

Responses to RFI on Priority Services Register (Large Domestic Premises Issue)

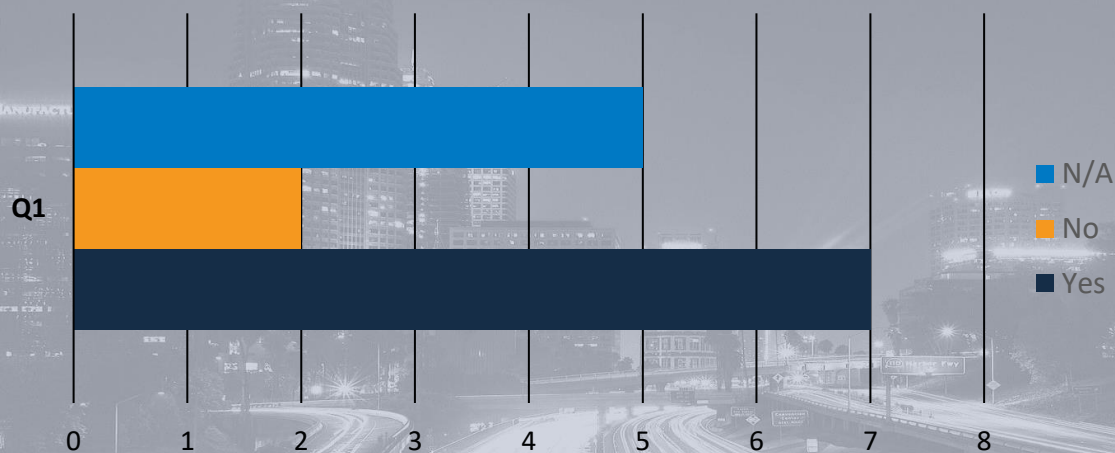
Date: August 1st, 2018

Public in confidence

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Q1. Do you agree with the proposed approach? If not, please provide rationale.



Specific responses

Anonymous 1 - The S84 and S83 records for customers with an LSP AQ (>73,200) are currently excluded from the S42 flow. We are concerned that customers who may need additional help or support may not be identified if they happen to live in a premise with a large AQ. We are concerned that Suppliers will be unable to fulfil their Supply Licence Conditions throughout the customer's lifecycle. Most seriously the data gap could potentially put a customer at risk. It would be a straightforward solution to remove the LSP restrictions on the flows to allow details of all PSR registrations to flow from Suppliers/Shippers to Xoserve.

CDSP - We do agree this matter needs to be discussed and solutions considered to centrally record customer vulnerability.

To provide some context, central system vulnerability validation has always been based on AQ rather than property classification as majority of domestic consumers have an AQ<73,200. It has however been identified that some domestic consumers have an AQ >73,200. The current validation relating to Supply Meter Points with an AQ >73.200kWh are rejected and not recorded centrally.

A Change Proposal (XRN4687 – PSR updates for large domestic sites) has been raised with the CDSP to consider how this can be addressed.

Anonymous 2 - We consider providing updates for PSR Customers to Gas Transporters paramount regardless of them being classified as Large Supply Point (Annual Quantity (AQ) >73,200kWh) or Small Supply Points (Annual Quantity (AQ) <73,200kWh) because provision of such information may be critical to the health and safety of the customer.

As a result, we believe the solution should allow Suppliers/ Shippers to provide updates for all Domestic PSR Customers which currently is not the case. We would welcome further exploration of the changes to the PSR update process for PSR domestic customers with Large Supply Points.

Anonymous 3 - The CDSP should process all PSR information where they are provided it and the Customer has consented to provide minimal impact to Vulnerable Customers.

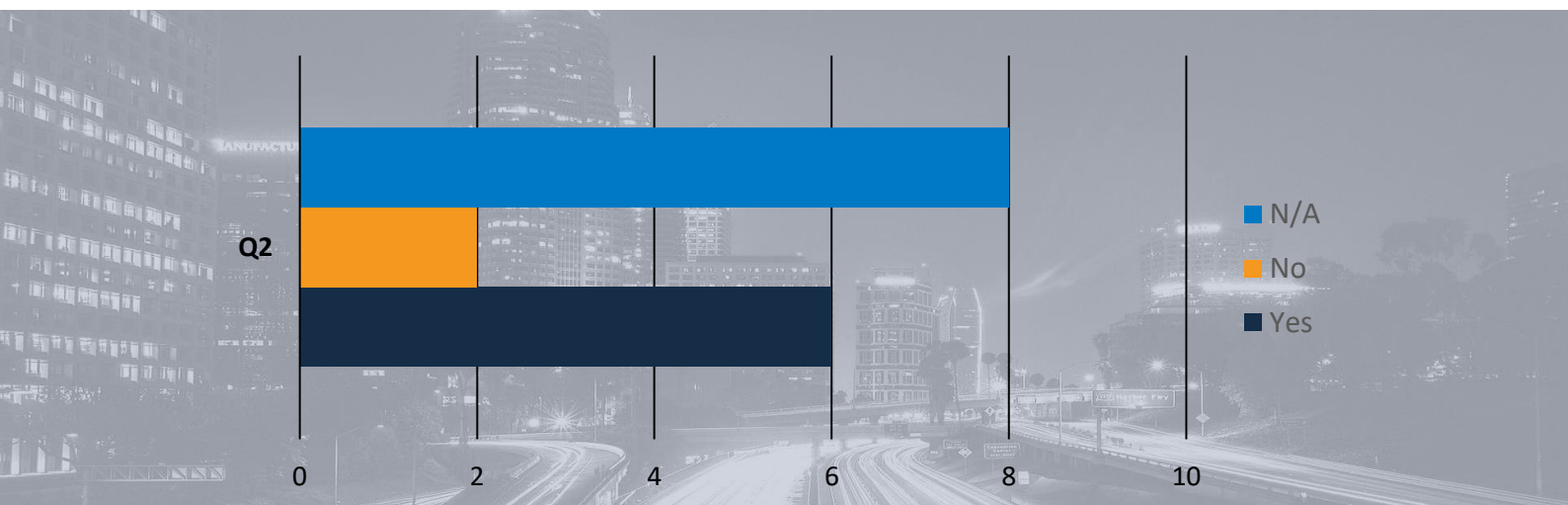
Scottish Power - We are not sure what is meant by this approach? If this means see what the numbers are then no we do not. These are customers that are on the PSR and need to be reported.

Npower - Npower agree in principal with the proposed approach.

Anonymous 5 - We agree some action is required for Domestic customers with an AQ >73,200.

Anonymous 6 - We are unclear on what the proposed approach is other than on responding to this RFI and providing data, if this is the proposed approach we see no issue in providing data to help further investigation into the issue.

Q2. Based on the detail provided, and provided this information is appropriately anonymised and encrypted, are you happy to share the percentage of your portfolio affected by this issue and are you happy for the actual number of sites within your portfolio that are affected to be included in an aggregated figure for use in discussions regarding how many customers are potentially affected?



Specific responses

Anonymous 1 - There are almost 10,000 domestic sites with an AQ of >73,200. The number of PSR customers is estimated at between 10 – 15% but the implementation of new and extended needs codes will mean that this percentage could change in the future.

CDSP - We believe there is merit in amending the current solution to facilitate recording of priority consumer information to enable Licensed entities to fulfil their obligations.

The Change Proposal (XRN4687 – PSR updates for large domestic sites) has been raised to consider how this can be addressed and has been discussed at the Change Management Committee (ChMC) meeting.

Currently there are 5 options (4 potential solutions and 1 option to do nothing) stipulated within the CP. The way in which the validation process is amended is dependent on the preferred solution option decided by Change Managers within the ChMC meeting.

Anonymous 2 - We consider providing updates for PSR Customers to Gas Transporters paramount regardless of them being classified as Large Supply Point (Annual Quantity (AQ) >73,200kWh) or Small Supply Points (Annual Quantity (AQ) <73,200kWh) because provision of such information may be critical to the health and safety of the customer.

As a result, we believe the solution should allow Suppliers/ Shippers to provide updates for all Domestic PSR Customers which currently is not the case. We would welcome further exploration of the changes to the PSR update process for PSR domestic customers with Large Supply Points.

Scottish Power - Details have not been provided. As above, we think the numbers are irrelevant.

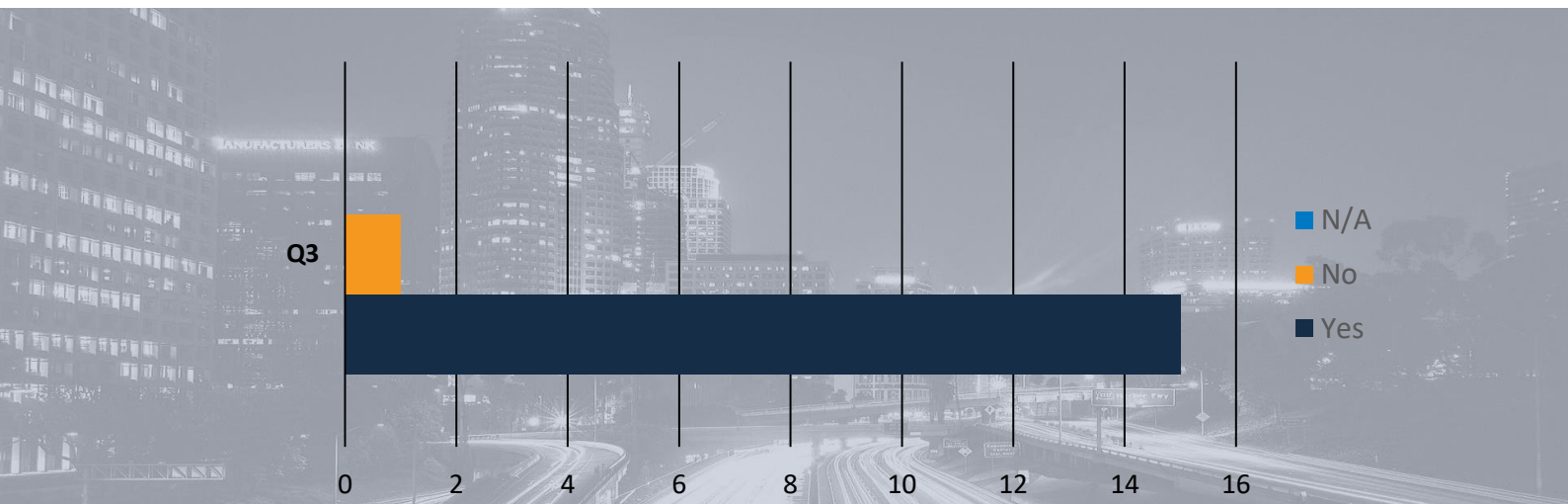
Anonymous 4 - We do not currently have a figure which will provide the industry with a genuine view of the scale of the issue. However, figures reviewed previously deem this a relevant piece of work.

Npower - Yes, Information regarding sites affected by this issue within the portfolio can be shared, if data is appropriately anonymised and encrypted. This however would be on the basis that advance notification is given for any such data requests and appropriate timescales allowed for collation of this data.

Anonymous 5 - Yes, we are happy to share this information as it will give a clearer indication of the number of Customers affected. However, we need to ensure that the information we send is encrypted securely as it contains sensitive Customer information and any reports are to be suitably anonymised. Although the volumes might help size the magnitude of the issue it only takes 1 customer to have been impacted in an emergency situation, so we therefore believe the focus should be on a solution between SPAA and the CDSP rather than the quantity of customers impacted. We believed the volumes were to help scope the solution options and any interim processes which may be required.

Anonymous 6 - Across our portfolio we only have 3 LSP sites with a PSR. This is under 1% of our portfolio. We are happy to share this information.

Q3. Do you believe that there is any merit in expanding the current process to accept the >73,200kWh updates?



Specific responses

GDN Joint Response - all PSR customer information relating to domestic customers, needs be able to flow through the standard gas industry data mechanisms in place from supplier to shipper to GDN and it should be noted that there is an expectation from customers who gave explicit consent for their information to be shared for GDNs to respond to them as a Priority Customer. We believe that the removal of the AQ validation process from the S84/S83 PSR data flows would be the easiest approach; as GDNs we use Market Sector Code (MSC) not AQ information. In addition, due to the nature of GDN works; we are present on the customer doorstep during our interactions meaning

Anonymous 1 - We believe there is merit in expanding the current process, and an unacceptable risk to leave the situation as is.

The moral and legal obligation to safeguard and help customers in vulnerable situations applies equally to all Domestic customers, regardless of AQ and size of property. The Needs Codes provide Networks information regarding customers that require additional support during gas incidents both planned and unplanned. This includes method of communication, knock and wait services, fire hazard (oxygen cylinders) and the ability to prioritise support based on risk to customer and colleague.

These customers are Domestic, not non-Domestic, and as a Supplier we are obliged by OFGEM as part of our licence (LC 26.3) to share data relating to customers who, due to their Personal Characteristics or otherwise being in a vulnerable situation, may require Priority Services 26.3 Duty to share information.

In so far as permitted by any laws relating to data protection and/or privacy, the licensee must share the Minimum Details using the Relevant Industry Mechanisms.

Anonymous 2 - We believe that expanding the current process to allow the PSR updates for Domestic Customers with Large Supply Points should be developed as a part of a wider industry solution.

Such a solution will ensure that all of our PSR Domestic Customers are treated in the same manner and their characteristics and needs are met and shared with the relevant parties.

Anonymous 3 - Yes, it is essential to capture any Vulnerable Customer within the CDSP systems to ensure that all are connected in a timely manner.

Anonymous 4 - Yes, Code Provisions state - "Domestic Supply" means a supply of Gas to Premises which is taken wholly or mainly for domestic purposes.

Supply Licence Conditions state – 6.1 Unless the context otherwise requires, a Domestic Premises is a premise at which a supply of gas is taken wholly or mainly for a domestic purpose except where that premises is a Non-Domestic Premises.

The Code and Licence provisions do not set a threshold; therefore, systems should be amended so that any update sent, can be accepted. It would be worth noting, that there are 2 strands to this, those customers who are using over the threshold and those customers who used to use above this but now don't.

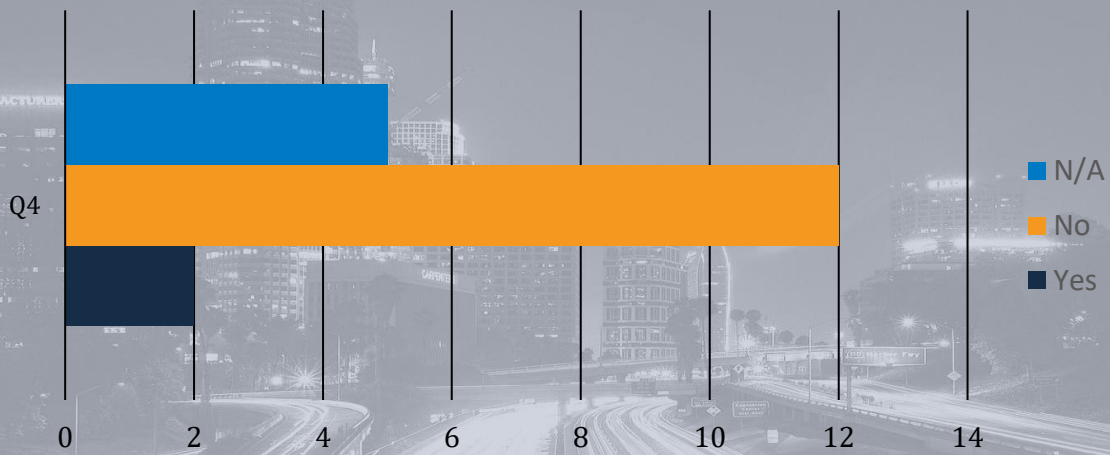
Npower - Npower agrees with the overarching principal that all domestic customers (irrespective of consumption levels) identified as vulnerable should have the opportunity for their personal/sensitive information to be shared with the CDSP (with their informed consent). Information captured by suppliers should be sent to the CDSP to ensure appropriate support and services are provided in the event of an emergency or planned loss of supply.

Anonymous 5 - Yes, we believe that it is vital for the current process to ensure that larger Domestic customers are included (those that use >73,200 kWh) because we have an obligation under Standard Licence Condition 26 to add the Customer's details to the Priority Services Register. Whilst our organisation obtains the vulnerability information from our Customers we are unable to share it with the CDSP which could be detrimental in an emergency situation for a particular Customer if that information has not been shared. Vulnerability for Domestic Customers' should be shared regardless of their level of consumption and the development of 16/370A mandated the process for Domestic customers. The omission of large consuming Domestic Customers' is down to a design issue rather than deliberate exclusion. We firmly support all Domestic Customers' information being shared regardless of the level of gas use they may have.

BU-UK - We do believe there is merit in expanding the current process to accept vulnerability for AQs > 73,200kWh as this will capture a greater number of customers applicable for the Priority Services Register (PSR).

Anonymous 6 - Yes, we do not see any other viable solution that expanding the current process to accept PSR updates to sites with AQs over 73,200kWh.

Q4. Do you believe that the creation of a manual process would be more in line with what is being proposed?



Specific responses

GDN Joint Response - We believe that a secure and consistent way to share this PSR data through systemised flows is best and that the process can use the same mechanisms as currently used. It should be noted that the proposed solution to the issue raised (XRN4687 raised by EoN) was submitted to the DSC change committee on 13th June 2018 and is currently being assessed through Xoserve DSC Change Management procedures, and therefore a view of volumetric, timescales and costs will be provided in due course. Should the solution require a lead time to implement then there would be merit in considering the interim arrangements in order that any relevant customers can be accommodated. It is worth noting again, that as GDNs we use Market Sector Code (MSC) not AQ information. It could also be worth Suppliers/Shippers considering a data cleanse activity across these customers as a priority to trigger a flow as soon as the systems will allow.

Anonymous 1 - We would not support a manual process as this would be prone to error and we do not differentiate domestic PSR customers by AQ. If there were appropriate interim data sharing agreements in place between suppliers and GDNs it may be possible to provide one off lists of relevant customers to mitigate the safeguarding risk in the short term.

CDSP - Within Change Proposal XRN4687 – PSR updates for large domestic sites, one of the 5 options are an offline solution. It is the decision of the Change Managers regarding whether this is the preferred option to be implemented.

Anonymous 2 - Our view is that the improvement to this process will require an automated secure transfer mechanism such as IX dataflow. PSR information is classed as sensitive personal data under GDPR, and therefore we don't believe a manual process will give the industry confidence in securely transferring such sensitive details.

This can lead to issues under GDPR if handled incorrectly. Manual workarounds should only be used as short-term interim solutions only.

Anonymous 3 - Automation of any process is better than manual handling because it will prevent the potential for human error.

Anonymous 4 - We do not believe that manual processes are suitable due to the data which is being provided. We agree that there should be a process in place as soon as possible, however, the long-term solution should follow the existing process for properties under the threshold.

Npower - Currently, there is insufficient information to provide a decision on whether the solution should be automated or manual.

Outcomes of the research and investigation, as proposed in the SPAA Change Process Issues Form, should inform any future solutions albeit manual or automated. Consideration should be given to both cost and volume as well as to the General Data Protection Regulation in both instances.

Anonymous 5 - No, we prefer an automatic process in line with what has been implemented for Domestic Customers using <73,200 kWh and we do not believe that a long term manual process would be the correct solution. However, until an automated process is implemented, we would consider a manual process for the short term.

BU-UK - In the short term the creation of a manual process does appear to be the most cost-effective approach. It should be noted though that such a process should be considered as part of future CDSP development to incorporate PSR updates for all Domestic Customers, not just those affected by SPAA CP 16/370A as coming into effect in June.

Anonymous 6 - We are unclear what is being proposed in terms of a manual process, we would much prefer the CDSP to not reject PSR updates to sites above 73,200kWh subject to costs being provided.

Q5. How are Domestic Customers which have been added to the Priority Services Register with an AQ of above 73,200kWh being managed currently by your business?

Specific responses

GDN Joint Response - As GDNs our visibility of vulnerability information is dependent upon receiving PSR data through the industry data flows. As per Q3 we propose that validation rules relating to AQ, can be removed and through the on the doorstep visit – our colleagues are trained to establish and respond appropriately to any vulnerability whether PSR data is relevant or otherwise.

Anonymous 1 - All Domestic customers are managed in the same way regardless of AQ.

Anonymous 2 - On CoS gain we send a competitive registration request (S38). We then send the CNC.S84 flow with a Priority Service Register update to CDSP.

Scottish Power - We treat them exactly the same as any other domestic customer. This means we will be sending updates irrespective of the AQ. Further, we believe that as vulnerable customers are more likely to have higher gas usage there is a real chance they could, at times, have an AQ over the threshold.

Anonymous 4 - All customers who require assistance are managed the same internally. We make the same in-house adaptations of services to these customers as we do for those below the threshold. However, it should be noted that although these customers are managed the same internally, the information is not passed through the CDSP because of system constraints.

Npower - If a sign of vulnerability is identified, the customer is sensitively questioned to establish the details surrounding their vulnerability and also to determine the level of support that can be offered to suit their needs. The training that is delivered to npower employees and representatives applies to all domestic sites and the process for logging any vulnerabilities and appropriate Priority Service Register (PSR) services is the same for all customers. Scripts are read to customers to confirm they are happy for the vulnerable information to be logged on their account and also for this information to be shared with the CDSP and any third parties who may benefit them in an emergency situation. Due to the low volume of customers who have AQ levels over 73,200 kwh, a different approach is not adopted with these customers as they will benefit from most of the available PSR services, including regular meter readings, special output format bills, interpreting services, free gas safety check and free meter move (if eligible).

Anonymous 5 - Despite not having the mechanism to share the vulnerability information with the CDSP for our Customers with an AQ >73,200kWh, it doesn't impact the way our Customers are treated, as all of our Customers are managed in the same way regardless of their threshold of use.

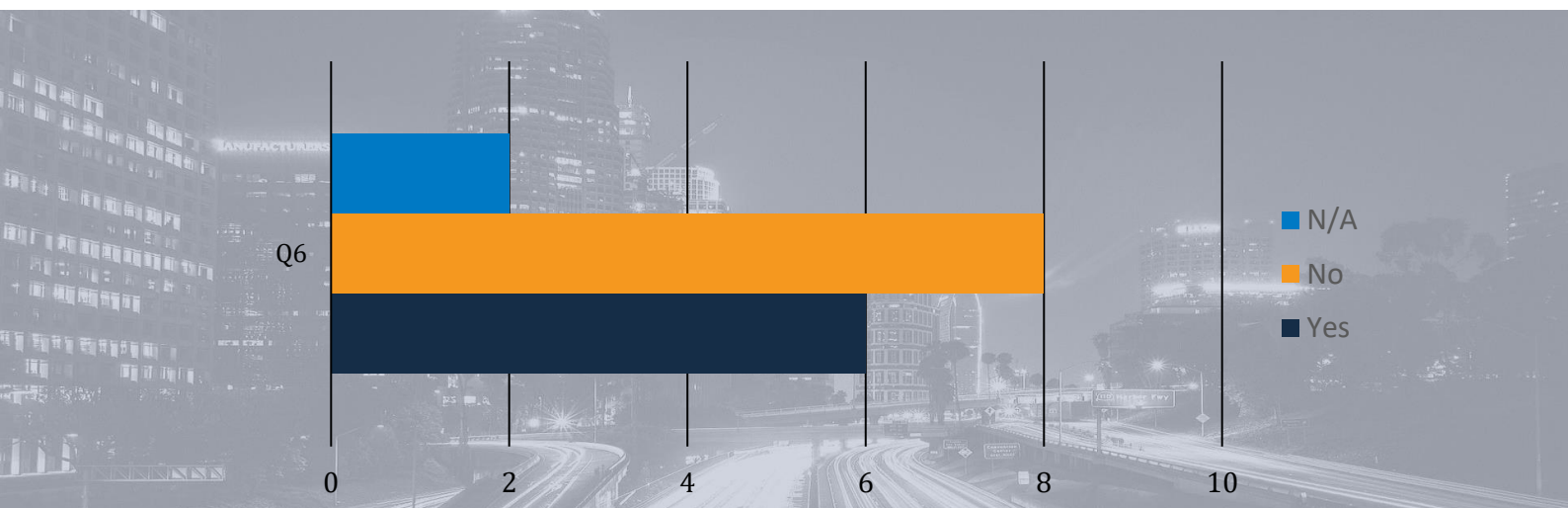
The only difference is that currently we cannot share the vulnerability information for our Customers who have an AQ >73,200kWh which we endeavour will change.

BU-UK - Currently all Priority Services Register customers and their connected data are being treated as the same, regardless of whether their AQ is above or below 73,200kWh, and regardless of whether they are recorded as a large or small domestic customer etc. The information is connected to a MPRN.

Anonymous 6 - We have recently required the LSP PSR sites and are working with the customers to provide necessary addition services to meet their needs.

Anonymous 7 - The same as customers with an AQ below 73,200kWh.

Q6. Do you believe that the Schedule and the legal text requires updating to reflect this issue?



Specific responses

GDN Joint Response - The schedule does not refer to an AQ limit. It should be noted that there is a separate process (as opposed to PSR) for managing commercial properties with vulnerability needs – such as hospitals & care homes – and for clarity this does not need to be captured by the schedule either.

Anonymous 1 - This change will correct an error in reporting domestic PSR customers which is already covered by governance.

CDSP - It is assumed that this responsibility is reflected in License. Licensed parties should consider whether sufficient detail exists within the Licence. On balance, but to be informed by views of Licensed parties' responses, we would consider it prudent for this matter to be articulated explicitly.

Anonymous 2 - Currently, the Schedule refers in generic terms to PSR updates and it doesn't define the Domestic Customers with Large Supply Points.

We believe that the definition of Domestic Customers should be updated to consider the Domestic Customers with Large Supply Points.

A clarification clause should also be added defining the PSR update process for such customers so that the Schedule is applicable to all Domestic Customers.

Anonymous 3 - This will provide clarity to all and ensures that there is a consistent approach to the issue.

Scottish Power - If you mean should all domestic customers be updated irrespective of the AQ then yes. However, it could be argued that as the Schedule makes no reference to the AQ it already does as it is silent on AQ. Further, the SPAA definition of a domestic supply has no reference to the AQ.

Anonymous 4 - The schedule should not be adapted to meet the issue; the issue should be adapted to meet the Schedule. There should not be any system constraints which a detrimental impact on domestic customers who use above a certain threshold.

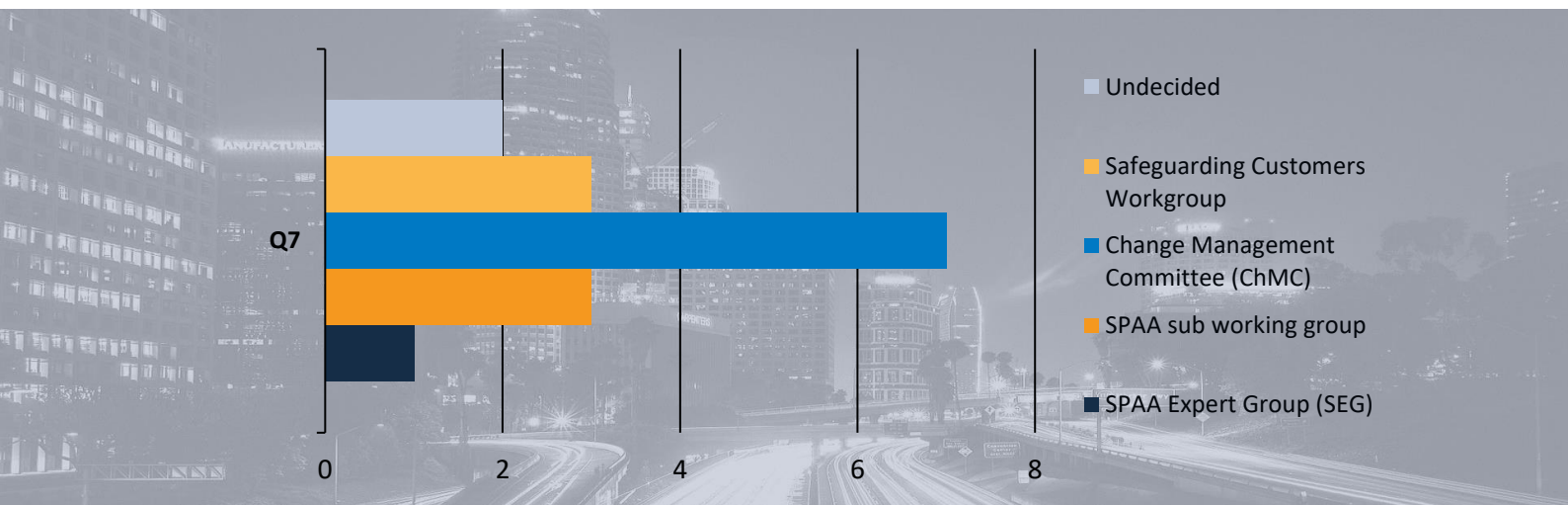
Npower - In view of the proposal, npower are in agreement that the Schedule and legal text are updated to reflect the current issue, on the understanding that this is for housekeeping only at this stage.

Anonymous 5 - Yes, we believe that the Schedule requires updating to explicitly document (even for the short term) the process taken for Domestic Customers' < 73,200 kWh and > 73,200 kWh. The solutions going forward maybe identical, so the Schedule can have any temporary clauses removed, however, if the processes end up being different this also needs to be reflected in the Schedule.

BU-UK - So that the process is aligned with related Priority Services activities, we believe the Schedule and legal text should be updated to reflect the issue raised.

Anonymous 6 - Based on the solution developed to the issue we would expect there to be changes, however understanding of the scale of issues need to be first determined.

Q7. If parties do believe that a solution is required, it would be beneficial to understand where you believe the best place for development would be?



Specific responses

Anonymous 1 - The Safeguarding Customer Working Group should be asked to assist and to gain support from members if required. SPAA does not need to change its documentation to facilitate the fix we are proposing.

CDSP - As the solution may involve a change to central system validation processes, a Change Proposal (XRN4687 – PSR updates for large domestic sites) has been raised and discussed at the ChMC meeting in June 2018. The CP has been referred by Change Managers to the DSC Delivery Sub-Group (DSG) to consider the solution options. The preferred option and implementation date will be decided by the Change Managers within the ChMC meeting (option c). The CDSP are happy to regularly feedback to SPAA regarding the progression and discussions of the ChMC regarding this matter. If required, the associated changes to the SPAA Schedule will need to be developed through SPAA (SEG/ SPAA Change Board)

Anonymous 2 - We believe that Safeguarding Customers Working Group is the best group to develop the solution. We do believe that the solution, if automated via data flows (CNF & CNC), would require the Change Management Committee’s approval.

The SPAA Expert Group should be kept informed of the progress the developments.

Scottish Power - C or D – it's not a SPAA matter. Also, if other suppliers are doing as we do we believe the need for a manual solution is up to Xoserve / GTs as the data is being sent and could be recovered over the IX. This would reduce the overall data protection risk.

Anonymous 4 - We believe this strand of work will require careful attention and we do not believe that this will be given if added to an existing working group. On this basis, we believe a sub-group should be created with close support from the Safeguarding Customers Workgroup.

Npower - Npower believes that the results of the research activity and industry data analysis are fundamental in informing the options to address this current gap. At this early stage of the proposal, it is suggested that the appropriate forum to progress this may be the Change Management Committee (ChMC) However, depending on the outcome of the research, this view may alter.

Anonymous 5 - We believe the best place for development of the solution would be at the SPAA Expert Group with updates being provided to the other groups (except (b) as we do not believe a working group is required). However, if there are deviations in the treatment of Customers' with >73,200 kWh there might need to be a joint discussion between the Safeguarding Customers Workgroup, SEG and the ChMC to ensure the solution is acceptable for all groups rather than discussions happening in all 3 groups.

BU-UK - We believe that the most appropriate place for future development to take place is within the Safeguarding Customers Workgroup. With there being an overlap of PSR considerations between Gas and Electricity, a combined body looking at Ofgem's wider vulnerable customer strategy may be the best placed group to develop a solution for this issue raised.

Anonymous 6 - We would expect the solution needs to be developed under the UNC with SPAA input, so would recommend a joint working group or SPAA attending the ChMC to discuss the issues and possible next steps.

Q8. Do you believe that the changes being discussed will require Authority Consent?



Specific responses

Responses – The majority of responses only supplied a yes or no as the answer, we have detailed below the more in depth.

GDN Joint Response - On the basis of the currently proposed solution, we do not consider that a change proposal is required and therefore due to this nor is authority consent required.

Npower - Yes, we believe that it would be required as it has a customer impact.

Anonymous 4 - The rationale provided for CP16/370A for Authority Consent was due to the introduction of a new schedule. In our view, having reviewed the schedule wording, the proposed review of this process would not change the intent of the new Schedule therefore we do not feel that Authority Consent is required.

Anonymous 5 - We not believe that the changes will require Authority Consent because legal text changes are likely to be minimal and would therefore meet the Self-governance criteria for SPAA changes. The ChMC proposals do not require Authority consent but they do need the approval of the ChMC and a change proposal being sponsored to deliver any changes for UK Link.

Q9. Do you have any additional comments to make?

Specific responses

GDN Joint Responses - Importantly we would support a simple solution in order to ensure a timely and low impact implementation, thus ensuring that all vulnerable customers are managed appropriately as soon as possible.

It would be beneficial as a result of this RFI, for everyone to have a view of the scale of this issue, as it will help shape the initial steps required to improve the position with quick effect whilst also allowing flow options to be considered into the future.

Should the proposed solution not be viable then consideration will need to be given to alternative approaches, which may impact our position should it mean changes far beyond the scope of CP16/370A.

Finally, we hope that the removal of AQ validation also enables Suppliers/Shippers to develop processes which accommodate PSR data in relation to Farm dwellings and those residences above a commercial business address.

Anonymous 2 - The back population of the rejected PSR updates for impacted customers should be considered, should any a change be implemented to resolve this issue.

Industry may wish to consider a mechanism to capture the vulnerability characteristics of domestic end users, or associated residents/clients, in non-domestic premises, such as care homes, hospitals, or schools as a part of a future development. However, these should not be confused or combined with the PSR, which is a distinct regulatory requirement.

Npower - The assumption is that any future data request will include validation from suppliers that these are genuine domestic properties; with supporting explanation where appropriate

Anonymous 5 - Whilst not specific to the remit of this RFI we would like to highlight an additional issue that may need to be considered by the SEG or the Safeguarding Customer Working Group; there are situations where we have a Domestic Customer but because it is classified as I&C e.g. a flat linked to a shops supply, the customer isn't treated the same as a Domestic Customer living above a shop with independent Domestic and I&C supplies. We are concerned that some Customers' are missing out because of the nature of their supply design which could be detrimental to them and therefore some further considerations on this are needed.