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18 February 2016

Dear Bhavika,

Re: Priority Services Register Review – Final Proposals

On behalf of Electricity North West Limited, I would like to thank you for the opportunity to respond to the above open letter. Our answers to the specific questions posed are provided in Appendix 1, with our high-level observations set out below.

We are supportive of Ofgem's proposals to improve the identification of eligible customers and appropriate sharing of information within the industry to ensure such customers received appropriate levels of support and assistance, particularly in the event of a disruption to their power supplies.

We are concerned as to whether the timetable envisaged by Ofgem in the consultation document remains achievable, particularly due to the proposals to amend industry data flows to improve data sharing with regard to vulnerable customers not receiving majority support.

We believe it is essential that appropriate means are in place to ensure that this data sharing is as smooth and straightforward as possible. The rejection of the proposed amendments to the needs codes will hinder the ability of all to facilitate this. We therefore request that Ofgem give consideration to this challenge when determining the effective date of the proposed licence modification.

We remain committed to working Ofgem and other members of the industry to facilitate the necessary changes in a timely manner.

I hope this response is of assistance. If you wish to discuss any of the points raised, please feel free to contact me (details provided above).

Yours sincerely

Jen Carter
Regulation Manager

Appendix 1 – Electricity North West Limited’s response to Ofgem’s Consultation Questions

Q1: Do you agree with our final proposals for enhancing eligibility and customer identification and the associated proposed licence conditions?

We agree with the approach taken by Ofgem to distinguish in its approach between energy suppliers and network companies. We suggest that these categories remain rather broad, whilst potentially missing other customers who may be vulnerable due to their own specific circumstances. As such, we will continue to work with our customers to understand if they have any particular needs and to respond to these appropriately.

Q2: Do you agree with our final proposals for amending the PSR services and the associated proposed licence conditions?

We agree to the final proposals for the minimum PSR services that DNOs should offer to identified customers.

Q3: Do you agree with our final proposals for recording and sharing information about customers in vulnerable situations and the associated proposed licence conditions?

We agree that it is important for energy companies to be able to record and share information about customers in vulnerable situations where informed consent has been granted. To this end, we supported the IT changes described in paragraph 3.14 proposed by the Customer Safeguarding Working Group to develop consistent ‘needs’ codes which is also referred to in the consultation as phase one activity.

As a member of the Master Registration Agreement (MRA) Issues Resolution Group (IREG) and MRA Development Board (MDB), we voted to accept the ‘needs’ codes as described in paragraph 3.25 and additional IT changes to the Data Transfer Catalogue (DTC) to improve data sharing. Disappointingly, the proposed IT changes did not receive majority support and as such were not approved by MDB in December 2015.

We remain committed to working Ofgem and other members of the industry to facilitate the necessary changes. However, we are concerned as to whether the timetable envisaged in the second phase of activity remains achievable due to the rejection of the IT changes proposed under phase one activity.

Q4: Do you agree with our final proposals for raising awareness of the priority services, including any specific suggestions for energy companies to improve awareness?

We recognise that uptake of priority services is lower than we would like and are reviewing this area to see how we can assist our customers to understand the support available to them and how they can access it.

We welcome suggestions from our customers and stakeholders on how we can efficiently and effectively improve awareness of the PSR and the services offered to those on. We assume that Ofgem will share suggestions received in response to this question with energy companies so we can review and act upon these where appropriate?

Q5: Do you agree with our final proposals for monitoring energy company performance in this area?

We support the evolution of the Stakeholder Engagement and Consumer Vulnerability Incentive Guidance to provide a vehicle for DNOs to demonstrate to Ofgem and our wider Customers and Stakeholders what we are doing to improve the service offered to vulnerable customers. We will be separately responding to Ofgem on the latest draft of this Guidance.