

8 August 2019

Meghna Tewari  
Head of Vulnerability and Consumer Policy  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

By email only to: [CDconsultations@ofgem.gov.uk](mailto:CDconsultations@ofgem.gov.uk)

Dear Meghna,

**Draft Consumer Vulnerability Strategy 2025 Consultation**

BUUK Infrastructure Limited (BUUK) welcomes the opportunity to respond to the above consultation. This response is provided for and on behalf of BUUK's IGT and IDNO Licensees (GTC Pipelines Limited, Independent Pipelines Limited, Quadrant Pipelines Limited, The Electricity Network Company Limited and Independent Power Networks Limited).

In general BUUK supports Ofgem's proposals set out in the draft Consumer Vulnerability Strategy 2015 consultation. However there are areas where we seek further clarity on how proposals impacting network companies will translate into obligations on independent gas transporters (IGTs) and independent distribution network operators (IDNOs). In particular, for GDNs, Ofgem propose to introduce a new principles-based Licence Obligation for RIIO-GD2. It is unclear to us on how such licence obligations will apply to IGTs, and how IGTs would secure any required funding for the provision of such services. We believe that vulnerable consumers connected to an IGT network should not receive any lesser service than similar equivalent customers do when connected directly to the GDN network. Therefore it is important that where (and if) IGTs are required to provide such services they should receive an appropriate allowance for doing so.

We note the proposal to continue the Fuel Poor Network Extension Scheme. Whilst IGTs, by the nature of networks they provide, do not undertake a significant number of connections under this scheme, for those that we have provided, we have found the administration of the funding arrangements variable across GDNs. To the extent that the scheme continues, we think there is merit in reviewing the process to ensure it is efficient and does not unduly delay or hinder the provision of connections.

Notwithstanding the above, we are aware of Government's stated ambition to end the provision of gas connections to new premises. Whilst Ofgem states that it will give itself the

option to end the FPNES earlier if required, it does not consider what options it may consider to replace the scheme in the event that no new gas connections are made.

Please contact me if you wish to discuss the points we have raised.

Yours sincerely

Mike Harding  
Regulation Director