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14 May 2015

## Review of the Priority Services Register

Dear Sarah

Thank you for the opportunity to respond to the above consultation. This response should be regarded as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc.

The comments we have provided in the appendix in answer to your questions are not confidential and can be published via the Ofgem website.

I hope that you will find our comments helpful. If you have any questions, please contact me in the first instance.

Yours sincerely



Keith Hutton  
Head of Regulation  
UK Power Networks

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## Appendix

### **Q1. Do stakeholders agree that ‘families with children under 5’ should be added as a specified eligible “core” group to receive additional help during interrupted supply and for the provision of free gas appliance safety checks?**

UK Power Networks understand the rationale for using five as the appropriate age for this core group and support the proposed change. We would add however that the inclusion of any transient vulnerable status must be supported by a robust process across the industry to remove these customers when the trigger date is reached. This will ensure that data is only held where appropriate for the customers’ needs and so comply with principles 4 (accuracy) and 5 (retention) of the Data Protection Act.

### **Q2. Do stakeholders agree that the specified eligibility covering elderly people for the services related to safety should be changed from ‘pensionable age’ to ‘75 and over’?**

We support the proposal to amend the core group for eligibility covering elderly customers to ‘75 and over’. However we recognise that there will be some customers who due to their age and circumstance may be vulnerable but who do not fall within the recognised codes. It is imperative that there remains a mechanism to capture this group so that the appropriate welfare can still be provided.

### **Q3. Do stakeholders consider that pregnant women should be added as a specified eligible “core” group receiving free gas safety checks?**

We feel that it is more appropriate for GDNs to comment on this question.

## **Other Feedback**

### **Eligibility**

We recognise the benefits in adopting a needs based eligibility model and fully support this proposal. We accept that this will lead to more customers being registered on the PSR but using a targeted approach we will be able to deliver the right services to them when they are needed most.

### **Services**

We fully support the ‘Knock and Wait’ service to ensure all vulnerable customers are given time to answer.

UK Power Networks welcomes the proposal to work with energy companies and consumer groups to evaluate the costs associated with delivering the services needed by our vulnerable customers.

We welcome further clarity on a list of prescribed services for suggested core groups to identify costs to our business in delivering effective protection for our vulnerable community.

### **Customer identification and data sharing**

We agree with the proposal to continue to share vulnerable customer data through linking registers and using existing support schemes as this provides a cost effective solution to increasing the numbers of customers on the register. Furthermore, such links are an appropriate mechanism to help ensure the currency of the data on the register. Benefits from this including avoiding contacting families of recently deceased customers or avoiding sending resources to assist

customers who no longer require extra assistance. With this in mind we will continue to support the ENA CSIWG in developing both “needs” codes and the industry mechanisms for data sharing.

### **Improving the take-up of services**

From discussions with Local Resilience Forums and charity partners the consensus is that no one sector has a definitive list of all vulnerable people. From this we can assume that the current PSR numbers are not a true reflection of the number of vulnerable customers within the energy sector. UK Power Networks agree that more needs to be done to publicise the PSR and work closely with Local Authorities and Charity Partners to this end.

### **Compliance and monitoring**

Mindful of the importance of the services provided to PSR customers on our networks, we support the need to conduct a review of the implementation with the new obligations (licence conditions) once they are fully operational.

However, in order to improve the service that PSR customers receive, we believe that these reviews should not be audits but best practice evaluations. As such, companies will then be more inclined to work with the reviewer to identify and implement best practice. This is particularly important if the wording of the obligation on DNOs is not carefully considered (for example, to avoid an absolute obligation to identify and register every PSR customer in their footprint).