



Customer Vulnerability Strategy RIIO-ED2 2023-2028

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Contents

1.	Executive summary	3
2.	Building on our existing Customer Vulnerability Strategy	9
3.	Understanding consumer vulnerability	11
4.	Building our strategy – stakeholder engagement	12
5.	Our Customer Vulnerability Strategy	17
	5.1 Principle 1:	20
	5.2 Principle 2:	26
	5.3 Principle 3:	30
	5.4 Principle 4:	40
6.	Customer Vulnerability Strategy costs and the options considered with stakeholders .	44

1. Executive summary

- 1.1.** The five years that constitute RIIO-ED2 will be ones of significant change for our customers; as the urgency to decarbonise our economy grows and the UK's ambition to build back better from Covid-19 is realised. Western Power Distribution (WPD) has a significant role to play, not only in driving this agenda, but in ensuring the customers we serve are protected and can positively benefit from the changes taking place.
- 1.2.** To navigate this uncertainty, stakeholder engagement is, and will continue to be, absolutely critical. Extensive engagement around consumer vulnerability has been completed for many years – with a range of stakeholders (from experts and partner organisations to utilities, local authorities and future customers). This encompasses bespoke events such as WPD's annual consumer vulnerability workshops and surveys of customers supported by WPD's consumer vulnerability projects, as well as broader scoped events such as WPD's Customer Panel and annual co-creation stakeholder workshops.
- 1.3.** In the building of our RIIO-ED2 Business Plan, we adopted 26 unique engagement mechanisms, and 16 of these specifically targeted stakeholders representing or identifying as customers in vulnerable situations and/or the topic of consumer vulnerability (see the table in paragraph 4.7). Needless to say, our Customer Vulnerability Strategy has been co-created through extensive, iterative engagement and we have ensured it is fully endorsed by our stakeholders.
- 1.4.** Our Customer Vulnerability Strategy therefore outlines how we will support customers in vulnerable situations through transformational years for our energy system, with holistic, expert-led and locally-tailored services. Building on the last seven years of delivering a bespoke vulnerability strategy, we will go further than ever before to deliver 39 unique initiatives that generate positive outcomes for our customers. In the case of fuel poverty, for example, our stakeholders have asked us to go well beyond our current baseline, so we will support 113,000 customers to save £60 million on their energy bills over RIIO-ED2, through an expanded suite of interventions that seek to address challenges in the round.
- 1.5.** Though highly ambitious, the execution of our strategy is made possible by the strong foundations we have built over many years. At the centre of this is the network of partner agencies we have cultivated to refer customers to WPD's Priority Services Register (PSR) and deliver tailored fuel poverty and vulnerability support that aligns with the multi-dimensional nature of customer needs. Looking forward to RIIO-ED2, it is clear that a collaborative, joined-up approach is not just preferable but essential to address the scale of challenges facing customers, extending our reach and unlocking wider benefits that would otherwise not be possible. One way we will deliver this is through our commitment to achieve a 'one-stop-shop' service, ensuring that customers only have to join the PSR once to be automatically registered with their energy supplier, water company, gas distributor and telecommunications companies.
- 1.6.** In the wake of Covid-19, the difficult situations many still face has intensified what it means to have an effective, adaptive Customer Vulnerability Strategy, able to support the evolving needs of customers in times of crisis. In particular, it has highlighted the impact vulnerable situations can have on customers' ability to adapt to change, offering crucial lessons to take forward as we look to deliver a smart energy future. To ensure that the transition to net zero is fair and inclusive, we must extend our definition of vulnerability to reflect the capabilities needed to engage in smart energy offers, understand the potential disadvantages that a future network could engender and deliver interventions to widen participation. We have therefore developed stretching targets to ensure customers in vulnerable situations are supported to participate in the smart network, offering 600,000 Priority Services Register (PSR) customers a bespoke smart energy action plan each year. At the same time, we are seeking to expand the scale of the PSR by identifying and adding 50,000 hard-to-reach customers annually, ensuring that those in vulnerable situations receive comprehensive support and advice.
- 1.7.** As we drive forward the transformative change needed to achieve net zero, our Customer Vulnerability Strategy will ensure we can achieve an inclusive transition that protects and benefits those in vulnerable situations.

Core Business Plan commitments

- 1.7.** WPD's RIIO-ED2 Business Plan is underpinned by 45 core commitments that achieve the ambitious, fundamental outcomes stakeholders strongly support. Our core commitments are separated into three high level categories which align with Ofgem's output categories. These are to: meet the needs of consumers and network users, maintain a safe and resilient network and deliver an environmentally sustainable network.
- 1.8.** Under these categories we have developed the commitments with stakeholders under a range of key topics including 'customers in vulnerable situations'. The core commitments under this topic which will be delivered by this Customer Vulnerability Strategy are set out in the table below:

Business Plan core commitments		
Customers in vulnerable situations	6	Proactively contact over 2 million Priority Services Register customers once every two years (with 60% via direct telephone call) to remind them of the services we provide and update their records.
	7	Achieve a 'one-stop-shop' service so that customers only have to join the Priority Services Register once to be registered automatically with their energy supplier, water company, gas distributor and telecommunications companies.
	8	Increase the number of customers registered on the Priority Services Register to 40% of total eligible customers including 50,000 hard-to-reach customers each year.
	9	Support 113,000 fuel poor customers to save £60 million on their energy bills over RIIO-ED2.
	10	600,000 Priority Services Register customers to be offered a bespoke smart energy action plan each year.

- 1.9.** In addition to these, there are also a number of commitments which will deliver positive outcomes for customers in vulnerable situations:

Business Plan core commitments		
	16	Annually publish an updated WPD Social Contract, reporting the positive outcomes delivered for customers and as a minimum, maintain our prime Environmental, Social and Governance (ESG) rating.
	17	Support local people in our communities via an annual £1m 'Community Matters' fund, funded entirely by shareholders at no cost to customers.
	18	Deliver 1,000 volunteer days per year for WPD staff to support local community initiatives associated with vulnerability and environmental initiatives, with annual reporting in WPD's Social Contract of the positive impacts achieved.
	43	Create a low carbon technology energy advisory service for customers, providing a support service for people looking to switch to electric vehicles, heat pumps, or solar photovoltaic (PV)

- 1.10.** As part of our Customer Value Proposition (CVP) in our Business Plan, we are proposing additional support for schools and other local community buildings which could potentially fall behind in the energy transition. This is not only about providing financial support but about actively targeting those users who might not be able to bid for more sustainable energy options without support.
- 1.11.** **CVP-6: Build decarbonised communities and local energy schemes by funding solar PV on schools and community buildings in areas of high economic deprivation.**
- 1.12.** WPD's social indicator mapping (see section 5.2) will be used to target support and engagement to schools and community organisations in deprived areas, enabling them to establish solar PV at their locations, become more energy efficient and reduce their bills.

Summary of our Customer Vulnerability Strategy initiatives

- 1.13.** The wide ranging scope of consumer vulnerability means that many customers vulnerable to a loss of supply may face intersecting vulnerabilities, which can also overlap with other issues such as struggling to afford to heat their homes or being able to participate in the opportunities provided by the energy transition.
- 1.14.** As such, the framework set out by Ofgem for DNOs' Vulnerability Strategies necessarily has many areas where requirements intersect and overlap. The framework has a set of baseline expectations under four key principles:

Principle 1:

Effectively support consumers in vulnerable situations, particularly those most vulnerable to a loss of supply, through a sophisticated approach to the management, promotion and maintenance of a Priority Services Register (PSR).

Principle 2:

Maximise opportunities to identify, and deliver support to, consumers in vulnerable situations through smart use of data.

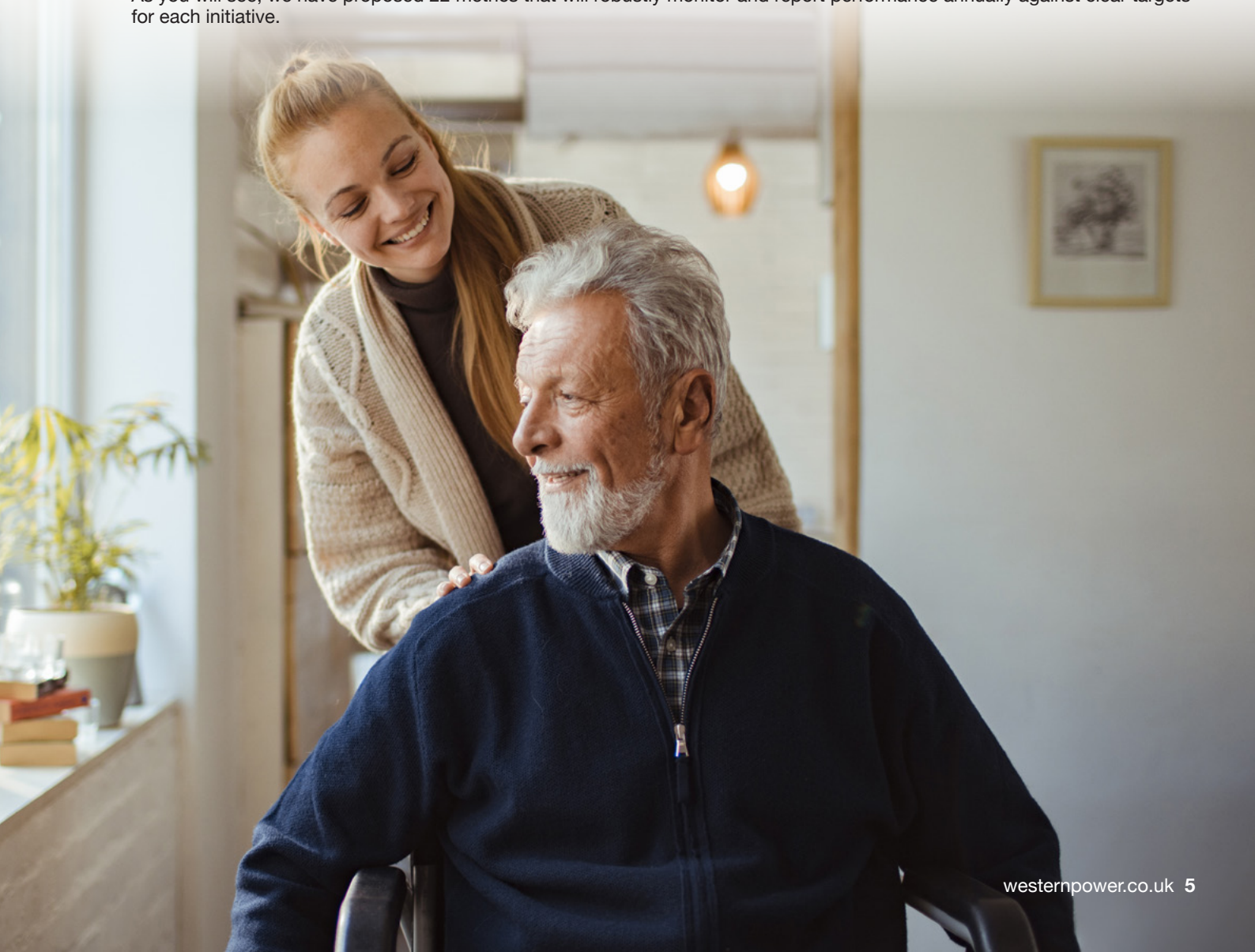
Principle 3:

Understand new forms of vulnerability, in particular by identifying blockers to participating in a smart flexible energy system.

Principle 4:

Embed the approach to protecting the interests of consumers in vulnerable situations throughout a company's operations to maximise the opportunities to deliver support.

- 1.15.** In section 5 of this strategy, the full range of initiatives we propose to deliver to meet the needs of our customers is detailed in tables for each baseline expectation. As there is overlap between many of the baselines, a number of the initiatives appear under more than one baseline to ensure that we clearly demonstrate how each baseline expectation will be met or exceeded. As you will see, we have proposed 22 metrics that will robustly monitor and report performance annually against clear targets for each initiative.



In addition to the 9 core commitments in our Business Plan relevant to customer vulnerability, within this strategy we are proposing an additional 39 initiatives to drive the highest levels of service and positive outcomes for our customers. Of these, 21 seek to stretch our performance significantly beyond Ofgem's baseline expectations and our own high standards of industry-leading performance set in RIIO-ED1. This gives us a strong track record to build on further, and all initiatives have extensive stakeholder support and have been co-created via engagement with over 9,500 stakeholders.

1.16. The table below summarises all of the initiatives in our Customer Vulnerability Strategy and indicates which of the four key principles the initiatives deliver against.

Customer Vulnerability Strategy initiatives		Principle			
		1	2	3	4
1	<p>WPD's social indicator mapping published online with data which is open-sourced for anyone to use, inviting ideas to collaboratively develop new services. The data enables us to tailor outreach to gaps in our PSR take-up, where the mapping suggests potential areas of vulnerability.</p> <p>Key areas of coverage:</p> <ul style="list-style-type: none"> • PSR: Total number of customers eligible and gaps in WPD's coverage • Fuel Poverty: Households finding it difficult to affordably heat their homes • Resilience: Community resilience levels to inform local network investment • Community Energy: Location of schemes to potentially protect/involve the interests of the most vulnerable in the smart energy transition. • Exceeding baseline: Our approach will include over 60 social indicator datasets. 	●	●	●	
2	<p>Maintain a network of referral partner agencies providing coverage across all four licence areas. Use data mapping to identify and target gaps in coverage to proactively reach out to local trusted agencies to expand our coverage.</p> <ul style="list-style-type: none"> • Exceeding baseline: Our approach will maintain a minimum of 150 partner agencies. 	●	●	●	
3	<p>Work with local agencies, including those in the health sector, to broaden awareness and increase understanding of the PSR among customers in vulnerable situations and those who support them.</p> <ul style="list-style-type: none"> • Exceeding baseline: We will extend this to partnerships with telecoms providers. 	●	●	●	
4	PSR data and information strategy in place and reviewed annually.	●	●	●	
5	Dedicated PSR data cleanse teams contact all customers registered on the PSR at least once every two years to update their records and provide up-to-date information on the services we can offer.	●	●	●	●
6	<p>Data share arrangements in place with suppliers, gas distributors and water companies, compliant with GDPR and Ofgem Data Best Practice Guidance.</p> <ul style="list-style-type: none"> • Exceeding baseline: We will establish two-way data sharing, partnering with all eight water companies in WPD's region. 	●		●	
7	<p>External accreditations ensure independent experts assess and endorse our processes and continue to provide guidance and advice allowing us to set strategic direction (e.g. BSI inclusivity standard, Accessibility AA, Action on Hearing Loss charter mark and Customer Service Excellence).</p> <ul style="list-style-type: none"> • Exceeding baseline: We will achieve compliance or compliance plus ratings in all 57 elements of the Customer Service Excellence assessment. 	●	●	●	●
8	Customers can communicate with us via multiple channels including: Twitter, Facebook, WPD smart device App, WPD Power Cut Reporter App, text message, website, email, WhatsApp and Webchat.	●			
9	Exceeding baseline: Translation services available 24/7 by telephone and on WPD's website for over 100 languages including RoboBraille online function for customers to quickly and independently convert information or documents on our website into audio books, braille or another format.	●			
10	Exceeding baseline: InterpreterNow providing customers with the ability to contact WPD via a sign language interpreter free of charge.	●			
11	Exceeding baseline: Achieve AbilityNet Accreditation Certificate for WPD website.	●			
12	PSR customers provided with dedicated 24/7 phone number to call in the event of a power cut.	●			
13	<p>PSR customers provided the following 24/7 support during power cuts:</p> <ul style="list-style-type: none"> • Accurate information on all network outages and bespoke alerts via online power cut map and WPD smart device Apps • Collaborate with external agencies including the British Red Cross and National Caterers Association to provide welfare support: e.g. crisis packs, warm meals, alternative accommodation • PSR customers medically dependent on electricity are provided tailored advice including discussion of back-up plans for any medical electrical dependencies. 	●			

Customer Vulnerability Strategy initiatives (continued)		Principle			
		1	2	3	4
14	Exceeding baseline: We will work with expert stakeholders to develop resilience planning specifically targeted at premises providing care and support for vulnerable customers, including care homes, refuges and shelters.	●		●	
15	Exceeding baseline: Commission an annual horizon scan with the Centre for Sustainable Energy (CfSE) to identify additional data sets to incorporate into data mapping and potential new referral partners.	●	●	●	
16	Exceeding baseline: We will also encourage, reveal and promote innovative ways in which other organisations have made use of WPD's vulnerability data and mapping tools to deliver social benefits. This will help to promote the data and tools more widely and catalyse wider social impact from this data.	●		●	
17	Work with expert stakeholders, including our Customer Panel and 150 expert referral partners, to refresh our definitions and understanding of vulnerability each year.		●	●	
18	Hold annual consumer vulnerability workshops to engage expert stakeholders and to work with them to develop our understanding of vulnerability, share best practice and understand the priorities which need to be addressed.		●	●	
19	Exceeding baseline: Work with our expert stakeholders to update our Customer Vulnerability Strategy each year and co-create an ambitious annual action plan to develop new, innovative outreach initiatives for the vulnerable and fuel poor.	●	●	●	
20	Exceeding baseline: Our work with the CfSE on the 'Smart and Fair?' initiative will provide research that will enable us to expand our definition and understanding of vulnerability to reflect capabilities to participate in a smart network, considering how this evolves over time. We will collaborate to develop a Capability Lens and offer profiling tools, enabling us to model and therefore identify the capabilities of vulnerable customers to participate in a smart, low carbon future. These will be used to: calibrate existing schemes; design and implement new interventions to support wider participation in a smart energy market.		●	●	●
21	Exceeding baseline: We will work with key stakeholders to understand and serve the needs of disabled electric vehicle drivers, ensuring they are provided access to adequate charging infrastructure in a timely manner, delivered as part of local area energy plans.			●	
22	Exceeding baseline: We will enhance our internal App for our field staff, providing access to advice and information on identifying vulnerability, our support and the PSR, ensuring staff are equipped to help vulnerable customers they encounter.	●	●		●
23	We will collaborate with industry partners to create an online platform bringing together tools, advice and support for small and medium businesses to participate in the energy system transition, and provide energy resilience advice in relation to dealing with power cuts.		●	●	●
24	We will continue to maintain partnerships with Local Resilience Forums to assist in the co-ordination of community support during incidents such as flooding.	●	●		
25	Core fuel poverty schemes delivered by expert lead partners - monthly performance monitoring enables assessment of schemes' effectiveness and provides ongoing communication on new and emerging issues with opportunities to identify new support interventions, collaborate and share best practice. <ul style="list-style-type: none"> • 23 core schemes based on 'hub' delivery model with one lead partner in each WPD region responsible for detailed assessment of customers' needs and coordinating multiple local services to provide support • Two referral models 'Power Up' and 'Affordable Warmth' • Nine core interventions • Contractual arrangements provide performance reporting requirement. Granular outcomes reported for each customer supported • Only quantitative savings and outcomes captured for each customer • Wider qualitative social value calculated via common SROI model and reported separately • Contract performance managed by dedicated WPD Social Obligations team • Customer survey to verify/correct/update the outcomes recorded and to assess their satisfaction. 		●	●	
26	Power Up Smart providing nine core interventions and tailored energy advice targeted at PSR customers with smart meters.		●	●	
27	Power Up Health providing nine core interventions in partnership with local health services and support groups and customers referred to WPD by their medical oxygen provider.		●	●	
28	Annual fuel poverty innovation competition 'Energy Affordability Fund' seeking innovative projects to tackle fuel poverty. <ul style="list-style-type: none"> • Scope co-created with expert stakeholders including WPD's Customer Panel each year • Support provided by WPD social obligations experts to help applicants generate viable proposals • Applications assessed and scored in collaboration with WPD's Customer Panel. 		●	●	

Customer Vulnerability Strategy initiatives (continued)		Principle			
		1	2	3	4
29	Exceeding baseline: We will develop and implement new interventions for fuel poverty outreach schemes, specifically targeting advice to support customers in the energy transition and participate in the opportunities this provides to help them with their energy costs.		●	●	
30	Exceeding baseline: Every WPD innovation scheme will formally consider the impacts and opportunities for customers in vulnerable situations. This approach maximises consumer touchpoints, signposting support for customers participating in trials and expanding referral channels for support schemes.		●	●	●
31	Exceeding baseline: We will deliver customer vulnerability training to all 6,500 employees on an annual basis.	●			●
32	All field staff have PSR referral App on their smart devices to register customers to the PSR and refer them to our support partners.	●			●
33	Dedicated online content targeted at customers in vulnerable situations including: <ul style="list-style-type: none"> • Dedicated Priority Services Hub on WPD's website signposted from the homepage for customers, existing partners and potential partners • WPD Power Cut Reporter App • Social media including targeted campaigns. 	●	●	●	
34	Exceeding baseline: We will take a leading role in coordinating a range of industry participants (including funding for collaborations with community energy stakeholders and water companies) to share best practice and co-deliver schemes, ensuring vulnerable customers are not left behind by the smart energy transition.	●	●	●	
35	WPD's Resources and External Affairs Director, as Vulnerability Champion, provides strategic direction and ensures consumer vulnerability is embedded in WPD's company-wide operations and embodied in our culture.	●	●	●	●
36	We will continually review and expand the training provided to staff, so they have the knowledge needed to provide an empathic service, tailored to a continually changing range of specific needs. <ul style="list-style-type: none"> • Exceeding baseline: We will identify expert external training on individual factors which can give rise to vulnerability, including the provision of support to ensure customers are able to participate in smart energy services. 	●			●
37	As part of our induction process, all new employees receive training about the PSR and the services we offer customers in vulnerable situations ensuring this focus is embodied by our entire workforce.				●
38	WPD policy ensures all necessary vetting and screening processes are conducted on relevant staff with Disclosure and Barring Service (DBS) checks for all new employees and those who enter customer premises on a tri-annual cycle.				●
39	Exceeding baseline: WPD's Social Contract will drive wider understanding of vulnerability for WPD staff through initiatives building links with the communities they live and work in, through: <ul style="list-style-type: none"> • A shareholder-funded annual £1m support fund for local community initiatives and good causes, including supporting customers in vulnerable situations • 1,000 volunteer days each year, enabling staff to support local community initiatives associated with consumer vulnerability, education, safety, diversity and the environment. 				●

2. Building on our existing Customer Vulnerability Strategy

During RIIO-ED2 our Customer Vulnerability Strategy will ensure we deliver our most ambitious and extensive programme of support for customers in vulnerable situations. Our long-standing strategy provides us with the foundation to be able to go further than ever before.

- 2.1. Stakeholders have consistently told us that WPD should continue to expand our support for customers in vulnerable situations during RIIO-ED2. They have encouraged us to build on the industry-leading outcomes we have delivered in RIIO-ED1 by setting out ambitious plans and targets which represent a step change in the support we provide.
- 2.2. Our long-standing Customer Vulnerability Strategy has been in place for more than seven years. It has evolved to reflect the changing priorities and challenges of our customers and has been key to delivering successful outcomes. The strong foundations we have built over this time not only evidence what we have achieved, but provide the infrastructure that will enable us to continue innovating, developing and improving our approach to deliver the stretching and ambitious targets we have set for RIIO-ED2.

Long-standing Customer Vulnerability Strategy

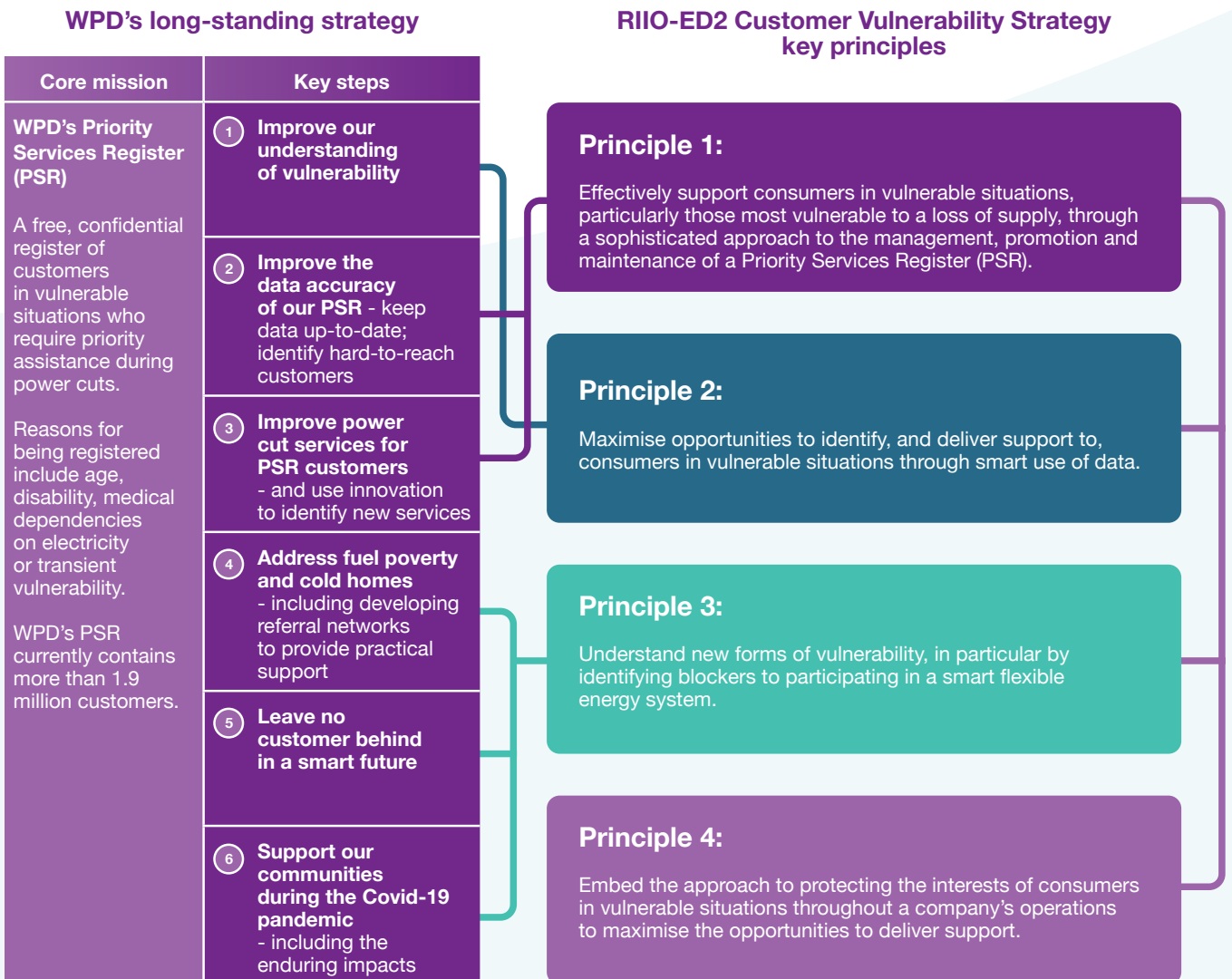
- 2.3. Our long-standing Customer Vulnerability Strategy has been key to our strong record of service delivery in RIIO-ED1, with initiatives and partnership networks that have increased in reach, breadth and depth of service. This serves as WPD's own internal baseline, from which we have developed a highly ambitious strategy for RIIO-ED2, as well as providing the expertise and infrastructure to deliver these plans successfully.
- 2.4. Support for customers in vulnerable situations during power cuts has been the enduring focus of our strategy, with our stakeholders confirming this year after year. At its core, our strategy has centred on the maintenance and improvement of the Priority Services Register (PSR), a free, confidential service that provides additional support to customers in vulnerable circumstances.
- 2.5. Building on this, our approach ensures we continually develop our understanding of vulnerability, identifying actions to improve the services we deliver and the outcomes we achieve for customers.
- 2.6. Our aim is always to deliver tangible actions, outputs and benefits for customers. To maintain the success of our delivery, the strategy has been updated and refined in partnership with our stakeholders, and subjected to rigorous external assessment and scrutiny each year.
- 2.7. This has led to significant additions to the strategy, as close collaboration with expert stakeholders and learning from our delivery reveals new priorities and opportunities to provide greater support. Driven by stakeholders, and working closely with expert partners, these additions have included a greater emphasis on addressing fuel poverty and protecting the interests of vulnerable customers during the smart energy transition. As a result:

We take the widest possible view of vulnerability in our strategy	By doing so we are able to understand the vulnerable situations prevalent in our communities in increasing depth and detail. Collecting accurate and complete data provides us with a greater comprehension of the vast spectrum of vulnerable situations customers may be faced with, and allows us to deliver targeted and bespoke support where it is most needed. Likewise, taking a data-driven approach to understanding the root causes of vulnerability and combining with extensive engagement ensures our support is holistic and expert-led, providing a range of bespoke services which our customers require.
We are building on a long-standing strategy	Having a long-standing strategy has ensured it is well understood by everyone at WPD. Consequently, our customer vulnerability programme is becoming more deeply embedded in our operations, and means that all staff have an awareness of the work we can do to support customers in vulnerable situations. This extends from field teams working on the network, to staff handling customer calls and innovation engineers delivering schemes for a low carbon future.
Partnerships are extremely important to our strategy	Through co-developing and co-delivering our consumer vulnerability projects, we are able to achieve the best possible outcomes for our customers, while maintaining value for money. Stakeholders agree that WPD should expand the broad network of existing outreach organisations that we work in partnership with to deliver fuel poverty support to customers, rather than seeking to deliver these services directly ourselves. Key to this is that WPD can leverage other sources of funding and in doing so, we can keep costs lower for customers overall by facilitating access to support, whilst still unlocking considerable value for customers in helping them to take actions to demonstrably lift them out of fuel poverty that they would not have taken without WPD's intervention.

- 2.11. A further benefit of working in collaboration with external support agencies is the breadth and depth these partnerships provide to our delivery programme. The unique expertise each partner organisation brings, provides a scalability in services that would otherwise be unachievable (if it was managed by WPD alone). The services that can be delivered are greater, more bespoke and perhaps most importantly, more accessible. Local, community based, geographically targeted support can be achieved.
- 2.12. It therefore goes without saying that close collaboration with expert partners is critical in ensuring our Customer Vulnerability Strategy can deliver the most wide ranging and effective services to support vulnerable and fuel poor customers throughout RIIO-ED2 – and that the delivery of our vulnerability and fuel poverty services revolves around our extensive network of partnerships. Key to providing such tailored support for our customers is our ‘one-stop-shop’ approach; a hub and spoke model that connects customers to appropriate support from a range of our sub-partner agencies, through contact with a lead partner agency in each licence area. In this way, customers need only sign up once to the PSR to access the services of numerous organisations, reducing the complexity for those in need of support.
- 2.13. Our engagement and collaboration with expert stakeholders has revealed a need for innovative and ambitious approaches to provide support for our customers and communities in the ongoing recovery from Covid-19 and the transition to a net zero economy. Stakeholders have been clear that WPD must take a leading role in ensuring the net zero transition is fair and inclusive for vulnerable customers. Our strategy has evolved to reflect this, with a focus on ensuring no customer is left behind in the energy transition. This means recognising the many ways in which disadvantage could manifest for customers in vulnerable situations to ensure we can maximise participation in the smart network.

Evolving our strategy to deliver for our customers in RIIO-ED2

- 2.14. Our long-standing strategy has provided the essential framework to deliver against our stakeholders’ priorities. In developing our Customer Vulnerability Strategy for RIIO-ED2 we have built on this strategy as a platform to deliver the vulnerability baseline expectations under the key principles set out by Ofgem. The links from our existing strategy to Ofgem’s baseline expectations under the key principles are set out below:

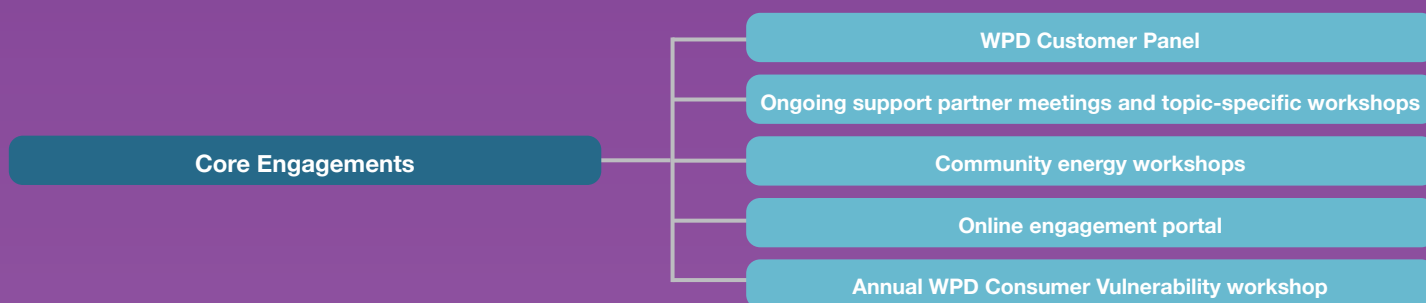


3. Understanding consumer vulnerability

- 3.1.** Consumer vulnerability presents itself in many different and complex ways and means that some people are more dependent on essential services for support. Vulnerability can be long or short-term and recurring. The causes can be permanent, transient or progressive, and types of vulnerability vary widely across age and demographic groups. An already complex and dynamic definition, the scope of vulnerability has shifted dramatically during the Covid-19 pandemic, driving many customers into vulnerable circumstances for the first time, or amplifying existing vulnerabilities. Crucially, this must serve as a reminder that it is never enough to expect what has worked in the past to remain effective in the future.
- 3.2.** It is vital that WPD maintains a comprehensive understanding of consumer vulnerability and, in particular, the issues prevalent in our region for our approach to evolve, better target and deliver excellent outcomes for customers. Continually improving our understanding of vulnerable situations is therefore a key element of our core Customer Vulnerability Strategy.

Stakeholder insight and vulnerability data

- 3.3.** Our understanding of consumer vulnerability and assessment of issues in our regions are driven by continuous stakeholder engagement and analysis of the key data we source on a wide scope of vulnerability indicators. This provides the basis for: locating the hardest-to-reach and most in-need; establishing effective, trusted customer contact; and, improving the tailored support services we deliver.
- 3.4.** Regular and challenging engagement with our expert consumer vulnerability stakeholders, such as our expert Customer Panel and our support partners, enables us to continually review our understanding of vulnerability. Our local delivery experts provide key insight on the circumstances prevalent in our region and emerging issues as well as providing feedback on best practice and the effectiveness of our approach.
- 3.5.** Maintaining up-to-date consumer vulnerability data provides the key information required to identify vulnerable customers, track the effectiveness of our outreach and better target the services we provide.
- 3.6.** Our enduring stakeholder engagement and comprehensive consumer vulnerability data have been vital to our successful RIIO-ED1 performance and to the development of our RIIO-ED2 strategy.
- 3.7.** We will continue to drive ongoing improvements in order to deliver successful outcomes for customers during RIIO-ED2 through our ongoing engagement activities such as:



- 3.8.** Through this in-depth and continuous engagement, we will continue to be able to identify new insights and will build on this by identifying new stakeholders, such as in the health sector, who can provide further detailed feedback in their areas of expertise.

Changing consumer vulnerability landscape

- 3.9.** Covid-19 has exposed the inequalities that exist in our society, bringing to light the impact vulnerable situations can have on customers' ability to adapt to change. Digital exclusion, for example, has been intensified by the consequences of lockdown, in which so much contact has moved online or over the phone. As we develop a smarter, greener energy network, the digital exclusion that is already most prevalent among customers in vulnerable situations risks creating further disadvantages, and will therefore remain a key consideration of our approach.
- 3.10.** The national urgency of a legally binding net zero carbon target has pushed environmental sustainability to the forefront for employees, customers and stakeholders alike. With a pressing need to decarbonise our energy system through the introduction of new and emerging technologies, it remains paramount that customers in vulnerable situations are supported to participate in the smart energy future. Indeed, customers in vulnerable situations face a higher risk of missing out on the benefits associated with the shift to a smart energy system due to factors like energy use, property type or income. At worst, these customers could not only miss out on the benefits of participation, but also be burdened with the increased costs of a system in which they are unable to participate. We are therefore committed to delivering a strategy that ensures the transition to net zero is just and fair, leaving no customer behind.

4. Building our Strategy – Stakeholder Engagement

Co-creating a strategy fully informed by our stakeholders

- 4.1. We first began consulting stakeholders on our RIIO-ED2 Business Plan in 2018, and have built this Customer Vulnerability Strategy and associated commitments around their priorities. Asking stakeholders to start with ‘a blank page’, we endeavoured to gather insights without asking leading questions, in order to obtain genuine responses. Starting from a blank sheet of paper was an intentional tactic to:
- Refine, challenge and update our understanding of stakeholder priorities
 - Identify significant changes in expectations
 - Invite suggestions for how we can improve, change or evolve our operations.
- 4.2. Our experience of delivering an extensive consumer vulnerability programme means we have built a considerable knowledge to anticipate some of the needs of our customers. This understanding has been combined with the input of our stakeholders over the last two years to build tangible commitments that deliver the best possible outcomes for our customers.
- 4.3. Since our first engagement, we have built our Business Plan in stages – collaborating with stakeholders throughout, in a process of ‘co-creation’. This has allowed us to play back to stakeholders what we’ve heard from them to ensure we have understood their needs correctly. Whilst in many cases the priorities and actions suggested by stakeholders have not come as a surprise, our rigorous and continual stakeholder engagement ensures that we never assume to know what our customers want.
- 4.4. A detailed description of how we have undergone our most comprehensive and inclusive stakeholder engagement programme ever to arrive at the proposed commitments we will deliver for stakeholders in RIIO-ED2 is set out in our Business Plan Annex 3 - Giving customers a stronger voice: Enhanced engagement.
- 4.5. In this section we outline key insights from stakeholders in relation to the development of our Customer Vulnerability Strategy.

Our engagement approach

- 4.6. We have undertaken an extensive programme of engagement to deliver an ambitious Customer Vulnerability Strategy built with stakeholders to deliver positive outcomes for our customers in vulnerable situations.
- 4.7. The tables over the next pages summarise the engagement activity which has directly led to the development and refinement of the initiatives in this strategy. This includes the volumes of stakeholders engaged during each of the five stages of our programme carried out to date. It also indicates how our engagement methods have been tailored to encompass the full range of stakeholder knowledge and interest levels, based on the following key:

Key – Stakeholder knowledge/interest level:

- 1 Expert
- 2 Interested
- 3 Limited knowledge
- 4 Future customer



We have engaged more than 9,000 stakeholders in the development and refinement of this strategy. We have done so via the following mechanisms and forums:

Ref	Engagement method	Description	Stakeholder groups involved/targeting	Stakeholder expertise level	Total engaged				
					Stage 1: preliminary engagement	Stage 2: willingness to pay	Stage 3: BP development	Stage 4: BP refinement	Stage 5: acceptance testing
1	Customer Panel	Workshops with WPD's permanent panel of more than 30 expert stakeholders, with representatives spanning all WPD's key stakeholder segments.	Domestic, business, connections, emergency resilience, healthcare, government, utilities, academic institutions, fuel poor and vulnerable.	1	38	-	30	29	-
2	Topic-specific bilaterals and expert workshops	Events with expert stakeholders to explore topics in greater depth and practical considerations and implications to be addressed. E.g. vulnerability stakeholders; EV stakeholders (e.g. motorway service operators). Example forums include: community energy workshops, connections surgeries and future networks events.	Connections, vulnerable customers, electric vehicles, environment, future energy scenarios, community energy, etc.	1	182	-	92	1	-
3	Co-creation stakeholder workshops	Qualitative workshops in a roundtable format, with stakeholders with reasonable levels of knowledge and interest in WPD's operations. Designed to identify priorities from scratch and co-create draft commitments to address these.	Domestic, small businesses, major energy users, parish councils, local authorities, consumer interest bodies, charities, connections providers, community energy groups, developers, trade associations, utilities, universities, environmental groups, storage providers, energy aggregators.	1 2	330	-	393	222	-
4	Consultation 'sprint' workshops	Innovative approach where all stakeholders are sent WPD's Plan documents in advance. WPD then deliver a series of 2-3 minute quick-fire presentations on every key priority area, followed by quantitative voting on every WPD proposed commitment (levels of ambition, overall acceptability and stakeholder requirements for alternatives). Then a series of breakout discussions for stakeholders to suggest alternatives.	Domestic, small businesses, major energy users, parish councils, local authorities, consumer interest bodies, charities, connections providers, community energy groups, developers, trade associations, utilities, universities, environmental groups, storage providers, energy aggregators.	1 2	-	-	-	88	-
5	Webinars	Sessions to provide stakeholders with an overview of WPD's Business Plan, how to respond and to invite questions and clarifications on the content.	Domestic, small businesses, major energy users, parish councils, local authorities, consumer interest bodies, charities, connections providers, community energy groups, developers, trade associations, utilities, universities, environmental groups, storage providers, energy aggregators.	1 2	-	-	-	86	-
6	Social obligations conferences	Conferences held in different locations or online, aimed at vulnerable customer representatives to discuss WPD's social obligations strategy and programme delivery.	Charities, local authorities, parish councils, non-Government organisations, delivery partners.	1 2	53	-	57	-	-

Ref	Engagement method	Description	Stakeholder groups involved/targeting	Stakeholder expertise level	Total engaged				
					Stage 1: preliminary engagement	Stage 2: willingness to pay	Stage 3: BP development	Stage 4: BP refinement	Stage 5: acceptance testing
7	Strategy development workshops	Qualitative workshops in a roundtable format, with stakeholders with reasonable levels of knowledge and interest in WPD's operations. Designed to co-create WPD strategies and specific commitments/action plans for RIIO-ED2 in particular relation to: DSO; Innovation; Environment; Connections; Vulnerability; Digitalisation.	Domestic, small businesses, major energy users, parish councils, local authorities, consumer interest bodies, charities, connections providers, community energy groups, developers, trade associations, utilities, universities, environmental groups, storage providers, energy aggregators.	1 2	-	-	-	37	-
8	Written consultations	Seeking views on WPD's draft Business Plans via set questions and voting. Options for stakeholders to submit responses online, via email or post.	Domestic, small businesses, major energy users, parish councils, local authorities, consumer interest bodies, charities, connections providers, community energy groups, developers, trade associations, utilities, universities, environmental groups, storage providers, energy aggregators.	1 2 3	-	-	-	141	51
9	Online engagement portal	Replicated WPD's face-to-face co-creation workshops online, with the presentations filmed, followed by a range of multiple choice and free-format questions. Promoted using Twitter, LinkedIn and invitations sent to all registered stakeholders.	Domestic, small businesses, major energy users, parish councils, local authorities, consumer interest bodies, charities, connections providers, community energy groups, developers, trade associations, utilities, universities, environmental groups, storage providers, energy aggregators.	2 3	29	-	82	40	-
10	Quantitative research surveys - customers in vulnerable situations	Telephone surveys with randomly selected customers as part of well-established satisfaction surveys following a day-to-day contact with WPD regarding the Priority Services Register. Questions independently designed with Accent to ensure they are neutral and non-leading.	Customers in vulnerable situations.	3	100	-	1,628	-	-
11	Power cut follow-up surveys	Text message sent to every WPD customer as part of the power cut follow-up service, containing an invitation and link to participate in a series of survey questions on WPD's website.	All WPD customers affected by loss of supply.	3	131	-	-	-	-
12	Social value/willingness to pay qualitative workshops	Six discussion groups with end-users, bill paying customers and customers of the future. Enabled participants to spontaneously raise their priorities of WPD and within five key service areas, identify underlying initiatives. Test the understanding of key actions ahead of quantitative survey testing with a wider pool of customers, ensuring the measurability and outcomes/benefits of potential WPD actions are clear.	End-user bill paying domestic customers and future users – ensuring balanced representation in terms of gender, region, urban/rural, age and socio-economic background. Businesses – small, medium and large.	3 4	-	48	-	10	-

Ref	Engagement method	Description	Stakeholder groups involved/targeting	Stakeholder expertise level	Total engaged				
					Stage 1: preliminary engagement	Stage 2: willingness to pay	Stage 3: BP development	Stage 4: BP refinement	Stage 5: acceptance testing
13	Social value/willingness to pay (WTP) quantitative surveys	Quantitative, stated preference research to obtain customer WTP values for potential service improvements and initiatives. Majority via online surveys, but 100 in-home interviews conducted to ensure robust representation from customers who are typically harder to reach and underrepresented on commercial panels (i.e.: those in the lowest socio economic grouping (E), those at the extremes of the age spectrum (over 75s and under 25s) and those who are digitally excluded.	985 - End-user bill paying domestic customers and future users – ensuring balanced representation in terms of gender, region, urban/rural, age and socio-economic background. 203 - Businesses – small, medium and large.	3 4	-	1,188	-	1,280	-
14	Multi-phase deliberative, qualitative focus groups – end users	Identify short and long term customer requirements, from a wide cross-section of representative end-users, including future. It scopes out customers' current priorities (uninformed and, thus, uninfluenced by any specific WPD plans) as well as checking these against previously established priorities. It featured a comprehension session, extended priorities sessions, app-based tasks, and deliberative tasks. Co-creation sessions were then held to begin drafting commitments in customers' own words.	Household, non-household, vulnerable (including representative sample of over 75s, struggling, in debt, low income, BAME communities). Future customers.	3 4	50	-	68	96	-
15	Citizen Panels	Panels of representative end-user customers undertaking deliberative exercises on a wide range of topics throughout the entire business planning process.	Representative sample of customer base that meets a number of demographic and behavioural qualifiers including; age, gender, race, variance in needs and habits, customer in vulnerable situations, PSR customers, a mix of socio-economic circumstances, a mix of future and existing customers.	3 4	54	-	-	-	-
16	Social media surveys	A series of surveys and consultation questions posed via Twitter, Facebook and LinkedIn, also containing an invitation and link to participate in a series of survey questions on WPD's website. Example of output: Appendix A09.	WPD customers and future customers. The overall objective is to have a fair and balanced representation across geography, age and gender.	3 4	509	-	-	1,487	892

What our stakeholders said about customer vulnerability and fuel poverty

- 4.8. Our engagement has found that consumer vulnerability remains an enduring priority for stakeholders, particularly in light of the devastating impact Covid-19 has had on local communities. Stakeholders noted that the pandemic has dramatically increased consumer vulnerability, by creating a host of new vulnerabilities as well as leading to a rise in fuel poverty.
- 4.9. Stakeholders have maintained the importance of an accurate and up to date PSR. They have articulated that not only must the data be of a high-quality, the information must be used to provide comprehensive and tailored support, particularly during emergencies, as brought to light by Covid-19.
- 4.10. They recognise that the causes of vulnerability are complex, and can be long-term or transient. Therefore, it is vital that PSR data is frequently reviewed and updated, and enduring relationships built with customers. For customers in vulnerable situations, joining the PSR should be as simple as possible, and stakeholders expect WPD to collaborate with other utilities to share PSR data (in line with GDPR) so that customers do not have to register multiple times.
- 4.11. Stakeholders view protecting fuel poor households as an obligation for WPD because there is a direct correlation between power cut vulnerability and fuel poverty. However, while supporting those in fuel poverty has increased as a priority in the wake of the pandemic, stakeholders do not consider WPD best placed to provide in-house services. Rather, they would like to see WPD facilitate a comprehensive range of interventions to target the root causes of fuel poverty, working with our partners to achieve lasting positive impacts. As many customers living in cold homes are unlikely to seek support, stakeholders have emphasised the need for a proactive approach to identify and engage those in need, utilising our extensive network of partnerships in the community.
- 4.12. Supporting customers in vulnerable situations in the transition to net zero was also considered highly important by stakeholders who corroborated the need for a smart and fair energy system. Stakeholders suggested WPD must engage in projects to understand the changing needs of customers in vulnerable situations in a smart energy future, to identify those who will require support and the types of interventions necessary. WPD should embed consumer vulnerability across its operations, but particularly in innovation, with bespoke projects that aim to remove barriers to participation in a smart energy network.

Stakeholder top priorities

1.

Make sure no one is left behind in the transition to a smart network, especially customers in vulnerable circumstances and in fuel poverty

2.

Develop and continue to expand partnerships with carers and charities including Citizens Advice

3.

Facilitate better data sharing and work towards creating a centralised PSR

4.

Educate customers and raise awareness of the PSR, using a range of methods, to increase the number of people signing up

5.

Work with Ofgem to allow data to be safely shared with other utilities

6.

Provide funding and increase the support given to referral networks

7.

Continue to identify vulnerability by working with partners including local authorities, disability forums and health and social care providers

5. Our Customer Vulnerability Strategy

WPD's Customer Vulnerability Strategy has been co-created with more than 9,500 stakeholders through comprehensive engagement, building on the strong foundations of our long-standing consumer vulnerability activities to deliver our most ambitious and wide-ranging programme of support to our customers in vulnerable situations.

5.1. In this section we set out our Customer Vulnerability Strategy in detail, providing the full range of initiatives we will deliver during RIIO-ED2. We explain our approach to the delivery of baseline expectations and where we go further than this to deliver over and above, driven by our stakeholders' requirements and the needs of customers in our communities.

RIIO-ED2 consumer vulnerability requirements: principles and baseline expectations

5.2. Ofgem set out in their RIIO-ED2 Sector Specific Methodology Decision document the four principles and 13 baseline expectations for the standards of service that they expect DNOs to deliver for consumers in vulnerable situations during the five year price control period.

5.3. In line with Ofgem's Principles and Baseline Expectations, WPD's Customer Vulnerability Strategy comprises delivery initiatives which underline our core mission to support customers in vulnerable situations. Whilst the Principles and Baseline Expectations have distinctive objectives, our approach recognises the complexities of vulnerability and the intersecting nature of these strategic elements, with holistic, interconnected initiatives. Therefore some of our initiatives appear under more than one of the baselines where their delivery will provide positive outcomes under multiple baselines.

5.4. The four principles underpinning the baseline objectives are set out below:

Principle 1:

Effectively support consumers in vulnerable situations, particularly those most vulnerable to a loss of supply, through a sophisticated approach to the management, promotion and maintenance of a Priority Services Register (PSR).

Principle 2:

Maximise opportunities to identify, and deliver support to, consumers in vulnerable situations through smart use of data.

Principle 3:

Understand new forms of vulnerability, in particular by identifying blockers to participating in a smart flexible energy system.

Principle 4:

Embed the approach to protecting the interests of consumers in vulnerable situations throughout a company's operations to maximise the opportunities to deliver support.

5.5. WPD's delivery of the baseline expectations in RIIO-ED2 will build on the extensive programme of consumer vulnerability activity we have undertaken in RIIO-ED1. Our Customer Vulnerability Strategy sets out, as a minimum, how these baselines will be met. It also sets out the baseline performance achieved by WPD in RIIO-ED1, and where available, that of other DNOs.

5.6. Through detailed engagement and refinement of our strategy with our stakeholders, they have encouraged us to go far beyond baseline performance in a number of areas. As such our Customer Vulnerability Strategy sets out the activities we will undertake which will deliver enhanced outcomes over and above the baselines and the impacts this will have.

Measuring the customer value delivered by our commitments

- 5.7.** It is vital that the commitments set out in this strategy deliver outcomes that are valued by our customers. In the development of this strategy and our Business Plan for RIIO-ED2, WPD has undertaken social value research to determine value to customers, allowing us to estimate the 'gross benefit' of our commitments and revealing that our delivery of this strategy will deliver a minimum of £200m of gross value for customers.
- 5.8.** Section 7 of Annex 3 of our plan details the social value research we have undertaken through the stages of development of the plan, including how the research helped us to arrive at more specific commitments and performance targets, prioritising those with the highest intrinsic value to customers.
- 5.9.** Importantly, we do not use the results of this research in isolation, nor as a blanket justification to include commitments within our Business Plan. Instead, this measure helps us calibrate the scale of our Business Plan commitments in light of the value customers place on certain activities. It helps us to consider the relative priorities between action areas within the plan and to refine final ambitions that deliver the most effective social value for our customers relative to the cost of delivery. It enabled us to compare and contrast actions within different output categories and then to calibrate the scale of ambition and expenditure in line with customer feedback. For example, where there are a range of options under consideration which all respond to stakeholders' qualitative feedback, a factor including very high social value may influence the scale of action we propose.
- 5.10.** We have used an approach to measuring the social return on investment (SROI), which has combined the joint work with all DNOs to develop a common method to measuring social value and WPD's bespoke willingness to pay (WTP) research, to determine values for core commitments in this strategy. WPD has had the SROI framework independently applied to 16 of the commitments in our Business Plan, ensuring that appropriate values and assumptions are applied. This provides confidence that the values presented below in this strategy are a conservative estimate of the value generated.
- 5.11.** Importantly, this SROI framework will enable us to continue to measure the ongoing value delivered by the commitments in this strategy throughout RIIO-ED2 and report on our performance back to our customers and to Ofgem.
- 5.12.** The SROI research has determined the value for four core commitments which form part of this strategy, identifying approximately £200m gross present value – which will be delivered through:
- Financial savings for vulnerable and fuel poor customers
 - Health benefits related to warmer and safer homes
 - The societal impact of volunteering
 - Carbon emissions reductions.



This revealed value has demonstrated that our Customer Vulnerability Strategy will therefore deliver a minimum of £26 per WPD customer:

Commitment	Description	10-year Gross Present Value - total	10-year Gross Present Value - per customer	Benefits modelled
23	Support local people in our communities via an annual £1m 'Community Matters' investment, funded entirely by shareholders at no cost to customers	£72.2m	£9.13	Average benefit per £ spent modelled based on previous grant support in areas such as meal provision, tree planting, online support and mental health
10	Support 113,000 fuel poor customers to save £60 million on their energy bills over RIIO-ED2	£60m (non-discounted) + additional £6.8m of discounted social benefit	£7.59 (financial) + £0.86 (social) Financial benefits to customers based on previous fuel poverty programs	Reduction in negative impact of cold weather on customers' health (QALY)
11	Develop a model to identify the capabilities of vulnerable customers to participate in a smart, low carbon future and offer 60% of PSR customers specific support and education. Targeted advice and support for vulnerable customers in relation to low carbon technologies, smart meters, and flexible energy services for example - resulting in direct cost savings for fuel poor customers	£38.9m	£4.92	Financial benefits for customers based on Power Up trial and smart meter benefits Carbon emissions saved from reduction in consumption
8	Achieve a 'one-stop-shop' service for vulnerable customers joining the Priority Services Register so that they only have to register with WPD once to be registered automatically with their energy supplier, water company and gas distributor	£25.8m	£3.26	Increased convenience (willingness to pay)

- 5.13.** WPD tested all major commitments where there would be significant expenditure to fund these activities and where robust social value proxies exist, so that stakeholders can have trust in the validity of the results presented. Lower cost initiatives and initiatives that were contributory to overarching performance commitments were not tested individually. This was in order to ensure that the cost to test these commitments was proportionate to the cost of delivery in RIIO-ED2 and the likely value they will deliver. It was also important that we researched commitments where the outcome/benefit of our actions can be valued in a sufficiently robust way. However, by taking such a conservative approach, given that WPD's Customer Vulnerability Strategy contains 39 specific initiatives on top of these commitments, we can be confident that the overall social value of £200m for our actions is a minimum view. There will be a wide range of qualitative benefits that we will deliver for customers in addition, that are set out in detail in our action plan and associated reporting metrics.

Measuring our success

- 5.14.** It is important that our stakeholders and Ofgem are able to hold us to account for the delivery of the initiatives we are committing to in this strategy. Our Customer Vulnerability Strategy therefore has a set of clear metrics and stretching targets to ensure we provide the improvements and value for money our stakeholders and customers require.
- 5.15.** In addition we have set a number of items of Regularly Reportable Evidence (RRE). These will provide evidence of performance, both quantitative and qualitative on initiatives where we have not set a metric and target. Where we provide qualitative reporting, this will include qualitative description of the activities and findings of independent benchmarking and assessment, in order for us to evidence high standards of delivery and the quality of outcomes achieved for customers.
- 5.16.** Our performance against these metrics and RREs will be published annually to ensure that we provide transparency and our stakeholders can track the delivery of our strategy.

Licence obligations

- 5.17.** Our Customer Vulnerability Strategy ensures that WPD is able to robustly deliver compliance with our existing obligations linked to consumer vulnerability as part of our Electricity Distribution Licences.
- 5.18.** In addition to this, for RIIO-ED2 Ofgem will be introducing a new principles-based Licence Obligation. This new obligation is intended to compliment the existing obligation to maintain a PSR and support customers, by ensuring DNOs are more accountable for the minimum service provided to customers in vulnerable situations.
- 5.19.** The foundation provided by our long-standing strategy and the commitments we are making in our Customer Vulnerability Strategy for RIIO-ED2 will provide the basis to ensure our compliance with the obligations:
- (Existing) Standard Licence Condition 10 (SLC10). Special Services
 - (New for RIIO-ED2) Vulnerability Principles-Based Licence Obligation.
- 5.20.** Transparency and assurance for our customers of our continued compliance will be maintained through the rigorous external scrutiny set in out in our strategy.

Our strategy

- 5.21.** In the following subsections, our strategy is set out under each of the four consumer vulnerability principles, detailing our approach to the delivery of the baseline expectations.

5.1 Principle 1:

Effectively support consumers in vulnerable situations, particularly those most vulnerable to a loss of supply, through a sophisticated approach to the management, promotion and maintenance of a Priority Services Register (PSR).

Core delivery strategy

Maintaining an accurate and up-to-date PSR

- 5.22.** The PSR is crucial to our work to support vulnerable customers during power cuts. It is also the basis for our initiatives to help increase customers' resilience to power cuts and address any problems they may have with energy affordability.
- 5.23.** The effectiveness of the PSR depends on its accuracy. WPD currently have more than 1.9 million customers registered on the PSR. It is vital that the accuracy of these records are maintained so that support can be provided to customers when they need it most. We will therefore proactively contact customers at least once every two years to update their records, including 60% by direct phone call to maximise our opportunities to offer further advice and support and reach the digitally excluded. These calls not only serve to maintain an accurate vulnerability database, they ensure customer details are up to date for contact in the event of a power cut.
- 5.24.** Our dedicated PSR data cleanse teams are trained to give specialist advice to PSR customers when contacting them to update their records. Having these conversations by phone, and not via written channels, enables WPD staff to explain and discuss the benefits for customers of being signed up to the PSR. Staff are empowered to support PSR customers on a case by case basis, offering guidance on power cuts and signposting the broader services available through our partnership schemes.
- 5.25.** These teams are supported by staff in WPD's Contact Centre, trained to deliver the same specialist advice and top up our core activities either when call volumes are quieter or during crises when pro-active update calls to our PSR customers are our first priority.

Power cut resilience and support

- 5.26.** Vulnerable customers often need extra support during a power cut and we will continue to provide advice to PSR customers with staff trained with the skills to deliver advice tailored to an ever increasing range of specific needs.
- 5.27.** Call handlers receive a range of specialist training from charities and organisations representing different vulnerable groups, including support for blind and deaf customers, mental health, suicide awareness, dementia, oxygen therapy and dialysis. Building staff's awareness and understanding of the unique difficulties customers may face, particularly during a power cut, ensures our services are always delivered with empathy and staff are equipped to recognise additional needs and refer customers accordingly. An example of this can be seen in the case study below.
- 5.28.** We will continue to enhance our communication with customers via a full range of channels. Customers registered on the PSR are provided with dedicated direct dial telephone numbers to bypass messaging ensuring they always have easy access to a fully trained PSR call handler to discuss their situation with. They are also able to communicate via Twitter, Facebook, text message, website, email, WhatsApp and Webchat.
- 5.29.** We will maintain and further enhance our 'Power Cut Reporter app', designed specifically to support our PSR customers. Its features include power cut reporting (including via voice control), web chat with our Contact Centre, proactive power cut notifications for customers, loved ones and carers, and a power cut alarm feature.
- 5.30.** External reviews and accreditations play a vital role in ensuring we are delivering the quality and efficacy we strive for. Far from providing just validation, these accreditations will continue to provide a level of independent scrutiny and perspective that pushes their impact way beyond - giving stakeholders the peace of mind that we are credible, responsible and demonstrably compliant and enabling us to identify and deliver continuous improvements.

Case study: Mrs A, an 86 year old lady living in a rural area of South Wales called to report her power had gone off on a winter night, she had recently lost her husband and was very upset and frightened about a stranger coming to her house in the dark to help her. Our advisor remained on the phone with her for 49 minutes, he gave her the engineer's name who was dispatched to attend, he talked with her to reassure her and keep her calm, the engineer was speaking with us to tell us he was pulling into the drive of her property and we were able to tell her that he was about to knock her door. We remained on the line until the customer was happy to let the engineer enter her premises, and the advisor spoke with both the customer and engineer until he left after restoring supply.

5.31. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: Our service and communication will be externally scrutinised under the Accessibility AA standard accreditation, Customer Service Excellence (CSE) Standard and British Standards Institution (BSI) Standard for Inclusive Service Provision (BSI18477).

5.32. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will provide customers with information on every planned and unplanned outage, giving restoration times and progress updates, contacting them proactively using their preferred method of communication whether that is call back, text message, WhatsApp or interaction on WPD's smart device App.

5.33. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will continue to provide accurate information on all network outages using our online power cut map and the WPD smart device App, enabling customers to access information for themselves as well as setting up and receiving bespoke alerts. We will use feedback from customers on each of these service channels to develop further improvements.

5.34. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will continue to work with our partners, like the British Red Cross and the National Caterers Association, to deliver crisis packs, warm meals and alternative accommodation to customers in vulnerable situations during power outages. With each situation being unique and customers requiring support tailored to their individual needs, the provision of these services will always be on a case-by-case basis, with local teams able to make decisions when supporting customers in a prolonged power outage.

Promoting the PSR and a 'one-stop-shop' for Priority Services customers

5.35. It is vital that the consumer vulnerability services we deliver reach those who need it most. Our consumer vulnerability data mapping enables us to see where potentially high volumes of vulnerability align with gaps in our PSR take-up. Using this data, we currently estimate that our PSR take-up sits at roughly 30% coverage of those who would be eligible to register. As set out in 5.41 and 5.42, we will enhance the accuracy of our social indicator mapping data to improve our understanding of the reach of our PSR and the take-up within the categories or reasons for registering.

5.36. It is crucial that we continue to identify and support hard-to-reach customers to register to the PSR, using trusted expert partners. Through the increased accuracy of our indicator mapping we will be able to work with partners to take a better targeted approach to increase PSR take up in categories which have low coverage and are in greatest need of support. As part of our strategy, we will reach out to trusted local agencies which can help to extend our support to these areas, ensuring more comprehensive coverage by promoting and referring customers to the PSR.

5.37. Stakeholders consistently urge us to collaborate where there is potential for greater social benefits for customers by pooling resources and expertise with others. Collaborative delivery is more likely to be trusted by customers, who may have varying recognition of the different partners and the core services they provide in isolation. Moreover, stakeholders report that dealing with multiple different contacts can cause confusion; instead it is better that utilities work together to provide single sources of help and avoid repeating services.

5.38. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will continue to develop cross-referrals with partner agencies to ensure customers only need to register with one agency to benefit from the services of multiple agencies. Thanks to a network of more than 150 referral partner agencies and other utilities, we will be able to increase data sharing and achieve a 'one-stop-shop' service for vulnerable customers wishing to join the PSR while ensuring all General Data Protection Regulations (GDPR) requirements are met.

5.39. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will use targeted social and traditional media campaigns, working with local agencies, including those in the health sector, to broaden awareness and increase understanding of the PSR among customers in vulnerable situations and those who support them.

5.40. Details of the initiatives we will deliver in RIIO-ED2 against the baseline expectations under Principle 1 are set out in the following tables:

Principle 1: Effectively support consumers in vulnerable situations, particularly those most vulnerable to a loss of supply, through a sophisticated approach to the management, promotion and maintenance of a Priority Services Register (PSR).

Baseline Expectation 1.1: Undertake proactive and targeted advertising of the PSR and the services offered to vulnerable consumer groups. By targeted, we mean aimed at specific areas of highest need or where data analysis suggests there are gaps in PSR reach.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Wider DNO average of 37,000 direct sign ups (2019/20 – year 5) Number of referral partners varies significantly (from 21 to 400+). Full details unknown as the information is not publicly available for all DNOs. 	<ul style="list-style-type: none"> Average of 20,000 PSR customers identified and directly registered with WPD per year in RIIO-ED1 to date Anticipated to reach an average of 45,000 per year by end of RIIO-ED1 (2022/23 - year 8) Network of 118 referral partners. 	<ul style="list-style-type: none"> A minimum of 40% of total customers eligible for the PSR are registered (by identifying 50,000 hard-to-reach customers each year to join the PSR) Maintain a minimum of 150 referral partners.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target	
<p>Stakeholders emphasised the difficulties in identifying and engaging people in vulnerable circumstances, particularly those who are digitally excluded. In light of the scale of vulnerable circumstances brought about by Covid-19, stakeholders wanted to see a high level of ambition in this area, collaborating with a wide range of partner agencies and using accurate data to target areas of high deprivation and raise awareness of the support offered through the PSR.</p>	<ul style="list-style-type: none"> Provide up to date open-sourced consumer vulnerability data mapping to identify PSR eligibility and take-up, to better target outreach schemes. <ul style="list-style-type: none"> Exceeding baseline: our approach will include more than 60 social indicator datasets. Maintain a network of referral partner agencies providing coverage across all four licence areas. Use data mapping to identify and target gaps in coverage to proactively reach out to local trusted agencies to expand our coverage. <ul style="list-style-type: none"> Exceeding baseline: our approach will maintain a minimum of 150 referral partners. 	Metric 1: number of partner agencies using WPD data mapping	200 annually	
		Regularly Reportable Evidence (RRE) 1: number of datasets	-	
	<ul style="list-style-type: none"> Use targeted PSR promotional campaigns including social media campaigns, on top five PSR gaps. 	<ul style="list-style-type: none"> Work with local agencies, including those in the health sector, to broaden awareness and increase understanding of the PSR among customers in vulnerable situations and those who support them. <ul style="list-style-type: none"> Exceeding baseline: we will extend this to partnerships with telecommunications providers. 	Metric 2: independent assessment of WPD data mapping quality	'Compliance plus' rating
			Metric 3: Number of newly identified PSR customers registering directly with WPD	Baseline: 20,000 per year (+ exceeding target below)
			Metric 4: PSR reach - % of eligible customers in WPD regions registered	Baseline: 5% increase in take up vs. eligibility across all measureable PSR groups by 2028 (+ exceeding target below)
	<p>Stakeholder insights</p> <p>Covid-19 was seen as a factor in increasing the number of people likely to need support. Stakeholders wanted WPD to be clearer on the impact this would have on the total people requiring support but not currently registered on the PSR. Stakeholders agree that a robust identification process is essential, one that leverages data sharing, and a referral network across organisations and bodies to locate hard-to-reach customers.</p>	<p>Exceeding baseline requirements</p> <p>BP Commitment - Ensure a minimum of 40% of total customers eligible for the PSR are registered (by identifying 50,000 hard-to-reach customers each year to join the PSR).</p>	RRE 2: number of referral partners	-
			RRE 3: qualitative description of activities	-
Metric 3: (as above)			(as above)	
<p>Impact</p> <p>50,000 newly identified customers signed up to the PSR each year. Customers who may not seek out support receive the benefits of being on the PSR through the services and advice of our partner agencies. Customers with the most serious vulnerabilities are proactively identified and offered support.</p>	<p>Metric 5: number of partner agencies trained by WPD</p>	Metric 3: Number of newly identified PSR customers registering directly with WPD	200 annually	
		Metric 4: PSR reach - % of eligible customers in WPD regions registered	10% increase (baseline 5%) in take up vs. eligibility across all measureable PSR groups, achieving min 40% take up overall by 2028	

Baseline Expectation 1.2: Have a data and information strategy in place, specific to meeting the needs of vulnerable consumers. This should demonstrate how DNOs will maintain their PSR database, with customer data checks at least every 24 months. Data analysis should be used to inform the development and delivery of service offerings. As part of their data and information strategy, DNOs should consider how best to facilitate the sharing of vulnerable customer data with suppliers and other utilities to get customers onto the PSR in line with Data Best Practice.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Reported proactive contacts from other DNOs ranges from 882,920 to 2,466,855 for the same five year period (an average of 431,057 per year) No other DNO reporting two-way data sharing with water companies. 	<ul style="list-style-type: none"> Proactive contact to 1.9m (all) PSR customers once every two years: 30% via direct telephone call; 70% by letter/email Between 2015/16 and 2019/20 WPD proactively contacted 4,260,783 customers (an average of 852,157 per year) Data sharing arrangements in place six of the eight water companies in WPD's region: Manual (one-way) sharing with four; Two-way data sharing with two Currently WPD shares in excess of 100,000 records annually. 	<ul style="list-style-type: none"> Proactive contact to over 2m (all) PSR customers once every two years: 60% via direct telephone call; 40% by letter/email Partnering with all eight water companies in WPD's region, and established two-way data sharing Share 150,000 PSR records annually.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
<p>PSR data needs to be updated frequently, particularly given the transient and changing nature of many vulnerable circumstances. Stakeholders are clear that there should be collaboration with gas distributors, water companies and suppliers to ensure customers don't miss out on essential support, while maximising the efficiency of overlapping services.</p>	<ul style="list-style-type: none"> PSR data and information strategy in place and reviewed annually. 	Metric 6: PSR Data strategy published	Annually
	<ul style="list-style-type: none"> Dedicated PSR data cleanse teams contact all customers registered on the PSR at least once every two years to update their records and provide up to date information on the services we can offer. 	Metric 7: PSR data cleanse – number and % PSR customers contacted to update their records every 24 months	100% - 2 million PSR customers
	<ul style="list-style-type: none"> Data share arrangements in place with suppliers, gas distributors and water companies, compliant with GDPR and Ofgem Data Best Practice Guidance. <ul style="list-style-type: none"> Exceeding baseline: as per baseline 3.1: We will establish two-way data sharing, partnering with all eight water companies in WPD's region. 	Metric 8: % of PSR customer record update contacts by telephone	Baseline: 30% (+ exceeding target below)
		Metric 9: number of PSR records shared with utilities	Baseline: 100,000 (+ exceeding target below)
<p>To ensure that WPD makes every interaction count with customers on the PSR, stakeholders suggested we should broaden the scope of customer contact to provide wider support and information over the phone at the same time as data cleansing. This was deemed particularly important for customers who are digitally excluded and therefore may not have easy access to information about further support.</p>	<p>BP Commitment - Proactively contact over 2 million Priority Services Register customers once every two years (with 60% via direct telephone call) to remind them of the services we provide and update their records.</p>	Metric 7: PSR data cleanse – number and % PSR customers contacted to update their records every 24 months	100% - 2 million PSR customers
		Metric 8: % of PSR customer record update contacts by telephone	60% (baseline 30%)
	<p>BP Commitment - Achieve a 'one-stop-shop' service so that customers only have to join the Priority Services Register once to be registered automatically with their energy supplier, water company and gas distributor. We will engage to extend this to telecommunication companies where possible.</p>	Metric 9: number of PSR records shared with utilities	150,000 (baseline 100,000)
		RRE 4: number of data share agreements in place	-
		RRE 5: data share in place with telecoms companies	-

Impact

Regular contact to keep vital data on the needs of our most vulnerable customers accurate and up to date. Ensure WPD's PSR is representative of the needs of vulnerable customers with appropriate representation from high deprivation areas. More 'in person' contact enables bespoke advice to be delivered to meet that individual's needs, ensures customer details are up to date for contact in the event of a power cut and supports our digitally excluded customers. The process of signing up to the PSR is simple for customers, who no longer have to register multiple times with each utility company to receive priority support.

Baseline Expectation 1.3: Communicate with and provide information to PSR customers in formats suited to a range of additional communication needs, including hearing or sight loss. For accessibility services, companies should meet a minimum standard of Accessibility AA. Translation services should be available for at least the top 10 languages in a DNO area.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Three DNOs are accredited with Louder than Words and the same number with the BSI inclusivity standard BS18477. Other standards held include The Institute of Customer Service and the stakeholder engagement standard AA1000SES No other DNO can be identified as achieving the Customer Service Excellence charter mark or having a website approved by AbilityNet Two other DNOs offer a Webchat function (not available on all web pages/using automated responses). 	<ul style="list-style-type: none"> WPD has held BS18477 with full compliance for eight years WPD is the top performing company in the UK (out of 600) in the CSE standard, with 45 out of 57 elements rated as the highest 'Compliance Plus' rating WPD holds the Louder than Words accreditation from RNID for levels of service and accessibility for customers and employees who are deaf or hard of hearing AbilityNet Accreditation Certificate awarded for WPD website WPD's Webchat function is live 24/7 and available on every web page. 	<ul style="list-style-type: none"> Achieve compliance or compliance plus ratings in all 57 elements of the CSE assessment Translation services available 24/7 by telephone and on WPD's website for over 100 languages including RoboBraille Continue to provide 'InterpreterNow' to provide customers with the ability to contact WPD via a sign language interpreter free of charge Continue to achieve AbilityNet Accreditation Certificate for WPD website.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target	
<p>It was suggested that people in vulnerable situations disproportionately struggle with communication, given the urgent or difficult circumstances they might be facing. Jargon and language may add difficulty for vulnerable users, while technology also acts as a barrier for many. Stakeholders therefore emphasised the need for multiple channels to enable customers in vulnerable situations to make and receive contact in a way that suits their needs. In particular, they urged WPD to ensure services are inclusive for people who struggle to access digital services.</p>	<ul style="list-style-type: none"> Accessibility AA standard accreditation in place with annual assessments 	<p>Metric 10: BMCS PSR score</p>	90%	
	<ul style="list-style-type: none"> Customer Service Excellence (CSE) Standard maintained with no non-compliance or partial compliance ratings - Exceeding baseline: we will achieve compliance or compliance plus ratings in all 57 elements of the CSE assessment 	<ul style="list-style-type: none"> British Standards Institution (BSI) Standard for Inclusive Service Provision (BSI18477) full compliance 	<p>Metric 11: independent assessment of WPD Accessibility AA standard</p>	Full compliance
			<p>Metric 10: BMCS PSR score</p>	90%
	<ul style="list-style-type: none"> Translation services in place for top ten languages in WPD's region 	<ul style="list-style-type: none"> Customers can communicate with us via multiple channels including: Twitter, Facebook, WPD smart device app, WPD Power Cut Reporter App, text message, website, email, WhatsApp and Webchat 	<p>Metric 12: independent assessment of WPD CSE Standard</p>	'Compliance plus' rating
			<p>Metric 10: BMCS PSR score</p>	90%
	<p>Stakeholder insights</p> <p>Stakeholders noted that lack of awareness about what services are available can lead to vulnerability, including people who don't speak English as a first language or don't have internet access. Accreditations and recognised partnerships, as well as promotion of available services is therefore important to ensure accessibility.</p>	<ul style="list-style-type: none"> British Standards Institution (BSI) Standard for Inclusive Service Provision (BSI18477) full compliance 	<p>Metric 13: independent assessment of WPD's BSI18477 Standard</p>	Full compliance
<p>RRE 6: top ten languages in WPD region and evidence of translation services in place</p>			-	
<p>Exceeding baseline requirements</p> <ul style="list-style-type: none"> Translation services available 24/7 by telephone and on WPD's website for over 100 languages including RoboBraille online function for customers to quickly and independently convert information or documents on our website into audio books, braille or another format InterpreterNow providing customers with the ability to contact WPD via a sign language interpreter free of charge Achieve AbilityNet Accreditation Certificate for WPD website 	<ul style="list-style-type: none"> Customers can communicate with us via multiple channels including: Twitter, Facebook, WPD smart device app, WPD Power Cut Reporter App, text message, website, email, WhatsApp and Webchat 	<p>Metric 10: BMCS PSR score</p>	90%	
		<p>RRE 3: qualitative description of activities</p>	-	
		<p>Metric 10: BMCS PSR score</p>	90%	
<p>Stakeholder insights</p> <p>Stakeholders noted that lack of awareness about what services are available can lead to vulnerability, including people who don't speak English as a first language or don't have internet access. Accreditations and recognised partnerships, as well as promotion of available services is therefore important to ensure accessibility.</p>	<ul style="list-style-type: none"> Translation services available 24/7 by telephone and on WPD's website for over 100 languages including RoboBraille online function for customers to quickly and independently convert information or documents on our website into audio books, braille or another format InterpreterNow providing customers with the ability to contact WPD via a sign language interpreter free of charge Achieve AbilityNet Accreditation Certificate for WPD website 	<p>RRE 6: top ten languages in WPD region and evidence of translation services in place</p>	-	
		<p>RRE 6: top ten languages in WPD region and evidence of translation services in place</p>	-	
		<p>Metric 14: AbilityNet Accreditation Certificate for WPD website</p>	Certificate in place	

Impact
<p>PSR customers are able to contact and communicate with WPD easily and with a choice of method or channel which is most convenient for them. WPD staff are able to proactively contact customers via a wide variety of channels and methods tailored to the customers' needs.</p>

Baseline Expectation 1.4: Have dedicated lines, or prioritisation processes, available for customers registered on the PSR when they need to contact the DNO, regardless of the time of day.

Baseline Expectation 1.5: Deliver a wide range of support during, or in relation to, a supply interruption that reflects different customer needs and is, at a minimum, in line with the company's existing RIIO-ED1 provision. There should be a clear link between the information held about PSR customers and how this is used to target, or prioritise, support. We consider a wide range of support could include, but is not limited to, crisis packs, hot meals and drinks, mobile generation, alternative accommodation or on-site welfare units. We would expect there to be multi-channel information provision during supply interruptions. Companies can deliver this support directly or through/in conjunction with partner agencies

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Other DNOs report a mix of the support offerings used by WPD. SECV submissions detail two offering crisis/resilience packs, two using the British Red Cross (BRC), three providing sign language functionality (though not always on-site, sometimes online) and one other whose field staff can refer customers for fuel poverty support. 	<ul style="list-style-type: none"> WPD provides a wide range of support during supply interruptions including crisis packs, hot meals and drinks, sign-language interpretation, PSR registration and referral to fuel poverty partners, mobile generation, on-site welfare from the British Red Cross (BRC) and the National Caterers Association. BRC also support WPD customers if required during planned interruptions. 	<ul style="list-style-type: none"> Continue to provide the wide range of support initiatives offered throughout RIIO-ED1 in addition to working with expert stakeholders to develop resilience planning specifically targeted at premises providing care and support for vulnerable customers, including care homes, refuges and shelters.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
Stakeholders stressed the importance of customer resilience to loss of supply, particularly for those who are medically dependent on electricity. They suggested that customer resilience will be increasingly difficult with the frequency and severity of extreme weather events because of climate change.	<ul style="list-style-type: none"> PSR customers provided with dedicated 24/7 phone number to call in the event of a power cut. 	Metric 10: BMCS PSR score	90%
	<ul style="list-style-type: none"> Provide multiple methods of contacting WPD in line with baseline standard 1.3. 	RRE 3: qualitative description of activities	-
	<ul style="list-style-type: none"> Provide PSR customers with information on planned and unplanned network outages, contacting them proactively using their preferred method of communication whether that is call back, text message, WhatsApp or WPD's smart device Apps. 	Metric 10: BMCS PSR score	90%
	<ul style="list-style-type: none"> PSR customers provided the following 24/7 support during power cuts: <ul style="list-style-type: none"> Accurate information and bespoke alerts via online power cut map and WPD smart device apps Collaborate with external agencies including the British Red Cross and National Caterers Association to provide welfare support: e.g. crisis packs, warm meals, alternative accommodation PSR customers medically dependent on electricity are provided tailored advice including discussion of back-up plans for any medical electrical dependencies. 	Metric 15: PSR speed of response	Speed of response to PSR customers less than 4 secs
		<ul style="list-style-type: none"> PSR customers medically dependent on electricity are provided tailored advice including discussion of back-up plans for any medical electrical dependencies. 	Metric 10: BMCS PSR score
	<ul style="list-style-type: none"> Bespoke training for Call Centre staff and field staff to provide targeted, tailored advice and support based on PSR customers' specific requirements. 	Metric 10: BMCS PSR score	90%
Stakeholder insights	Exceeding baseline requirements	Metric	Target
WPD need to consider vulnerable properties, such as care homes, that have a high density of vulnerable customers. Stakeholders would like to see WPD work both directly with customers in vulnerable situations, and organisations supporting vulnerable customers (i.e. care homes) to develop resilience planning.	<ul style="list-style-type: none"> We will work with expert stakeholders to develop resilience planning specifically targeted at premises providing care and support for vulnerable customers, including care homes, refuges and shelters. 	Metric 16: % of care homes, refuges and shelters in WPD's region provided resilience advice	10%

Impact

PSR customers are proactively contacted and supported during all planned and unplanned outages. Customers are better informed about outages and aware of the support available to them. They are able to access information online via a 'self-service' function, rather than needing to call us, if that is their preference.

5.2 Principle 2:

Maximise opportunities to identify and deliver support to consumers in vulnerable situations through the smart use of data.

Core delivery strategy

Mapping consumer vulnerability

5.41. WPD's social indicator data mapping provides an essential tool for us to understand where vulnerability exists in our regions and the coverage of PSR and support services. Developed with the Centre for Sustainable Energy (CfSE), the mapping data is published online with more than 60 social indicator datasets and on our website as an interactive map. The data is open-sourced for anyone to use and download, inviting ideas to collaboratively develop new services. The data enables us to tailor outreach to gaps in our PSR take-up; where the mapping suggests potential areas of vulnerability, we are able to seek local trusted referral partners and expert support partners to close these gaps. Our mapping currently identifies four key things:

- PSR: Total number of customers eligible and gaps in WPD's coverage
- Fuel Poverty: Households finding it difficult to affordably heat their homes
- Resilience: Community resilience levels to inform local network investment
- Community Energy: Location of schemes to potentially protect/involve the interests of the most vulnerable in the smart energy transition.

5.42. **CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE:** We will enhance the accuracy and frequency of data updates to enable robust measurement of WPD's PSR reach and increase the effectiveness of the data for our support partners. In addition, we will work with the CfSE to continue to add new or alternative data layers to the mapping.

Improving our understanding of evolving customer needs

5.43. We endeavour to take the widest possible view of vulnerability, and will continue work to develop our understanding of the contributory factors to vulnerability, including digital exclusion, rural isolation and the social rental sector.

5.44. Whilst our social indicator data mapping provides important data-driven insights, our continuous engagement with expert stakeholders also drives constant improvement and enhanced understanding. Close collaboration with our partners, Customer Panel, utilities and key stakeholders, enables us update our understanding of the issues faced by our customers and identify where WPD is best placed to provide support.

5.45. **CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE:** We will work with expert stakeholders, including our Customer Panel and referral partners, to refresh our definitions and understanding of vulnerability each year and co-create an ambitious annual action plan. The action plan will focus on the development of new, innovative outreach initiatives for vulnerable and fuel poor customers to address emerging issues and enhance the support we provide.

5.46. **CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE:** We will hold annual consumer vulnerability workshops to engage these expert stakeholders and to work with them to develop our understanding of vulnerability, share best practice and understand the priorities which need to be addressed. This engagement will inform the annual update of our Customer Vulnerability Strategy.



We will work with expert stakeholders, including our Customer Panel and referral partners, to refresh our definitions and understanding of vulnerability each year and co-create an ambitious annual action plan.

Principle 2: Maximise opportunities to identify and deliver support to consumers in vulnerable situations through the smart use of data.

Baseline Expectation 2.1: Utilise social indicator, or vulnerability, mapping to inform their service development and approach to partnerships. This approach may form part of the DNOs’ PSR management, but the identification of vulnerability should not be limited to PSR registrations and should recognise that vulnerability can be transient and may evolve in the transition to net zero.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> All DNOs report the use of data mapping in their SECV reports, which show a wide range in the levels of data and how it is used. 	<ul style="list-style-type: none"> WPD’s open-sourced social indicator mapping has been shared with 186 agencies and uses 67 datasets Data mapping is used to target fuel poverty and outreach projects and recent expansion includes the addition of data on the location community energy schemes to potentially protect/involve the interests of vulnerable customers in the smart energy transition. 	<ul style="list-style-type: none"> Our approach will include over 60 social indicator datasets and we will commission an annual horizon scan to identify additional data sets to incorporate into data mapping and potential new referral partners We will develop innovation projects that use data to better understand the causes of vulnerability and identify relevant interventions to support those customers.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
<p>Stakeholders recognised the challenging nature of engaging with customers, particularly if vulnerable customers have issues such as anxiety, ill mental health, don’t speak the English language or are not digitally literate. To increase the impact of our support services, they want to see WPD prioritise the identification of vulnerable services and fuel poverty, encouraging the use of, and innovation in, data mapping to identify potential vulnerability hot spots and improve vulnerable customer outcomes by targeting services. They suggested that having up-to-date and accurate data will better enable WPD to adapt to the dynamic and transient circumstances facing customers, while also ensuring that support is tailored to local need.</p>	<ul style="list-style-type: none"> WPD social indicator mapping published online with data which is open sourced for anyone to use, inviting ideas to collaboratively develop new services. The data enables us to tailor outreach to gaps in our PSR take-up, where the mapping suggests potential areas of vulnerability. Key areas of coverage: <ul style="list-style-type: none"> PSR: Total number of customers eligible and gaps in WPD’s coverage Fuel Poverty: Households finding it difficult to affordably heat their homes Resilience: Community resilience levels to inform local network investment Community Energy: Location of schemes to potentially protect/involve the interests of the most vulnerable in the smart energy transition. Exceeding baseline: our approach will include over 60 social indicator datasets. 	<p>Metric 1: number of partner agencies using WPD data mapping</p>	200 annually
		<p>Metric 2: independent assessment of WPD data mapping quality</p>	‘Compliance plus’ rating
Stakeholder insights	Exceeding baseline requirements	Metric	Target
<p>Stakeholders noted that the Covid-19 pandemic and lockdowns have resulted in changes to energy use and has thus impacted fuel poverty. They encouraged WPD to seek new ways of identifying fuel poor customers, using innovation to anticipate future needs as well as present circumstances.</p>	<ul style="list-style-type: none"> Commission an annual horizon scan with the Centre for Sustainable Energy (CfSE) to identify additional data sets to incorporate into data mapping and potential new referral partners. 	<p>Metric 1: number of partner agencies using WPD data mapping</p>	200 annually
		<p>Metric 2: independent assessment of WPD data mapping quality</p>	‘Compliance plus’ rating
	<ul style="list-style-type: none"> We will also encourage, reveal and promote innovative ways in which other organisations have made use of WPD’s vulnerability data and mapping tools to meet their own purposes to deliver social benefits. This will help to promote the data and tools more widely and catalyse wider social impact from this data. We will develop innovation projects that use data to better understand the causes of vulnerability and identify relevant interventions to support those customers. 	<p>RRE 2: number of referral partners</p>	-
		<p>RRE3: qualitative description of activities</p>	-

Impact
Greater data accuracy to locate customers in vulnerable situations within our network. Proactive outreach and targeted support for those customers identified as being in need, with wider social benefits generated by other organisations’ use of our social indicator data.

Baseline Expectation 2.2: Maintain a good understanding of the social issues associated with the scope of their role, the prevalence of these within their consumer base and how they are evolving.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Most DNOs report on having customer panels or similar and most also undertake bespoke vulnerability workshops. 	<ul style="list-style-type: none"> WPD's established Customer Panel of 30 expert members ensures vulnerable consumer views and perspectives are considered and allows WPD to maintain a robust understanding of its social obligations and how prevalent issues are evolving WPD's annual consumer vulnerability workshop has been running since 2019 and bespoke vulnerability surgeries are held at Customer Panel meetings and stakeholder workshops allowing expert feedback on WPD priorities, commitments and strategies. 	<ul style="list-style-type: none"> We will continue to work with our expert stakeholders to update our Customer Vulnerability Strategy each year and co-create an ambitious annual action plan to develop new, innovative outreach initiatives for the vulnerable and fuel poor Our work with the Centre For Sustainable Energy (CfSE) on the 'Smart and Fair?' initiative will provide research that will enable us to expand our definition and understanding of vulnerability to reflect capabilities to participate in a smart network and understand how this evolves over time.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
Stakeholders emphasised the value of maximising local expertise to reach vulnerable and fuel poor customers, through collaboration with delivery partners working across a range of social issues. This was deemed particularly important when engaging with customers experiencing transient vulnerability, or those who are hard-to-reach.	<ul style="list-style-type: none"> Work with expert stakeholders, including our Customer Panel and 150 expert referral partners, to refresh our definitions and understanding of vulnerability each year. 	RRE3: qualitative description of activities	-
	<ul style="list-style-type: none"> Hold annual consumer vulnerability workshops to engage expert stakeholders and to work with them to develop our understanding of vulnerability, share best practice and understand the priorities which need to be addressed. 	RRE3: qualitative description of activities	-
Stakeholder insights	Exceeding baseline requirements	Metric	Target
Stakeholders regarded a virtuous cycle of ongoing review and improvement as important, particularly given the rapid change brought about by Covid-19 and the smart energy transition.	<ul style="list-style-type: none"> Work with our expert stakeholders to update our Customer Vulnerability Strategy each year and co-create an ambitious annual action plan to develop new, innovative outreach initiatives for the vulnerable and fuel poor. 	Metric 17: consumer vulnerability action plan published	Annually
	<ul style="list-style-type: none"> Our work with the CfSE on the 'Smart and Fair?' initiative will provide research that will enable us to expand our definition and understanding of vulnerability to reflect capabilities to participate in a smart network and understand how this evolves over time. 	RRE 3: qualitative description of activities	-

Impact

With a more nuanced understanding of social and well-being issues, we have a greater ability to focus or adjust the interventions required for specific groups of customers, and to expand and adapt our programmes according to their needs. An annually updated Customer Vulnerability Strategy and action plan, co-created with expert stakeholders enabling WPD to continually improve our services for vulnerable customers and respond quickly to changes in expectations or requirements.

5.3 Principle 3:

Understand new forms of vulnerability, in particular by identifying blockers to participating in a smart flexible energy system.

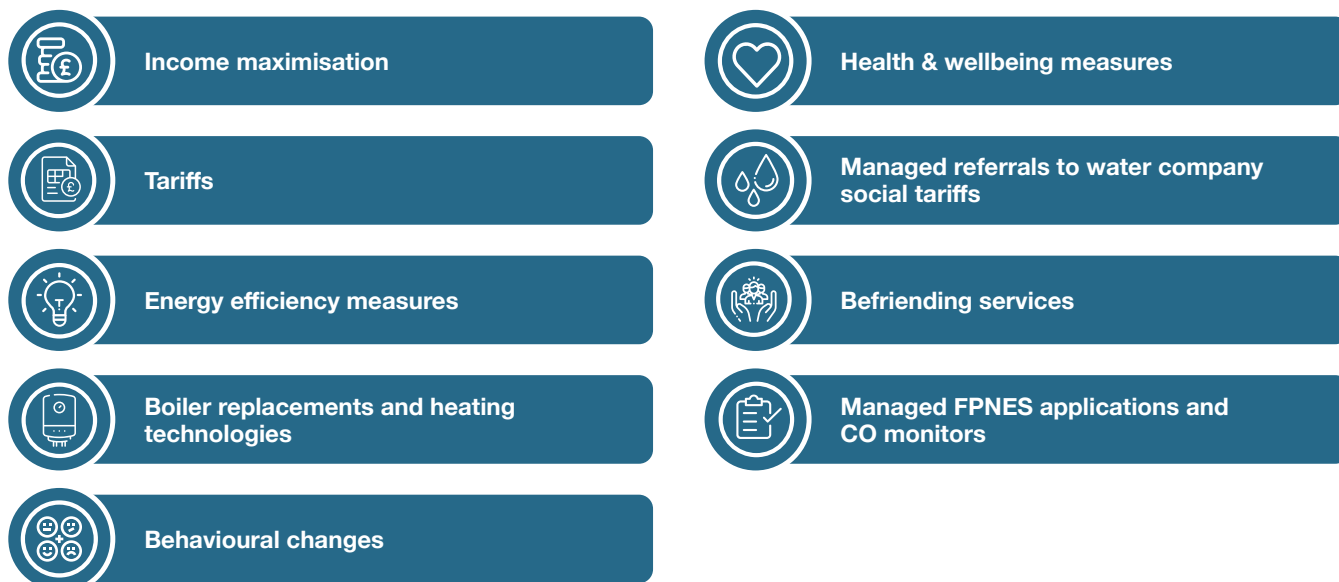
Core delivery strategy

Fuel poverty partnerships

- 5.47.** Vulnerability manifests itself in many ways and different combinations of factors create a greater reliance for customers on essential services for support. Very often, vulnerability goes hand-in-hand with difficulties around affordability and with the impacts of the Covid-19 pandemic.
- 5.48.** Discussions with our stakeholders and partners have made it clear that Covid-19 has caused a shift at both ends of this spectrum; more people have found themselves vulnerable due to shielding or health concerns, while the loss of jobs and income under lockdown has pushed greater numbers of people into poverty. Combined with the risk of these customers being left behind in the energy transition, the need to provide trusted, joined-up and holistic support to customers is greater than ever.
- 5.49.** Now embedded across our entire vulnerability programme, our 'one-stop-shop' model for providing customers with fuel poverty support draws together a huge range of partner agencies with a wide range of expertise. Our fuel poverty schemes work in a 'hub' model to deliver comprehensive support, with an appointed 'lead partner agency' in each of our four licence areas that assesses the individual needs of each customer. After identifying their bespoke requirements, the lead agency works with a pool of sub-partner agencies with specific expertise across the range of factors impacting fuel poverty. Everything is coordinated through the lead agency to avoid hand-offs and confusion for customers.
- 5.50.** Our experience shows that providing this form of support is most effective, offering multiple interventions without the confusion of dealing with multiple contacts. Without this we increase the risk of customers 'falling through the cracks' and those who are already struggling to understand the energy system may disengage with the process before benefits have been realised.
- 5.51.** At the same time, this model ensures our services are delivered locally by trusted community services that can build in-person relationships with customers. With many of the customers we encounter in vulnerable circumstances also facing difficulties with broadband access and speed or digital literacy, our partners have an extensive understanding of the unique challenges faced by the digitally excluded and are already experts at supporting them. All outreach is conducted primarily in-person or over the phone, with partners offering additional support with online services where necessary. Through our Energy Affordability Fund, partners targeted digitally excluded customers by providing: front-line worker training, newsletters, housing/tenancy manager advocates for residents, direct mails, proactive calling for clients at risk of exclusion, leaflet distribution and collaboration with local authorities. In the face of increasingly digitalised services, these approaches will continue to be vital as we endeavour to understand the impacts of digital exclusion and evolve our support interventions to meet customers' changing needs in a smart energy future.
- 5.52.** Our core programme is made up of two schemes: Power Up and Affordable Warmth.
- 5.53.** Our Power Up scheme receives referrals from WPD when we encounter customers struggling to heat their homes as part of our PSR services (partners also self-generate referrals through their outreach programmes).
- 5.54.** With a PSR of more than 1.9 million customers, our Power Up partnerships ensure we can provide tailored support to align with the range of vulnerable situations our customers face. Specialist agencies with bespoke expertise are central to identifying customers with different vulnerabilities, supporting their specific needs and scaling our approach across WPD's region.
- 5.55.** A key example of this is our Power Up Health scheme, which was designed around a partnership with an oxygen supplier, identified as a channel to engage customers with specific medical dependencies and sign them up to the PSR. This initial focus has since been expanded to partnerships with a range of local health services, enabling us to tailor our support for fuel poor customers with specific health needs.
- 5.56.** Power Up Smart brings together a network of local agencies to deliver follow-up support to customers who have recently had a smart meter installed. It combines specialist energy education with key learning from our existing 'Power Up' schemes, offering tailored advice on how to use the meter, monitor energy use and adapt behaviours to reduce waste.
- 5.57.** The Affordable Warmth scheme differs in that it is specifically designed to identify and support hard-to-reach customers struggling to heat their homes and meet their energy costs. WPD funds outreach targeted in high deprivation areas (revealed by our social indicator mapping). Customers receive fuel poverty support and are assisted to register to the PSR providing referrals back to WPD.

Fuel poverty interventions

5.58. To ensure comprehensive support, every one of our projects must be capable of delivering nine core interventions to assist customers:



5.59. Delivery of these wide-ranging interventions ensures that customers are able to benefit from holistic support tailored to their individual circumstances. This ensures that customers' situations are considered in the round, providing qualitative health, wellbeing and quality of life benefits, as well as quantitative 'hard' impacts such as energy bill savings and debt relief. An example of this can be seen in the case study below:

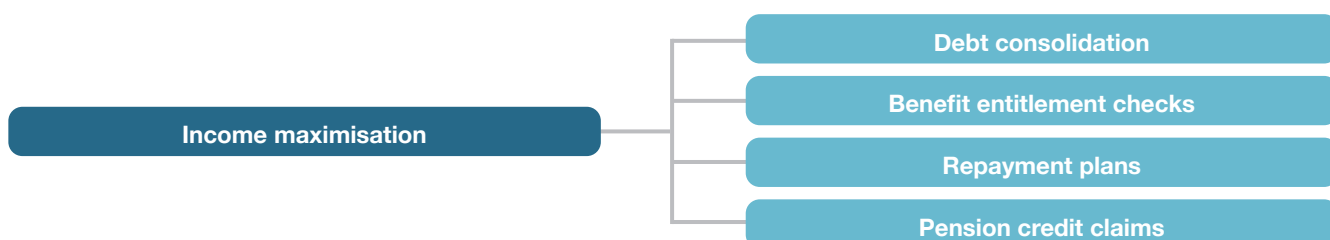
Mrs S was referred to WPD's partner agency, Care and Repair, by the Pulmonary Occupational Therapist at Llandough hospital, advising she needed help. Mrs S suffers from severe COPD, vertigo and depression. She is quite isolated and lonely due to her health conditions, unable to leave her home. After assessing Mrs S at her home, the caseworker identified several repairs and safety issues that needed to be resolved, including smoke alarms, defective toilet flush, broken patio doors, old boiler and no heating thermostat. She was also living on a very low income and struggling with debt. Care and Repair installed a rail on the stairs, provided a Carbon Monoxide detector, put Mrs S on the Priority Services Register with WPD and advised her about the Council Telecare service. She was also referred to NEST, who installed a new boiler and thermostat and arranged for her to benefit from the HelpU tariff with Welsh Water. Care and Repair helped Mrs S secure Pension Credit and Attendance Allowance. Funding was also obtained to install new patio doors, which previously she wasn't able to open and let in the wind and rain. The South Wales Fire Service installed smoke alarms. Mrs S says she is now able to manage with the income she receives and was touched that Care and Repair were there for her and able to provide support.

Ensuring effectiveness

5.60. It is vital that we are able to monitor the effectiveness of our fuel poverty programme to identify improvements and share successful, innovative approaches to enhance best practice across our projects and partners.

5.61. All of our schemes must be able to record an outcome in each of the nine interventions for every customer they support. This is a contractual obligation, with a requirement for monthly reporting providing the ability to manage the performance of these schemes, ensuring effective delivery for our customers.

5.62. WPD is therefore able to monitor granular outcomes for every customer. E.g. :



5.63. In RIIO-ED1, we have captured these ‘hard’ verified quantitative savings and outcomes, providing a conservative measure of the total value delivered to customers through these interventions. We will expand this approach for RIIO-ED2 to include assessment of benefits delivered such as the additional value of providing customers with PSR referrals, befriending services and the longer-term impacts beyond the initial support such as health improvements.

5.64. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will measure a wider set of outcomes for customers using the common social value methodology to assess the wider qualitative impacts delivered, enabling enhanced understanding of the performance of our programme.

Identifying improvements

5.65. In order to ensure continuous improvement, we will collaborate with our partners and other expert stakeholders, engaging with them to share best practice and increase understanding of circumstances leading to fuel poverty and the support which can be provided. Our annual consumer vulnerability workshops will provide the platform to collaborate with stakeholders and co-create the areas of our Customer Vulnerability Strategy dealing with fuel poverty.

5.66. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will develop a range of tools to increase our understanding of fuel poverty and to identify customers impacted, so that we can target our outreach services most effectively.

5.67. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will update our data mapping to improve the granularity and detail of fuel poverty indicators which will support the effective targeting of outreach services.

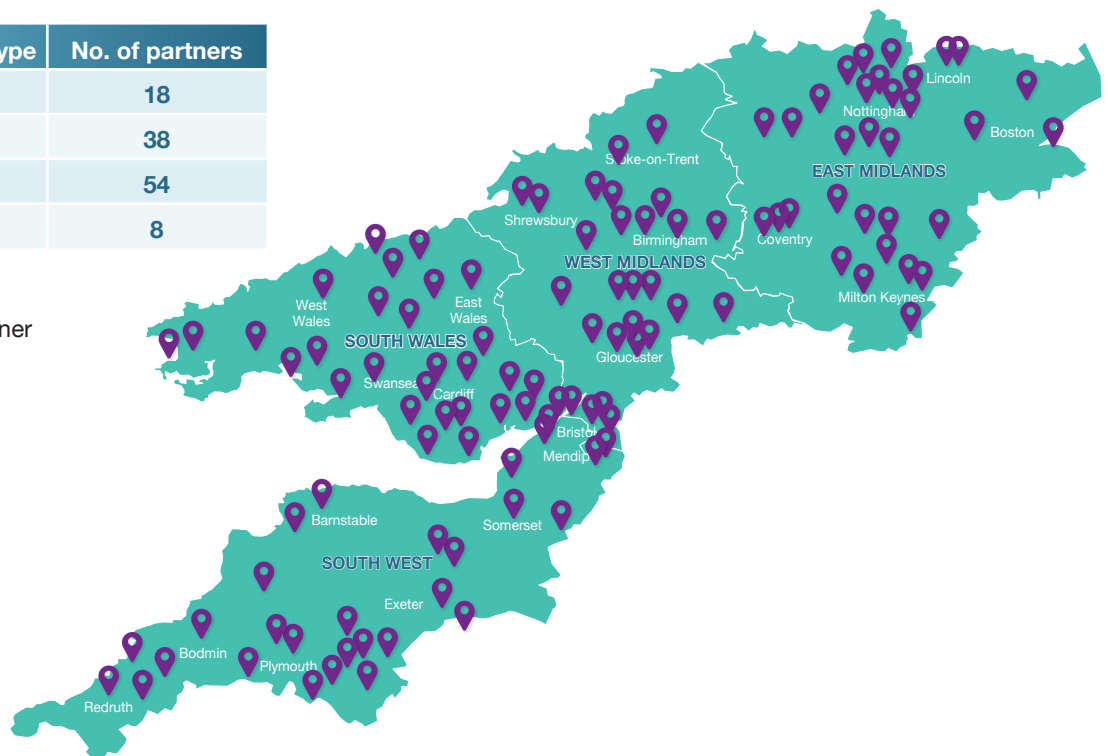
PSR Referral networks

5.68. Stakeholders have remained consistent in our engagement that WPD should seek to expand our reach through effective collaboration, using appropriate, trusted local partners to contact the hard-to-reach and assist them with joining the PSR. Two-way partnerships have enabled us to refer our customers to services such as local Fire Services to provide home fire safety checks. We will continue to expand our network of referral partners, using our PSR data mapping to target areas of eligibility and reaching out to trusted local agencies who can expand our support in these areas.

5.69. The diverse range of agencies we work with enables us to reach customers across the spectrum of vulnerable situations, providing unpaid referrals with coverage across our regions. The table and map below shows the number and range of partners WPD currently work with:

Partner sector type	No. of partners
Health	18
Local Authority	38
Charity	54
Utilities	8

 Referral partner



- 5.70.** The benefits of our one-stop-shop approach to customer support extends to working with utilities to ensure that a customer only has to register with one company to be automatically registered on the corresponding PSR of their energy supplier, water company and gas distributor. We already have data share arrangements in place with six of the water companies in our region, pioneering a two-way data share process with two of them, a first for DNOs and water companies. In RIIO-ED2 stakeholders have asked us to continue to expand these arrangements and as a result of their feedback we will seek to extend this beyond utility companies to also include telecommunication providers. We will continue to collaborate with these companies to lead engagement and share best practice.

5.71. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will achieve a ‘one-stop-shop’ service so that customers only have to join the PSR once to be registered automatically with their energy supplier, water company and gas distributor. We will engage to extend this to telecommunication companies where possible.

Enabling participation in a smart energy future

- 5.72.** The UK’s ambition to achieve net zero emissions by 2050 has accelerated the development of technologies to enable decarbonisation, with new opportunities rapidly emerging for customers to change their energy habits in order to access a range of financial benefits. However, with the introduction of these offers lies the potential for those in vulnerable situations to unfairly miss out on the benefits of a smarter network, due to factors such as energy use, property type or income. This poses the risk of burdening the most vulnerable customers with the additional costs of developing a smart network, while preventing them from accessing the benefits.
- 5.73.** WPD is driven to deliver a smart and fair energy network, in which no customer is denied the benefits of participation. Key to enabling this will be our understanding of how the parameters of vulnerability are likely to change as the network becomes smarter and greener. In particular, as the uptake of low carbon technology increases, we must anticipate the impacts for those in vulnerable situations and develop interventions to widen participation and mitigate the risk of customers being left behind.
- 5.74.** Our Customer Vulnerability Strategy sets out our commitment to continually improve our view of vulnerability, in particular, understanding the way in which the net zero transition will impact vulnerable customers and create new types of vulnerability. It will enable us to identify innovative interventions to mitigate the risk of vulnerable customers suffering detriment, by removing barriers to participation and actively promoting opportunities to take part in smart network offerings.
- 5.75.** Through our approach we will proactively support the efforts of local regions and communities to deliver bespoke net zero action plans and explore how to maximise the positive financial impacts of net zero for vulnerable customers.
- 5.76.** Stakeholders have encouraged WPD to take a leading role in the energy transition; we will do so by initiating collaboration with a range of industry participants to share best practice and co-deliver innovative schemes to ensure vulnerable customers are not left behind by the smart energy transition. Working closely with our fuel poverty support partners we will also seek to find ways they can provide access to the financial support vulnerable customers may need to participate. This will ensure a joined up, holistic approach to protecting vulnerable customers in the net zero transition and create a fairer system for customers, who receive comprehensive services regardless of their location, and benefit from better outcomes than if we had acted alone. Engagement with stakeholders reveals that the Covid-19 pandemic has exacerbated issues such as digital exclusion. They have therefore encouraged us to further strengthen our focus to ensure the net zero transition is inclusive and fair for all.
- 5.77.** To deliver this, we must understand how different groups will be affected by the shift to a smart energy network and initiate collaborative engagement to avoid adverse impacts and encourage participation. We are proactively enabling inclusivity from the outset, rather than reactively resolving issues and taking remedial steps after issues emerge. In such a fast-paced, evolving area, ongoing and iterative engagement will be key.

Building a view of customer capabilities and smart network opportunities

- 5.78.** When we refer to ‘no one left behind in a smart future’, we mean ensuring customers are not adversely affected, unable to ‘keep up’ with the pace of change or denied access to the positive opportunities decarbonisation can deliver.
- 5.79.** We have collaborated with Scottish and Southern Electricity Networks (SSEN) and the Centre for Sustainable Energy (CfSE) to create a bespoke research programme, called ‘Smart and Fair?’, with the specific intention to turn ‘no one left behind’ from theory into practical delivery.
- 5.80.** Through this programme, we developed an innovative ‘Capability Lens’ tool to capture the range of characteristics impacting the ability of domestic households to participate in smart energy offerings, such as demand side response, flexible tariffs and low carbon technologies. The tool was tested and refined with expert stakeholders from a range of fields supporting vulnerability, ensuring it considers the full spectrum of situations customers could face.

5.81. The Capability Lens was used to create tools to map customer capabilities against smart energy offers and to combine household capabilities with socio-demographic characteristics. Key characteristics mapped by the Capability Lens were: energy usage and technology, digital literacy, dwelling and local area, financial, personal and social. This enabled a systematic analysis of those at risk of being disadvantaged and what the requirements to 'keep up' with a smart energy system might look like.

5.82. Customer Vulnerability Strategy – KEY DELIVERABLE: Through our participation in the CfSE's 'Smart and Fair?' research programme we will utilise the tools it develops to understand the range of characteristics impacting the ability of a domestic household to participate in smart energy offerings, map capabilities against smart energy offers and understand the those at risk of being disadvantaged.

5.83. Though these characteristics will likely be subject to change as the energy market evolves and new opportunities to participate are created, the tools developed by the 'Smart and Fair?' project demonstrate what is already known about vulnerability in the net zero transition. The study found that those most likely to miss out on smart energy offers were also likely to be the group with significantly higher rates of vulnerability, posing the risk that non-participation may exacerbate their situation further and potentially increase financial inequalities. Moreover, households who were identified as least likely to take up smart energy offers did so due to multiple factors.

5.84. The factors, listed below, were identified as key determiners of a customer's ability to participate in smart energy offers:

- **Broadband access and speed** – some smart energy offers require access to the internet
- **Digital literacy/attitudes to technology** – some offers require use of digital technology like smart phones and smart meters
- **Energy usage** – some offers require households to reduce energy use or change time of use, which may be dependent on employment hours, medical equipment or family makeup
- **Access to capital/attitudes to finance and risk** – some offers require an initial investment of capital, or may only produce financial benefits over a long period of time
- **Household circumstances** – factors such as renting or owning a property will determine a household's ability to participate in offers that require the installation of smart energy features (e.g. EV charger, solar panels, smart meter).

5.85. By embedding these findings through practical application to our existing consumer vulnerability programme we will design and implement interventions to support greater and wider participation in smart energy offers. We will also use these tools to assess the effectiveness of existing schemes, recalibrating how to support customers in vulnerable situations within our support programme, for example by targeting digitally excluded customers, engaging with landlords and collaborating with our partners to financially benefit customers via our fuel poverty interventions. Given those situations will change as a smarter energy system emerges, we will continue to enhance and refresh our approach as our understanding improves.

5.86. As a result of the initial stage of 'Smart and Fair?' we have set a requirement for all WPD innovation schemes to formally consider the impacts and opportunities for customers in vulnerable situations in addition to undertaking innovations specifically targeting consumer vulnerability in the net zero transition.

5.87. The ongoing 'Smart and Fair?' research will enable us to expand our definition of vulnerability to reflect a new understanding of the capabilities needed to participate in, and benefit from, a smart network, both now and in the future.

Ensuring accessibility of electric vehicle charging

5.88. As our understanding of vulnerability in the net zero transition has developed, we have identified an area where WPD is in a position to use our expertise to provide support for our customers, in relation to electric vehicles (EVs). With the government's recent acceleration of EV ambitions, we are aware of the difficulties the migration may cause for some of our customers, such as individuals with physical disabilities. Currently, almost one in ten new cars are bought on behalf of disabled people, and by 2035, over 1.3m disabled motorists will be reliant on public charging. It is anticipated that about 0.9m disabled motorists are unlikely to be able to charge their vehicle at home, with limited flexibility on where they can park and accessibility concerns for charging solutions.

5.89. We will undertake specific research in 2021, engaging key stakeholders across the sector to understand the barriers, issues, and needs of disabled drivers, their user experience and identifying how needs will map against local area energy planning. This qualitative and quantitative research will help us inform and validate recommendations for how WPD can work collaboratively with key bodies to enable greater EV take up from disabled drivers.

5.90. Customer Vulnerability Strategy – KEY DELIVERABLE: We will work with key stakeholders to understand and serve the needs of disabled EV drivers, ensuring they are provided access to adequate charging infrastructure in a timely manner, delivered as part of local area energy plans. At this stage, it is crucial to understand not just the barriers faced, but also how best to deliver solutions, and who is best placed to provide them. We plan to develop a coordinated approach, working with local authorities and key supply chain stakeholders through early trials which will inform the support we deliver in RIIO-ED2.

Supporting businesses in our communities

- 5.91.** Engagement with small and medium enterprises (SMEs) has revealed that the compounding impacts of Covid-19 and the net zero transition are causing them major challenges. SMEs can have limited time, knowledge and capacity to adapt, balancing green ambitions with the need to ‘get on with business’. At the same time, they emphasise that the available information about net zero is confusing and support is fragmented.
- 5.92.** Expert stakeholders, including our Customer Panel, have challenged us to champion better protections for small businesses in a smart energy market, in line with the principles established by ‘Smart and Fair?’ They suggest our definition of vulnerability should include SMEs, who support our communities with jobs and services, urging us to assist businesses struggling with their energy costs while simultaneously driving decarbonisation across the sector.
- 5.93.** WPD is collaborating with Northern Powergrid and Electricity North West to work with the Federation of Small Businesses (FSB), Chambers of Commerce and The Broadway Initiative to understand the tools, advice and support SMEs require in order to participate in the energy transition and meet their net zero targets.
- 5.94.** This collaboration is developing an online platform which aims to make net zero relevant to UK SMEs, enabling those that have been hardest hit by the pandemic to improve their productivity and unlock green growth opportunities for the wider benefit of communities that these businesses support. Building the service iteratively, we are ensuring that the platform effectively meets the needs of users.

5.95. Customer Vulnerability Strategy – KEY DELIVERABLE: We will collaborate with industry partners to create an online platform bringing together tools, advice and support for small and medium businesses to participate in the energy system transition, and provide energy resilience advice in relation to dealing with power cuts.

Providing PSR customers with bespoke energy advice

- 5.96.** Our data cleanse calls to PSR customers are about much more than updating data; they give us an opportunity to build relationships with customers facing vulnerability, and to better understand their needs so that we can refer them to expert services through our established partnerships. As we progress towards a smart energy network, these calls will be particularly important to ensure those customers who are digitally excluded, and therefore at risk of being disadvantaged by the transition to net zero, receive tailored support and advice.
- 5.97.** We are committed to providing education and support for consumers and stakeholders to encourage everyone to embrace the opportunities offered by the smart energy transition and low carbon economy.

5.98. Customer Vulnerability Strategy – KEY DELIVERABLE: We will expand the scope of our calls to PSR customers, offering customers the opportunity to develop a smart energy plan tailored to their circumstances. Specially trained staff will identify the specific smart energy needs of our PSR customers offering customers the opportunity to develop a bespoke plan and to be referred to a range of expert partner agencies delivering enduring support to enable them to participate in smart services, including flexibility markets.

- 5.99.** Our stakeholders have identified that a lack of understanding or confidence around low carbon technologies is a barrier to take-up. They want us to ensure that the net zero transition is fair by mitigating these difficulties and widening participation where WPD is able, and best placed to do so.
- 5.100.** Although not a core commitment in our first draft Business Plan, following consultation with stakeholders, we generated a new core commitment to provide an advisory service for customers to support wider uptake of low carbon technologies.

5.101. Customer Vulnerability Strategy - KEY DELIVERABLE: We will create a low carbon technology energy advisory service for customers, providing a support service for people looking to switch to electric vehicles, heat pumps or solar PV.

Principle 3: Understand new forms of vulnerability, in particular by identifying blockers to participating in a smart flexible energy system.

Baseline Expectation 3.1: Have an extensive network of partnerships with a range of organisation types, from multiple sectors including other utilities.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Regulatory submissions from other DNOs detail similar partnerships and fuel poverty schemes though the numbers of each are difficult to determine Based on regulatory submissions in RIIO-ED1 to date, the average savings amongst DNOs for fuel poor customers was £1.6 million. 	<ul style="list-style-type: none"> WPD has 118 referral partners – trusted charities, local authorities, health organisations and industry counterparts – who provide PSR advice and help customers to join the PSR, usually online Striving towards a one-stop-shop to make PSR registrations quick and simple for customers, WPD already shares data with six water companies and receives data from two of them. Throughout RIIO-ED1 to date, WPD has made £27 million of savings for fuel poor customers. 	<ul style="list-style-type: none"> We will maintain our expert support partnerships and network of referral partners – working with a minimum of 150 partner agencies Established two-way data sharing, partnering with all eight water companies in WPD’s region, extending to telecommunications companies where possible We will develop and implement new interventions for fuel poverty outreach schemes, specifically targeting advice to support customers in the energy transition and participate in the opportunities this provides to help them with their energy costs.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
<p>Although this is not WPD’s direct area of responsibility, stakeholders have overwhelmingly encouraged WPD to do more for customers facing fuel poverty. This priority has only been exacerbated by the impacts of Covid-19, with many people experiencing poverty for the first time, compounded by a greater reliance on electricity during the nation’s lockdowns.</p>	<ul style="list-style-type: none"> We will maintain our expert support partnerships delivering fuel poverty outreach schemes (set out in baseline 3.4). 23 core schemes based on ‘hub’ delivery model with one lead partner responsible for detailed assessment of customers’ needs and coordinating multiple local services to provide support Two referral models: <ul style="list-style-type: none"> Power Up schemes receive referrals from WPD and self-generate Affordable Warmth schemes identify and support hard-to-reach customers and provide referrals to WPD’s PSR Lead partners in each region provide comprehensive coverage across WPD geography Lead partners’ expertise is supplemented by their network of sub-partners from a wide range of organisation types and sectors to provide specialist customer support interventions. 	Metric 18: number of fuel poor customers supported	113,000 (baseline 70,000)
		Metric 19: total financial savings of fuel poor customers supported	£60 million (baseline £27 million)
	<ul style="list-style-type: none"> We will continue to maintain partnerships with Local Resilience Forums to assist in the co-ordination of community support during incidents such as flooding. 	RRE 3: qualitative description of activities	-
	<ul style="list-style-type: none"> We will maintain a network of referral partner agencies from different organisation types and sectors providing coverage across all four licence areas. Exceeding baseline: our approach will maintain a minimum of 150 partner agencies. 	RRE 2: number of referral partners	-
	<ul style="list-style-type: none"> We will continue to partner with other utilities, within WPD’s region. Exceeding baseline: We will establish two way data sharing, partnering with all eight water companies in WPD’s region. Exceeding baseline: as per baseline 1.2: We will engage to extend this to telecommunication companies where possible. 	RRE 2: (as above)	-
		Metric 9: number of PSR records shared with utilities	150,000 (baseline 100,000)
Stakeholder insights	Exceeding baseline requirements	Metric	Target
<p>The multi-dimensional nature of customer needs requires support and proactive interventions from a wide range of agencies. However, stakeholders have urged WPD to lead efforts to pull these sources of support together into a single point of contact for customers, alleviating the confusion of dealing with multiple agencies. In particular, they have challenged us to increase the number of partners we work with, broadening the scope of our support interventions, particularly when enabling customers to access opportunities presented by smart, low carbon initiatives.</p>	<ul style="list-style-type: none"> We will develop and implement new interventions for fuel poverty outreach schemes, specifically targeting advice to support customers in the energy transition and participate in the opportunities this provides to help them with their energy costs. 	Metric 18: number of fuel poor customers supported	113,000 (baseline 70,000)
		Metric 19: total financial savings of fuel poor customers supported	£60 million (baseline £27 million)

Impact
Customers living in cold homes and/or struggling to afford their energy bills receive tailored support to make long term changes to improve their ability to afford to heat their home. Vulnerable and fuel poor customers benefit from a better understanding of the changing nature of vulnerability in a smart energy future, with accompanying interventions to mitigate harm to customers and widen participation.

Baseline Expectation 3.2: Make use of referral channels and signposting support for customers. This will primarily be done through customer service teams, but we expect DNOs to seek opportunities to maximise consumer touchpoints.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> DNOs report an array of training is given to all contact centre staff with many having training covering mental health, dementia, befriending and similar issues. 	<ul style="list-style-type: none"> WPD Contact Centre staff are trained on a vast array of issues vulnerable customers may face including mental health, oxygen use, Parkinson's and Dementia, in many cases signposting further support and referring customers directly to our fuel poverty partners WPD referred over 5,000 customers in the last year to 12 Fire and Rescue Services. These partnerships also allow the fire service to promote the PSR, provide resilience advice and assist their clients to join the PSR. 	<ul style="list-style-type: none"> We will continue to enhance consumer vulnerability training, employing a range of expert external providers to deliver training to all 6,500 WPD employees on an annual basis and implement new, specialist training opportunities as and when new forms of vulnerability are identified. We will develop innovation projects specifically designed to deliver better understanding of the future challenges for customers in vulnerable situations and enable maximisation of consumer touchpoints, signposting support for customers participating in trials and expanding referral channels for support schemes.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
<p>Stakeholders recognise the importance of maximising customer interactions, particularly as many customers in vulnerable situations may also be time-poor, isolated or digitally excluded.</p> <p>Stakeholders who work directly with customers have emphasised that people often face multiple vulnerabilities, and therefore may require multiple sources of support. It is therefore extremely important to ensure WPD employees are equipped to recognise when people need additional support and are aware of the correct referral channels.</p>	<ul style="list-style-type: none"> Dedicated PSR Data Cleanse teams proactively contact PSR customers. These phone calls provide opportunities to build relationships with customers facing vulnerability, and to better understand their needs so that we can refer them to expert services through our established partnerships. WPD staff are trained on consumer vulnerability (set out in baseline 4.1) and are able to signpost support to customers. <ul style="list-style-type: none"> Exceeding baseline: we will continue to enhance training, employing a range of expert external providers to deliver training to all 6,500 WPD employees on an annual basis. We will also ensure that we develop new training to enable staff to provide further specialist advice where new forms of vulnerability are identified, including the provision of support to ensure customers are able to participate in smart energy services. All field staff have the PSR referral App on their smart devices to register customers to the PSR and refer them to our support partners. Dedicated online content targeted at customers in vulnerable situations including: <ul style="list-style-type: none"> Dedicated Priority Services Hub on WPD's website signposted from the homepage for customers, existing partners and potential partners. WPD Power Cut Reporter App Social media including targeted campaigns. 	<p>Metric 10: BMCS PSR score</p> <p>Metric 20: % new PSR customers registering directly with WPD as a result of staff referrals</p> <p>Metric 20: (as above)</p> <p>Metric 3: Number of new PSR customers registering directly with WPD</p>	<p>90%</p> <p>5%</p> <p>(as above)</p> <p>50,000 per year (baseline 20,000)</p>
Stakeholder insights	Exceeding baseline requirements	Metric	Target
<p>Stakeholders were supportive of WPD identifying innovation projects in this area, although it was stressed that there also needs to be an emphasis on turning trials into business as usual. Some stakeholders suggested that WPD should be reviewing all of their innovation projects to establish whether there is some benefit for vulnerable customers.</p>	<ul style="list-style-type: none"> Every WPD innovation scheme will formally consider the impacts and opportunities for customers in vulnerable situations. This approach enables maximisation of consumer touchpoints, signposting support for customers participating in trials and expanding referral channels for support schemes. We will develop innovation projects specifically designed to deliver better understanding of the future challenges for customers in vulnerable situations. This will identify the most effective interventions to support customers through the net zero transition and will provide new opportunities to effectively engage with customers. 	<p>RRE 3: qualitative description of activities</p> <p>RRE 3: (as above)</p>	<p>-</p> <p>-</p>

Impact
Support for customers in vulnerable situations is signposted to customers throughout our interactions with them, enabling more customers to receive the support they need.

Baseline Expectation 3.3: Be involved in two-way flow partnerships supporting vulnerable customers, in line with the companies' understanding of social issues in their region. This should include the network company having direct involvement in the end to end process of delivering support, providing expertise and co-creating schemes. Where appropriate, we would expect to see example schemes where the DNO is taking a leading role.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Regulatory submissions from other DNOs detail similar fuel poverty schemes though the numbers for each are difficult to determine. Using the information publicly available, for RIIO-ED1 to date, the average savings amongst DNOs for fuel poor customers was £1.6 million. 	<ul style="list-style-type: none"> WPD currently has 23 fuel poverty schemes delivered by expert lead partners and in the five years up to 2019/20 delivered £27m in savings to almost 70,000 customers. In the last two years alone WPD delivered £20.7 million of direct savings to 40,665 fuel poor customers – more than any other network operator in the first five years of RIIO-ED1 combined. 	<ul style="list-style-type: none"> WPD will deliver £60m in savings to around 113,000 fuel poor customers We will continue with and expand the effectiveness of our PSR referral partnerships, with a target for 200 partner agencies to use WPD data mapping (annually) to identify gaps in PSR take-up

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
<p>Stakeholders have urged us to collaborate where there is potential to generate greater social benefits for customers by pooling resources and expertise with others who share our ambitions. Collaborative delivery is more likely to be trusted by customers, who may have varying recognition of the different partners and the core services they provide in isolation. Moreover, stakeholders report that dealing with multiple different contacts can cause confusion; instead it is better that utilities and support agencies work together to provide single sources of help and avoid repeating services.</p>	<ul style="list-style-type: none"> Delivery of 23 core fuel poverty schemes with expert lead partners with two-way flow both of customer referrals and of insights on customer vulnerability. <ul style="list-style-type: none"> Monthly monitoring of performance by WPD's Social Obligations team, provides communication on new and emerging issues with opportunities to identify new support interventions, collaborate and share best practice. Contractual arrangements provide a clear performance reporting requirement. WPD's social indicator data enables partners to better identify gaps in take up or high concentration of vulnerability and to target support most effectively. New interventions and pilot schemes co-created with partners and expert stakeholders. Annual fuel poverty innovation competition 'Energy Affordability Fund' seeking innovative projects to tackle fuel poverty. <ul style="list-style-type: none"> Scope co-created with expert stakeholders including WPD's Customer Panel each year Support provided by WPD social obligations experts to help applicants generate viable proposals Applications assessed and scored in collaboration with WPD's Customer Panel We will continue with and expand the effectiveness of our PSR referral partnerships by: <ul style="list-style-type: none"> Using WPD's consumer vulnerability mapping to identify gaps in PSR take up and seek out appropriate local trusted referral partners Maintaining two-way referral channels, including with the Fire Service Exceeding baseline: as per baseline 3.1: We will establish two way data sharing, partnering with all eight water companies in WPDs region 	Metric 10: BMCS PSR score	90%
		Metric 18: number of fuel poor customers supported	113,000 (baseline 70,000)
		Metric 19: total financial savings of fuel poor customers supported	£60 million (baseline £27 million)
		Metric 18: (as above)	(as above)
		Metric 19: (as above)	(as above)
		Metric 1: number of partner agencies using WPD data mapping	200 annually
RRE 2: number of referral partners	-		
Stakeholder insights	Exceeding baseline requirements	Metric	Target
<p>Stakeholders and customers want to buy-in to net zero, but this could ultimately result in higher costs to customers, and it is important that vulnerable customers are not over-burdened or disadvantaged further.</p> <p>Community energy champions who can advise their next-door neighbours are effective as communities trust each other and there is already an existing relationship. Stakeholders see this as a key way to help locate isolated individuals and engage those that may not be aware about WPD in the smart energy transition.</p>	<ul style="list-style-type: none"> We will take a leading role in coordinating a range of industry participants (including funding for collaborations with community energy stakeholders and water companies) to share best practice and co-deliver schemes to ensure vulnerable customers are not left behind by the smart energy transition. 	RRE 3: qualitative description of activities	-

Impact
New, innovative approaches identified to tackle existing and emerging consumer vulnerability issues. New projects are made more effective through expert collaboration and learnings from existing consumer vulnerability programme.

Baseline Expectation 3.4: Have a clear process for identifying which partnerships are likely to be most effective at delivering benefits through co-operative working. This should be clearly linked to the priority areas of focus of the strategy, in particular addressing fuel poverty and supporting those at risk of being left behind by the energy system transition.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Regulatory reporting by DNOs suggest that all DNOs offer some of or similar interventions to WPD In 2019/20 surveyed distribution PSR customers provided overall satisfaction scores ranging from 8.9/10 to 9.5/10. 	<ul style="list-style-type: none"> All WPD fuel poverty partners use sub-partners to ensure they can offer nine specified interventions Contractual agreements are in place for all WPD fuel poverty projects ensuring robust monthly reporting for every customer case PSR customers are surveyed to establish satisfaction with data cleanse calls and fuel poverty outreach. Satisfaction currently is at its highest ever – 9.5/10. 	<ul style="list-style-type: none"> 600,000 Priority Services Register customers to be offered a bespoke smart energy action plan each year 113,000 fuel poor customers will be supported to save £60 million on their energy bills over RIIO-ED2 via (at least) nine core interventions WPD will collaborate to ensure those at risk of being left behind by the smart energy system transition are supported (e.g. create an online support platform for SMEs and develop a model/profiling tools to identify at risk customers).

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
Stakeholders felt strongly about providing support to those struggling with affordability, particularly given that Covid-19 has exacerbated difficult circumstances for many. WPD must take steps to address the root causes of fuel poverty and build customer awareness of the support we can provide by forging new partnerships with agencies who have a direct relationship with fuel poor customers. They expressed concern over how vulnerable customers would perceive the relevance to their lives of the energy transition. They therefore suggested that partnering with trusted agencies would be key in enabling WPD to successfully engage with vulnerable and fuel poor customers on the energy transition, providing specific support and education. WPD should seek to replicate and embed learnings from this quickly with partners and wider stakeholders in the community.	<ul style="list-style-type: none"> Core fuel poverty schemes delivered by expert lead partners - monthly performance monitoring reviews enable the assessment of schemes' effectiveness and provide ongoing communication on new and emerging issues with opportunities to identify new support interventions, collaborate and share best practice. <ul style="list-style-type: none"> 23 core schemes based on a 'hub' delivery model with one lead partner in each WPD region responsible for detailed assessment of customers' needs, coordinating multiple local services to provide support Two referral models: 'Power Up' and 'Affordable Warmth' with nine core interventions Contractual arrangements provide performance reporting requirement. Granular outcomes reported for each customer supported. Only quantitative savings and outcomes captured for each customer Wider qualitative social value calculated via common SROI model and reported separately Contract performance managed by dedicated WPD's Social Obligations team. Customer survey to verify/correct/update the outcomes recorded and to assess their satisfaction 	Metric 18: number of fuel poor customers supported Metric 19: total financial savings of fuel poor customers supported	Baseline: 70,000 (+ exceeding target) Baseline: £27million (+ exceeding target)
	<ul style="list-style-type: none"> Power Up Smart providing nine core interventions and tailored energy advice targeted at PSR customers with smart meters Power Up Health providing nine core interventions in partnership with local health services and support groups and customers referred to WPD by their medical oxygen provider. 	RRE 3: qualitative description of activities	-
	<ul style="list-style-type: none"> Identify and assess opportunities for new partnerships, support schemes or innovation trials supported by: performance monitoring and engagement with support partners; engagement with expert stakeholders including WPD's Customer Panel; customer satisfaction and feedback 		
Stakeholder insights	Exceeding baseline requirements	Metric	Target
The energy transition provides opportunities and potential challenges as vulnerable customers may have access to new technology and revenue streams, but have to get to grips with the complex technology deployed in their homes, which could be challenging without substantial support from WPD. Stakeholders want WPD to educate customers on smart solutions as well as fuel poverty and energy efficiency interventions. Engagement with small and medium enterprises (SMEs) revealed they face similar issues, asking us to champion better protections for small businesses in a smart energy market and deliver energy resilience advice in relation to dealing with power cuts. They suggested our definition of vulnerability should be extended to include SMEs.	BP Commitment – Support 113,000 fuel poor customers to save £60 million on their energy bills over RIIO-ED2.	Metric 18: (as above) Metric 19: (as above)	113,000 (baseline 70,000) £60 million (baseline £27m)
	BP Commitment – 600,000 Priority Services Register customers to be offered a bespoke smart energy action plan each year.	Metric 21: number of PSR customers offered smart energy plan	600,000
	<ul style="list-style-type: none"> We will collaborate with the Centre for Sustainable Energy on the 'Smart and Fair'? Initiative to develop a Capability Lens and offer profiling tools to enable us to model and identify the capabilities of vulnerable customers to participate in a smart, low carbon future. These will be used to: calibrate existing schemes; design and implement new interventions to support wider participation in a smart energy market. 	RRE 3: qualitative description of activities	-
	<ul style="list-style-type: none"> We will collaborate with industry partners to create an online platform bringing together tools, advice and support for small and medium businesses to participate in the energy system transition, and provide energy resilience advice in relation to dealing with power cuts. 	RRE 3: qualitative description of activities	-
	<ul style="list-style-type: none"> We will work with key stakeholders to understand and serve the needs of disabled EV drivers, ensuring they are provided access to adequate charging infrastructure in a timely manner, delivered as part of local area energy plans. 	RRE 3: qualitative description of activities	-
	<ul style="list-style-type: none"> We will create a low carbon technology energy advisory service for customers, providing a support service for people looking to switch to electric vehicles, heat pumps or solar PV. 	RRE 3: qualitative description of activities	-

Impact

Customer support maximised through robust monitoring and performance management of consumer vulnerability programme. Effectiveness of existing and new support schemes maintained through assessment and best practice.

5.4 Principle 4:

Embed the approach to protecting the interests of consumers in vulnerable situations throughout a company's operations to maximise the opportunities to deliver support.

Core delivery strategy

Embedded culture of support for vulnerable customers

- 5.102.** The longevity of WPD's Customer Vulnerability Strategy has ensured that it is firmly embedded throughout our operations and well understood by staff across all customer touchpoints.
- 5.103.** This approach starts with strong leadership; WPD's senior management team leads by example, demonstrating commitment and direction which ensures expectations are clear and support for our customers in vulnerable situations is a core focus. Our Director of Resources and External Affairs, as WPD's Vulnerability Champion, leads engagement with expert stakeholders including our Customer Panel and provides review and sign-off of our annual Customer Vulnerability Strategy ensuring its continued efficacy through delivery of specific, stretching targets, measured and reported monthly.

Expert external training

- 5.104.** Through regular expert training our staff are able to improve their understanding of consumer vulnerability and increase the level of detail in their knowledge of a broader range of specific causes of vulnerability for customers, enabling them to provide specialist support. This enables us to consistently identify customers' needs, communicate with empathy and sensitivity and embed our approach across every major customer touchpoint in our business.
- 5.105.** To ensure we embed the importance of our consumer vulnerability programme within our culture, every WPD new starter and apprentice, regardless of their role, receives training on our PSR and support services.
- 5.106. Customer Vulnerability Strategy – KEY DELIVERABLE:** We will further enhance training, employing a range of expert external providers to deliver training to all 6,500 WPD employees on an annual basis. We will also ensure that we enhance and refresh training to enable staff to provide further specialist advice where new forms of vulnerability are identified including the provision of support to ensure customers are able to participate in smart energy services.

Keeping our customers safe

- 5.107.** It is important that we maintain the safety of our customers throughout our operations. WPD policy ensures that all relevant staff, such as those entering customers' premises or working with vulnerable groups, have regular vetting with Disclosure and Barring Service (DBS) checks.

Maximising opportunities to support vulnerable customers

- 5.108.** Throughout the Covid-19 pandemic, in particular during lockdown, the unique position WPD has within our communities became clearer than ever, as our continued work to keep power flowing meant that our staff were able to interact with customers who may have been isolated from contact with other support. Through the contact we have with customers during planned and unplanned works, whether via our Call Centre or field staff, we are uniquely placed to recognise vulnerability and identify customers who could benefit from the consumer vulnerability services we can offer.

WPD's embedded approach has already driven benefits for our customers: **"I would like to thank the two engineers who came to my house today. Their vigilance and diligence in completing the work was excellent. They also mentioned the Priority Services Register, as one of them noticed the Disabled badge on my car. I wasn't aware of it until he mentioned it and have since signed up online. I can't speak highly enough of them."** - Upgrade customer, Plymouth

- 5.109. Customer Vulnerability Strategy – KEY DELIVERABLE:** We will enhance our internal App for our over 3,600 field staff, which provides them with access to advice and information to support customers and links to the practical community support schemes we operate. The App complements our training for all frontline workers about identifying vulnerability, our programmes and the PSR, and ensures staff are equipped to help customers they encounter in a range of vulnerable situations.

Social Contract

- 5.110.** Our Social Contract, published as part of our RIIO-ED2 Business Plan, will serve as a mechanism enabling us to further embed consumer vulnerability in our company-wide operations. With an established set of delivery principles, the Social Contract will determine the way in which WPD embodies good corporate citizenship across our capabilities, ensuring consideration of consumer vulnerability in new and existing initiatives.
- 5.111.** Through the linkage between initiatives in the Social Contract and our Customer Vulnerability Strategy, our staff will build further understanding of vulnerability in the communities they serve. By working and partnering with communities, staff will be able to deliver positive benefits and build stronger links through initiatives including:
- A shareholder-funded annual £1m support fund for local community initiatives and good causes, including supporting customers in vulnerable situations, through activities that build on our 'core purpose' consumer vulnerability and fuel poverty schemes
 - 1,000 volunteer days each year, enabling staff to support local community initiatives associated with consumer vulnerability, education, safety, diversity and the environment. During this time, employees will have the opportunity to share their skills, provide support and mentorship within the community and improve their own wellbeing and self-confidence through acts of community service.



Principle 4: Embed the approach to protecting the interests of consumers in vulnerable situations throughout a company's operations to maximise the opportunities to deliver support.

Baseline Expectation 4.1: Have processes in place for embedding a commitment to protecting the interests of vulnerable customers within the company's culture. This should include a well-justified approach to ensuring all staff have received an appropriate form of vulnerability training to maximise the potential from all customer touchpoints. Companies should make use of external advice and support to set strategic direction, such as a vulnerability advisory or research panel. DNOs should appoint a vulnerability champion at senior management or Board level.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Regulatory reporting from DNOs suggests most DNOs have comprehensive training for, as a minimum, frontline staff. One DNO now has a dedicated Consumer and Vulnerability Trainer in post. 	<ul style="list-style-type: none"> PSR training on identifying and assisting vulnerable customers reaches all staff at WPD and includes refresher sessions and inductions for new starters, including apprentices WPD's established Customer Panel of 30 expert members assists WPD in setting strategic direction and is attended by WPD's External Affairs Director (our vulnerability champion) or the Chief Executive. 	<ul style="list-style-type: none"> All 6,500 WPD employees will receive annual consumer vulnerability training. High quality external training from a range of specialist providers will be used to deliver tailored training that reflects the expanding services and changing needs of customers. Expert stakeholders will provide key insight to inform strategic direction and co-create annual vulnerability action plans.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
Stakeholders want to see WPD maximise customer interactions with employees, by ensuring the entire workforce is engaged with the company's Customer Vulnerability Strategy and able to identify where customers may need additional support. They suggested that to embed a commitment to protecting customers' interests in company culture, WPD should ensure that all customer-facing staff receive training, not just those who work specifically on the PSR.	<ul style="list-style-type: none"> WPD's Resource and External Affairs Director, as Vulnerability Champion, provides strategic direction and ensures consumer vulnerability is embedded in WPD's company-wide operations and embodied in our culture 	RRE3: qualitative description of activities	-
	<ul style="list-style-type: none"> Expert stakeholders on WPD's Customer Panel provide key insights to inform strategic direction and co-create annual vulnerability action plans 	Metric 17: consumer vulnerability action plan published	Annually
	<ul style="list-style-type: none"> Annual consumer vulnerability workshop enables expert stakeholders to feedback on consumer vulnerability landscape, WPD's performance and co-create annual action plans. 	RRE 3: qualitative description of activities	-
	<ul style="list-style-type: none"> WPD Data cleanse teams trained to provide specialist advice and support to PSR customers via expert external providers. 	Metric 10: BMCS PSR score	90%
	<ul style="list-style-type: none"> Team of 37 Contact Centre support staff trained to deliver same specialist advice during periods of low call volumes in the Contact Centre and during crises when PSR customers are our first priority. 	Metric 11: independent assessment of WPD	Full compliance
	<ul style="list-style-type: none"> We will continually review and expand the training provided to staff, so they have the knowledge needed to provide an empathic service, tailored to a continually changing range of specific needs. <ul style="list-style-type: none"> Exceeding baseline: we will identify expert external training on individual factors which can give rise to vulnerability. 	Metric 12: independent assessment of WPD CSE Standard	'Compliance plus' rating
	<ul style="list-style-type: none"> As part of our induction process, all new employees receive training about the PSR and the services we offer customers in vulnerable situations ensuring this focus is embodied by our entire workforce 	Metric 13: independent assessment of WPD's BSI18477 Standard	Full compliance
	<ul style="list-style-type: none"> External accreditations ensure independent experts assess and endorse our processes and continue to provide guidance and advice allowing us to set strategic direction (eg BSI inclusivity standard, Accessibility AA, Action on Hearing Loss charter mark and Customer Service Excellence) 	RRE 3: qualitative description of activities	-
Stakeholder insights	Exceeding baseline requirements	Metric	Target
It was reiterated that keeping employee training up-to-date was particularly important considering the Covid-19 pandemic, which had highlighted the presence of a range of new vulnerabilities.	<ul style="list-style-type: none"> All 6,500 WPD employees will receive annual consumer vulnerability training from a range of specialist providers, tailored to reflect expanding services and changing needs of customers. 	Metric 22: % staff receiving consumer vulnerability training each year	100%

Impact
All staff understand consumer vulnerability and the responsibilities WPD have to our customers with clear leadership and commitment at WPD Board level. Customer facing staff trained to provide specialist, empathic support to the vulnerable and fuel poor, meaning that customers are better supported with their individual requirements and needs.

Baseline Expectation 4.2: Seek opportunities to protect vulnerable customers throughout their capabilities.

RIIO-ED1 Benchmarking

Industry	WPD in RIIO-ED1	WPD in RIIO-ED2
<ul style="list-style-type: none"> Regulatory reporting by DNOs reveals an array of initiatives where their expertise can protect vulnerable customers. 	<ul style="list-style-type: none"> WPD innovation schemes include assessment of their impact on vulnerable and fuel poor customers to identify opportunities to support or understand barriers which need to be addressed. 	<ul style="list-style-type: none"> Every WPD innovation scheme will formally consider the impacts and opportunities for customers in vulnerable situations WPD's Social Contract will drive wider understanding of vulnerability for WPD staff through initiatives building links with the communities they live and work in.

Delivery strategy

Stakeholder insights	Baseline delivery initiatives	Metric	Target
Stakeholders want to see WPD maximise customer interactions with employees, by ensuring the entire workforce is engaged with the company's Customer Vulnerability Strategy and able to identify where customers may need additional support.	<ul style="list-style-type: none"> WPD policy ensures all necessary vetting and screening processes are conducted on relevant staff with Disclosure and Barring Service (DBS) checks for all new employees and those who enter customer premises on a tri-annual cycle. 	RRE 3: qualitative description of activities	-
Stakeholder insights	Exceeding baseline requirements	Metric	Target
Stakeholders want to see the needs of customers in vulnerable situations as a consideration in innovation projects. In particular, they supported the development of innovative new initiatives to identify customers that could be disadvantaged by the transition to a smart energy network, and to widen participation for those groups. Stakeholders believe that WPD is well-placed, and has an unrivalled track record of delivery, to provide key support to help customers in the long-term recovery from the impacts of the pandemic. They have shown overwhelming support for a Social Contract, with many identifying that companies are expected to demonstrate excellent social and environmental responsibility as a minimum. They see the Social Contract as a vehicle to generate wider social impact in our communities, leveraging opportunities to combine with our PSR and fuel poverty services to support the most in need.	<ul style="list-style-type: none"> Every WPD innovation scheme will formally consider the impacts and opportunities for customers in vulnerable situations. This approach enables maximisation of consumer touchpoints, signposting support for customers participating in trials and expanding referral channels for support schemes. 	RRE 3: qualitative description of activities	-
	<ul style="list-style-type: none"> WPD's Social Contract will drive wider understanding of vulnerability for WPD staff through initiatives building links with the communities they live and work in, through: <ul style="list-style-type: none"> A shareholder-funded annual £1m support fund for local community initiatives and good causes, including supporting customers in vulnerable situations 1,000 volunteer days each year, enabling staff to support local community initiatives associated with consumer vulnerability, education, safety, diversity and the environment. 	RRE 3: qualitative description of activities	-

Impact
Customers are able to maintain trust and a sense of safety from interactions with WPD. WPD staff gain improved understanding of consumer vulnerability in the communities they live and work in, providing help and support through volunteering. WPD's innovation programme ensures opportunities to support vulnerable customers are maximised and safeguards against any unintended barriers to their participation.

6. Customer Vulnerability Strategy costs and the options considered with stakeholders

Costs

6.1. The annual costs for WPD's Customer Vulnerability Strategy in RIIO-ED2 are set out within our Business Plan Data Template submissions to Ofgem, in section 'M4: Vulnerability strategy'. In summary they include:

Deliverable Name	Description	Annual cost (£m)*
Fuel poverty outreach programme (Power Up and Affordable Warmth)	Partner outreach schemes, additional costs included in RIIO-ED2 plan to increase our support programme to deliver a higher number of customers supported (113,000) and uplift in savings achieved (£60m)	2.0
PSR promotion and outreach	Identify and engage 50,000 hard-to-reach vulnerable customers each year to join the Priority Services Register within RIIO-ED2. Includes targeted advertising and to enable pay-per-referral agreements with partners	0.2
Smart energy action plans for PSR customers (no one left behind in a smart future)	Offer 600,000 vulnerable and fuel poor customers per year specific support and education in relation to the smart energy transition. This requires additional Contact Centre staff and additional expenditure to support partnership outreach schemes	1.0
PSR data cleanse (1m contacted a year)	Contact every PSR customer once every 24 months, with 60% contacted by telephone	2.1
SME Net Zero business portal	Advice hub and outreach service to support small and medium enterprises to achieve net zero goals, including advice on low carbon technologies etc	0.1
Smart energy outreach trials for vulnerable customers	A range of pilot schemes to enable vulnerable customers to participate in and benefit from new services associated with energy transition and the achievement of net zero	0.3
Dedicated lines for 24/7 PSR customer contact	Continuation of RIIO-ED1 approach. PSR customers provided with dedicated 24/7 phone number to call in the event of a power cut	0.1
Power cut support - e.g. crisis packs and welfare support	Continuation of RIIO-ED1 approach. We provide crisis packs and work with partners including National Caterers Association and British Red Cross	0.1
Social indicator mapping	Expansion in RIIO-ED2 to include support for net zero related activities and increase accuracy to e.g. track PSR reach achieved	0.1
Annual vulnerability stakeholder workshops	Annual engagement to ensure we maintain a good understanding of the social issues associated with the scope of our role	0.1
Vulnerability staff training	We will further enhance training, employing a range of expert external providers to deliver training to all 6,500 WPD employees on an annual basis. We will also ensure that we develop new training to enable staff to provide further specialist advice where new forms of vulnerability are identified, including the provision of support to ensure customers are able to participate in smart energy services.	0.1
Total		6.1

Figure 1 WPD Customer Vulnerability Strategy summary costs

*All costs are stated in 2020/21 prices (current day prices)

Stakeholder engagement appendices

- 6.2.** WPD has undertaken extensive stakeholder engagement to co-create our Business Plan core commitments and key strategies. Whilst this document summarises the headline activities and findings that have influenced our Customer Vulnerability Strategy specifically, a more in-depth overview of the insights we have gained is set out in 'Annex 3 Giving customers a stronger voice: Enhanced engagement' (in particular chapter 5, which provides all of the stakeholder support for our vulnerability core commitments and explains the options we considered with stakeholders). See www.westernpower.co.uk/RIIO-ED2BusinessPlan
- 6.3.** For a more in-depth view of the specific insights we have gained from stakeholders in relation to customer vulnerability, key documents include:

Appendix CV01 – Social obligations conference (2019): Summary Report

- 6.4.** In October 2019, WPD held two workshops to discuss its social obligations programme with stakeholders (including local authorities, consumer bodies, charities and non-governmental organisations). This included work done to support both customers in vulnerable situations, as well as those in fuel poverty.
- 6.5.** This summary report details the feedback received from both events, and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40566>

Appendix CV02 – Social obligations conference (2020): Summary Report

- 6.6.** On 29 September 2020, WPD held an online workshop to discuss its social obligations programme with stakeholders. The purpose of the workshop was to inform stakeholders about the company's activities in relation to the support provided to customers in vulnerable situations and in fuel poverty.
- 6.7.** This summary report details the feedback received, and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40569>

Appendix CV03 – Consumer Vulnerability and Social Contract Strategy Workshop: Feedback Report

- 6.8.** As part of its Business Plan requirements, Ofgem requested all DNOs develop a set of individual strategies and action plans for key topics – known as 'delivery strategies' – to ensure they deliver on stakeholders' expectations and demonstrate that they will meet the baseline requirements set by the regulator. This workshop focused on two of these delivery strategies; Consumer Vulnerability and Social Contract, and sought feedback from stakeholders on these topics. The workshop was held virtually on 23 February 2021.
- 6.9.** This summary report details the feedback received, and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40581>

Appendix CV04 – Synthesis Report 1: Phase 1 Preliminary Engagement

- 6.10.** WPD produces 'synthesis reports' at the close of each Business Plan engagement stage to summarise the stakeholder views received, demonstrate priorities have been sense-checked and remain the correct ones, and to provide an indication of how synthesised feedback from previously completed stages should shape the next stage of engagement being moved on to.
- 6.11.** This report is the result of the initial synthesis work completed which collated and analysed all the stakeholder feedback collected, breaking it down into appropriate high-level topics. Each topic is discussed separately and includes a breakdown of the number of stakeholders who contributed to WPD's understanding, the number of feedback pieces collected, as well as details on the events and stakeholder segments involved.
- 6.12.** The report and can be found on our website at <https://yourpowerfuture.westernpower.co.uk/downloads-view/40620>

Appendix CV05 – Synthesis Report 2: Phase 2 Business Plan Development

- 6.13. WPD produces ‘synthesis reports’ at the close of each Business Plan engagement stage to summarise the stakeholder views received, demonstrate priorities have been sense-checked and remain the correct ones, and to provide an indication of how synthesised feedback from previously completed stages should shape the next stage of engagement being moved on to.
- 6.14. This report builds on the previous ‘preliminary engagement’ work completed by exploring the detailed stakeholder opinions around each priority, including proposed commitments.
- 6.15. The report and can be found on our website at <https://yourpowerfuture.westernpower.co.uk/downloads-view/40623>

Appendix CV06 – Synthesis Report 3: Phase 3 Defining Outputs

- 6.16. WPD produces ‘synthesis reports’ at the close of each Business Plan engagement stage to summarise the stakeholder views received, demonstrate priorities have been sense-checked and remain the correct ones, and to provide an indication of how synthesised feedback from previously completed stages should shape the next stage of engagement being moved on to.
- 6.17. This stage builds on the previous “Business Plan Development” work by exploring detailed stakeholder opinions around draft outputs and measures.
- 6.18. The report and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40629>

Appendix CV07 – Synthesis Report 4: Phase 4 Business Plan Refinement

- 6.19. WPD produces ‘synthesis reports’ at the close of each Business Plan engagement stage to summarise the stakeholder views received, demonstrate priorities have been sense-checked and remain the correct ones, and to provide an indication of how synthesised feedback from previously completed stages should shape the next stage of engagement being moved on to.
- 6.20. This stage builds on the previous “Defining Outputs” work by testing stakeholder opinions around draft commitments and their ambition.
- 6.21. The report and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40629>

Appendix CV08 – Social Contract Development Research: Qualitative Insights (Accent)

- 6.22. WPD commissioned Accent (independent market research experts) to carry out a research project that would provide insight into the development of a Social Contract - learning from ‘Best In Class’ service providers. It was designed to: explore what customers felt should be covered in a Social Contract; understand how customers felt this should be measured, and identify how customers expected this to be communicated.
- 6.23. The results from this research piece are summarised within this report and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40632>



Options considered

6.24. As part of our specific customer vulnerability workshops and formal consultation on WPD's first draft Business Plan in January 2021, we sought stakeholder views on a wide range of actions we would take to address their priorities. Identified as part of 'Stage 1: Preliminary engagement' in our Business Plan development and refinement stages, this culminated in seeking views from stakeholders on the specific actions we proposed to take, where they wanted us to go further, as well as asking them to suggest entirely new commitments if they wished. The figure below provides a few examples of this optioneering:

Core commitment	Current RIIO-ED1 performance	Option 1: Incremental improvement	Option 2: Current best view	Option 3: Further ambition	Option 4: Considerably greater ambition	Positive impact for customers	Option 5: Your suggestion for alternatives
Proactively contact over two million Priority Services Register customers once every two years to remind them of the services we provide and update their records	30% via direct telephone call; 70% by letter/email	30% via direct telephone call	40% via direct telephone call	60% via direct telephone call	80% via direct telephone call	Regular contact to keep vital data on the needs of our most vulnerable customers accurate and up to date. Ensure WPD's PSR is representative of the needs of vulnerable customers with appropriate representation from high deprivation areas. More 'in person' contact enables bespoke advice to be delivered to meet that individual's needs	?
	Bill impact:	-1p	-	+2p	+4p		
Identify and engage hard-to-reach vulnerable customers each year to join the Priority Services Register within RIIO-ED2	20,000 a year	20,000 customers	30,000 customers	40,000 customers	50,000 customers	Customers with the most serious vulnerabilities are proactively identified and offered support	?
	Bill impact:	-0.5p	-	+0.5p	+1p		
Support fuel poor customers to make savings on energy bills over RIIO-ED2.	70,000 customers saved £27m in the last 5 years	56,000 customers to save £30m	75,000 customers to save £40m	94,000 customers to save £50m	113,000 customers to save £60m	Customers living in cold homes and/or struggling to afford their energy bills received tailored support to make long term changes to improve their ability to afford to heat their home	?
	Bill impact:	-1.5p	-	+1.5p	+3p		

Figure 2: Examples of the options stakeholders were asked to feedback on in relation to each of WPD's proposed core commitments in the first draft Business Plan consultation

6.25. For a fuller list of the options that were presented to stakeholders as part of our business plan refinement stage, please see:

Appendix CV09 – First draft Business Plan Consultation Document

6.26. In January 2021 WPD published its first draft Business Plan for RIIO-ED2. An accompanying consultation document was published alongside it, seeking stakeholder views in a number of key areas.

6.27. The consultation document summarises the core commitments created following extensive engagement with our stakeholders since 2019, and provides essential context and current performance to enable stakeholders to respond, and understand our core proposals.

6.28. The document can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40647>

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