

## **Consolidated Meeting Notes:**

### **RWG customer contact details group – face to face workshop 13th January 2025, Ofwat offices Birmingham**

#### **Summary of position – all subject to consultation**

- Different requirements for different segments ie. Sensitive, Large or Other customers
  - Retailers not required to obtain contact details for all customers – only to attempt to obtain (best endeavours)
  - Must share contact details wherever available
  - Higher requirements for higher risk customer segments:
    - Sensitive customers (Reference point RWG Good Practice Guide, but to be replaced by national definition of NHH Sensitive (Ofwat leading))
    - Large customers with bigger economic impact
  - Wholesalers to develop SSAs for Tier 1 sensitive customers and consider for Large non-sensitive customers (risk assessed)
- Code stated uses – unplanned and planned work
- Central solution for storing and sharing contact details (retailer to wholesaler, not retailer to retailer) and central defined data schedule
- Need to update the market privacy notice to clarify the purpose that contact details can be used for – allay data protection concerns
- Possibly develop standard market-wide data sharing agreement / or confirm covered by existing Code data protection provisions

#### **Meeting notes**

**Attendees:** Gerard Lyden, Mike Rathbone, Holly Woodhead, Sian Forward, Simon Bennett, Rosie Milsom-Dyer, Emily Jerome, Paul Baker, Lucy Byrnes, Ian Taylor, Stuart Boyle,

**Apologies:** Lauren Walsh, Ray Porter, Mary Porter-Chorley, Sam Mawby

#### **Intro**

Aim to develop options to go out to consultation

#### **Actions**

01\_04 Done

01\_06 done

ACTION (Simon): SSA data to be split by Wholesaler

01\_07 Done

#### **Aim**

- Reminder of potential outputs -code change, good practice guides, etc.
- Now entering Phase 2 -options identification
- Consultation slot planned for 1-29 April

## **Why do we need this / key design principles agreed?**

- Needed for Security and Emergency Measures Directive
- No centralised solution for sharing customer contact data
- Can't force obligations on TPs to share data if customers don't want to share their details
- Need to differentiate and prioritise between customers
- 8% of SPIDs are sensitive and therefore we should have contact details
- Missing Site Specific Arrangements (SSA)

## **Session 1 -how do Retailers and Wholesalers get customer contact details and how do they use them?**

Wholesaler group:

- Incoming contact from customers when there is an incident. Contact details are taken and saved for BMEX survey. Very small percentage of customers get in contact during incidents, i.e. only those affected and not dissuaded from contact by information on websites or recorded messages. Customer contact details are not copied across into CMOS and not kept because they may not be the ongoing contact. They are used during the incident to provide updates.
- Shared by retailers. Most wholesalers' experience is that very few retailers share contact details proactively. UU have 75% coverage in their Everbridge system. Note that Retailer uploads wipe out previous details. Infrequent updates because Retailers don't want to share. Not usually the right contact, e.g. billing instead of operations. Formats differ. Wholesalers sometimes have nowhere to store the contact details. Where phone numbers have been provided some wholesalers then put details into a SMS system used alongside affected HH customers. There has been some nervousness expressed about sharing data due to GDPR
- Have a website where customers can sign up to receive text messages. UU use this for SSA and sensitive customers. Very low take up – tends to be reactive once an incident happens.
- When making appointments to install smart meters or other planned work – first point of call is Retailers but can obtain details in other ways – not retained outside of the Hub
- Google search/ websites – pretty low success rate for getting to right contact, can be some good sources e.g. Care Quality Commission is a good source for care home SSA contact details
- Knock on the door
- Local Resilience Forum – typically for sensitive customers during incidents

Wholesalers don't tend to share contact details back with Retailers – believe they may not have use for operational contacts.

Wholesalers do share contact details for Tier 1 SSA sites to make sure they are correct but don't always share the SSA itself due to sensitivity of the customer (e.g. where there may be security concerns)

Wholesalers also need to know when operational contacts are available - weekends, nights etc. and any out of hours arrangements

Retailer group:

- During Onboarding -High success rate (no additional costs)
- Key customers - Sensitive customers -TPI's help with this – high success rate -takes Account manager time
- Call centre scripts asking for contact details – reasonable success rate and relatively easy/low cost as part of BAU
- Debt collection -high costs and not so successful. If they don't want to pay they won't share their details.
- Vacancy projects -high cost, although good success rates
- Marketing -Medium success and costs
- Asking on bills -Low success rate

**Session 2 -Use cases**

<p>Unplanned events</p> <ul style="list-style-type: none"> <li>• Proactive text messaging during incidents / events – same as for households (date/ duration/ alternative supplies)</li> <li>• Voice blasts (voice version of texts)</li> <li>• Correct single customer phone call</li> </ul>
<p>Billing (Retailer) and debt collection</p> <ul style="list-style-type: none"> <li>• but have to be careful as operational contacts may not be appropriate. (School caretaker won't be involved in paying bills.)</li> </ul>
<p>Vacant with consumption (and leaks)</p>
<p>Offering advice</p> <ul style="list-style-type: none"> <li>• E.g. adverse weather, generally communicated by wholesaler</li> </ul>
<p>High Consumption messaging</p> <ul style="list-style-type: none"> <li>• E.g. increase in consumption</li> <li>• Operational or billing contact</li> </ul>
<p>Continuous flow</p> <ul style="list-style-type: none"> <li>• Especially with smart meters / AMR</li> <li>• Identify leaks early</li> </ul>
<p>Wholesaler asking customers to reduce demand in incident</p> <ul style="list-style-type: none"> <li>• Direct or via Retailer</li> <li>• Can be targeted at high consumption sites or particular sites with non-essential use that can be temporarily stopped</li> <li>• Sometimes to avoid an incident impacting customers more widely</li> </ul>
<p>Bilateral day-to-day e.g. meter exchange</p> <ul style="list-style-type: none"> <li>• Making appointments</li> <li>• Have to request from retailer</li> </ul>
<p>Planned work</p> <ul style="list-style-type: none"> <li>• Inc smart meter roll-out</li> <li>• Can sometimes be a letter drop today</li> </ul>
<p>SSAs</p> <ul style="list-style-type: none"> <li>• 121 conversations with sensitive customers (ongoing)</li> <li>• Used for network planning and contingency planning</li> </ul>
<p>Planning responses to unplanned events</p>
<p>Understanding what actions will help customers in an unplanned event e.g. traffic management</p>

**Reflections:**

- What is the worth of collecting customer details given it's likely not to be used before it goes out of date? Need to balance cost and value.
- Definitely need to keep contact data up to date for SSA and large consumers.
- Provides a way of targeting a specific area affected by an incident
- Reduces incoming calls and gives much better customer experience
- Need to limit time of day when text messages are sent out (e.g. 8am-9pm)
- Code provisions are not working - Wholesalers can't get hold of many retailers out of hours (some Retailers are reliably available 24/7)
- Retailer is responsible for the sensitive flag
- Wholesaler is responsible for the SSA flag.

**Session 3 -Mandated versus Obligated**

SENSITIVE	LARGE CUSTOMERS	OTHER CUSTOMERS
Health risk High <ul style="list-style-type: none"> <li>• Tier 1 – Hospitals/prisons</li> </ul> Medium <ul style="list-style-type: none"> <li>• Tier 2 – Care Homes / residential schools</li> </ul> Lower <ul style="list-style-type: none"> <li>• Tier 3 – Schools / Colleges /Universities</li> <li>• Tier 4 – Animals</li> </ul> ?? <ul style="list-style-type: none"> <li>• Critical national infrastructure</li> </ul>	Economic risk <ul style="list-style-type: none"> <li>• Airports, train stations</li> <li>• Food</li> <li>• Large industrial</li> <li>• Data centres</li> </ul>	Lower health / economic risk
MUST	SHOULD	COULD
Retailers <ul style="list-style-type: none"> <li>• Request contact details</li> <li>• Regularly review / request (proactive)</li> <li>• Remove barriers (e.g. contractual)</li> <li>• Provide reasons why can't provide (assured)</li> <li>• Share proactively with wholesalers                             <ul style="list-style-type: none"> <li>○ Pref via central system</li> </ul> </li> </ul>	Retailers <ul style="list-style-type: none"> <li>• Request contact details</li> <li>• Regularly review / request (proactive)</li> <li>• Remove barriers (e.g. contractual)</li> <li>• Share proactively with wholesalers                             <ul style="list-style-type: none"> <li>○ Pref via central system</li> </ul> </li> </ul>	Retailers <ul style="list-style-type: none"> <li>• Request contact details during BAU</li> <li>• Review / request (reactive/ on contact)</li> <li>• Remove barriers (e.g. contractual)</li> <li>• Share proactively with wholesalers                             <ul style="list-style-type: none"> <li>○ Pref via central system</li> </ul> </li> </ul>
Wholesalers <ul style="list-style-type: none"> <li>• Public Health Site Specific Arrangements for Tier 1</li> </ul>	Wholesalers <ul style="list-style-type: none"> <li>• Non-Public Health Site Specific Arrangements – for high risk/impact sites (risk assessed)</li> </ul>	

### **What else do we want to know? (Questions for consultation)**

- Have any other methods been used to obtain customer contact details? How successful was it?
- How complete is the customer data?
- How aged is the customer data?
- Who often is sensitive flag in CMOS reviewed?
- How often is SSA data in CMOS reviewed?
- Do wholesalers want the data?
- How would wholesalers use the data?
- What are the data protection concerns?
- What data sharing agreements do retailers and wholesalers have in place?

### **Market Improvement Fund**

The following areas were suggested for possible MIF applications:

1. A central number / contact point for all customers to use in water emergencies/unplanned events – similar to all 105 if there is a power cut [UK Power Cut? Call 105 For Free | Find Your Electricity Provider](#)
2. Gather publicly available customer contact details centrally and make available to all Trading Parties (buy in from specialist provider)
3. Carry out a data cleanse for all sensitive customer flags in CMOS – removing customers that don't fit the definition of sensitive (eg betting shops) and adding in any that may have been missed (eg. new hospitals)

**ACTION:** GL to reach out to member post meeting to see if anyone wants to lead a MIF submission.