Emily Kearny
Director
UK Regulators Network
Sent by email

8 March 2019

Dear Emily,

We – Water UK and ENA – are pleased to respond jointly on behalf of our members to the UKRN publication *Making better use of data to identify customers in vulnerable situations: A follow-up report.*

We agree with UKRN that harnessing the power of data has the potential to improve the customer experience for customers in vulnerable situations and help ensure their needs are met.

There is much that water and energy companies can do – and are doing – individually. There are some things that can only be done collectively, and the water and energy sectors have come together for this purpose to extend to the water sector the current priority service data sharing arrangements that have been established within the energy sector.

We are pleased that the follow-up report recognises the significant progress that has been made towards this goal. The report is right to highlight six key learning points from the work to date and in particular the lessons learned from the successful trial in the North West of England, involving the shared customers of Electricity North West and United Utilities.

We highlight below how these learning points are being taken forward and then outline our forward programme of work to achieve the goal of establishing water-energy data sharing by April 2020.

Maintaining customer trust

The report rightly observes that customer trust for data sharing is crucial, particularly given the ever greater focus on data sharing in light of the implementation of GDPR and high-profile data breaches in other sectors.

The pilot demonstrated that customer confidence and consent to cross-sector data sharing can be secured through carefully considered scripts and training – providing that the rationale for data sharing and its benefits are clear to the customer. These points were readily demonstrated in the trial, due to natural synergies between the water and energy sectors, two essential public services.

Data matching

Efficiently matching address data continues to be a significant focus for the project and has a number of aspects. To ensure that data is routed to the correct electricity network or water company, a systems pilot is underway, involving four water companies and three electricity network companies, which will include the testing of approaches to automating the matching of address field data.

In at least the short term, some degree of manual intervention is likely to be needed to resolve situations where there is an inconsistency in the name or address details held by water and energy network companies.

Training

The importance of appropriate training of front-line staff was a key message from the pilot; training materials developed for the pilot will be shared with all companies as we move towards national roll out.

Balancing automation and the human touch

While controlled automation of data transfer is essential for data security and efficiency, we recognise that the human touch is also crucial to understand the circumstances of individual customers and the services that are appropriate to them. The project team is facilitating the sharing of training materials and approaches, to help each individual company provide appropriate services to their customers based on their circumstances.

Automated data flows are at the heart of the project, with the common needs codes already used in energy being extended to water, with some adaptations so that they are also appropriate for the delivery of priority services to water customers. However, there may be a requirement for some additional contact with customers, potentially via tailored welcome packs, to ensure that the right services (e.g. communication preference between Braille vs audio), are provided during future interactions. Decisions regarding the appropriate level of additional contact along these lines will naturally be a matter for individual companies.

Working together to make life easier for customers

Making it easier for customers to interact with, and have equal access to, services that they need is the fundamental reason for this project. We have been pleased that this goal and the practical steps we are taking to achieve it, have resonated with both customers and stakeholders. Throughout this project, and beyond, companies will continue to look for opportunities to make the priority services registration experience seamless and as stress-free as possible.

Sector-wide roll out of water/energy data sharing and transfer to business as usual operations

We will continue to discuss with regulatory stakeholders, in particular Ofgem, Ofwat and UKRN, progress towards full roll out, and the facilitating role that regulators could play.

As the project in essence has two parts – water companies are responsible for sending information for the relevant electricity network company to use, and electricity network companies are responsible for

sending information for the relevant water company to use – progress through these gateways will be managed and monitored separately.

Overall, while the project remains well placed to deliver priority services data sharing between energy networks and water companies across England and Wales by April 2020, some risks remain and as a result the project status at the start of March 2019 is amber.

We are continuing to focus on ensuring that project has the right resources, and we are enhancing our engagement with energy suppliers to understand how as cross-sector project team we can best ensure that the customer experience of registering for priority services in either sector is as smooth and easy as possible as data sharing is established between water companies and DNOs.

Our agreed key implementation gateways are set out below; we will be monitoring progress against these closely and where necessary taking action to ensure delivery.

Date	water/energy or both	Description
Dec 2018	Water	Water registration pilot started to test different technical solutions to sending information to the correct DNO
Feb 2019	Energy	Energy registration pilot started to test technical solution(s) for DNOs to send information to the correct water company
Mar 2019	Water	Water registration pilot completed and report provided to all water companies with recommendations on which approach(es) to adopt; all water companies confirm their approach
Mar 2019	Energy	ENA confirm agreement to change current energy sector only needs codes to meet combined energy and water requirements and make required formal submissions for these changes
May 2019	Energy	Energy registration pilot completed and all DNOs confirm their approach to sending information to the correct water company
July 2019	Energy	Formal ratification of changes to needs codes to meet combined energy and water requirements
Aug 2019	Water	All water companies procured and installed gateway for message transfer
Sep 2019	Both	Training materials for shadow operation, including mandatory business rules, provided to all energy network and water companies
Sep 2019	Both	Confirmation that energy network and water companies ready to enter shadow operation in October
Oct 2019	Both	Start of shadow operation
Jan 2020	Both	Lessons learnt from shadow operation shared with all companies
Feb 2020	Energy	Formal implementation of changes to needs codes to prepare for live operation
Mar 2020	Both	Confirmation that all energy network and water companies have acted on lessons learnt from shadow and are ready for cut over from shadow to live
Apr 2020	Both	Live operation starts; combined needs codes used consistently by water companies and DNOs, including for the two-way transfer of data between water companies and DNOs

Following 'go live' in April 2020, the project will:

- ensure a smooth handover to company 'business as usual' operations
- help resolve any initial implementation issues
- provide a project close out report to stakeholders

This project report will demonstrate how the project has performed against its success factors:

1. Seeking explicit consent: from April 2020, all customers registering for priority services in water and energy will be asked if they would like their priority services data to be kept and shared with other utility companies serving their premises
2. Refreshing consent: from April 2020, explicit consent to share priority services data is refreshed according to a common policy framework
3. Sending priority services data: where explicit consent to share is given or refreshed, registering utilities identify and notify the other utilities serving the premises via standardised electronic messages
4. Receiving and using priority services data: receipt of priority services registration messages from another utility, results in changes to the receiving utility's local priority services register and is used to enable delivery of safeguarding services
5. Positive feedback: stakeholder feedback is positive about the data sharing arrangements
6. Smooth handover to BAU operations and project closure: systems completed, documented and operational, with ongoing governance arrangements in place.

Following this, we anticipate that stakeholder interest will move towards outcomes such as the number of customers receiving priority services and customer satisfaction, for which there are regulatory mechanisms for individual companies to report against – for example, the new common performance commitment on priority services being introduced by Ofwat as part of PR19.

We would be pleased to provide further updates as we progress through the milestones set out above.

We also look forward to discussing progress – and the benefits this project will provide customers – further at our meeting in Warrington on 2 April, when UKRN visits the project. If any further information would be helpful in the meantime, we would be pleased to assist.

Yours sincerely,

Rob Wesley   Tony Glover
Head of Policy   Director of Policy & Gas
Water UK   ENA