



**Question 1: Do you agree that energy companies should be required to offer non-financial services with the aim of equalising outcomes for customers?**

We agree with the principle, but note that Equality Act 2010 and the Standards of Conduct already imply this. We would suggest that Ofgem seek by a process of questioning suppliers as to how they treat customers as individuals and how they equalise outcomes for customers, against the background of potential enforcement action, to establish whether there really is a requirement for further regulation.

We also note that such a licence condition would not allow for provision of free gas safety checks as these go over and above equalising outcomes, providing an additional service and, moreover, requiring subsidy from other customers who may be on a lower income or with fewer assets than the target group.

**Question 2: Do you agree that we should continue to prescribe a minimum set of services? Do you support the proposed list of services? What additional services, if any, do you think energy companies should be required to provide?**

We agree with the continuation of a minimum set of prescribed services.

At E.ON we are changing our approach to move away from offering services to customers on the PSR on the basis of their condition, to an approach of understanding the needs of the individual and offering services to meet those needs.

We do support the proposed list of services, however for some of the services, we do not agree with the eligibility criteria. All service provision should be based on the needs of the individual, so suppliers should be making their own assessment on which customers need these services. Examples of where the eligibility criteria in the proposed list of services require further consideration are:

- Meter readings – we believe it would be more appropriate to require suppliers to inform eligible customers who receive an estimated bill about how they can contact their supplier to arrange for a meter reading to be taken, if they prefer not to have an estimated bill.
- Re-siting of a PPM – eligibility should be restricted to customers who are of pensionable age, chronically sick or disabled and either live alone or only with others who are of pensionable age, chronically sick or disabled. Customers can make a meter impractical/less safe to vend by, for example building a new kitchen around the meter position or converting a property into flats and placing meters in positions that may not always be accessible e.g. all meters in one flat and the occupants fall out or in the shop below and the shop keeper doesn't wish to continue giving access. In these circumstances consideration must be given to the relative cost of re-siting the meter.

- Providing information by means that are accessible to customers with communication needs – we strongly recommend that there is more prescription over the communication needs in scope for these services and the type of information that must be provided in these forms. For example, whilst it is reasonable to expect suppliers to produce a bill in braille or large print, it wouldn't be reasonable to expect suppliers to produce bills in a language of choice for customers whose first language is not English. Whilst we offer a number of services to allow customers who may struggle to communicate with a number of different means to contact us (minicom, email, language line for non English speakers etc), the criteria proposed (*Customers who may find it harder than the typical customer to communicate with the licensee or access the licensee services*) is too ambiguous, making it difficult to ensure consistency.

**Question 3: If applicable, what services do you currently provide and what are the current costs of providing services (please break down by service)? What financial impact do you think widening eligibility in the way we have proposed will have? Please provide evidence to support your answer.**

We currently offer gas safety checks, with customers receiving the same service whether eligible for a free check or request us to carry out the service and pay the charge. Our current cost is £50/service, although our new provider is currently charging £60/service. Our charges are under review and therefore are likely to increase. An increase in eligibility will mean a small increase in our cost base

**Question 4: Do you agree that we should move away from requiring energy companies to provide services to disabled, chronically sick and pensionable age customers to an approach which requires energy companies to take reasonable steps to identify and provide appropriate services to any customer with safety, access or communication needs?**

No. The Priority Service Register should retain its current definition and the services offered to customers on the register should be relevant to those that are on it. We believe this is more manageable, given the importance of communicating who is on the PSR to distribution networks and, potentially, having a single brand name.

We believe suppliers should be identifying customers with safety, access and communication needs and offering services to meet the needs of these customers; however this should be independent of the PSR. As a customer's circumstances change, so will their needs. Suppliers are already required through the Standards of Conduct, to have in place customer service arrangements and processes that are fit for purpose, to deliver fair customer outcomes. With this in mind, we don't believe it is necessary to place any new obligations on suppliers where it comes to supporting vulnerable customers.

**Question 5: Do you agree that energy companies should be required to maintain a wider register of consumers that they have identified as being in a vulnerable situation?**

Suppliers should be able to identify customers in a vulnerable situation. As much vulnerability is transitory, to keep a register and ensure that it is always accurate may not be practical. Suppliers should be allowed to determine how best to identify and record this information. This shouldn't

have to be in the form of a register, although this may be how they choose to keep the record. This shouldn't be a licence obligation. For the purposes of sharing information amongst energy companies, the register of customers on the PSR should be a narrow set of customers, who all energy companies can commonly agree are vulnerable.

**Question 6: Do you agree that suppliers, DNOs and GDNs should share information about customers' needs with: a) each other? b) other utilities?**

- a) Yes. The information shared should be restricted to customers who qualify to go onto the PSR. This is why PSR qualification must be restricted to a clearly defined group of customers who have specific needs that are common across all energy companies. There may be system changes required to support changes to sharing arrangements.
- b) At this stage it would be more reasonable to expect energy companies to signpost customers to similar services offered by other utilities. Customer needs in other sectors may differ from those of the energy industry.

**Question 7: Should energy companies be required to share information about customers' needs with other fuel providers such as LPG and heating oil distributors. How could the transfer of this information work? What are the benefits and risks of sharing the information?**

At this stage it is unclear as to what information other fuel providers would need and how they would use it. This then poses obvious DPA concerns. If there are set of obligations they are required to fulfil, we could explore how as energy companies we could support them. The transfer of information would only be feasible if the data is sent to a central point from where it can be accessed as opposed to sharing with individual distributors.

**Question 8: Do you agree that we should stipulate the minimum details that we expect energy companies to share, for example that names and phone numbers must be shared where they are available? Is there any other information that should be shared and for what purposes?**

There should be minimum data items that energy companies share, however this should be agreed between the data parties. These should be agreed as they are today via the relevant industry codes.

**Question 9: Do you agree that energy companies should agree common minimum 'needs codes' to facilitate the sharing of information? Should we require energy companies to agree these codes? How might this work and what mechanisms are already in place to facilitate this? What role would Ofgem need to have in this process?**

Yes. To ensure that data sharing delivers the right customer outcomes, common needs codes are essential. This reinforces the need for the PSR to be a register of customers who would be considered vulnerable by suppliers, DNOs and GDNs. There are already a number of codes in place. It would be appropriate to review these with a view to aligning the codes for gas and electricity, however they do broadly cover the customers most in need of additional support.

These common needs codes should be agreed by energy companies either through industry codes or the Customer Safeguarding Group, which comprises suppliers, GDNs, DNOs, Ofgem and Energy UK.

**Question 10: Should information about a customer's needs be shared with their new supplier when they switch? What is the best way to facilitate the sharing of this information?**

If the information is very specific and the services provided are quite specific, as with the current PSR, then the idea of sharing at point of transfer is one we would support. This isn't without risk though. Data may not be accurate, for example a new tenant moves in and initiates a transfer before the current supplier is aware of the change in tenancy. The PSR data would be for the old customer.

An alternative option would be to ask supplier to do more at point of agreeing a contract to establish if the customer qualifies for the PSR. It is worth considering how a customer would feel about information relating to their age or health was shared between suppliers during a switch, over being asked directly.

**Question 11: Do you agree that a single cross-industry brand will raise awareness of priority services?**

A single cross industry brand could raise awareness. At present energy companies may refer to the PSR and its services using language more suited to their brand, which could lead to a lack of awareness about the PSR. To achieve this, the PSR must be a tightly defined set of customers who can both be identify themselves and by energy companies as qualifying to go onto the PSR. Otherwise there could be further confusion as they may have qualified with one supplier or DNO and then after moving or switching they don't meet the interpretation of the new supplier or DNO.

There should be a separation between the PSR and the services available to the customers on it. The PSR as a register should be a register of customers who are at risk in the event of a supply interruption and that should be its unique selling point. Whilst eligibility for the minimum set of services suppliers must make available, may be qualifying to go onto the PSR, it shouldn't form part of the PSR offering. Instead it should be a list of services aiming at equalise outcomes for customers for customers on the PSR. Suppliers can then offer these services under their own branding.

**Question 12: Do you agree that a guidance document would help advice providers and raise awareness? Who should produce this document?**

A guidance document would be helpful to advice providers, to enable them to provide consistent and confident advice. The guidance document should be led by Ofgem with engagement from the Customer Safeguarding Working Group.

**Question 13: What more can be done to raise awareness of priority services?**

**Question 14: Do you agree that supplier independent audits are the best way of monitoring companies' compliance with our proposed obligations? Do you have views on the approach the audit should take and what it should cover?**

No. This would be a fundamental change in regulation as it is inevitable that the audit would lead to eventually to a highly prescriptive regime. Moreover, the alternative approach of using the Standards of Conduct to investigate concerns has yet to be tried.