

Bhavika Mithani
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Dear Bhavika,

Review of the Priority Service Register

Thank you for the invitation to respond to the above document. Good Energy is a fast-growing 100% renewable electricity supply company, offering value for money and award-winning customer service. An AIM-listed PLC, our mission is to support change in the energy market, address climate change and boost energy security.

Executive Summary

Good Energy is fully supportive of the move to a needs based approach to offering additional services to vulnerable customers, and is therefore disappointed that counter to this, Ofgem is proposing to add additional broad categories of customers, many of which will have no discernible need to the “core” group. We believe that the concept of “core” groups is out of step with a needs based approach and should be abolished. At best they should just be a signpost to energy companies to have “specific regards when assessing need” to such categories of customers.

With regards to data sharing, we are supportive of a more formal cross-industry approach. We believe this could be incorporated into the current work Ofgem is doing on centralisation of registration services as part of Next Day switching. However, we would caution against an over-reliance on “Need codes”, as this may mean that customers are pigeon holed as receiving certain benefits rather than having their needs properly addressed. There also needs to be a way to ensure these remain accurate and up to date.

We have answered your specific questions with reference paragraph below, expanding where necessary.

Q1. Do stakeholders agree that ‘families with children under5’ should be added as a specific eligible “core” group to receive additional help during interrupted supply and for the provision of free gas appliance safety checks?

We do not believe that all families with pre-school aged children need to be classed as vulnerable, although we recognise that some vulnerable families may need extra help if they also have young children at home and there is a loss of supply. We would therefore be supportive of recording that young children are at the property if a customer is on the priority services register, but this should not be a singular reason to be added to the PSR.

With regard to free gas safety checks, we feel such an offer would be regularly utilised by non-needy families with young children the cost of which would be borne by all customers, including those in need of financial support. We are also concerned that in the rental sector private landlords will evade their responsibilities to get appliances checked by getting eligible tenants to

apply to their energy suppliers. If suppliers are to offer free gas safety checks, then their needs to be an assessment of need rather than an approach of a broad brush categorisation of customers.

Q2. Do Stakeholders agree that the specific eligibility covering elderly people for the services related to safety should be changed from 'pensionable age' to '75 and over'?

Whilst we welcome the move away from 'pensionable age' we still remain of the view that categorising people by a characteristic rather than their need is the wrong approach. There may well be people below 75 that need assistance and many over 75 who do not, but would apply for free safety checks if eligible.

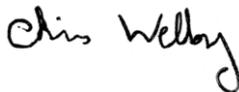
Q3. Do Stakeholders consider that pregnant women should be added as a specified eligible "core" group receiving free gas safety checks?

As stated above we believe eligibility should be based on need rather than categorisation. Pregnant women are no more vulnerable to faulty gas appliances than non-pregnant women, and thus this categorisation is nonsensical.

Of course, a family may be financially vulnerable if the pregnant woman is unable to work due to difficulties with their pregnancy, which is a different matter, and some families may be vulnerable because the woman is recovering from a complicated birth (or have a premature child), but this would be post birth, and thus outside the categorisation.

I hope you find this response useful. If you have any questions or require clarification, please do not hesitate to contact me.

Kind regards,



Chris Welby

Policy & Regulatory Affairs Director