

CARE REGISTER REVIEW: SPECIAL PROVISIONS FOR
VULNERABLE CUSTOMERS
A Consumer Protection Strategy Project

SSE AIRTRICITY RESPONSE TO
THE UTILITY REGULATOR

2017

INTRODUCTION

SSE Airtricity welcomes the opportunity to comment on the Utility Regulator's Care Register Review: special provisions for vulnerable customers.

SSE Airtricity is the largest independent supplier operating in Ireland with almost 800,000 domestic and commercial customers on the island of Ireland.

SSE Airtricity offers a range of supports to its vulnerable customer base and looks forward to contributing to the UR's second review focussing on gas network companies and electricity and gas suppliers. We are supportive of all measures that will contribute to promoting awareness of all care registers, including suppliers' registers. We believe the customer must be at the heart of any improvements that can be implemented to ensure that vulnerable customers receive the support they need from the industry at a time when they need it.

GENERAL COMMENTS

SSE Airtricity has reviewed the proposals contained in the consultation paper and is generally supportive of the proposals. We have specific comments on the proposals below.

PROPOSAL 2 COMMON NAMING CONVENTION AND CONSISTENT LANGUAGE

SSE Airtricity would like the proposal for NIE Networks and NIW to adopt a common naming convention for care registers and use of consistent and accessible language to be extended to the whole utility industry i.e. gas network operators and electricity and gas suppliers. We believe it would be for the benefit of all customers if the whole utility industry (gas, electricity, water) used common and consistent terminology.

PROPOSAL 5 NIE NETWORKS AND NIW WORKING TOGETHER TO IMPROVE PROMOTION AND AWARENESS OF CARE REGISTERS

It is the view of SSE Airtricity that any awareness programmes must include all participants and not be restricted to NIE Networks and NIW. All participants (gas network operators and suppliers) have a role in promoting awareness. Electricity and gas suppliers have obligations to maintain a register of domestic customers who are of pensionable age, disabled or chronically sick. If a customer registers directly with NIE Networks, they can

only register life supporting and sustaining medical equipment i.e. critical care. If a customer is of pensionable age or is disabled, they must first register with their supplier who will then notify NIE Networks of the customer's vulnerability. Because customers with specific medical equipment can register directly with NIE Networks we are concerned that the NIE Networks care register may not be aligned to suppliers' registers. Customers registering directly with NIE Networks are currently not encouraged by NIE Networks to also register their vulnerability with their supplier. The registers may get more out of line should NIE Networks and NIW promote their own registers but exclude suppliers' registers from any promotion awareness campaigns. Additionally, NIE Networks depends on suppliers to notify them of customers who are of pensionable age or are disabled and it is for this reason that any promotion campaign must also include promotion of suppliers registers.

PROPOSAL 3 & 7 DATA SHARING BETWEEN NIE NETWORKS AND NI WATER.

The paper refers to ways in which NIE Networks maintains its Critical Care Register; "Registration can be made by – telephone, on-line, postal, & market message (via suppliers)". When a customer advises SSE Airtricity of a vulnerability status we obtain the customers consent to share that information with NIE Networks. The customer's vulnerability status is then communicated to NIE Networks via an automated XML market message. We would like the UR to seek clarification from the ICO, if not already obtained, that in this particular scenario it would also be the responsibility of NIE Networks to obtain the customers expressed consent for NIE Networks sharing of vulnerable customer information, received via an electricity supplier, with NI Water. The consent obtained by suppliers' covers sharing with NIE Networks only and it would not be feasible for suppliers to manage the consent between NIE Networks and NI Water as we have no way of communicating the non-consent.

NIE NETWORKS SHARING OF VULNERABLE CUSTOMER INFORMATION WITH SUPPLIERS

SSE Airtricity would like to take this opportunity to highlight a particular area of concern we have in relation to the NIE Networks care registers and would ask that it be addressed in the second care register review. As stated above when suppliers are notified of a customer's vulnerability we advise NIE Networks via market message. However, there is no reciprocal approach taken by NIE Networks. NIE Networks does not share critical care information received directly from a customer with the customers registered supplier and

do not even advise the customer to register their vulnerability with their supplier. Suppliers have obligations with regards to supporting vulnerable customers and we believe the “tell them once” approach should also apply between NIE Networks and suppliers. We believe this can only have a positive impact on electricity customers. Indeed, in the Republic of Ireland it is suppliers who have the responsibility for the collection and maintenance of vulnerable customer information and an annual reconciliation takes place to ensure that the supplier and network operators registers are aligned.

CONCLUSION

SSE Airtricity supports the review being undertaken by the Utility Regulator with regards to special provisions for vulnerable customers. We seek clarification from the Utility Regulator with regards to responsibility of obtaining a customers expressed consent for the sharing of information, obtained via suppliers, between NIE Networks and NI Water. It is SSE Airtricity view that it is the responsibly of NIE Networks to obtain the consent in this instance.

We understand this review focusses on NIE Networks and NIW but it is our view that some of the proposals; common naming conventions and promotion and awareness of registers must be extended at this stage to include suppliers and gas network operators. In relation to the Utility Regulator’s second review which is to focus on gas network companies and electricity and gas suppliers we ask that the Utility Regulator apply the “tell them once” approach between network companies, gas and electricity, and suppliers.