*

This dedicated telephony team provides a route into SSE for external agencies such as local housing authorities and Citizen's Advice Bureaus who are working in the community with clients on a low income and/or other vulnerable circumstances. Within the last 12 months we have developed a relationship with cancer charities CLIC Sargent and Macmillan who are both able to warm transfer their clients directly through to this team.

#### *Specialist teams*

- Bereavement team – dedicated, specially trained advisors who have an entire focus on helping customers through this difficult process. Customers are able to contact the

team directly and callers are assigned an individual advisor who will be their key point of contact throughout the process.

- Extra Help Collections Team – a dedicated team of advisors with specific skill sets, experience and training, who provide vulnerable customers with advice, tailored payment plans and details/referrals to advice agencies, support services and charities.
- Vulnerability support team – provide assistance and care to our most vulnerable customers, especially those with Mental Health problems. This can be a complex area and our specialised teams are key to helping customers on a day to day basis.
- Electric Heating team. This is a dedicated team for those with complex heating arrangements, to help offer customers access to information on how best to use their systems and best tariff advice.
- Vulnerability Friends across all sites – advisors who have received additional vulnerability training, who can offer advice and help to colleagues.

#### *Tailored services*

- Signvideo, Languageline
- Home visits from External Liaison Officers for customers who need face to face support on their energy system, energy efficiency and payments.
- Processes in place for those who find it difficult to transact online, enabling them to sign up by phone, this includes the offer of postal packs for those who are unable to communicate by phone or online to ensure the customer has the relevant information to be able to make an informed choice

#### Minimum standards proposals for consumer vulnerability within RIIO-2

SSEN is supportive of the suggestion that the need for minimum standards or additional licence conditions should be considered in the round as part of wider RIIO-ED2 discussions. It is important that these discussions carefully consider the significant benefits delivered under the existing framework in RIIO-ED1 and that actions are focused, appropriately funded and deliver real benefits for consumers. In terms of RIIO-ED1 developments, SSEN has created a Vulnerability Strategy Wheel which is embedded into our culture of doing the right thing for customers. Over 20% of homes in our distribution licence areas are registered on the Priority Services Register, this equates to 66% of eligible households already been registered for the free help and support our PSR provides. We also actively promote PSR at every opportunity: radio, television, street advertising, through healthcare professionals, partnerships, charities and our customer contact centres. We ensure our services are inclusive and accessible with independently chaired Inclusive Services Panels challenging our ideas and decisions. SSEN created an industry leading Priority Services Guide which explains eligibility criteria, ways to register and triggers to spot vulnerability. Uniquely, the guide explains support available to customers from all utility providers. This guide is especially inclusive providing guidance for



partners, water companies, GDNs, suppliers as well as DNOs. We agree with the comments from the consultation on PSR being promoted more widely. It could include PSR becoming a brand on its own with a common identity and a basic training package used industry wide. We are also supportive of a single registration point but recognise the complexity of making it a reality.

**Outcome 3D: We want consumers to be effectively identified as eligible for priority services; and for them to receive consistent and high-quality priority services in a timely way.**

SSE fully supports this outcome and our Vulnerability Strategy Team continuously monitors our Service Level Agreements with our external providers to ensure they provide a high quality, timely and consistent service to our customers.

As outlined in our response to outcome 1A, we recognise the benefits data sharing across other sectors will have for our vulnerable customers and have been a proactive member of the Safeguarding Customers Working Group which is leading the PSR data sharing project with Water, Networks and Energy.

### **3. Encouraging Positive and Inclusive innovation**

*Outcome 4A: We want all consumers (particularly those in vulnerable situations) to have access to affordable energy and suitable services. We want products and services to be designed to meet the needs of a wide range of consumers (including the most vulnerable).*

SSE is supportive of this outcome and have already taken steps to ensure we are meeting expectations in this area. The British Standard for Inclusive Service Provision is recognised as the standard for any company looking to imbed flexible customer service practices and demonstrating competency in our ability to identify vulnerability in different forms and adapt our service accordingly. As part of the verification processes, our policies, process and customer service practices were reviewed within the complaints, credit management and sales functions. We have achieved accreditation under the British Standard for Inclusive Service Provision for the last two consecutive years, this is recognised as a gold standard for providing flexible and accessible customer service. The review recognised our ability to take an objective view of customers' personal circumstances and provide a service that suits individual needs through flexible customer service practices that are designed and communicated to all customers, including any customers in vulnerable situations.

*Outcome 4B: We expect suppliers and networks to demonstrate innovative measures to support consumers in vulnerable situations*



SSE ES has already taken steps to be innovative when it comes to supporting customers in vulnerable circumstances and provide inclusive services throughout telephony translation services through our partners Language Line and SignVideo. We were the first energy supplier to introduce use of SignVideo and shared best practice and spoke publicly as part of Sustainability Firsts 'Project Inspire' of the benefits of allowing BSL users to talk to us in the first language.

SSEN welcomes Ofgem's proposal to implement a £30m use-it-or-lose-it allowance for gas distribution and to consider this further for electricity distribution. We look forward to commenting on this further as part of RIIO-ED2 discussions and development of the broader innovation framework. The Solent Achieving Value through Efficiency (SAVE) Project which has recently completed, provided SSEN with industry leading experience and learning around implementing behavioural change, energy efficiency and engagement initiatives. While initially focused on reducing energy consumption in areas of demand growth, the same initiatives could be fielded successfully to minimise fuel poverty and improve local community interaction.