Question 6: Do you agree that Vulnerable Customers need a different UMeTS service, and if so is the proposed definition of Vulnerable Customers Correct?	
British Gas	If the distributor is only in position to offer a credit meter exchange service we believe it is appropriate to limit this service to Vulnerable Customers only. We have proposed the following amendment to the definition as follows: *Vulnerable Customer: means a Customer who, for reasons of age, health or disability, is likely to be vulnerable and at risk in the event of a Supply Failure (and a person shall be considered to be "vulnerable" if he or she is unable to safeguard their own welfare, or that of dependant members of their household).* We believe this amendment would deal with the consequences relevant to the situation.
CE ELECTRIC UK	We believe that all customers, including vulnerable customers, should be entitled to receive UMetS. Under current electricity industry structure we believe that this service should be provided to all customers by their appointed suppliers, as the procurers of all other metering-related services in the current fully-competitive market, rather than by new obligations being placed on distributors via DCUSA. We understand that at least one supplier and a number of meter operators have introduced a 24/7 meter operator facility in recognition of the customer service benefits. We believe that a 24/7 Mop facility via suppliers supports competition and more appropriately aligns to the supplier hub principle, and to the reality of where legal responsibilities relating to meters rest within the industry, than a UMetS obligation on distributors. It makes sense that the most vulnerable members of society are given additional protection to insure them against being off supply for prolonged periods, which might place them at an unacceptable level of risk of harm. The definition of vulnerable customer put forward by the working group sets out an acceptable basis for assessing vulnerability whilst allowing field staff the flexibility to make the final decision on vulnerability based on the circumstances they find on site during a visit.
Central Networks	Central Networks believes that all customers should receive the best possible service and urgent metering is a service that should be provided to all customers.
E.ON UK	There may be a need for an UMeTS service for those customers that are electrically dependent. As a far as the definition of a Vulnerable customer, why should they treated differently due to a meter fault as opposed to a general distribution system fault?
EDF Energy	We agree that Vulnerable Customers may need a different UMetS service.

Customers plc	We agree that the proposed definition in DCP 008A/DCP 008C is correct for UMetS services, although not necessarily appropriate for other services.
EDF Energy Networks	While we are concerned for the welfare of vulnerable customers, if the problem is perceived to be with the metering then that is a supplier responsibility. It is wrong for suppliers to seek to pass that responsibility onto another party. We trust that suppliers have the same concerns for the welfare of vulnerable customers such that their supply will be restored. However, if there is any doubt about the nature of the fault, then the distributor should attend. The current definition of vulnerable customer is a fair description of a vulnerable customer but not a reasonable definition in this contractual context. The proposed drafting places an undue obligation on distributors. A person in a call centre cannot make such an assessment of the health/welfare of someone from a telephone conversation. Such a definition may lead to fraudulent claims of ill-health etc. where callers learn the “right” responses to such questioning. If a different service is to be required for vulnerable customers where a metering fault is identified on the phone, we believe that the person in the call centre should be able to rely on the distributor’s own priority services register for people who depend on electricity for medical reasons, which is maintained pursuant to the distribution license. This gives the distributor a degree of certainty as to whether he should attend site or not. We therefore suggest that, if it is to be required, Clause 29A.3.3 be changed to read “the Customer is part of the Company's special needs register or is a Customer who, in the reasonable opinion of the Company based on the dialogue referred to in Clause 29A.1, is a Vulnerable Customer” However, if this enhanced level of service is to be available for such customers with meter faults why should it only be available out of hours? Either the distributor should attend all such vulnerable customers (because they are vulnerable and need a speedy response) or none at all (because it is a metering fault which is a supplier responsibility). The distributor should not be expected to offer a metering service out of hours merely because the supplier has chosen not to do so. Such obligations should properly be placed on suppliers. We believe that attempts to restore supply should always be made if the distributor is on site, so a different level of UMetS service or an assessment of vulnerability at that time would be unnecessary. However, if it is to be required, the proposed definition of vulnerability and the current drafting places an

	undue obligation on distributors and we therefore suggest that Clause 29.A.4.2 be changed to "in the reasonable opinion of the Company, the Customer is a Vulnerable Customer".
Electricity North West Limited	From a Distributor perspective there should be no discrimination between types of domestic Customers since in our opinion we believe that we should only undertake UMetS if we find that there is a meter fault while on site. It would be helpful to the Customer, and to the Distributor answering the initial call from the Customer, for Suppliers to offer UMetS at any time i.e. 24-7, but such a decision is for the Supplier and not the Distributor.
energywatch	energywatch agrees with the definition of vulnerable as proposed. It is essential that any consumer unable to safeguard his own or his household's welfare is assisted quickly and effectively. Despite the definition, however any decision about vulnerability will be subjective and energywatch would expect all parties to err on the side of caution. Equally suppliers and DNOs must not only consider immediate vulnerability but also consequential detriment if a consumer is likely to be without a supply for any length of time.
ESP Electricity Ltd	ESP do not understand the need for a newly defined customer status. We feel the Priority Register currently provided by DNOs, IDNOs and Suppliers to meet their respective licence obligations and outlined in ESP's Code of Practice accordingly, meet the requirements of 'vulnerable' customers. However, should the need for a new category of vulnerable customer become evident as part of this consultation, we feel it should be dealt with via the MRASCo change process for updating a flow defined in the DTC (in this case, the D0225 flow).
IPNL	We find it difficult to comment upon whether there is a need for a UMeTs service or a different UMeTS service for vulnerable customers. No number has been provided for the incidents of meter failure nor the number of such failures affecting customers on the Priority Services Register. The proposed definition of a vulnerable customer is subjective. It will put customer facing staff who will have to deal with the initial contact from the customer or their representative in a difficult position. How would a distribution company judge whether a Customer who, for reasons of age, health or disability, is likely to be vulnerable in the event of a Supply Failure (and a person shall be considered to be "vulnerable" if he or she is unable to safeguard their own welfare, or that of members of their household). Also, how does a customer services advisor judge whether a person is vulnerable if they are unable to safeguard their own welfare. Distributors in order to protect their employees will have to require very strict definitions of situations falling within the ambit of the service. These will need to be added to the DCUSA.
Npower Group	Extensive debate relating to Vulnerable Customers has been undertaken by the Working Group, and 2 of the options now on the table (DCP08A and DCP08C) have been drafted to contain a definition of the term "Vulnerable Customer" ie: "means a Customer who, for reasons of age, health or disability, is likely to be vulnerable in the event of Supply Failure (and a person shall be considered to be "vulnerable" if he or she is unable to safeguard their

	own welfare, or that of members of their household)" We are in agreement that customers that fit the above definition should have their supply restored as soon as possible. In practical terms, this means that: • if a Distributor is on-site at a vulnerable customer's premises they should restore the supply whilst on site, even if the cause is a metering fault, rather than leaving the customer's premises without resolving the issue and making the customer wait for another operative to attend to resolve the problem. if a Distributor identifies a metering fault whilst on the telephone to a vulnerable customer out-of-hours, the Distributor should provide a UMeTS service to this vulnerable customer in order to ensure that their supply is reinstated as soon as possible, rather than the customer having to wait until the next Working Day to contact their Supplier about the issue.
Scottish Power Energy Retail Limited	Agree that Vulnerable Customers need different UMeTS service Agree with the proposed definition of Vulnerable Customers
SP Distribution / SP Manweb	We agree that clear rules are required for Vulnerable Customers and agree with the proposals put forward by the Working Group in relation to their treatment. We agree with the proposed definition of Vulnerable Customers.
SSE Energy Supply Limited	Yes, but the current definition of Vulnerable Customer is inconsistent with similar definitions previously agreed and published in other industry documents such as the Priority Services Register. There needs to be some consistency in the use of this term and existing definitions may be more appropriate.
SSEPD	We agree that "*Vulnerable Customers*" need a different UMeTS service from other off supply Customers. We do not think a further and DCUSA specific definition is suitable for "Vulnerable Customers". For reasons of consistency in interpretation we wish to see the use of an existing definition of Vulnerable Customers, such as that under D0225 Dataflow.
The Electricity Network Company ltd	Has the size of the problem been quantified in respect of vulnerable customers? We believe the volumes are very low. We believe a much greater number of vulnerable customers will lose supply because of prepayment issues: issues with lack of credit rather than with the meter itself. In previous answers we have put forward an alternative solution that could be applied in respect of such classes of customer. Whilst we recognise that parties may look at the proposal with Rather than define vulnerable customer I believe it is better to make direct reference to the licence conditions that categorise this class (or classes) of customer. Given that the services provided here are outside the scope of the distribution licence the classification of a vulnerable customer should relate to the

	Priority Services Register in the supply licence.
Western Power Distribution (South West) plc and Western Power Distribution (South West) plc	Yes – as we support the proposed definition.