



Customer Vulnerability Strategy RII0-ED2

December 2021

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How this strategy impacts other areas of our plan

Our focus is to achieve the best possible positive outcomes for our customers, by utilising innovative solutions and smarter working practices to drive efficiency in all we do. This strategy forms part of a suite of wide ranging, ambitious and interconnected strategies that we will be implemented in RIIO-ED2. Each one is designed to contribute towards the delivery of the same four overarching strategic outcomes we will achieve for customers:



1. Sustainability

Lead the drive to net zero as early as possible.



2. Connectability

Customers can easily connect their electric vehicles, heat pumps and renewable generation.



3. Vulnerability

First class vulnerable customer support programme where everyone benefits in a smart future.



4. Affordability

Maintain excellent customer service, safety and network performance and transform the energy grid for future generations, while keeping bills broadly flat.

Each of our strategies is embedded across our operations and never delivered in silos. This will lead to joined up delivery, utilise opportunities to share knowledge and expertise across WPD teams, and achieve maximum benefits for customers. By doing so we will ensure each of our strategies has a far reaching impact and identifies opportunities to improve our service, performance and efficiency in every possible area of our business. Our strategies are therefore highly interrelated and co-dependent.

The following table provides a snapshot of some of the extensive impacts of this Customer Vulnerability Strategy, and signposts to other areas of our plan upon which its successful delivery will be dependent.

Strategy	Reference within the strategy:		
Climate Resilience	-	-	-
Customer Vulnerability			
Destination Net Zero: Business Innovation and Efficiency	✓	Utilising vulnerable customer data to prioritise network improvement schemes	Page 64
Digitalisation Strategy and Action Plan	✓	Automating the process of Priority Services Register data sharing	Page 17
DSO	✓	Improving the accessibility of our suite of flexibility services	Page 18
Environment & Environmental Action Plan	-	-	-
Innovation	✓	Considering vulnerability impacts and opportunities in all new innovation schemes	Page 17
Major Connections	✓	Enhancing the ease and accessibility of the connections process specifically for low carbon technologies (LCTs) and offering bespoke smart energy action plans to enable greater access to LCTs	Page 18
Network Visibility	-	-	-
Net Zero Communities	✓	Supporting Priority Services Register customers to participate in local community energy schemes	Page 18
Social Contract	✓	Addressing fuel poverty and delivering an extensive programme of community support schemes	Page 65
Whole Systems	-	-	-
Workforce Resilience	✓	Establishing vulnerability champions at local depots to ensure our approach to vulnerable customer support is far reaching and embedded in all we do	Page 63

1. Executive summary

- 1.1.** Driven by our stakeholders, we are proposing to go further than ever before with our RIIO-ED2 Customer Vulnerability Strategy. Building on our strong foundations, and starting with an unrivalled track record of service for customers, we will deliver five unique core commitments and 41 wider commitments – with 24 of these stretching our performance significantly beyond Ofgem’s baseline expectations and our own high standards of industry leading performance.
- 1.2.** Our Customer Vulnerability Strategy was first established in 2013, and it is well understood that customer vulnerability is the responsibility of everybody at WPD. It is embedded in our operations - from field teams working on the network, to customer service staff and innovation engineers. Built with, and regularly scrutinised by, the many customers and stakeholders we serve, our holistic approach echoes the multi-dimensional nature of vulnerability, enabling us to effectively understand and provide for the full spectrum of customer needs.
- 1.3.** Though highly ambitious, the execution of this strategy places a strong emphasis on collaborative working, leveraging local expertise and relationships to generate the greatest value for customers. Our network of expert partner organisations sit at the core of service delivery plans and play an integral role in addressing the scale of challenges facing our customers, extending our reach and unlocking wider benefits that would otherwise not be possible.
- 1.4.** The five years that constitute RIIO-ED2 will be characterised by rapid change for customers; as the decarbonisation of our economy gathers pace and the UK navigates the challenges of Covid-19 recovery. We recognise that in delivering an essential service, we have a significant responsibility to do so in a way that is fair and inclusive, providing additional support to those who need it. Importantly, as we deliver this support, we must continue to develop and refine our understanding of the vulnerable circumstances our customers face, ensuring our strategy remains effective in meeting future challenges and no customer is left behind in the transition to net zero.
- 1.5.** In the development of this strategy, more than 16,000 stakeholders were engaged to ensure our plans were ambitious, inclusive and truly reflective of their priorities and expectations. We have listened to our stakeholders, and as we look forwards - to RIIO-ED2 and beyond - the following document will outline how we plan to deliver a service that supports and benefits customers in vulnerable situations, placing them at the forefront of our future plans.

100%

of PSR customers proactively contacted every two years (60% by telephone).

113,000

fuel poor customers supported to save

£60 million

50,000

hard-to-reach customers identified and added to the PSR each year.

600,000

PSR customers offered a bespoke smart energy action plan each year.

Social Contract updated annually including

£1 million

‘Community Matters’ fund.

Accessible charging

infrastructure for disabled EV drivers.

Core Business Plan commitments

- 1.6.** WPD's RIIO-ED2 Business Plan is underpinned by 42 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.
- 1.7.** 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	18	Ensure customers are not left behind in the smart energy transition by offering 600,000 Priority Services Register customers a bespoke smart energy action plan each year.
	19	Support at least 113,000 fuel poor customers to save £60 million on their energy bills over RIIO-ED2.
	20	Expand the reach of our Priority Services Register to at least 75% of total eligible customers and 80% of customers with critical medical dependencies to ensure those in greatest need receive targeted support services. This will include registering at least 50,000 additional hard-to-reach customers each year.
	21	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.
	22	Maintain high quality data to allow us to deliver bespoke support to customers in vulnerable situations by proactively contacting over two million Priority Services Register customers once every two years to remind them of our services and update their records (with 60% via direct telephone call).

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

Business Plan core commitments	
23	Support and add significant value to our local communities via a 'Community Matters' social initiative associated with the smart energy transition, vulnerability, environment and sustainability. This will include a shareholder-funded annual £1 million community support fund and 1,000 volunteer days per year for WPD staff to support local causes.
24	Deliver enduring, long term support to our communities by publishing an updated WPD Social Contract and performance report every year and maintain our prime Environmental, Social and Governance (ESG) rating.
25	Build decarbonised communities and local energy schemes by providing £540,000 shareholder-funded support per year to install solar PV on schools in areas of high economic deprivation.
33	Deliver improved network reliability where on average power cuts are better than one interruption every two years lasting less than 22 minutes (12% reduction in customer interruptions (frequency) and 16% reduction in customer minutes lost (duration)), utilising vulnerable customer data to prioritise network improvement schemes.

Summary of our Customer Vulnerability Strategy initiatives

- 1.9.** The wide ranging scope of customer 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 unable to participate in the opportunities provided by the energy transition.
- 1.10.** 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.

- 1.11.** 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. 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 41 initiatives to drive the highest levels of service and positive outcomes for our customers. Of these, 24 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 16,000 stakeholders.

1.12. 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.

Key

- The commitment relates to or supports this principle
- The commitment directly contributes to this principle and can be found in the tables in section 5.

Customer Vulnerability Strategy initiatives	Positive impact for customers	Principle			
		1	2	3	4
<p>1 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. 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. <p>Exceeding baseline: Our approach will include more than 60 social indicator datasets.</p>	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.	•	•		
<p>2 Exceeding baseline: Commission an annual horizon scan with the Centre for Sustainable Energy (CfSE) to identify additional datasets to incorporate into data mapping and potential new referral partners.</p>	Improves our understanding of the landscape of customer vulnerability in our regions, including emerging and future challenges our customers may face. Ensures our data is accurate and up to date to enable us to provide better targeted support to customers.	•	•		
<p>3 Exceeding baseline: 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 greater social impact from this data.</p>	Accurate data, presented in an accessible and useful format enables organisations in our region to identify areas of high vulnerability and target the support they provide. Sharing innovative approaches allows other organisations to learn from best practice and ensures customers across our region can access the benefits of successful schemes.		•		
<p>4 Exceeding baseline: Develop innovation projects that use data to better understand the causes of vulnerability and identify relevant interventions to support those customers.</p>	Data driven innovation projects will enable refined identification of customers in vulnerable situations and more targeted support.		•	•	
<p>5 Have a PSR data and information strategy in place and reviewed annually.</p>	Provides assurance to customers and stakeholders that WPD is sharing accurate data and maintaining, refreshing and cleansing the PSR database in a robust and effective way.	•			
<p>6 Maintain dedicated PSR data cleanse teams, who contact all customers registered on the PSR at least once every two years.</p>	Customers are contacted by dedicated teams with expert training to update their records and provide up-to-date information on the services we can offer.	•		•	•
<p>7 Have data share arrangements in place with suppliers, gas distributors and water companies, compliant with GDPR¹ and Ofgem Data Best Practice Guidance.</p> <p>Exceeding baseline: We will extend our data share arrangements to partner with telecommunications companies. We will establish two way data sharing, partnering with all eight water companies in WPD’s region.</p>	Other utilities’ customers gain the benefit of WPD’s extensive PSR reach, as data shared with other utilities enables those customers to access a wider range of support.	•		•	

Customer Vulnerability Strategy initiatives		Positive impact for customers	Principle			
			1	2	3	4
8	<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> <p>Exceeding baseline: We will extend this to partnerships with telecoms providers, maintaining a minimum of 150 partner agencies.</p>	<p>Having a network of referral partners across our licence area ensures that we can take a locally tailored approach, working with organisations that are recognised and trusted, with a good understanding of the regional issues our customers face. Where we identify areas in need of support through our social indicator mapping, this network enables us to proactively target our PSR promotion and outreach services.</p>	•		•	
9	<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> <p>Exceeding baseline: We will provide all partners with training to share best practice, innovative approaches and interventions to support customers in a smart energy future.</p>	<p>Customers who may not seek out support are aware of, and able to 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>Annual training ensures innovative and best practice approaches are shared across our partnership network, so that all customers have access to the same quality and breadth of support and interventions.</p>	•			
10	<p>Achieve external accreditations, ensuring 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, Louder than Words Charter and Customer Service Excellence).</p> <p>Exceeding baseline: We will achieve compliance or compliance plus ratings in all 57 elements of the Customer Service Excellence assessment.</p>	<p>Provides independent scrutiny to assure stakeholders that we are credible, responsible and demonstrably compliant, while providing insights that enable us to identify areas for improvement.</p>	•			•
11	<p>Maintain Accessibility AA standards on our website.</p> <p>Exceeding baseline: Achieve AbilityNet Accreditation for WPD website.</p>	<p>Multiple rounds of user testing by individuals with additional accessibility needs ensures we provide the best experience for all customers.</p>	•			
12	<p>Customers can communicate with us via multiple channels including: Twitter, Facebook, WPD Power Cut Reporter app, text message, website, email, WhatsApp and Webchat.</p>	<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>	•			
13	<p>Exceeding baseline: Translation services available 24/7 by telephone and on WPD's website for more than 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.</p>	<p>All customers are able to access information in a format that is convenient to them.</p>	•			
14	<p>Exceeding baseline: SignVideo service, providing customers with the ability to contact WPD via a sign language interpreter free of charge.</p>	<p>Ensures WPD's service is fully accessible to deaf customers.</p>	•			
15	<p>Dedicated online content targeted at customers in vulnerable situations including:</p> <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 providing PSR sign up and advice. • Social media, including campaigns targeted at our top five PSR gaps. 	<p>Customers can easily and readily access content via our online channels to increase awareness of the support we offer.</p>	•		•	

Customer Vulnerability Strategy initiatives		Positive impact for customers	Principle			
			1	2	3	4
16	PSR customers provided with dedicated 24/7 phone number to call in the event of a power cut.	Enables PSR customers to bypass messaging and ensure they always have direct access to a fully-trained PSR call handler to offer advice and support tailored to a range of specific needs.	•			
17	Exceeding baseline: Our average speed of response for PSR customers will be two seconds.	Customers can feel assured that they always have immediate access to a PSR call-handler to discuss their situation with, and get a response 50% quicker than WPD's average customer response time (four seconds).	•			
18	PSR customers provided the following 24/7 support during power cuts: <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 Power Cut Reporter app. • Accurate information and bespoke alerts via online power cut map and WPD Power Cut Reporter app. • 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. 	<p>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.</p> <p>During loss of supply, customers on the PSR are provided support tailored to their situation and needs.</p>	•			
19	Exceeding baseline: 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.	Reduce the impact of loss of supply for premises supporting vulnerable customers by ensuring they are prepared in the event of a power cut, while helping WPD to better understand the needs of those premises and tailor our support accordingly.	•			
20	Work with expert stakeholders, including our Customer Panel and 150 expert referral partners, to refresh our definitions and understanding of vulnerability each year.	Collaborating with experts and those who support vulnerable customers on a daily basis ensures we take the widest possible view of vulnerability and have an up-to-date awareness of the challenges our customers face, so that we can design and deliver interventions to effectively support them.		•		
21	Hold annual customer 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.	With a more nuanced understanding of social and wellbeing 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. Collaborating with expert stakeholders to share best practice enables us to continually improve our approach.		•		•
22	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.	An annual action plan enables WPD to continually improve our services for vulnerable customers and respond quickly to changes in expectations or requirements, ensuring we can deliver new interventions as our understanding of what 'no one left behind' means, evolves.		•	•	•

Customer Vulnerability Strategy initiatives		Positive impact for customers	Principle			
			1	2	3	4
23	<p>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 further develop the 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.</p>	<p>Learnings from the ‘Smart and Fair?’ project will ensure our understanding of vulnerability evolves to capture the changing needs and capabilities of customers in the net zero transition, as well as the risks of being disadvantaged by the changing energy system.</p> <p>Tools developed by ‘Smart and Fair?’ will enable us to identify potential barriers to customer participation in smart energy offers, and design and develop interventions to support them.</p>		•	•	
24	<p>Exceeding baseline: 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.</p>	<p>This approach will drive better, more inclusive facilities for disabled EV drivers, as well as developing insights to inform the wider roll-out of EV charging infrastructure.</p>			•	
25	<p>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.</p>	<p>The platform enables the small businesses who support our communities, to unlock the benefits of decarbonising their operations.</p> <p>Power cut resilience advice reduces the impact of loss of supply on small businesses, ensuring they are prepared in the event of a power cut.</p>			•	
26	<p>Continue to maintain partnerships with Local Resilience Forums to assist in the coordination of community support during incidents such as flooding.</p>	<p>Strong partnerships ensure we can quickly adapt to support customers during crises, and contribute to coordinated community responses.</p>			•	
27	<p>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.</p> <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 SROI² 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. 	<p>Our hub delivery model provides customers with joined-up support from a range of partners without the confusion of dealing with multiple service providers. Every service delivery partner offers nine core interventions, considering customers’ situations holistically and delivering health, wellbeing and quality of life benefits on top of financial savings and debt relief.</p> <p>Working with a network of partner agencies has multiple benefits for our customers, including:</p> <ul style="list-style-type: none"> • Breadth and depth of support provided by multiple partners with a range of expertise. • Partner credibility ensures services are trusted by customers. • Geographically tailored support and local knowledge. • Scalability of approach that would be unachievable if delivered by WPD alone. • Joined up services for customers that address their needs in the round. <p>This model ensures customers receive tailored interventions that have a substantial impact on their ability to afford their energy bills.</p>			•	

²Social Return on Investment

Customer Vulnerability Strategy initiatives		Positive impact for customers	Principle			
			1	2	3	4
28	Power Up Smart providing nine core interventions and tailored energy advice targeted at PSR customers with smart meters.	Power Up Smart benefits from the same hub delivery model. As well as providing our core interventions, the scheme supports customers who have a smart meter to use it effectively and benefit from a better understanding of their energy usage.			•	
29	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.	Power Up Health benefits from the same hub delivery model. As well as providing our core interventions, the scheme enables us to proactively identify customers with specific health needs and tailor our support to them.			•	
30	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. 	Facilitating expert partners to trial innovative approaches which, where successful can be rolled out more widely and shared with other DNOs, enabling all customers to receive the benefits of innovation.			•	
31	Exceeding baseline: 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.	Utilising the insights from 'Smart and Fair?', we will ensure that customers requiring fuel poverty support will be able to benefit from the opportunities of participating in the energy transition.			•	
32	Exceeding baseline: Every WPD innovation scheme will formally consider the impacts and opportunities for customers in vulnerable situations. This approach maximises customer touchpoints, signposting support for customers participating in trials and expanding referral channels for support schemes.	Innovation projects are inclusive, and, where possible generate positive benefits for vulnerable customers by addressing the unique challenges they face.			•	•
33	Exceeding baseline: 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.	Customers benefit from a broader pool of expertise and funding when organisations share best practice and deliver collaborative initiatives.			•	
34	Exceeding baseline: Enhance our internal app for all 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.	The app will be linked to the training provided to employees, building their confidence to identify vulnerable situations and take customers' details (with their consent). Customers then receive proactive contact to discuss their situation, removing any effort from the customer needing to contact us.			•	
35	Exceeding baseline: Deliver customer vulnerability training to all 6,500 employees on an annual basis, with key training for all staff and specialist training for staff who regularly interact with vulnerable customers (e.g. field staff, Contact Centre staff).	Customers in vulnerable situations receive the support they need, regardless of the WPD employee or team they interact with. For example, our team of 37 Contact Centre support staff are 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.	•		•	•

Customer Vulnerability Strategy initiatives		Positive impact for customers	Principle			
			1	2	3	4
36	Continually review and expand the training provided to staff in line with changing customer needs. 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.	Customers in vulnerable circumstances benefit from an empathic service, tailored to a continually changing range of specific needs.			•	•
37	As part of our induction process, all new employees receive training about the PSR and the services we offer customers in vulnerable situations.	From the outset, WPD employees are aware of the vulnerable circumstances our customers may face, as well as the support we can provide, ensuring this focus is embodied by our entire workforce.				•
38	WPD's Resource and External Affairs Director, as Vulnerability Champion, provides strategic direction and ensures customer vulnerability is embedded in WPD's company-wide operations and embodied in our culture.	All staff understand customer vulnerability and the responsibilities WPD have to our customers with clear leadership and commitment at WPD Board level.				•
39	Exceeding baseline: Appoint vulnerability champions at local depots to act as a point of contact for staff and to raise awareness of our customer vulnerability programme.	Vulnerability champions support teams across our region and provide valuable insights to feed into our programme, ensuring our approach is locally tailored to the needs of customers.				•
40	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.	Customers are able to maintain trust and a sense of safety from interactions with WPD.				•
41	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.	Employee participation in local initiatives enables WPD to add additional value to organisations supporting vulnerable customers, as well as increasing the visibility of WPD and the services we can offer in the community.				•

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 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

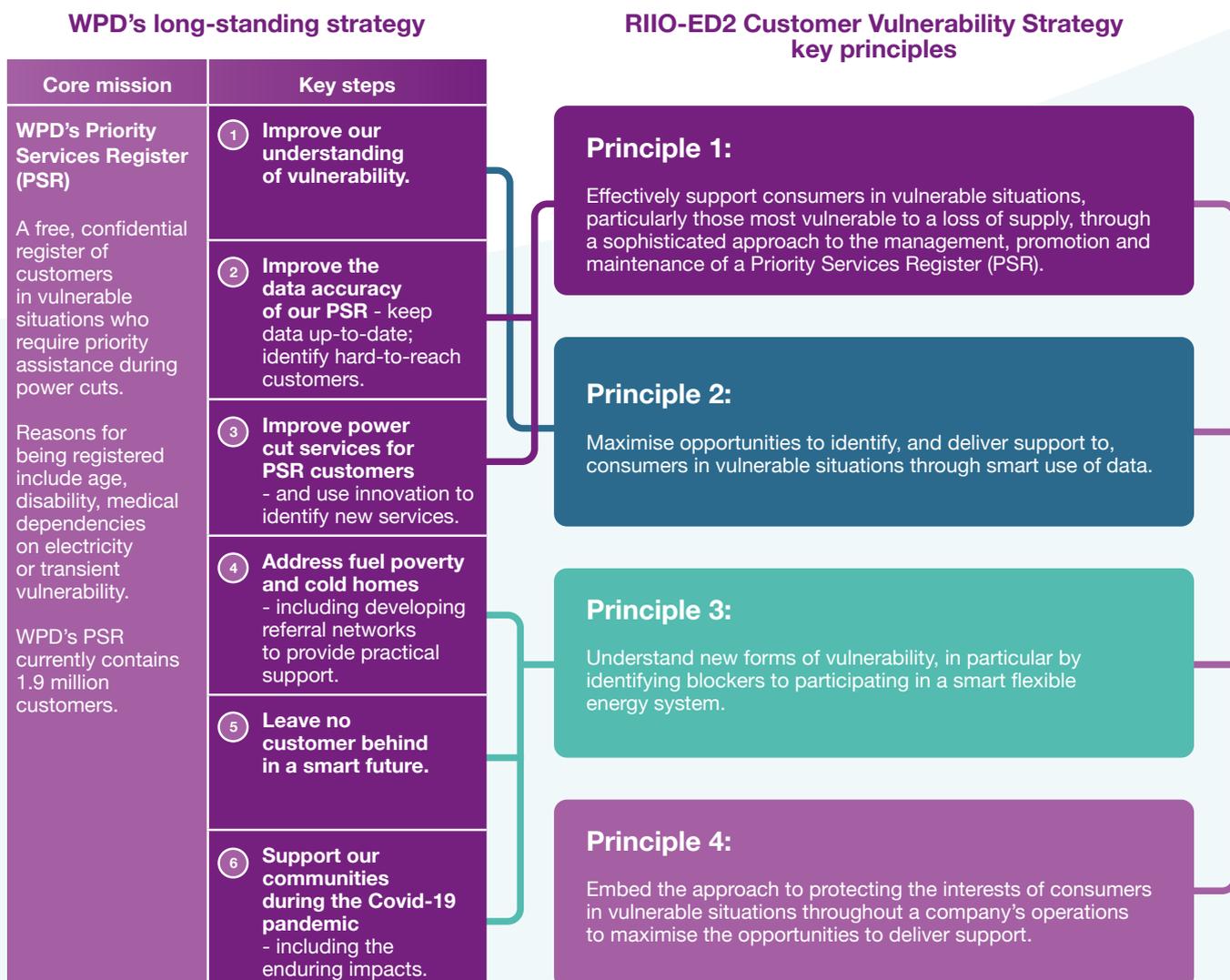
- 2.3. Our long-standing strategy has been key to our strong record of service delivery in RIIO-ED1, with initiatives and partnership networks that have increased in reach, breadth and depth of service. This serves as WPD's own internal baseline, from which we have developed a highly ambitious strategy 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 is 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:

<p>We take the widest possible view of vulnerability in our strategy.</p>	<p>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.</p>
<p>We are building on a long-standing strategy.</p>	<p>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.</p>
<p>Partnerships are extremely important to our strategy.</p>	<p>Through co-developing and co-delivering our customer 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.</p>

- 2.8. 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.
- 2.9. 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.
- 2.10. 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 decarbonised 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

- 2.11. 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 customer vulnerability

- 3.1. Customer 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 customer 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.

Hard-to-reach customers

- 3.3. When talking about our approach to vulnerability, we often reference hard-to-reach customers. At the broadest level, we would define these as the 41% of eligible customers who are not yet registered to our PSR and who require bespoke outreach via trusted community partners. More specifically, hard-to-reach customers can be those who are less likely to self-identify as needing the PSR, those who might be disengaged from the energy sector, and those whose vulnerability might be hidden from traditional service providers such as their energy supplier.
- 3.4. We therefore take as wide a view as possible in identifying those who are hard-to-reach and who could benefit from our support, tailoring our approach to target gaps in PSR take up using our data mapping, communication channels and our network of local referral partners.

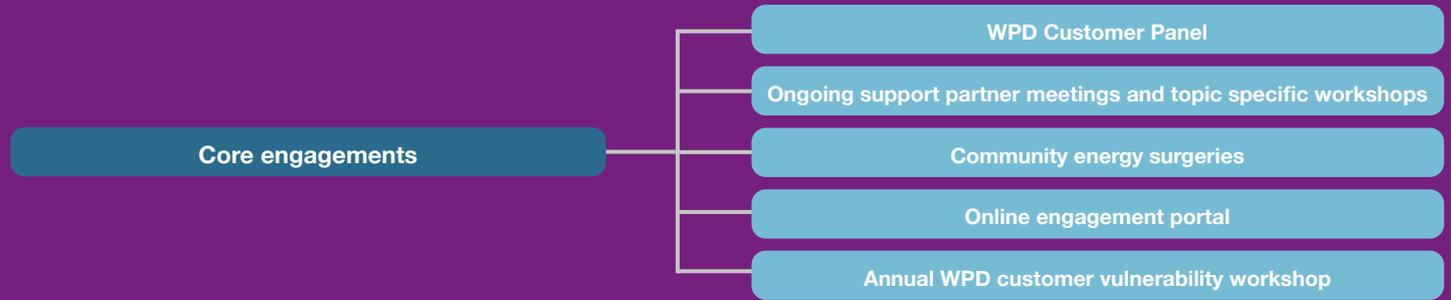
Changing customer vulnerability landscape

- 3.5. 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 shift from in person services, to contact 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.
- 3.6. 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.



Stakeholder insight and vulnerability data

- 3.7. Our understanding of customer 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.
- 3.8. Regular and challenging engagement with our expert customer vulnerability stakeholders, such as our Customer Panel and 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.
- 3.9. Maintaining up-to-date customer vulnerability data provides the key information required to identify vulnerable customers, track the effectiveness of our outreach and better target the services we provide.
- 3.10. Our enduring stakeholder engagement and comprehensive customer vulnerability data have been vital to our successful RIIO-ED1 performance and to the development of our RIIO-ED2 strategy.
- 3.11. 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:



- 3.12. Through this in-depth and continuous engagement, we will continue to generate 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.





Intersection between our Customer Vulnerability Strategy and the wider Business Plan

- 3.13.** Delivering our Customer Vulnerability Strategy is not a stand alone exercise, but one that draws on skills, practices and expertise from across the company. Likewise, our approach to protecting the interests of vulnerable customers is one that influences all areas of our business, from the development of innovation projects to new flexibility services.
- 3.14.** In this section, we will illustrate some of the key intersections between WPD's Customer Vulnerability Strategy and other key areas of our Business Plan, demonstrating where we have identified collaborative or cross-cutting approaches to drive efficiencies and co-benefits, to improve our support for vulnerable customers.

Innovation

- 3.15.** While we have a defined strategy for innovation, our culture ensures that these principles are harnessed to deliver far reaching benefits in all areas of our business. We will continue to work closely with our innovation teams, embedding successful projects to improve our 'Business as Usual' approaches, while ensuring staff are encouraged to embrace and celebrate innovation. Our Customer Vulnerability Strategy details an explicit commitment to consider vulnerability in all new innovation schemes, as well as the development of innovation projects with the specific intention of enabling the participation of vulnerable customers in smart energy services. This ensures that we not only consider the needs of vulnerable customers in our innovation projects, but also that we take innovative actions to address the unique challenges they face.

Data and digitalisation

- 3.16.** Our data and digitalisation throughout RIIO-ED2 will ensure we continue to enhance the delivery of effective and targeted outreach to customers in vulnerable situations, by enabling us to more robustly capture and understand the needs of customers in our region. It is therefore crucial that WPD makes the data we have on vulnerability impactful and available to those who need it, while ensuring we maintain GDPR compliance. Our approach, where all data is presumed open unless proven otherwise, ensures that data is shared in a timely, accurate and complete manner that suits the end user. In the case of customer vulnerability, this applies both to the delivery partners we work with to identify households in need of PSR and fuel poverty services, as well as to other areas of our business who can use this data to target new projects and schemes to drive the greatest benefit for customers.
- 3.17.** Our PSR data and information strategy will be linked to our RIIO-ED2 Digitalisation Strategy and Action Plan to further facilitate innovative uses of WPD's data by us and others, ensuring the potential value of the data we hold is maximised. Digitalisation will also be key in automating the process of PSR data sharing, so that customers only have to join one PSR to access the benefits of multiple services from all their utility providers. This will simplify the customer experience, while enabling customers to capitalise on the positive outcomes of being on the PSR. Moreover, sharing data across utilities will help to facilitate a common view of vulnerability to aid industry collaboration and joined up offerings.



Distribution System Operator

- 3.18.** To enable a greater volume of demand, generation and storage to be connected, our networks are becoming smarter and more active. Creating a more efficient and flexible system will benefit all customers and empower them to be at the centre of the energy revolution. To ensure the positive impacts of this transition are felt by all, we will ensure customers in vulnerable situations are informed and aware of opportunities for participation. This includes providing bespoke advice to PSR customers on flexibility tariffs, Low Carbon Technology (LCT) connections, smart meters and local community energy schemes.
- 3.19.** Our work to establish the capabilities and needs of vulnerable customers in a smart energy network, via our ‘Smart and Fair?’ research with the Centre for Sustainable Energy, will directly inform the development of our flexibility services and energy efficiency proposition. Utilising insights from this research programme, we will identify potential technical and contractual barriers to uptake so that these can be reduced to ensure we provide targeted, accessible information and our product can maximise opportunities to support vulnerable customers. We will use our social indicator data and findings from ‘Smart and Fair?’ to support the identification of areas where flexibility and/or energy efficiency measures would generate the greatest social value and create a methodology to capture this in our cost benefit analysis, in order to target customers when developing flexibility tenders. By engaging with aggregators, suppliers and other industry participants who will be enabling participation in domestic flexibility, we can identify opportunities to target vulnerable customers and build flexibility advice into the support our Priority Services Register and fuel poverty support partners provide, leveraging our existing energy efficiency and tariff switching interventions to unlock further value for customers.
- 3.20.** The strategic forecasting and analysis activities undertaken as part of our role as a Distribution System Operator will require input from the Customer Vulnerability Strategy throughout the RII0-ED2 period. As we endeavour to better understand how our customer demand is changing in a more active energy system, considering the impacts of energy efficiency measures across our domestic customer base will influence distribution network design. Insights from our customer vulnerability programme will also be central to informing our interactions with local stakeholders, specifically the local authorities in our region, as we support them to understand how local decarbonisation targets can be realised, with a bespoke plan that ensures that no vulnerable customer is left behind by the energy transition.

Electric Vehicles

- 3.21.** With the uptake of Electric Vehicles (EVs) accelerating in line with government targets, we recognise that our approach to maximising uptake must consider accessibility for customers in vulnerable situations. As customer capabilities to adopt EVs are better understood and barriers identified, for example, through the ‘Smart and Fair?’ project, we will ensure learnings are fed into our EV strategy. We will undertake specific research to understand the needs of disabled drivers, to inform and validate recommendations for how WPD can collaborate with key actors, such as local authorities and Motability (a charity supporting people with disabilities to access vehicles) to ensure that disabled EV drivers are provided adequate charging infrastructure in a timely manner. This will drive better, more inclusive facilities for disabled EV drivers, as well as developing insights to inform the wider roll out of EV charging infrastructure.

Social Contract

- 3.22.** While our Customer Vulnerability Strategy sets out what we will do over the next five year regulatory period for customers in vulnerable situations, our Social Contract outlines how WPD will act as a good corporate citizen across everything we do as a company. The Social Contract therefore simultaneously underpins, and builds on, what we set out in our strategy, by outlining the social purpose that guides our actions, as well as initiatives that go over and above to generate wider social impact.
- 3.23.** In particular, the ‘Empowered Communities’ focus area illustrates how we will build on our core customer vulnerability and fuel poverty activities to generate wider positive benefits for customers, via outreach in areas of high economic deprivation, volunteering and community funding.

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 their spontaneous priorities. 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 customer 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 have 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 in RIIO-ED2 is set out in our Business Plan Annex 3 - Giving customers a stronger voice: Enhanced engagement.

Our engagement approach

- 4.5. We have undertaken an extensive programme of engagement to build, with stakeholders, an ambitious Customer Vulnerability Strategy to deliver positive outcomes for our customers in vulnerable situations.
- 4.6. The tables over the next few 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 six 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 16,000 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: High level social value research	Stage 3: BP development	Stage 4: BP refinement	Stage 5a: BP acceptance	Stage 5b: BP gap analysis
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	-	28
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. vulnerable 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	-	20
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 two to three 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	59	-
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	56	81
6	Social obligations conferences	Conferences held in different locations or online, aimed at vulnerable customer representatives to discuss WPD's Customer Vulnerability Strategy and programme delivery.	Charities, local authorities, parish councils, non-government organisations, delivery partners.	1 2	53	-	57	-	-	17

Key – Stakeholder knowledge/interest level: 1 Expert 2 Interested 3 Limited knowledge 4 Future customer

Ref	Engagement method	Description	Stakeholder groups involved/targeting	Stakeholder expertise level	Total engaged					
					Stage 1: Preliminary engagement	Stage 2: High level social value research	Stage 3: BP development	Stage 4: BP refinement	Stage 5a: BP acceptance	Stage 5b: BP gap analysis
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 RII0-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	-	73
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	-	-	453
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 (WTP) 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	-	103

Key – Stakeholder knowledge/interest level: 1 Expert 2 Interested 3 Limited knowledge 4 Future customer

Ref	Engagement method	Description	Stakeholder groups involved/targeting	Stakeholder expertise level	Total engaged					
					Stage 1: Preliminary engagement	Stage 2: High level social value research	Stage 3: BP development	Stage 4: BP refinement	Stage 5a: BP acceptance	Stage 5b: BP gap analysis
13	Social value and 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.	3,417 - End user bill paying domestic customers and future users – ensuring balanced representation in terms of gender, region, urban/rural, age and socio-economic background. 595 - Businesses – small, medium and large.	3 4	-	1,188	-	1,280	-	1,544
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.	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	-
17	Acceptability testing	Research to test the acceptability of the Business Plan overall and each specific core commitment proposed, and tested the affordability of the plan.	Domestic and business customers	3 4	-	-	-	-	2,721	1,635

Key – Stakeholder knowledge/interest level: 1 Expert 2 Interested 3 Limited knowledge 4 Future customer

Customer Engagement Group

- 4.7. WPD's Customer Engagement Group (CEG) have independently scrutinised and challenged our Business Plan and supplementary documents, including this Customer Vulnerability Strategy, and the quality of engagement undertaken to inform it.
- 4.8. The CEG reflects the interests of existing and future customers and promotes good value customer outcomes, with a focus on affordability, protecting vulnerable customers, the environment, sustainability and the transition to a low carbon energy system.
- 4.9. The group provides assurance to Ofgem that our Business Plan understands and addresses the requirements of customers. From the outset, the CEG's feedback and scrutiny has directly influenced and improved our engagement programme. Further details on the composition of the CEG, their approach and the challenges made can be found in supplementary annex SA-05 Giving customers a stronger voice - Enhanced engagement.
- 4.10. WPD's CEG has established seven subgroups with the aim of reviewing the Business Plan in specific areas and providing rigour and challenge to the WPD staff directly responsible for generating content. In the development and delivery of our stakeholder engagement programme, the CEG Research subgroup met 35 times to provide scrutiny and challenge. This has ensured that engagement was comprehensive and robust, insights have been used correctly to inform our plans, and that actions proposed truly reflect the priorities and ambitions of stakeholders.
- 4.11. The CEG Customer subgroup, responsible for reviewing our Customer Vulnerability Strategy, Social Contract, Willingness To Pay and Customer Value Propositions, met 16 times to evaluate our approach in these areas. Although no formal challenges were raised specifically on WPD's Customer Vulnerability Strategy, CEG feedback has resulted in refinements and improvements to the strategy, driving us to provide greater detail and clarity on targeting hard-to-reach customers and the level of service we will provide.
- 4.12. Furthermore, we have used an assessment criteria developed by the CEG in order to test our approach and ensure our plan is well-justified. This feedback has resulted in a number of changes to our Customer Vulnerability Strategy, for example:
- The CEG's criteria required us to explain why actions are appropriate for a DNO to undertake and to be funded by customers. We have addressed this by including detailed stakeholder feedback that clearly demonstrates how stakeholders have driven our strategic outputs. We have also further expanded on our track-record and long-standing approach, which leverages partnerships and local expertise to maximise benefits for customers, justifying why WPD is best placed to deliver these commitments.
 - In response to CEG requirements to demonstrate that we have considered alternative approaches, supplementary annexes SA-05, Giving customers a stronger voice - Enhanced engagement, and SA-02a Our commitments – Justification analysis, outline other options considered with stakeholders in order to show clear justification for our proposed activities.
 - CEG criteria stipulated that WPD must demonstrate that the benefits of actions plausibly outweigh the costs, which we have responded to in a detailed breakdown of the Social Return on Investment (SROI) of our Customer Vulnerability Strategy outcomes (see pages 26-30).
 - They sought clarification on how innovation and digitalisation are embedded in all we do, leading to further explanation of the intersection between our Customer Vulnerability Strategy and the wider Business Plan, and the co-benefits that will be generated by integrating our approaches (see pages 17-18).

What our stakeholders said about customer vulnerability and fuel poverty

- 4.13. Our engagement has found that customer 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 customer vulnerability, by creating a host of new vulnerabilities as well as leading to a rise in fuel poverty.
- 4.14. Stakeholders have maintained the importance of an accurate 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.
- 4.15. They recognise that the causes of vulnerability are complex and continually evolving. 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.
- 4.16. 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 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 touchpoints in the community.
- 4.17. 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 customer 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 16,000 stakeholders through comprehensive engagement, building on the strong foundations of our long-standing customer 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 its RIIO-ED2 Sector Specific Methodology Decision document the four principles and 13 baseline expectations for the standards of service that it expects 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 initiatives which deliver 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 expectations 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:

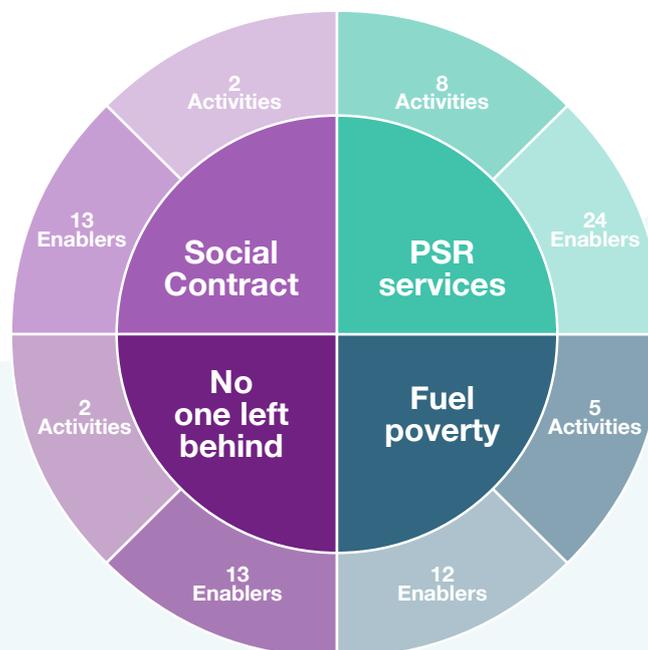
Embed the approach to protecting the interests of consumers in vulnerable situations throughout a company's operations to maximise the opportunities to deliver support.

5.5. WPD's delivery of the baseline expectations in RIIO-ED2 will build on the extensive programme of customer vulnerability activity we have undertaken in RIIO-ED1. Our Customer Vulnerability Strategy sets out how WPD will meet Ofgem's expectations as a minimum, and exceed our own baseline performance, based on our revealed performance in RIIO-ED1.

5.6. Through detailed engagement and refinement of our strategy with our stakeholders, we have been encouraged to go far beyond baseline performance in a number of areas. As such, our Customer Vulnerability Strategy details the activities we will undertake to deliver enhanced outcomes which exceed the baselines and the positive impact this will generate for customers. It also sets out the stretching targets we will achieve in RIIO-ED2.

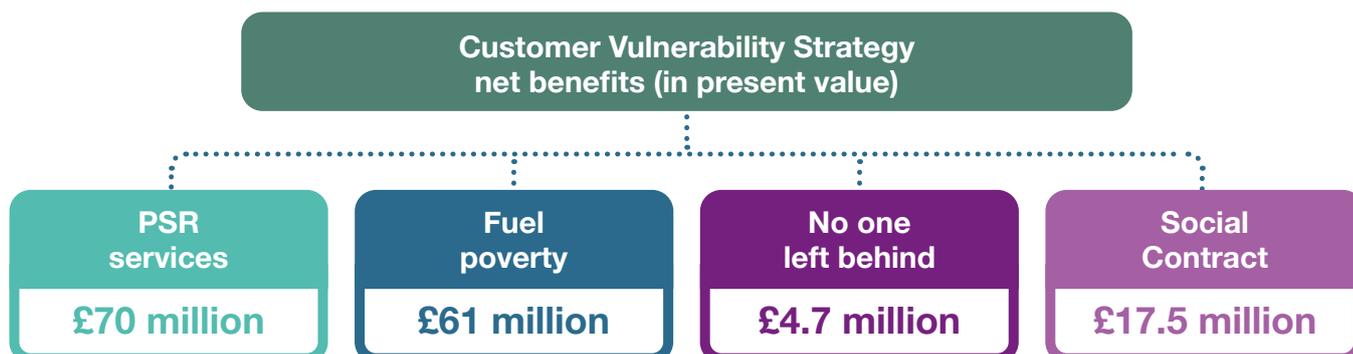
Measuring the customer value delivered by our strategy

- 5.7.** It is vital that the wider commitments (WC) and Business Plan commitments (BPC) set out in this strategy deliver outcomes that are valued by our customers. Our plan details the social value research we have undertaken through the stages of development of our Business Plan and this strategy, including how the research helped us to arrive at more specific commitments and performance targets, prioritising those with the highest intrinsic value to customers. This social value research has determined the 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 £183 million of gross value for customers.
- 5.8.** 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.
- 5.9.** 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. This was the case for one of our Customer Value Propositions, in which we had initially proposed to install solar panels on community buildings. Whilst carrying out the quantification of social value, we realised that by focusing on schools, we could increase our impact by using the installed panels as a platform for Science, Technology, Engineering and Maths (STEM) education for schoolchildren. This also leverages on the experience we already have in carrying out education programmes in schools in our areas, making this proposition more valuable while also aligned to our strengths.
- 5.10.** Specifically for our Customer Vulnerability Strategy, we have measured the value that this work will deliver to society. At a high level, the commitments and initiatives laid out in this document all contribute to the delivery of four key outcomes to our customers, communities, and the environment:
- PSR services** PSR customers are provided with the support they need during power cuts.
 - Fuel poverty** Fuel poor customers save money on their bills and have a warmer home.
 - No one left behind** Vulnerable customers save money and reduce their carbon emissions by participating in the energy system transition.
 - Social Contract** Communities realise social and environmental benefits from a social purpose embedded throughout WPD, with investment in community-led projects and staff volunteering.
- 5.11.** All commitments and initiatives presented in this document contribute to one or more of these outcomes. Some initiatives relate to specific activities that will result in these outcomes – such as our fuel poverty schemes – while others enable them to be delivered in a fair, efficient, and inclusive way, such as with our annual customer vulnerability workshops.
- 5.12.** By measuring the benefits of each of the outcomes (rather than at a specific commitment level), we avoid possible accuracy issues such as double counting benefits, particularly for those that enable more than one outcome. For example, initiatives like our vulnerability mapping contribute to both our fuel poverty and PSR services outcomes. Measuring the benefits of the overall outcome, while acknowledging the contribution that each individual activity and commitment makes to achieving them, gives us a clearer and more holistic view of the value we will deliver.



Quantification approach & results

- 5.13. During working groups in early 2020, all six Distribution Network Operators (DNOs), alongside Ofgem and key consumer groups discussed the (quantitative) measurement of social value in the context of the Customer Value Proposition (CVP) as part of the Business Plan incentive.
- 5.14. DNOs decided to develop a common approach to measuring social value, a consistent mechanism that would allow for straightforward assessment and comparison. In line with the Spackman approach³ and the Treasury's Green Book⁴, the framework provides a structure through which the DNOs will deliver values that are consistent, comparable and conservative.
- 5.15. This framework was tested throughout its development, agreed with consumer bodies and shared with Ofgem in December 2020 – with the framework referenced in Ofgem's Business Plan guidance.



- 5.16. The framework has been independently applied to quantify the benefits of this strategy, ensuring that appropriate values and assumptions are used. This provides confidence that the values calculated are a conservative estimate of the value that will be generated.
- 5.17. We have calculated the benefits associated to each of the four outcomes, with details of the calculations and results provided below. Some initiatives in this strategy are new and therefore we will need to gather the necessary data and identify reliable proxies to measure the full impact that our commitments will have in society. However by taking this conservative approach, we can be confident, given the additional value to be revealed, that our overall social value more than £153 million for our actions during RIIO-ED2, is a minimum view. The values quantified at this stage provide a good representation of the scale of the impact that our activities will generate, and we expect to build on and improve this measurement during RIIO-ED2 as more data becomes available.
- 5.18. We have chosen to present the results of the net benefits that will be achieved during RIIO-ED2, even though the investment will likely have further impacts beyond this period. By doing this, we can more easily monitor our progress against this forecasted value and report back to our customers and Ofgem. In Appendix 1 we set out how our Business Plan commitments and wider commitments in this strategy have been mapped against each of the four key outcomes, in the following section some specific examples are given.



PSR services: PSR customers are provided with the support they need during power cuts.

- Our PSR services will deliver £70 million of net social value through the following benefits:
 - Reduced stress during outages.
 - Welfare support provided during outages.
 - Reduced outage time due to generator provision.
- Proxies were used for each benefit in accordance with the DNO's social value framework.
- We considered the costs required to deliver the PSR services available to those registered as well as the environmental cost (carbon emissions) of providing generators which are diesel-powered.
- Our PSR outcome will deliver a social return on investment of **£6.09 per pound spent** over RIIO-ED2.

Outcome:

PSR customers are provided with the support they need during power cuts.

Net Benefit Value: £70 million over RIIO-ED2

Gross Benefit Value: £81.4 million

Cost: £11.4 million

*All in present values

Benefits:

- Reduced stress during outages.
- Welfare support provided during outages.
- Reduced outage time due to generator provision.

Activity examples:

PSR customers provided with 24/7 support during power cuts (WC16); 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 (BPC22).

Enabler examples:

PSR data and information strategy in place and reviewed annually (WC5); Provide up to date open sourced customer vulnerability data mapping to identify PSR eligibility and take up (WC1).

Fuel poverty: Fuel poor customers save money on their bills and have a warmer home.

- Our fuel poverty schemes will deliver £61 million of net social value through the following benefits:
 - Financial savings for fuel poor customers.
 - Reduction in negative impact of cold weather on customers' health.
- We used data available from our existing schemes to measure the expected financial savings for each customer and used proxies to estimate the health benefits due to having a warmer home.
- Our fuel poverty outcome will deliver a social return on investment of **£6.23 per pound spent** over RIIO-ED2.

Outcome:

Fuel poor customers save money on their bills and have a warmer home.

Net Benefit Value: £61 million over RIIO-ED2

Gross Benefit Value: £70.7 million

Cost: £9.7 million

*All in present values

Benefits:

- Financial savings for fuel poor customers.
- Reduction in negative impact of cold weather on customers' health.

Activity examples:

Power Up Smart providing nine core interventions and tailored energy advice targeted at PSR customers with smart meters (WC28); Annual fuel poverty innovation competition 'Energy Affordability Fund' (WC30).

Enabler examples:

Maintain a network of referral partner agencies with coverage in four license areas (WC8); WPD social indicator mapping with data which is open sourced for anyone to use, inviting ideas to collaboratively develop new services (WC1).

No one left behind: Vulnerable customers save money by participating in the smart energy transition.

- Our efforts to leave no one behind in the smart energy transition will deliver £4.7 million of net social value through the following benefits:
 - Financial benefits to customers due to smart energy and efficiency advice, including smart meters and flexibility tariffs.
 - Reduced carbon emissions due to reduction in electricity consumption.
- We used data from our Power Up Smart trial to estimate benefits per customer, as well as the cost of traded carbon to calculate the benefits associated with reduced emissions.
- Our no one left behind outcome will deliver a social return on investment of **£1.11 per pound spent** over RIIO-ED2.

Outcome:

Vulnerable customers save money by participating in the smart energy transition.

Net Benefit Value: £4.7 million over RIIO-ED2

Gross Benefit Value: £9 million

Cost: £4.3 million

*All in present values

Benefits:

- Financial benefits to customers due to smart energy and efficiency advice.
- Reduced carbon emissions due to reduction in electricity consumption.

Activity examples:

600,000 Priority Services Register customers to be offered a bespoke smart energy action plan each year (BPC18).

Enabler examples:

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 (WC23).

Social Contract: Communities realise social and environmental benefits from a social purpose embedded throughout WPD, with investment in community-led projects and staff volunteering.

- Our Social Contract will deliver £17.5 million of net social value through the following benefits:
 - Value to society of the community fund investment.
 - Value to society of volunteer days.
 - Financial benefits from advice provided to SMEs.
 - Environmental benefits (reduced carbon emissions) from advice provided to SMEs.
- We used proxies in accordance with the DNOs’ social value framework to quantify these benefits, as well as data from past grants we have awarded to communities to estimate the expected return on investment of our community fund.
- Our Social Contract outcome will deliver a social return on investment of **£3.37 per pound spent** over RIIO-ED2.

Outcome:

Communities realise social and environmental benefits from a social purpose embedded throughout WPD, with investment in community-led projects and staff volunteering.

Net Benefit Value: £17.5 million over RIIO-ED2

Gross Benefit Value: £22.6 million

Cost: £5.1 million

*All in present values

Benefits:

- Value to society of the community fund investment and volunteer days.
- Financial benefits from advice provided to SMEs.
- Reduced carbon emissions.

Activity examples:

A shareholder-funded annual £1 million support fund for local community initiatives and good causes; 1,000 volunteer days each year, enabling staff to support local community initiatives (BPC23).

Enabler examples:

We will 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 (WC3).

Measuring our success

- 5.19.** It is important that both 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.
- 5.20.** In addition, we have set a number of items of Regulatory 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 a 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.
- 5.21.** Our performance against these metrics and RREs will be published annually to provide transparency and ensure our stakeholders can track the delivery of our strategy.
- 5.22.** The social value results presented show that our strategy will deliver considerable value to society during RIIO-ED2, totalling more than £153 million in Net Present Value. Importantly, this quantification 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. This will be done by monitoring both the number of customers that benefit from our initiatives and the actual savings that are achieved, as well as revisiting proxy values to make sure they are still representative and up to date.
- 5.23.** If there is a deviation from the expected net benefits presented in the previous section, we will make it clear in our reporting whether the reason for the difference is because of a change in our delivery or updates to the modelling (such as updated proxies), ensuring that our performance can be properly evaluated by customers, stakeholders and Ofgem.

Licence obligations

- 5.24.** 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.
- 5.25.** In addition to this, for RIIO-ED2 Ofgem will be introducing a new Principles-Based Licence Obligation. This new obligation is intended to complement 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.
- 5.26.** 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.
- 5.27.** 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

- 5.28.** 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).

Context

- 5.29. At the centre of our Customer Vulnerability Strategy, the effective management, promotion and maintenance of our PSR ensures we are able to support customers in vulnerable situations. With 1.9 million households now on our PSR, it is vital that we continually update records to ensure they are accurate when customers need our support. Using this data, we offer a holistic range of services to those customers who may be vulnerable in the event of a power cut.
- 5.30. As well as maintaining accurate data, we strive to continually expand the coverage of our PSR, targeting customers who may be harder to reach via traditional channels, such as digitally excluded customers or those facing transient vulnerability. To identify and support these customers, we use social indicator data and trusted expert partners to target the promotion of our PSR. By achieving a 'one stop shop' network of referral partners and other utilities, we will ensure customers only have to register once to benefit from the services of multiple agencies.
- 5.31. In this section, we will outline:
- Our approach to maintaining an accurate and up-to-date PSR.
 - The resilience support we provide to customers on the PSR and our response in the event of a power cut.
 - How we measure the effectiveness of our services.
 - Assessing PSR coverage and expanding our reach.
 - Our 'one stop shop' service for PSR customers.



Core delivery strategy

Maintaining an accurate and up-to-date PSR

STAKEHOLDER INSIGHTS: PSR data needs to be updated frequently, particularly given the transient and changing nature of many vulnerable circumstances.

“WPD needs to consider the challenges of the collection and expansion of PSR data, and the proportion of the PSR that falls into the temporary vulnerability category.”

“Vulnerability is transient so PSR data needs to be reviewed frequently, developing a close relationship with and tracking those on the register.”

“It would be good for WPD to really understand their customers’ needs, as they will differ significantly, and they will therefore need to communicate and deliver access to services in a range of different ways.”

- 5.32. The PSR is crucial in 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.
- 5.33. The effectiveness of the PSR depends on its accuracy. WPD currently have 1.9 million customers registered on the PSR. It is vital that the accuracy of these records is maintained so that support can be provided to customers when they need it most. We will therefore proactively contact all customers on the PSR at least once every two years to update their records, and provide advice on the services we can offer.
- 5.34. We will ensure the effectiveness of our PSR data cleanse through monitoring the percentage of records updated (including revalidating existing details) when undertaking our proactive contact. In monitoring this as well as both our PSR satisfaction and PSR response time during a power cut, we can have a holistic assessment of our PSR effectiveness and accuracy.
- 5.35. Our commitment during RII0-ED2 is to contact 60% of PSR customers by direct phone call to maximise opportunities to offer further advice and support. Our dedicated PSR data cleanse teams are trained to identify vulnerable customers by spotting trigger points (in line with the British Standards Institution (BSI) Standard BS18477: Inclusive Service Provision, requirements for identifying and responding to consumer vulnerability) and provide tailored guidance on provision of services offered when contacting PSR customers to update their records.
- 5.36. 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, and to answer any questions they may have. Staff are trained 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.
- 5.37. These teams are supported by staff in WPD’s Contact Centre, equipped to deliver the same specialist advice and top up our core activities either when call volumes are quieter, or during crises when proactive update calls to our PSR customers are our first priority.

5.38. **CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE:** Maintain high quality data to allow us to deliver bespoke support to customers in vulnerable situations by proactively contacting over 2 million Priority Services Register customers once every two years to remind them of our services and update their records (with 60% via direct telephone call).

Power cut resilience and support

STAKEHOLDER INSIGHTS: 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.

“Looking after vulnerable people at point of power outage is critical and providing advice and support on power cut preparation is key”

“One strategy to decrease the effect of power cuts on customers would be to increase their resilience”

“Initiatives that prioritise those most in need at the point of a power outage are of paramount importance”

“Helping organisations to plan is vitally important - emergency plans need to consider electricity, so communication on this issue should increase”

“There needs to be a simplified yet tailored service in this area. Recognising the different levels of vulnerability is very important”

Power cut resilience

- 5.39. Building customer resilience is a crucial part of ensuring they are supported during a loss of supply. Our PSR data cleanse teams, when contacting customers, offer proactive power cut resilience advice and support.
- 5.40. Our power cut advice leaflet is available online and distributed at outreach events by both WPD and our fuel poverty partners.
- 5.41. Crisis packs are distributed by WPD staff and the British Red Cross (BRC) during prolonged power cuts and by fuel poverty partners at outreach events and to the most in need individuals through their case work. They contain items which are considered (by our expert Customer Panel) useful to have in one handy place in the event of a power cut. The canvas bag currently contains items including a WPD key fob, a ‘What to do in a Power Cut’ information leaflet, a wind-up torch, a hat, socks, gloves and a flask.
- 5.42. As well as supporting customers on the PSR, we will expand our focus to the premises that support customers in vulnerable situations, such as care homes, to develop tailored resilience plans for the event of a loss of supply. This will ensure care homes are better prepared for power cuts and aware of their local WPD point of contact.

Tailored services

- 5.43. Building our employees’ awareness and understanding of the unique difficulties customers may face, particularly during a power cut, ensures our services are always delivered with empathy. Call handlers receive a range of specialist training from charities and organisations representing different vulnerable groups, enabling them to recognise additional needs and tailor their approach accordingly. Training includes specific support for blind and deaf customers, mental health training and suicide awareness. It also includes specific training to support customers with dementia and Parkinson’s Disease, as well as for those using oxygen therapy or dialysis, and is continually updated to reflect changing situations facing customers. An example of this service can be seen in the case study below:

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.

- 5.44. In order for the support services we offer to be as inclusive and effective as possible, we work with expert partners and specialist organisations whose knowledge and expertise plays an essential role in delivering tailored provisions to customers in the event of a power cut. Examples include: The BRC emergency response service, Nationwide Caterers Association and Category 1 responders (under the Civil Contingencies Act (2004)).
- 5.45. Our partners provide practical support, such as crisis packs, drinks and hot meals, as well as emotional and welfare support. They can provide individual support, or attend large scale incidents affecting multiple customers, including door-knocking to check the general welfare of customers. Feedback through ongoing engagement with expert partners and agencies who help deliver our support services is a crucial part of gauging how effective these services are, and what can be done to improve them.

5.46. 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.

Communication

5.47. As well as adapting the services we provide, we use a full range of channels to ensure all our communication with customers is tailored to their bespoke needs. 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, as well as traditional methods like letter and telephone.

5.48. Information is made as accessible as possible with a range of formats and services available to customers - for example: SignVideo (a British Sign Language translation service), Braille, ReciteMe, large print publications and Language Line. WPD holds the Louder than Words Charter from the Royal National Institute for Deaf People (RNID) for levels of service and accessibility for customers and employees who are deaf or hard of hearing.

5.49. Our Power Cut Reporter app features 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.

5.50. 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 Power Cut Reporter 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.

Power cut response

5.51. Vulnerable customers often need extra support during a power cut and we will continue to ensure staff are trained with the skills to deliver advice tailored to their specific needs.

5.52. In the event of a loss of supply, each contact is assessed individually and collectively (if part of wider fault) to tailor;

- Form of communication.
- Approach to communication.
- Use of information known from PSR records, in tandem with information coming from the customer.
- Response (send support partner, engineer etc. to attend).
- Frequency of communication.
- Speed of communication.

5.53. The Contact Centre is as proactive as possible, making as many outbound contacts as receiving inbound ones, and all PSR customers are contacted by either text/voice message or call, 24 hours a day in the event of an unplanned power outage. This gives WPD the chance to apologise, explain the fault, give an estimated time of restoration (ETR) and offer additional support if required.

5.54. Contact is also made throughout a fault (e.g. if customers are off supply more than 3 hours, an updated ETR has become available, where it has been identified the customer is part of a wider incident and when the fault has been completed and power restored.) Frequent touch-points with affected customers provides a cumulative benefit that enables us to monitor vulnerable customers throughout the duration of a power outage, and ensure the value and uptake of the support services we offer are maximised. It also allows us to directly receive, record and utilise real time feedback.

5.55. Our continual PSR data cleanse, ensuring data is as accurate as possible, allows us to quickly contact customers on the PSR in the event of a power cut. In 2020/21, this enabled us to contact PSR customers in an average of 27 minutes during power cuts, 21 minutes quicker than the previous year.

5.56. 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 Power Cut Reporter app.

5.57. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: Our average speed of response will be two seconds for PSR customers, when they contact us on our dedicated PSR phone line.

Measuring the effectiveness of our approach

- 5.58.** It is crucial we continually evaluate the impact, reach and relevance of our approach, in order to identify ways to improve the accuracy of our PSR and the service we provide to customers.
- 5.59.** 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, accreditations such as the Customer Service Excellence (CSE) Standard and the British Standards Institution (BSI) Standard for Inclusive Service Provision (BS18477) 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. In the CSE standard, we are currently the top UK performer (out of 600), with 46/57 'Compliance Plus' ratings (representing UK-wide best practice). We were also the first company in the UK to achieve eight years of full compliance with the BSI standard.
- 5.60.** We regularly review with customers the appropriateness of the services we offer, and work collaboratively with customers and stakeholders to identify and implement improvements. We use insights from mandated industry customer satisfaction surveys, for example, Ofgem's Broad Measure of Customer Satisfaction (BMCS). In addition, we seek frank and independent views from stakeholders through our own voluntary, bespoke surveys – with a representative sample of vulnerable customers who have received a service from WPD being independently surveyed every month. Satisfaction is currently at its highest ever, with a score of 9.5/10. We also carry out regular consultation with stakeholders to review our enduring Customer Vulnerability Strategy, in particular via WPD's quarterly Customer Panel and annual stakeholder engagement workshops.
- 5.61.** Alongside the PSR satisfaction metric generated from our bespoke survey, we also measure the efficacy of our PSR data and effectiveness of our power cut support through monitoring PSR response times during a loss of supply (inbound and outbound contacts).
- 5.62.** We conduct post-service follow up contact with all customers who have contacted us during a loss of supply, either by phone call or text message. The purpose of this contact is to apologise for the interruption, check in with customers, identify if there are any further ways we can support them and obtain feedback on our power cut response.

5.63. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: Our service and communication will be scrutinised by external accreditations, ensuring 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, Louder than Words Charter and Customer Service Excellence).

Assessing PSR coverage and expanding our reach

STAKEHOLDER INSIGHTS: Stakeholders agree that identifying and targeting customers in need of support is crucial, with partnerships seen as the most effective way of doing this.

“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.”

“The pandemic has increased levels of vulnerability – and created new forms of vulnerability. WPD need to keep pace with this.”

“Work should cover improving the numbers of vulnerable people targeted and better defining what vulnerability is and who is affected.”

- 5.64.** Our PSR data is crucial to our ability to provide help when customers need us most. Understanding what this data tells us about vulnerable customers across our network, through identifying their individual needs as well as the reach of the PSR (and therefore gaps in our coverage) allows us to tailor our services and target our support.
- 5.65.** WPD, with the expertise of the Centre for Sustainable Energy (CfSE), has developed a robust methodology for the estimation of PSR eligibility to determine an accurate picture of **59% PSR reach**.
- 5.66.** Whilst discreet datasets are not available to provide detailed data for each PSR Needs Code, by using wider datasets and applying a pragmatic and transparent approach to combine and convert to household data, it has delivered an accurate measurement of PSR reach. This accurate data is driving our new services, more effectively targeting gaps in PSR take up.

- 5.67. Historically, WPD's focus has been to utilise our PSR data to identify and target PSR promotion activities and fuel poverty interventions at areas of greatest need and lowest existing take up. To deliver this, our initial method for assessing PSR coverage was based on total population (not households, and therefore not considering cases of multiple PSR occupancy) and also analysis against standalone vulnerabilities (not considering circumstances where an individual may have multiple vulnerabilities). However as we look ahead to RIIO-ED2, and the inclusion of this as a key performance metric to provide transparency of our performance (rather than just a tool to direct services) it has been necessary to deliver a more robust view of total PSR reach.
- 5.68. WPD's latest data is now based on households and the overall vulnerable situations facing those occupants (therefore considering where Needs Codes overlap and also occurrences of multiple PSR occupants).
- 5.69. Households and customers can be used interchangeably in this instance – typically only one person in a household is named on the energy bill or registered with the DNO, thus there is normally only one named customer at each address. Ultimately, the PSR data reflects the number of households on the register and must be compared with total eligible households to ascertain the PSR coverage and, conversely, the PSR gap (difference between total eligibility and current coverage).
- 5.70. The methodology uses national statistics and other open data sources on circumstances or situations that can be matched to PSR Needs Codes, which are typically available at population level and for individual circumstances, combined with a method of converting this to households and accounting for overlaps. Importantly this allows us to compare more accurately with WPD's current PSR total of 1.9 million, which is based on households not population, whilst maintaining an ability to understand the composition of the PSR.

Robust estimation of PSR eligibility

- 5.71. The PSR records a range of individual vulnerable circumstances, categorised as a set of PSR Needs Codes (these are set out in Appendix 2) enabling us to accurately record customer needs to ensure we can deliver appropriate, tailored services. However, when considering the method to determine our PSR Reach, it would not be possible to match each individual PSR Needs Code to distinct datasets, a methodology is therefore required to link available datasets to Needs Codes. Some statistics are available that can be matched to individual PSR needs codes, but not all; data is available on those with long term limiting health conditions or disability, which we have therefore been able to use as a robust proxy to cover all households that would be eligible for the majority of health related Needs Codes. Additional data is available for other Needs Codes that relate to age and language skills.
- 5.72. However, national statistics and other open data sources on circumstances or situations that can be matched to PSR Needs Codes are typically available at population level and for individual circumstances rather than at household level. For instance, data is available on the population estimates by individual year of age (ONS mid-year population statistics) which can be used to calculate the numbers of people of pensionable age. No such comparable data is available for the numbers of households with one or more persons of pensionable age. Furthermore, some households are likely to be eligible for PSR for multiple reasons – for example, through an individual having multiple conditions that match with different Needs Codes – and our PSR holds over 4 million individual Needs Codes against the 1.9 million registered households. These households only need to be counted once for the purposes of the reach calculation.
- 5.73. Therefore, in order to estimate the number of households eligible for the PSR, population data needs to be converted to household level statistics and also consider the instances of overlap, where households have multiple conditions.
- 5.74. In Appendix 2 we have provided an example of how the methodology has provided a robust estimate of PSR eligibility at a household level for customers of pensionable age, using national datasets to account for multi-occupancy and instances of overlap of conditions. We have also set out the datasets used in the methodology and how they link to the PSR Needs Codes.

5.75. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will expand our PSR coverage to include 75% of all total eligible customers, and 80% of customers with critical medical dependencies by the end of RIIO-ED2, to ensure those in greatest need receive targeted support services.



Current PSR Reach:

59%

of total eligible households

(total eligible households = 3.2 million;
total currently registered = 1.9 million)

Promoting the PSR and a ‘one stop shop’ for Priority Services customers

STAKEHOLDER INSIGHTS: Customers should not have to register multiple times on the PSR, and there should be a move towards adopting a national register.

“Having a joined up system would help us to support the vulnerable customers there more effectively.”

“Streamlining data sharing is good, people should not be getting four phone calls from separate utilities in an emergency.”

“A national PSR should be developed rather than different groups and organisations all having their individual lists.”

- 5.76. It is crucial that we continue to identify and support hard-to-reach customers to register to the PSR, using trusted expert partners. Our social indicator mapping enables us to view where high volumes of vulnerability align with gaps in our PSR take up. Through the increased accuracy of our data mapping, we will work with our network of over 150 referral partners to take a more targeted approach, in order to increase PSR registrations 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, including those in the health sector, to extend our support to geographical areas where our PSR reach is low, ensuring more comprehensive coverage by promoting and referring customers to the PSR.
- 5.77. In addition to expanding our network of referral partners, we will continue to expand awareness of the PSR through active promotion using a variety of channels, such as GP waiting rooms, using hospital radio and magazines, at flu clinics and through various local authority and charity events (from lunch clubs to county shows). Our external communications team will continue to share our PSR sign-up information at events such as county shows and through our school education programme (which engaged almost 10,000 school children in 2020/21) and will seek new and innovative ways to promote the register. We will maximise online channels, such as social media, with campaigns specifically targeted at the top five gaps in our PSR.
- 5.78. We also collaborate with other utilities who share our footprint, ensuring customers get as much support as possible over winter and during energy or water emergencies - this has included joint workshops for charities and partner agencies, information and PSR sign-up leaflets, billboard advertisements and pharmacy bags promoting the PSR.
- 5.79. 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 organisations work together so that customers only have to explain their situation once to benefit from the varying services on offer. Stakeholders have urged us to work with other organisations, particularly utilities, to deliver a joined up approach to the PSR.
- 5.80. Our current approach to data sharing allows us to hold data share agreements with six water companies in the WPD region. Each month we send, either manually (encrypted and securely) or through a Secure File Transfer Process (SFTP) any new, updated or deleted PSR records where we have consent from the customer to do so. Two of these companies have expanded their agreements with us, allowing WPD to also receive data from them (using the SFTP) as well as send it, a first for DNOs and water companies.
- 5.81. Working with water companies, gas distributors and suppliers, we will establish data share agreements to provide a ‘one stop shop’ service for customers, so that they only have to join the PSR once to be registered automatically with all their utility providers. 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.
- 5.82. **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.
- 5.83. **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, expanding our network to 150 partners.
- 5.84. **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.
- 5.85. 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 industry benchmarking

- 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.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
<p>WC1: 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. 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. <p>Exceeding baseline: our approach will include more than 60 social indicator datasets.</p>	<p>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.</p>	<p>Metric 1: Number of partner agencies using WPD data mapping</p>	186	200 annually
		<p>RRE 1: Number of datasets</p>	-	-
		<p>Metric 2: Independent assessment of WPD data mapping quality</p>	-	Full compliance
<p>WC8: 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> <p>Exceeding baseline: We will extend this to partnerships with telecoms providers, maintaining a minimum of 150 partner agencies.</p>	<p>Having a network of referral partners across our licence area ensures that we can take a locally tailored approach, working with organisations that are recognised and trusted, with a good understanding of the regional issues our customers face. Where we identify areas in need of support through our social indicator mapping, this network enables us to proactively target our PSR promotion and outreach services.</p>	<p>Metric 3: Number of newly identified PSR customers registering directly with WPD per year</p>	31,000	50,000
		<p>Metric 4a: PSR reach - % of eligible customers in WPD regions registered</p>	59%	75%
		<p>Metric 4b: PSR reach - % of customers with critical medical dependencies registered on the PSR in WPD regions</p>	63%	80%
		<p>RRE 2: Number of referral partners</p>	118	-
<p>WC9: 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> <p>Exceeding baseline: We will provide all partners with training to share best practice, innovative approaches and interventions to support customers in smart energy future.</p>	<p>Customers who may not seek out support are aware of, and able to 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>Annual training ensures innovative and best practice approaches are shared across our partnership network, so that all customers have access to the same quality and breadth of support and interventions.</p>	<p>Metric 4b: PSR reach - % of customers with critical medical dependencies registered on the PSR in WPD regions</p>	63%	80%
		<p>RRE 2: Number of referral partners</p>	118	-
		<p>Metric 5: Number of partner agencies trained by WPD</p>	58	200 annually
<p>WC15: Dedicated online content targeted at customers in vulnerable situations including:</p> <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 providing PSR sign up and advice. • Social media including campaigns targeted at our top five PSR gaps. 	<p>Customers can easily and readily access content via our online channels to increase awareness of the support we offer.</p>	<p>RRE 3: Qualitative description of activities</p>	-	-
		<p>Metric 3: Number of newly identified PSR customers registering directly with WPD per year</p>	31,000	50,000
		<p>Metric 4a: PSR reach - % of eligible customers in WPD regions registered</p>	59%	75%
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
<p>BP Commitment 20 - Expand the reach of our Priority Services Register to at least 75% of total eligible customers and 80% of customers with critical medical dependencies to ensure those in greatest need receive targeted support services. This will include registering at least 50,000 additional hard-to-reach customers each year.</p>	<p>Customers with the most serious vulnerabilities are proactively identified and offered support. Those who may not seek out support are proactively reached and offered the benefits of joining the PSR.</p>	<p>Metric 3: Number of newly identified PSR customers registering directly with WPD per year</p>	31,000	50,000
		<p>Metric 4a: PSR reach - % of eligible customers in WPD regions registered</p>	59%	75%
		<p>Metric 4b: PSR reach - % of customers with critical medical dependencies registered on the PSR in WPD regions</p>	63%	80%
<p>WC2: Commission an annual horizon scan with the Centre for Sustainable Energy (CfSE) to identify additional datasets to incorporate into data mapping and potential new referral partners.</p>	<p>Improves our understanding of the landscape of customer vulnerability in our regions, including emerging and future challenges our customers may face. Ensures our data is accurate and up to date to enable us to provide better targeted support to customers.</p>	<p>RRE 1: Number of datasets</p>	-	-

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 industry benchmarking

- Reported proactive contacts from other DNOs ranges from 882,920 to 2,466,855.
- In September 2021, one DNO announced plans for two way data sharing with one other water company.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
WC5: Have a PSR data and information strategy in place and reviewed annually.	Provides assurance to customers and stakeholders that WPD is sharing accurate data and maintaining, refreshing and cleansing the PSR database in a robust and effective way.	Metric 6: PSR data and information strategy published	-	Annual
WC6: Maintain dedicated PSR data cleanse teams, who contact all customers registered on the PSR at least once every two years.	Customers are contacted by dedicated teams with expert training to update their records and provide up-to-date information on the services we can offer.	Metric 7: % of PSR customers contacted to update their records every 24 months Metric 8: % of PSR customers contacted to update their records by telephone	100% 30%	100% 60%
WC7: Have data share arrangements in place with suppliers, gas distributors and water companies, compliant with GDPR and Ofgem Data Best Practice Guidance. Exceeding baseline: We will extend our data share arrangements to partner with telecommunications companies. We will establish two way data sharing, partnering with all eight water companies in WPD's region.	Other utilities' customers gain the benefit of WPD's extensive PSR reach, as data shared with other utilities enables those customers to access a wider range of support.	Metric 9: Number of PSR records shared with utilities per year RRE 4: Number of data share agreements in place	100,000 Six data share agreements in place – one way sharing with four; two way sharing with two	150,000 -
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
BP Commitment 21 - 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.	Customers no longer have to register multiple times with each individual utility company in order to receive priority support.	Metric 9: Number of PSR records shared with utilities per year	100,000	150,000
		RRE 4: Number of data share agreements in place	Six data share agreements in place – one way sharing with four; two way sharing with two	-
		RRE 5: Data share in place with telecoms companies	-	-
BP Commitment 22 - Maintain high quality data to allow us to deliver bespoke support to customers in vulnerable situations by proactively contacting over two million Priority Service Register customers once every two years to remind them of our services and update their records (with 60% 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 via phone calls enables bespoke advice to be delivered to meet that individual's needs and supports our digitally excluded customers, as well as ensuring records are updated.	Metric 7: % of PSR customers contacted to update their records every 24 months	100%	100%
		Metric 8: % of PSR customers contacted to update their records by telephone	30%	60%

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 industry benchmarking

- 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, a digital accessibility expert.
- Two other DNOs offer a Webchat function (not available on all web pages/using automated responses).

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
<p>WC10: Achieve external accreditations, ensuring 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, Louder than Words Charter and Customer Service Excellence). Exceeding baseline: We will achieve compliance or compliance plus ratings in all 57 elements of the Customer Service Excellence assessment.</p>	<p>Provides independent scrutiny to assure stakeholders that we are credible, responsible and demonstrably compliant, while providing insights that enable us to identify areas for improvement.</p>	Metric 10: BMCS PSR score	91.6%	93%
		Metric 12: Independent assessment of WPD CSE Standard	Top UK performer in CSE standard	Top UK performer in CSE standard
		Metric 13: Independent assessment of WPD BS18477 Standard	Full compliance	Full compliance
<p>WC11: Maintain Accessibility AA standards on our website. Exceeding baseline: achieve AbilityNet Accreditation for WPD website.</p>	<p>Multiple rounds of user testing by individuals with additional accessibility needs ensures we provide the best experience for all customers.</p>	Metric 11: AbilityNet Accreditation for WPD website	Accreditation in place	Accreditation in place
<p>WC12: Customers can communicate with us via multiple channels including: Twitter, Facebook, WPD Power Cut Reporter app, text message, website, email, WhatsApp and Webchat.</p>	<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>	Metric 10: BMCS PSR score	91.6%	93%
		RRE 3: Qualitative description of activities	-	-
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
<p>WC13: Translation services available 24/7 by telephone and on WPD's website for more than 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.</p>	<p>All customers are able to access information in a format that is convenient to them.</p>	RRE 6: Top ten languages in WPD region and evidence of translation services in place	-	-
<p>WC14: SignVideo service, providing customers with the ability to contact WPD via a sign language interpreter free of charge.</p>	<p>Ensures WPD's service is fully accessible to deaf customers.</p>	RRE 6: Top ten languages in WPD region and evidence of translation services in place	-	-

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 industry benchmarking

• Other DNOs report a mix of the support offerings used by WPD. Stakeholder Engagement and Consumer Vulnerability (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.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
WC12: Customers can communicate with us via multiple channels including: Twitter, Facebook, WPD Power Cut Reporter app, text message, website, email, WhatsApp and Webchat.	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.	RRE 3: Qualitative description of activities	-	-
WC16: PSR customers provided with dedicated 24/7 phone number to call in the event of a power cut.	Enables PSR customers to bypass messaging and ensure they always have direct access to a fully trained PSR call handler to offer advice and support tailored to a range of specific needs.	Metric 10: BMCS PSR score	91.6%	93%
WC17: Our average speed of response for PSR customers will be two seconds.	Customers can feel assured that they always have immediate access to a PSR call handler to discuss their situation with, and get a response 50% quicker than WPD’s average customer response time (four seconds).	Metric 14: PSR speed of response	3.97 seconds on average	2 seconds on average
WC18: PSR customers provided the following 24/7 support during power cuts: <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 Power Cut Reporter app. • Accurate information and bespoke alerts via online power cut map and WPD Power Cut Reporter app. • 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. 	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. During loss of supply, customers on the PSR are provided support tailored to their situation and needs.	Metric 10: BMCS PSR score	91.6%	93%
		RRE 3: Qualitative description of activities	-	-
		Metric 14: PSR speed of response	3.97 seconds on average	2 seconds on average
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
WC19: 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.	Reduce the impact of loss of supply for premises supporting vulnerable customers by ensuring they are prepared in the event of a power cut, while helping WPD to better understand the needs of those premises and tailor our support accordingly.	Metric 15: % of care homes in WPD’s region supported to create a resilience plan	-	10%
WC35: Deliver customer vulnerability training to all 6,500 employees on an annual basis, with key training for all employees and specialist training for staff who regularly interact with vulnerable customers (e.g. field staff, Contact Centre staff.)	Customers in vulnerable situations receive the support they need, regardless of the WPD employee or team they interact with. For example, our team of 37 Contact Centre support staff are 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 10: BMCS PSR score	91.6%	93%

5.2 Principle 2:

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

Context

- 5.86.** Our ability to identify customers in vulnerable situations and provide them with effective, tailored support, hinges on our smart use of data. Our social indicator mapping depicts a view of vulnerability across our region, enabling us to target referral and support partners in geographical areas of low PSR take up but potentially high vulnerability. This data-driven approach is supported by close collaboration with partners and stakeholders, enabling us to continually update and improve our understanding of the challenges customers face.
- 5.87.** As the UK moves towards net zero, new possibilities are emerging for customers to participate in a smarter energy network. At the same time, it is vital that we are able to identify those customers who may be at risk of missing out on, or could be unfairly disadvantaged by, the opportunities of a decarbonised energy system. We are working with the Centre for Sustainable Energy (CfSE) and Scottish and Southern Electricity Networks (SSEN), to identify and capture these evolving needs.
- 5.88.** In this section, we will outline:
- The social indicator data we use to identify gaps in our PSR coverage and effectively target outreach services.
 - How we will use data to ensure our view of vulnerability evolves in line with the challenges facing customers in the net zero transition.



Core delivery strategy

Mapping customer vulnerability

STAKEHOLDER INSIGHTS: To increase the impact of our support services, stakeholders want to see WPD prioritise the identification of vulnerable customers and those facing fuel poverty, encouraging the use of, and innovation in, data mapping to identify potential vulnerability hot spots and improve 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.

“The Covid-19 pandemic has highlighted the presence of a range of new vulnerabilities, and improving the numbers of vulnerable people targeted and better defining what vulnerability is and who is affected is particularly important.”

“A mapping exercise, that considers the characteristics of people in different vulnerable situations - so it is more customer-focused rather than regulator-led, should be looked into. It needs to be aligned to the changing needs of people.”

“Information on vulnerable customers should be displayed on an interactive map which can be overlaid with other useful information.”

“There could be the use of mapping as a first thing but then also use local organisations and partnerships to gain more information.”

- 5.89. 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.
- 5.90. Layering datasets through our social indicator mapping provides a picture of where effective support is most necessary; a combination of factors indicating vulnerability, aligned with geographical gaps in our PSR coverage, allows our partner agencies to direct outreach to areas of greatest need. This ensures that customers who are facing transient vulnerability, don’t self-identify as being in a vulnerable situation, or are hard-to-reach via our PSR promotion activities, are proactively targeted for support.

5.91. **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

- 5.92. 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.
- 5.93. 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 to update our understanding of the issues faced by our customers and identify where WPD is best placed to provide support.

5.94. **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.

5.95. **CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE:** We will hold annual customer 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.

Building a view of customer capabilities and smart network opportunities

STAKEHOLDER INSIGHTS: Stakeholders have raised several ‘capabilities’ that they were concerned would present barriers to participation in a smart energy network, including low levels of income and limited access to the internet, but recognise that it will be important to understand the future challenges that will arise over the period. They felt that developing a model to identify these capabilities to participate in a smart, low carbon future would help WPD to identify areas to target.

“The PSR will need to be adaptable over time as it will need to align with future energy policy and vice versa including providing opportunities for vulnerable customers in a smarter network.”

“We face some big challenges in our communities. Educational attainment and technology issues – the move to low carbon will leave vulnerable customers behind. There are people who adopt new technology quickly but it’s not true for most.”

“We need to make sure everyone can benefit and not just those who are financially able.”

“A strong and effective PSR database would act as a foundation stone to make sure that decarbonisation initiatives are effective, fair and affordable for all customers.”

- 5.96. 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.
- 5.97. We have collaborated with SSEN and the 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.
- 5.98. 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.
- 5.99. The Capability Lens has been 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.
- 5.100. A range of factors, listed below, were identified as key determiners of a customer’s ability to participate in smart energy offers:
- Digital capabilities (e.g. lack of access to broadband, poor broadband speed, lack of access to smart technologies, poor digital literacy).
 - Attitudes to technology, innovation and change.
 - Energy usage and flexibility of peak use (e.g. inflexibility due to medical equipment, employment hours or family demographics).
 - Access to capital, income and attitudes to finance (leasing, investment, debt, risk).
 - Dwelling or local area (e.g. renting a property, lack of off-street parking or roof space).
- 5.101. Though these characteristics will likely be subject to change as the energy market evolves and new opportunities to participate are created, the tools already developed by the ‘Smart and Fair?’ project demonstrate what is currently known about vulnerability in the net zero transition. This research 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.
- 5.102. As the project continues to develop, the findings from ‘Smart and Fair?’ will enable us to expand our definition of vulnerability to reflect the capabilities needed to participate in a smart energy network, considering how this will evolve over time. Under Principle 3, we set out how we will use this understanding to design and deliver interventions to support customers in vulnerable situations in the net zero transition, ensuring no one is left behind.

5.103. **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.



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 industry benchmarking

• 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.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
<p>WC1: 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. 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. <p>Exceeding baseline: our approach will include more than 60 social indicator datasets.</p>	<p>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.</p>	<p>Metric 1: Number of partner agencies using WPD data mapping</p>	186	200 annually
		<p>Metric 2: Independent assessment of WPD data mapping quality</p>	-	Full compliance
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
<p>WC2: Commission an annual horizon scan with the Centre for Sustainable Energy (CISE) to identify additional datasets to incorporate into data mapping and potential new referral partners.</p>	<p>Improves our understanding of the landscape of customer vulnerability in our regions, including emerging and future challenges our customers may face. Ensures our data is accurate and up to date to enable us to provide better targeted support to customers.</p>	<p>Metric 1: Number of partner agencies using WPD data mapping</p>	186	200 annually
		<p>Metric 2: Independent assessment of WPD data mapping quality</p>	-	Full compliance
		<p>RRE 2: Number of referral partners</p>	118	-
<p>WC3: 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.</p>	<p>Accurate data, presented in an accessible and useful format enables organisations in our region to identify areas of high vulnerability and target the support they provide. Sharing innovative approaches allows other organisations to learn from best practice and ensures customers across our region can access the benefits of successful schemes.</p>	<p>RRE3: Qualitative description of activities</p>	-	-
<p>WC4: Develop innovation projects that use data to better understand the causes of vulnerability and identify relevant interventions to support those customers.</p>	<p>Data-driven innovation projects will enable refined identification of customers in vulnerable situations and more targeted support.</p>	<p>RRE3: Qualitative description of activities</p>	-	-

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 industry benchmarking

• Most DNOs report on having customer panels or similar and most also undertake bespoke vulnerability workshops.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
WC20: Work with expert stakeholders, including our Customer Panel and 150 expert referral partners, to refresh our definitions and understanding of vulnerability each year.	Collaborating with experts and those who support vulnerable customers on a daily basis ensures we take the widest possible view of vulnerability and have an up-to-date awareness of the challenges our customers face, so that we can design and deliver interventions to effectively support them.	RRE3: Qualitative description of activities	-	-
WC21: Hold annual customer 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.	With a more nuanced understanding of social and wellbeing 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. Collaborating with expert stakeholders to share best practice enables us to continually improve our approach.	RRE3: Qualitative description of activities	-	-
Exceeding baseline requirements		RRE3: qualitative description of activities	-	-
WC22: 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.	An annual action plan enables WPD to continually improve our services for vulnerable customers and respond quickly to changes in expectations or requirements, ensuring we can deliver new interventions as our understanding of what 'no one left behind' means, evolves.	Metric 16: Customer Vulnerability Action Plan published	-	Annual
WC23: 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 further develop the 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.	<p>Learnings from the 'Smart and Fair?' project will ensure our understanding of vulnerability evolves to capture the changing needs and capabilities of customers in the net zero transition, as well as the risks of being disadvantaged by the changing energy system.</p> <p>Tools developed by 'Smart and Fair?' will enable us to identify potential barriers to customer participation in smart energy offers, and design and develop interventions to support them.</p>	RRE 3: Qualitative description of activities	-	-

5.3 Principle 3:

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

Context

- 5.104.** Vulnerability manifests itself in many ways and different combinations of factors create a greater reliance for customers on essential services for support. Often, vulnerability goes hand-in-hand with difficulties around affordability, which has been exacerbated by the long term impacts of the Covid-19 pandemic.
- 5.105.** The multi-dimensional and fluctuating nature of customer needs requires proactive support and interventions from a wide range of agencies. Now embedded across our entire vulnerability programme, our one stop shop model for providing customers with fuel poverty support draws together a huge variety of partner agencies with a wide range of expertise. Our Power Up delivery partners each provide a suite of interventions to support fuel poor customers, while our network of referral partners identify customers who are struggling to afford their bills and refer them to the PSR. These networks will not only remain crucial in providing tailored, local support, but also act as a continuous feedback loop to improve and innovate our approach in RIIO-ED2.
- 5.106.** As we continue to expand our view of the situations facing customers, we must understand how vulnerability is likely to change as the network becomes smarter and greener. In particular, as the uptake of low carbon technologies increases, the demands on customer participation in the energy network will inevitably change, posing the risk that some customers may be adversely affected, unable to keep up with the pace of change or denied access to the positive opportunities offered by decarbonisation. Our RIIO-ED2 strategy will therefore go beyond what we have delivered in RIIO-ED1, by working to understand the impacts for those in vulnerable situations and develop interventions to widen participation and mitigate the risk of customers being left behind. While the challenges customers will face in the transition to a smart energy network are not yet fully established, we have embedded the flexibility within our approach to anticipate the needs of customers and quickly adapt, innovate and improve to support them.
- 5.107.** In this section, we will outline:
- Our fuel poverty support offering, via a network of local expert partners.
 - The holistic portfolio of interventions we provide to maximise benefits for customers.
 - Our approach to measuring effectiveness and identifying improvements.
 - The referral networks we use to reach customers in a wide range of situations.
 - How we will enable customers in vulnerable situations to participate in a smart energy future, including the small businesses that support our communities.

Core delivery strategy

Fuel poverty partnerships

STAKEHOLDER INSIGHTS: 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.

“Working with partners can help WPD best reach those that need their help.”

“There is currently such a range of organisations working on a range of vulnerability issues that WPD needs to coordinate action between all the services. Working together will maximise the benefit to society.”

“Protecting the interests of vulnerable customers is hugely important. The more flexible that it can be and the more referral networks, partnering and outreach that it has, the better.”

“Working with charities and organisations that are trusted by vulnerable people enables a stronger relationship with those engaged, and allows the work to better inform those people.”

- 5.108.** 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.
- 5.109.** 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.
- 5.110.** 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. In the face of increasingly digitalised processes, 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.
- 5.111.** Our core programme is made up of two schemes: Power Up and Affordable Warmth.
- 5.112.** 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).
- 5.113.** With a PSR of 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.
- 5.114.** 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.
- 5.115.** 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.
- 5.116.** 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

STAKEHOLDER INSIGHTS: 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.

Several stakeholders mentioned that “customers may trust WPD more than the government to provide these services and support” when discussing fuel poverty reduction. “WPD have a trusted brand and they are not fully exploiting this at the moment.”

“WPD should do everything in their power to help reduce fuel poverty.”

“Further work needs to be done to identify people that have become fuel poor and support them.”

“Holistic support for fuel poor customers, by for example, cross-referrals from healthcare providers, and more collaboration between WPD and the emergency services, is very important. They see people on the ground as part of their work and they can identify signs of fuel poverty.”

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



Income maximisation



Health and wellbeing measures



Tariffs



Managed referrals to water company social tariffs



Energy efficiency measures



Befriending services



Boiler replacements and heating technologies



Managed Fuel Poor Network Extension Scheme (FPNES) applications and Carbon Monoxide (CO) monitors



Behavioural changes

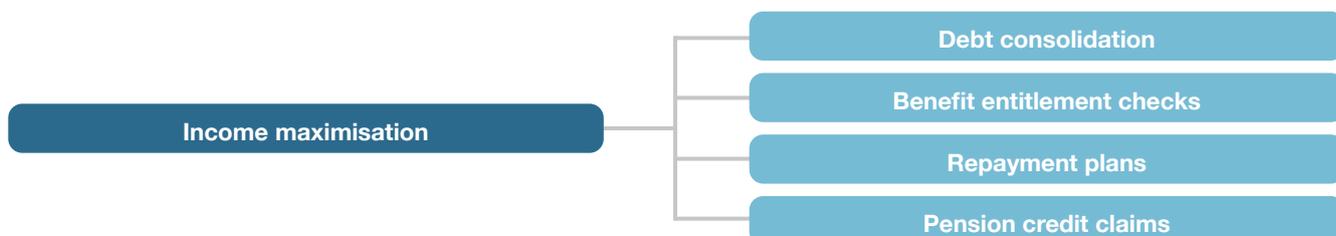
5.118. Delivery of these wide ranging interventions enables customers to benefit from holistic support tailored to their individual circumstances. This ensures that customers’ situations are considered in the round, providing qualitative health, wellbeing and quality of life benefits, as well as quantitative ‘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.

5.119. During RIIO-ED2 we will also work to develop new interventions, as well as expansions or revisions to existing interventions, to reflect both the changing needs of customers, and the new services and opportunities available in the transition to net zero.

Ensuring effectiveness

- 5.120. 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.
- 5.121. 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.
- 5.122. WPD is therefore able to monitor granular outcomes for every customer. E.g.:



- 5.123. 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. 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.
- 5.124. 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.

5.125. 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

- 5.126. 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 customer vulnerability workshops will provide the platform to collaborate with stakeholders and co-create the areas of our Customer Vulnerability Strategy dealing with fuel poverty.
- 5.127. We will also continue to work closely with our Customer Panel, via quarterly meetings and topic specific surgeries, to evaluate and improve our programme. Insight from our partners who closely interact with customers in vulnerable situations also acts as a constant feedback loop to refine and enhance our services.
- 5.128. In addition to enabling us to measure the effectiveness of our approach, we commission independent surveys with customers to identify potential improvements to our fuel poverty services. We survey customers referred by WPD to our Power Up schemes, or identified proactively by one of our Affordable Warmth outreach schemes, capturing financial savings and qualitative benefits, as well as satisfaction with services from WPD and our partners.
- 5.129. Innovation within WPD and collaboration with industry partners will, where successful, be incorporated into our ‘Business as Usual’ activities, enabling us to develop new interventions and improve existing services. For example, in partnership with the Centre for Sustainable Energy (CfSE), we run an Energy Affordability Fund grant competition, to support local organisations in delivering innovative new services for vulnerable and fuel poor customers. The competition runs annually with specific criteria each year, enabling us to develop new services to meet the new and emerging challenges our customers face, such as digital exclusion and the transition to a smarter energy system. Successful initiatives and ideas can also be adopted to improve existing services, and shared more widely across the industry so that all customers receive the benefits of these innovations.

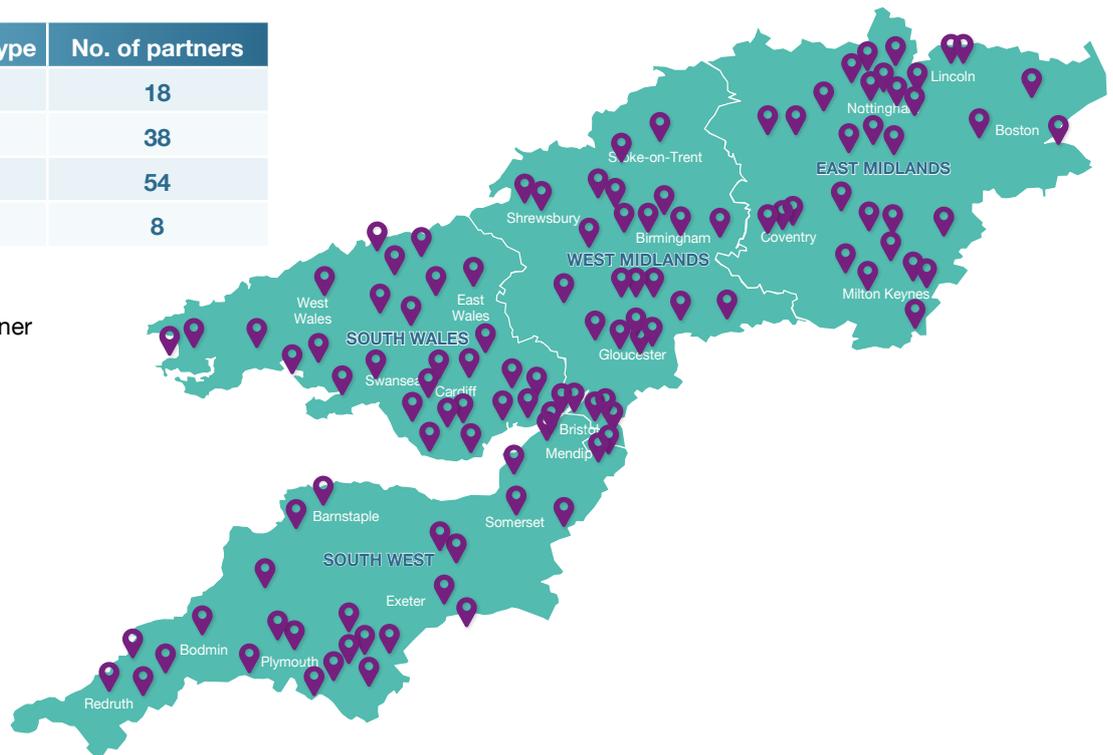
5.130. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will develop a range of tools to increase our understanding of fuel poverty and to identify customers impacted, so that we can target our outreach services most effectively.

5.131. 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

- 5.132.** 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, and in the last year WPD referred over 5,000 customers 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 register. 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.
- 5.133.** 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



- 5.134.** The benefits of our one stop shop approach to customer support across the spectrum of vulnerable situations 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 will extend this to include telecommunications providers where possible.

Enabling participation in a smart energy future

STAKEHOLDER INSIGHTS: 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 – domestic and business – are not over-burdened or disadvantaged further. They agree that industry collaboration is key, and that WPD is well-placed to take a leading role

“Vulnerability is not limited to domestic customers, micro businesses may also be classed as vulnerable, particularly in situations like during the Covid-19 pandemic.”

“Communication needs to improve to help the vulnerable understand how the smart network can benefit them and how they can participate.”

“WPD should ensure that there’s a coordinated approach, so that people know they can get trusted advice, with consistent and clear information.”

“We need to raise awareness among consumers of how they can save energy and protect customers from the costs of the transition.”

- 5.135.** 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 possible benefits.
- 5.136.** Our Customer Vulnerability Strategy sets out our commitment to continually improve our view of vulnerability, in particular, how different groups will be affected by the shift to a smart energy network. 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.
- 5.137.** 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.
- 5.138.** Ongoing research and engagement will enable us to identify innovative interventions to mitigate the risk of disadvantaging vulnerable customers, by removing barriers to participation and actively promoting opportunities to take part in smart network offerings. 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 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.
- 5.139.** Our participation in the CfSE's 'Smart and Fair?' project has enabled the development of bespoke tools designed to model the capabilities needed for customers to participate in smart energy offers. Under Principle 2, we set out how these tools have been developed and outline the key findings to date.
- 5.140.** By embedding these findings through practical application to our existing customer vulnerability programme we will design and implement interventions to facilitate customer participation in smart energy services, initiating collaboration with a range of industry participants to share best practice and co-deliver innovative schemes. We will also use these tools to assess the effectiveness of existing initiatives, recalibrating our approach, 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 likely change as a smarter energy system emerges, we will continue to enhance and refresh our approach as our understanding improves.
- 5.141.** 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 customer vulnerability in the net zero transition.
- 5.142.** Linking in with WPD's DSO Strategy, research from the 'Smart and Fair?' initiative will directly inform the development of a specific energy efficiency proposition, building on our flexibility services. Insights from the research will enable us to tailor the product to maximise participation for vulnerable customers and in combination with our data mapping, help to target its roll-out. Working with our expert partners we can seek to build this into our fuel poverty support services to unlock additional value for our customers.
- 5.143.** The ongoing 'Smart and Fair?' research will enable us to expand our definition of vulnerability to reflect a new understanding of the capabilities necessary to participate in, and benefit from, a smart network, both now and in the future. As a result, we will assess whether new PSR Needs Codes are needed to reflect our increasingly nuanced view of vulnerability, collaborating with industry participants to review the requirements and implement where necessary.

5.144. CUSTOMER VULNERABILITY STRATEGY – KEY DELIVERABLE: We will ensure that the evolving needs of vulnerable customers in the smart energy transition are understood and tailored interventions are developed to provide support.

Providing PSR customers with bespoke energy advice

- 5.145.** Key to ensuring customers can participate in the energy system will be providing trusted and impartial education and support. Stakeholders have urged us to build on our strong track record of coordinating a range of expert partners, to ensure vulnerable customers receive advice tailored to their specific circumstances and needs.
- 5.146.** As with our fuel poverty support, we will achieve this via proactive calls to PSR customers, which provide an important touchpoint with customers; they give us an opportunity to build relationships with those 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 at risk of being disadvantaged by the transition to net zero receive tailored support and advice.
- 5.147.** Using ‘Smart and Fair?’ consumer data analytics as a starting point, we will test methods to identify the best ways to communicate with different types of customers to establish understanding and secure engagement, in relation to the net zero transition.

5.148. 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 smart energy needs of our PSR customers, offering them 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.

Ensuring accessibility of electric vehicle (EV) charging

- 5.149.** 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 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, nearly one in ten new cars are bought on behalf of disabled people, and by 2035, over 1.3 million disabled motorists will be reliant on public charging. It is anticipated that about 0.9 million 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.
- 5.150.** We will undertake specific research in RIIO-ED1, 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.

5.151. 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 (LAEPs). 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

- 5.152. Engagement with small and medium enterprises (SMEs) has revealed that the compounding impacts of Covid-19 and the net zero transition are causing them significant challenges. SMEs can have limited time, expertise 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.
- 5.153. 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.
- 5.154. WPD is collaborating with Northern Powergrid and Electricity North West to work with the Federation of Small Businesses, 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.
- 5.155. This collaboration will continue to develop an online platform which aims to make net zero relevant to UK SMEs, enabling them to unlock green growth opportunities for the wider benefit of communities that they support. Building the service iteratively, we are ensuring that the platform effectively meets the needs of users.

5.156. **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.



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 industry benchmarking

- 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.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
<p>WC7: Have data share arrangements in place with suppliers, gas distributors and water companies, compliant with GDPR and Ofgem Data Best Practice Guidance. Exceeding baseline: We will extend our data share arrangements to partner with telecommunications companies. We will establish two way data sharing, partnering with all eight water companies in WPD's region.</p>	<p>Other utilities' customers gain the benefit of WPD's extensive PSR reach, as data shared with other utilities enables those customers to access a wider range of support.</p>	<p>RRE 4: Number of data share agreements in place</p>	<p>Six data share agreements in place – one way sharing with four; two way sharing with two</p>	-
		<p>RRE 5: Data share in place with telecoms companies</p>	-	-
		<p>Metric 9: Number of PSR records shared with utilities per year</p>	100,000	150,000
<p>WC8: 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. Exceeding baseline: We will extend this to partnerships with telecoms providers, maintaining a minimum of 150 partner agencies.</p>	<p>Having a network of referral partners across our licence area ensures that we can take a locally-tailored approach, working with organisations that are recognised and trusted, with a good understanding of the regional issues our customers face. Where we identify areas in need of support through our social indicator mapping, this network enables us to proactively target our PSR promotion and outreach services.</p>	<p>RRE 2: Number of referral partners</p>	118	-
<p>WC26: Continue to maintain partnerships with Local Resilience Forums to assist in the coordination of community support during incidents such as flooding.</p>	<p>Strong partnerships ensure we can quickly adapt to support customers during crises, and contribute to coordinated community responses.</p>	<p>RRE 3: Qualitative description of activities</p>	-	-
<p>WC27: 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.</p> <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. 	<p>Our hub delivery model provides customers with joined-up support from a range of partners without the confusion of dealing with multiple service providers. Every service delivery partner offers nine core interventions, considering customers' situations holistically and delivering health, wellbeing and quality of life benefits on top of financial savings and debt relief.</p> <p>Working with a network of partner agencies has multiple benefits for our customers, including:</p> <ul style="list-style-type: none"> • Breadth and depth of support provided by multiple partners with a range of expertise. • Partner credibility ensures services are trusted by customers. • Geographically tailored support and local knowledge. • Scalability of approach that would be unachievable if delivered by WPD alone. • Joined up services for customers that address their needs in the round. <p>This model ensures customers receive tailored interventions that have a substantial impact on their ability to afford their energy bills.</p>	<p>RRE 3: Qualitative description of activities</p>	-	-
		<p>Metric 17: Number of fuel poor customers supported</p>	85,000	113,000
		<p>Metric 18: Total financial savings of fuel poor customers supported</p>	£35.5 million	£60 million
<p>Exceeding baseline requirements</p>		Metric	Baseline	RIIO-ED2 Target
<p>WC31: 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.</p>	<p>Utilising the insights from 'Smart and Fair?', we will ensure that customers requiring fuel poverty support will be able to benefit from the opportunities of participating in the energy transition.</p>	<p>Metric 17: Number of fuel poor customers supported</p>	85,000	113,000
		<p>Metric 18: Total financial savings of fuel poor customers supported</p>	£35.5 million	£60 million

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 industry benchmarking

• 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.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
WC6: Maintain dedicated PSR data cleanse teams, who contact all customers registered on the PSR at least once every two years.	Customers are contacted by dedicated teams with expert training to update their records and provide up-to-date information on the services we can offer.	Metric 10: BMCS PSR score	91.6%	93%
WC15: 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 providing PSR sign up and advice. Social media, including campaigns targeted at our top five PSR gaps. 	Customers can easily and readily access content via our online channels to increase awareness of the support we offer.	Metric 3: Number of new PSR customers registering directly with WPD per year	31,000	50,000
WC36: Continually review and expand the training provided to staff in line with changing customer needs. 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.	Customers in vulnerable circumstances benefit from an empathic service, tailored to a continually changing range of specific needs.	Metric 19: % of WPD direct PSR registrations target via staff referral	-	5%
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
WC4: Develop innovation projects that use data to better understand the causes of vulnerability and identify relevant interventions to support those customers.	Data-driven innovation projects will enable refined identification of customers in vulnerable situations and more targeted support.	RRE 3: Qualitative description of activities	-	-
WC32: Every WPD innovation scheme will formally consider the impacts and opportunities for customers in vulnerable situations. This approach maximises customer touchpoints, signposting support for customers participating in trials and expanding referral channels for support schemes.	Innovation projects are inclusive, and, where possible generate positive benefits for vulnerable customers by addressing the unique challenges they face.	RRE 3: Qualitative description of activities	-	-
WC34: Enhance our internal app for all 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.	The app will be linked to the training provided to employees, building their confidence to identify vulnerable situations and take customers' details (with their consent). Customers then receive proactive contact to discuss their situation, removing any effort from the customer needing to contact us.	Metric 19: % of WPD direct PSR registrations target via staff referral	-	5%
WC35: Deliver customer vulnerability training to all 6,500 employees on an annual basis, with key training for all staff and specialist training for staff who regularly interact with vulnerable customers (e.g. field staff, Contact Centre staff).	Customers in vulnerable situations receive the support they need, regardless of the WPD employee or team they interact with, for example, our team of 37 Contact Centre support staff are 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 19: % of WPD direct PSR registrations target via staff referral	-	5%

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 industry benchmarking

• 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.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
<p>WC7: Have data share arrangements in place with suppliers, gas distributors and water companies, compliant with GDPR and Ofgem Data Best Practice Guidance. Exceeding baseline: We will extend our data share arrangements to partner with telecommunications companies. We will establish two way data sharing, partnering with all eight water companies in WPD's region.</p>	<p>Other utilities' customers gain the benefit of WPD's extensive PSR reach, as data shared with other utilities enables those customers to access a wider range of support</p>	RRE 2: Number of referral partners	118	-
		RRE 4: Number of data share agreements in place	Six data share agreements in place – one way sharing with four; two way sharing with two	-
		Metric 9: Number of PSR records shared with utilities per year	100,000	150,000
<p>WC8: 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. Exceeding baseline: We will extend this to partnerships with telecoms providers, maintaining a minimum of 150 partner agencies.</p>	<p>Having a network of referral partners across our licence area ensures that we can take a locally-tailored approach, working with organisations that are recognised and trusted, with a good understanding of the regional issues our customers face. Where we identify areas in need of support through our social indicator mapping, this network enables us to proactively target our PSR promotion and outreach services.</p>	RRE 2: Number of referral partners	118	-
		RRE 3: Qualitative description of activities	-	-
<p>WC27: 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. </p>	<p>Our hub delivery model provides customers with joined-up support from a range of partners without the confusion of dealing with multiple service providers. Every service delivery partner offers nine core interventions, considering customers' situations holistically and delivering health, wellbeing and quality of life benefits on top of financial savings and debt relief.</p> <p>Working with a network of partner agencies has multiple benefits for our customers, including:</p> <ul style="list-style-type: none"> breadth and depth of support provided by multiple partners with a range of expertise. partner credibility ensures services are trusted by customers. geographically tailored support and local knowledge. scalability of approach that would be unachievable if delivered by WPD alone. joined up services for customers that address their needs in the round. <p>This model ensures customers receive tailored interventions that have a substantial impact on their ability to afford their energy bills</p>	Metric 17: Number of fuel poor customers supported	85,000	113,000
		Metric 18: Total financial savings of fuel poor customers supported	£35.5 million	£60 million
		Metric 17: Number of fuel poor customers supported	85,000	113,000
<p>WC30: 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. </p>	<p>Facilitating expert partners to trial innovative approaches which, where successful can be rolled out more widely and shared with other DNOs, enabling all customers to receive the benefits of innovation.</p>	Metric 18: Total financial savings of fuel poor customers supported	£35.5 million	£60 million
		Metric 17: Number of fuel poor customers supported	85,000	113,000
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
<p>WC33: 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.</p>	<p>Customers benefit from a broader pool of expertise and funding when organisations share best practice and deliver collaborative initiatives.</p>	RRE 3: Qualitative description of activities	-	-

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 industry benchmarking

- 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.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
<p>WC27: 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.</p> <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. <p>WC28: Power Up Smart providing nine core interventions and tailored energy advice targeted at PSR customers with smart meters.</p> <p>WC29: 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.</p>	<p>Our hub delivery model provides customers with joined-up support from a range of partners without the confusion of dealing with multiple service providers. Every service delivery partner offers nine core interventions, considering customers' situations holistically and delivering health, wellbeing and quality of life benefits on top of financial savings and debt relief.</p> <p>Working with a network of partner agencies has multiple benefits for our customers, including:</p> <ul style="list-style-type: none"> • breadth and depth of support provided by multiple partners with a range of expertise. • partner credibility ensures services are trusted by customers. • geographically tailored support and local knowledge. • scalability of approach that would be unachievable if delivered by WPD alone. • joined up services for customers that address their needs in the round. <p>This model ensures customers receive tailored interventions that have a substantial impact on their ability to afford their energy bills</p> <p>Power Up Smart benefits from the same hub delivery model. As well as providing our core interventions, the scheme supports customers who have a smart meter to use it effectively and benefit from a better understanding of their energy usage.</p> <p>Power Up Health benefits from the same hub delivery model. As well as providing our core interventions, the scheme enables us to proactively identify customers with specific health needs and tailor our support to them.</p>	<p>RRE 3: Qualitative description of activities</p>	-	-
		<p>Metric 17: Number of fuel poor customers supported</p>	85,000	113,000
		<p>Metric 18: Total financial savings of fuel poor customers supported</p>	£35.5 million	£60 million
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
<p>BP Commitment 18: Ensure customers are not left behind in the smart energy transition by offering 600,000 Priority Services Register customers a bespoke smart energy action plan each year.</p> <p>BP Commitment 19: Support at least 113,000 fuel poor customers to save £60 million on their energy bills over RIIO-ED2.</p>	<p>Targeted advice and support for vulnerable customers in relation to low carbon technologies, smart meters, and flexible energy services for example.</p> <p>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.</p>	<p>Metric 20: Number of PSR customers offered smart energy plan</p> <p>Metric 17: Number of fuel poor customers supported</p> <p>Metric 18: Total financial savings of fuel poor customers supported</p>	-	600,000 annually
<p>WC22: 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.</p> <p>WC23: 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 further develop the 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.</p> <p>WC24: 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.</p> <p>WC25: 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.</p> <p>WC33: 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.</p>	<p>An annual action plan enables WPD to continually improve our services for vulnerable customers and respond quickly to changes in expectations or requirements, ensuring we can deliver new interventions as our understanding of what 'no one left behind' means, evolves.</p> <p>Learnings from the 'Smart and Fair?' project will ensure our understanding of vulnerability evolves to capture the changing needs and capabilities of customers in the net zero transition, as well as the risks of being disadvantaged by the changing energy system.</p> <p>Tools developed by 'Smart and Fair?' will enable us to identify potential barriers to customer participation in smart energy offers, and design and develop interventions to support them.</p> <p>This approach will drive better, more inclusive facilities for disabled EV drivers, as well as developing insights to inform the wider roll-out of EV charging infrastructure.</p> <p>The platform enables the small businesses who support our communities, to unlock the benefits of decarbonising their operations.</p> <p>Power cut resilience advice reduces the impact of loss of supply on small businesses, ensuring they are prepared in the event of a power cut.</p> <p>Customers benefit from a broader pool of expertise and funding when organisations share best practice and deliver collaborative initiatives.</p>	<p>Metric 16: Customer Vulnerability Action Plan published</p> <p>RRE 3: Qualitative description of activities</p> <p>RRE 3: Qualitative description of activities</p> <p>RRE 3: Qualitative description of activities</p>	-	Annual
		<p>RRE 3: Qualitative description of activities</p>	-	-
		<p>RRE 3: Qualitative description of activities</p>	-	-
		<p>RRE 3: Qualitative description of activities</p>	-	-

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.

Context

- 5.157.** 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. As our understanding of vulnerability evolves to take the widest possible view of the situations customers face, we recognise the need to maximise the interactions we have with our communities, to identify needs and deliver support.
- 5.158.** Our approach seeks to integrate vulnerability considerations at all levels of the business. To ensure the interests of customers in vulnerable situations are strongly represented across our workforce, expert training will be complemented by a network of vulnerability champions and digital solutions. We will also seek to embed customer vulnerability in our operations, by including criteria to consider vulnerability in our innovation and network improvement schemes.
- 5.159.** In this section, we will outline:
- The vulnerability champions who will support our Customer Vulnerability Strategy across all levels of our organisation.
 - Our programme of employee training.
 - Our approach to supporting customers throughout our operations.



Core delivery strategy

Embedded culture of support for vulnerable customers

STAKEHOLDER INSIGHTS: Stakeholders agree that prioritising vulnerability throughout WPD's operations will drive greater benefits for customers, expressing strong support for enhanced training and awareness of employees.

"Vulnerability champions could tie into other special interest champions within the operational structure of WPD such as environment."

"Immediately embedding the interests of vulnerable customers within your operation is a positive thing and feeds into the community of the organisation."

"When I initially read that every innovation scheme would support vulnerability, I thought why not every scheme?"

- 5.160.** Our 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 on our annual Customer Vulnerability Strategy ensuring its continued efficacy through delivery of specific, stretching targets, measured and reported monthly.
- 5.161.** To ensure this culture is embedded across the business, we will appoint vulnerability champions at local depots to act as a point of contact for staff and to raise awareness of our customer vulnerability programme. Spread geographically across our licence area, our depot staff already have a strong understanding of their area, making them well placed to support our Customer Vulnerability Strategy at a local level through their interactions with the community, and to provide valuable insight to feed back into our programme. As vulnerability champions, they will also support the development of our training programme to ensure it can be effectively rolled out across our entire workforce.

5.161. Customer Vulnerability Strategy – KEY DELIVERABLE: We will establish vulnerability champions at local depots to engage with communities, provide valuable insights to feed into our programme, support the development of employee vulnerability training and act as a point of contact for staff across our region.

Expert external training

- 5.162.** Through regular expert training our staff are able to improve their understanding of customer 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 allows us to consistently identify customers' needs, communicate with empathy and sensitivity and embed our approach across every major customer touchpoint in our business.
- 5.163.** To ensure we embed the importance of our customer vulnerability programme within our culture, every WPD new starter and apprentice, regardless of their role, receives training on our PSR and support services.
- 5.164.** In RIIO-ED2, we will provide vulnerability training to all employees on an annual basis, with key training for our entire workforce, and tailored training for employees who interact regularly with customers in vulnerable situations. Our Contact Centre staff, for example, receive regularly updated training on the specific needs customers may have, as set out in Principle 1. Likewise, we will provide bespoke training for field staff, to be complemented by our internal app.
- 5.165.** We will measure the effectiveness of this training through external scrutiny via our annual accreditations. Through the measurement of the number of PSR referrals generated by WPD staff during their day to day interactions with customers, we will be able to understand how our employee training and improved understanding of vulnerability translates into direct benefits for customers.

5.166. 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

- 5.167.** 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

- 5.168.** 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 interaction we have with customers during planned and unplanned works, whether via our Contact Centre or field staff, we are uniquely placed to recognise vulnerability and identify customers who could benefit from the customer 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

- 5.169. 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 will complement 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.

- 5.170.** Not only will all WPD innovation schemes be required to formally consider the impacts and opportunities for customers in vulnerable situations (see Principle 3), we will use vulnerable customer data to ensure that when carrying out work on the network, all our schemes take account of customer vulnerability and can be prioritised by their impact on vulnerable customers. This will ensure that customers in vulnerable situations are not disadvantaged and, where possible, benefit from prioritised network improvements.

Social Contract

STAKEHOLDER INSIGHTS: Stakeholders 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. Stakeholders are clear that whilst WPD is a large company covering a huge area, it has a local feel and should continue to build trust and visibility by bolstering the efforts of communities.

"I think it is a great move to have more of a local focus. I think volunteering and additional funding is a good way of doing this. WPD have skilled staff, so adding them to appropriate local projects would be good."

"The problem you've always got is that you're not the name on the bill, even though you supply the power to that household. It gives an opportunity for WPD to create a public visibility."

- 5.171.** Our Social Contract, published alongside our RIIO-ED2 Business Plan, will serve as a mechanism enabling us to further embed customer 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 customer vulnerability in new and existing initiatives.
- 5.172.** 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 £1 million support fund for local community initiatives and good causes, including supporting customers in vulnerable situations, through activities that build on our core purpose customer vulnerability and fuel poverty schemes.
 - 1,000 volunteer days each year, enabling staff to support local community initiatives associated with customer 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.
 - £540,000 shareholder-funded support per year to install solar PV on schools in areas of high economic deprivation, delivering wider social benefits through Science, Technology, Engineering and Maths (STEM) outreach from WPD STEM ambassadors.



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 industry benchmarking

• Regulatory reporting suggests most DNOs have comprehensive training for, as a minimum, frontline staff. One DNO now has a dedicated Consumer and Vulnerability Trainer in post.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
WC6: Maintain dedicated PSR data cleanse teams, who contact all customers registered on the PSR at least once every two years.	Customers are contacted by dedicated teams with expert training to update their records and provide up-to-date information on the services we can offer.	Metric 10: BMCS PSR score	91.6%	93%
WC10: Achieve external accreditations, ensuring 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, Louder than Words Charter and Customer Service Excellence). Exceeding baseline: We will achieve compliance or compliance plus ratings in all 57 elements of the Customer Service Excellence assessment.	Provides independent scrutiny to assure stakeholders that we are credible, responsible and demonstrably compliant, while providing insights that enable us to identify areas for improvement.	Metric 10: BMCS PSR score Metric 11: AbilityNet Accreditation for WPD website Metric 12: Independent assessment of WPD CSE Standard	91.6% Accreditation in place Top UK performer in CSE standard	93% Accreditation in place Top UK performer in CSE standard
WC21: Hold annual customer 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.	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. Collaborating with expert stakeholders to share best practice enables us to continually improve our approach.	RRE 3: Qualitative description of activities	-	-
WC22: 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.	An annual action plan enables WPD to continually improve our services for vulnerable customers and respond quickly to changes in expectations or requirements, ensuring we can deliver new interventions as our understanding of what ‘no one left behind’ means, evolves.	Metric 16: Customer Vulnerability Action Plan published	-	Annual
WC36: Continually review and expand the training provided to staff in line with changing customer needs. 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.	Customers in vulnerable circumstances benefit from an empathic service, tailored to a continually changing range of specific needs.	Metric 12: Independent assessment of WPD CSE Standard	Top UK performer in CSE standard	Top UK performer in CSE standard
WC37: 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.	From the outset, WPD employees are aware of the vulnerable circumstances our customers may face, as well as the support we can provide, ensuring this focus is embodied by our entire workforce.	Metric 13: Independent assessment of WPD BSI18477 Standard	-	Full compliance
WC38: WPD’s Resource and External Affairs Director, as Vulnerability Champion, provides strategic direction and ensures customer vulnerability is embedded in WPD’s company-wide operations and embodied in our culture.	All staff understand customer vulnerability and the responsibilities WPD have to our customers with clear leadership and commitment at WPD Board level.	RRE3: Qualitative description of activities	-	-
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
WC35: Deliver customer vulnerability training to all 6,500 employees on an annual basis, with key training for all staff and specialist training for staff who regularly interact with vulnerable customers (e.g. field staff, Contact Centre staff).	Customers in vulnerable situations receive the support they need, regardless of the WPD employee or team they interact with. For example, our team of 37 Contact Centre support staff are 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 21: % staff receiving customer vulnerability training each year	100% frontline staff (Contact Centre and field staff) and all new starters (including apprentices)	100% of all staff annually
WC39: Appoint vulnerability champions at local depots to act as a point of contact for staff and to raise awareness of our customer vulnerability programme.	Vulnerability champions support teams across our region and provide valuable insights to feed into our programme, ensuring our approach is locally tailored to the needs of customers.	RRE3: Qualitative description of activities	-	-

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

RIIO-ED1 industry benchmarking

- Regulatory reporting by DNOs reveals an array of initiatives where their expertise can protect vulnerable customers.

Delivery strategy

Baseline delivery initiatives	Positive impact for customers	Metric	Baseline	RIIO-ED2 Target
WC40: 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.	Customers are able to maintain trust and a sense of safety from interactions with WPD.	RRE 3: Qualitative description of activities	-	-
Exceeding baseline requirements		Metric	Baseline	RIIO-ED2 Target
BP Commitment 23: Support and add significant value to our local communities via a 'Community Matters' social initiative associated with the smart energy transition, vulnerability, environment and sustainability. This will include a shareholder-funded annual £1m community support fund and 1,000 volunteer days per year for WPD staff to support local causes.	Act as a socially responsible business that will support the needs of the local communities we serve – delivering key corporate social responsibility initiatives to help people in vulnerable situations. Expand the impact, scope and reach of community and charity initiatives across WPD's regions, to deliver for the wider social good of people living in WPD's service territory.	RRE 3: Qualitative description of activities	-	-
BP Commitment 24: Deliver enduring, long term support to our communities by publishing an updated WPD Social Contract and performance report every year and maintain our prime Environmental, Social and Governance (ESG) rating.	Independent scrutiny of WPD's environmental, social and corporate governance initiatives to provide stakeholders with a view of WPD's performance relative to wider UK PLC and to identify improvements.	RRE 3: Qualitative description of activities	-	-
BP Commitment 25: Build decarbonised communities and local energy schemes by providing £540,000 shareholder-funded support per year to install solar PV on schools in areas of high economic deprivation.	Environmental benefits through carbon emissions saved, and financial benefits in reduced electricity bills. The reduced consumption through behavioural changes will also deliver financial and carbon savings. The solar PV starter packs will allow schools to promote STEM learning activities with a practical focus.	RRE 3: Qualitative description of activities	-	-
BP Commitment 33: Deliver improved network reliability where on average power cuts are better than one interruption every two years lasting less than 22 minutes (12% reduction in customer interruptions (frequency) and 16% reduction in customer minutes lost (duration)), utilising vulnerable customer data to prioritise network improvement schemes.	Utilising vulnerable customer data means that teams have a clear sight of vulnerability in the area where new schemes are being proposed, ensuring customers in vulnerable situations are not disadvantaged and, where possible, benefit from prioritised network improvements.	RRE 3: Qualitative description of activities	-	-
WC32: Every WPD innovation scheme will formally consider the impacts and opportunities for customers in vulnerable situations. This approach maximises customer touchpoints, signposting support for customers participating in trials and expanding referral channels for support schemes.	Innovation projects are inclusive, and, where possible generate positive benefits for vulnerable customers by addressing the unique challenges they face.	RRE 3: Qualitative description of activities	-	-
WC41: 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.	Employee participation in local initiatives enables WPD to add additional value to organisations supporting vulnerable customers, as well as increasing the visibility of WPD and the services we can offer in the community.	RRE 3: Qualitative description of activities	-	-

Key metrics

No.	Key metrics	RIIO-ED2 Trajectory						
		RIIO-ED1 Performance	RIIO-ED2 target	2023/24	2024/25	2025/26	2026/27	2027/28
1	Number of partner agencies using WPD data mapping	186	200 p.a.	200	200	200	200	200
2	Independent assessment of WPD data mapping quality	-	Full compliance					
3	Number of newly identified PSR customers registering directly with WPD per year	31,000 ⁵	50,000 p.a.	50,000	50,000	50,000	50,000	50,000
4a	% of eligible customers registered on the PSR in WPD regions	59%	75%	61%	63%	67%	71%	75%
4b	% of customers with critical medical dependencies registered on the PSR in WPD regions	63%	80%	65%	67%	71%	75%	80%
5	Number of partner agencies trained by WPD	58	200 p.a.	200	200	200	200	200
6	PSR data and information strategy published	-	Annual	Annual	Annual	Annual	Annual	Annual
7	% of PSR customers contacted to update their records every 24 months	100%	100%	100%	100%	100%	100%	100%
8	% of PSR customers contacted to update their records by telephone	30%	60%	60%	60%	60%	60%	60%
9	Number of PSR records shared with utilities per year	100,000	150,000 p.a.	150,000	150,000	150,000	150,000	150,000
10	BMCS PSR score ⁶	91.6%	93%	93%	93%	93%	93%	93%
11	AbilityNet Accreditation for WPD website	Accreditation in place	Accreditation in place	Accreditation in place	Accreditation in place	Accreditation in place	Accreditation in place	Accreditation in place
12	Independent assessment of WPD CSE standard	Top UK performer in CSE standard ⁷	Top UK performer in CSE standard					
13	Independent assessment of WPD BSI18477 Standard	Full compliance	Full compliance	Full compliance	Full compliance	Full compliance	Full compliance	Full compliance
14	PSR speed of response ⁸	3.97 seconds on average	2 seconds on average	2 seconds on average	2 seconds on average	2 seconds on average	2 seconds on average	2 seconds on average
15	% of care homes in WPD's region supported to create a resilience plan	-	10%	1%	2%	4%	7%	10%
16	Customer Vulnerability Action Plan published	-	Annual	Annual	Annual	Annual	Annual	Annual
17	Number of fuel poor customers supported ⁹	85,000 ¹⁰	113,000	~22,500	~45,000	~67,500	~90,000	113,000
18	Total financial savings of fuel poor customers supported ⁹	£35.5 million ¹¹	£60 million	~£12 million	~£24 million	~£36 million	~£48 million	£60 million
19	% of WPD direct PSR registrations target via staff referrals	-	5%	5%	5%	5%	5%	5%
20	Number of PSR customers offered a smart energy action plan	-	600,000 p.a.	600,000	600,000	600,000	600,000	600,000
21	% of staff receiving customer vulnerability training	100% frontline staff (Contact Centre and field staff) and all new starters (including apprentices)	100% of all staff annually					

Regulatory Reportable Evidence (RRE)

RRE 1: Number of datasets
RRE 2: Number of referral partners
RRE 3: Qualitative description of activities

RRE 4: Number of data share agreements in place
RRE 5: Data share in place with telecoms companies

RRE 6: Top ten languages in WPD region and evidence of translation services in place

⁵ Approximate figure based on WPD's average registrations over the five years 2016-21.

⁶ Our current BMCS PSR score is calculated based on five months of data from a pilot to capture satisfaction of PSR customers within the BMCS.

⁷ Top performer in the UK out of 600 companies.

⁸ Response times to calls on our dedicated PSR phone line.

⁹ We are committed to a target by the end of RIIO-ED2 for the volume of customers supported and savings made by customers. We have given an indication of the trajectory taken to achieve these targets, however we recognise that these may vary within individual years, due to factors such as national policy and changes in Government funding schemes.

¹⁰ Baseline represents the number of fuel poor customers supported over the five years 2016-21.

¹¹ Baseline represents actual financial savings of fuel poor customers over the five years 2016-21.

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:

Figure 1 WPD Customer Vulnerability Strategy summary costs

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 (£60 million).	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 (1 million customers 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

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

Appendix 1

Social return on investment – mapping of Business Plan commitments and wider commitments to high level outcomes

PSR services				
Outcome: PSR customers are provided with the support they need during power cuts				
Activities				
BPC20	BPC21	BPC22		
WC4	WC16	WC17	WC18	WC19
Enablers				
WC1	WC2	WC3	WC5	WC6
WC7	WC8	WC9	WC11	WC12
WC13	WC14	WC15	WC32	WC34
WC35	WC37	WC10	WC20	WC21
WC22	WC36	WC38	WC39	

Fuel poverty				
Outcome: Fuel poor customers save money on their bills and have a warmer home				
Activities				
BPC19				
WC30	WC28	WC27	WC29	
Enablers				
WC1	WC7	WC31	WC10	WC11
WC20	WC21	WC22	WC35	WC36
WC38	WC39			

No one left behind				
Outcome: Vulnerable customers save money by participating in the energy system transition				
Activities				
BPC18				
WC23				
Enablers				
WC1	WC7	WC23	WC33	WC10
WC11	WC20	WC21	WC22	WC35
WC36	WC38	WC39		

Social Contract				
Outcome: Communities realise social and environmental benefits through investment in community-led projects and volunteering				
Activities				
BPC23				
WC24				
Enablers				
BPC24				
WC3	WC26	WC41	WC10	WC11
WC20	WC21	WC22	WC35	WC36
WC38	WC39			

Appendix 2

Calculation of PSR Reach

6.2. Under Principle 1 of this strategy we have explained our methodology to deliver a robust estimation of our PSR reach. Table 1 below outlines an estimate of our PSR reach in RIIO-ED1 and our target for RIIO-ED2, as a percentage of our current estimated eligible customers, and current number of total customers (household and non-household).

	RIIO-ED1 actual	RIIO-ED2 target
PSR reach as a % of eligible customers	59%	75%
PSR reach as a % of all customers	23%	30%

6.3. In this appendix we set out an example of how the methodology provides a robust estimate of PSR eligibility at a household level for customers of pensionable age, using national datasets to account for multi-occupancy and instances of overlap of conditions.

6.4. This appendix also sets out the datasets used for our PSR reach methodology and how these map against PSR Needs Codes as well as a breakdown of WPD's current PSR by Needs Code.

Calculation of PSR eligibility

6.5. Using CfSE analysis of Census 2011 data on household composition by people for all over 65 year old households⁸ as an example, in order to estimate the number of households eligible for the PSR, population data needs to be converted to household level statistics and also consider the overlap of where households have multiple conditions.

6.6. The total number of people of pensionable age needs to be adjusted to estimate the total number of households with at least one household member who is of pensionable age. For this, the national data was analysed and it was determined that across England and Wales 59% of people of pensionable age are living with another pensioner at the same address (i.e. are pensionable age couples). So to arrive at the number of pensionable age households we need to divide 59% of the total number of pensionable age population by two and add this to the remaining 41% of pensionable age people (who we assume are living alone or with no other people of pensionable age). Thus,

$$\text{Total number of pensionable age households} = \frac{(0.41 \times \text{pensionable age population}) + (0.59 \times \text{pensionable age population})}{2}$$

$$\text{Total number of pensionable age households} = 0.705 \times \text{pensionable age population}$$

6.7. Using a similar logic, we can estimate the number of households who are families with at least one child under five from under five population data.

6.8. The methodology has also accounted for the overlap between those under five or of pensionable age who also have long term health conditions and disabilities, to estimate the number of people with long term health conditions and disabilities aged between five and pensionable age. This is then converted to a household number from population data using an average household size.

6.9. The statistics on the number of people with long term health conditions and disabilities will include those who are unable to communicate well in English (see above). The numbers of people who cannot speak English is then adjusted to take account for this, and similarly converted into household statistics from population data using average household size. The final estimate of total PSR eligibility at household level is then calculated as follows:

PSR eligibility (households) =



Number of pensionable age households.



+ Number of households with one or more children under five.



+ Remaining number of households with long term health conditions (those with disabilities or long term health problems that are not children or of pensionable age).



+ Households where at least one person is unable to speak English (but without disabilities or long term health problems).

1. Population with long term health problems or disabilities, at LSOA level, from Census 2011, QS303EW⁹.
2. Pensionable age population, from 2019 mid-year population estimates at LSOA level, ONS 2020¹⁰.
3. Population under 5 years old, from 2019 mid-year population estimates at LSOA level, ONS 2020¹¹.
4. People unable to speak English well or at all, at LSOA level, from Census 2011, QS205EW¹².

6.10. How the datasets link to PSR categories is shown in Table 2 below. It should be noted that there are some datasets available on the prevalence of specific health conditions that can be directly related to individual PSR Needs Code (e.g. dementia, hearing loss or sight loss). However, using these would significantly increase the complexity of calculating an overall total PSR eligibility number – there is not sufficient information available on the overlap in co-morbidity for different conditions. Furthermore, there is not reliable data available for all health related PSR Needs Codes so the picture would be partially complete. However, it is recommended that for understanding PSR coverage for specific Needs Codes, data on specific conditions could be used.

Accounting for WPD boundaries

6.11. The data above has been collected at LSOA level and used only statistics for LSOAs within WPD's boundary. However, a significant number of LSOAs on the WPD area boundary straddle the boundary and cover areas and populations outside of WPD's distribution area and therefore overinflate the eligibility estimate. In these 'boundary LSOAs' we have reduced the eligibility numbers used in the calculation to account for this.

Table 2: PSR categories linked to data used to determine overall PSR eligibility

PSR Needs Code	Data set used for overall eligibility
Nebuliser and Apnoea monitor	Population with long term health problems or disabilities (Census 2011, QS303EW)
Heart, lung & Ventilator	Population with long term health problems or disabilities (Census 2011, QS303EW)
Dialysis, feeding pump and automated medication	Population with long term health problems or disabilities (Census 2011, QS303EW)
Oxygen Concentrator	Population with long term health problems or disabilities (Census 2011, QS303EW)
Blind	Population with long term health problems or disabilities (Census 2011, QS303EW)
Partially sighted	Population with long term health problems or disabilities (Census 2011, QS303EW)
Hearing/speech difficulties (inc. Deaf)	Population with long term health problems or disabilities (Census 2011, QS303EW)
Stair lift, Hoist, Electric bed	Population with long term health problems or disabilities (Census 2011, QS303EW)
Pensionable Age	Pensionable age population, from 2019 mid-year population estimates at LSOA level (ONS 2020)
Physical impairment	Population with long-term health problems or disabilities (Census 2011, QS303EW)
Unable to communicate in English	People unable to speak English well or at all (Census 2011, QS205EW)
Developmental condition	Population with long term health problems or disabilities (Census 2011, QS303EW)
Dementia(s)	Population with long term health problems or disabilities (Census 2011, QS303EW)
Chronic/serious illness	Population with long term health problems or disabilities (Census 2011, QS303EW)
Medicine refrigeration	Population with long term health problems or disabilities (Census 2011, QS303EW)
Oxygen Use	Population with long term health problems or disabilities (Census 2011, QS303EW)
Families with young children 5 or under	Population under five years old, from 2019 mid-year population estimates at LSOA level, ONS 2020
Mental Health	Population with long term health problems or disabilities (Census 2011, QS303EW)
Unable to answer door	Not included
MDE Electric Showering	Not included
Careline/telecare system	Not included
Poor sense of smell	Not included
Restricted hand movement	Not included
Female presence preferred	Not included
Temporary - Life changes	Not included
Temporary - Post hospital recovery	Not included
Temporary - Young adult householder	Not included

⁹ <https://www.nomisweb.co.uk/census/2011/qs303ew>

¹⁰ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/lowersuperoutputareamidyearpopulationestimates>

¹¹ *ibid*

¹² <https://www.nomisweb.co.uk/census/2011/qs205ew>

Table 3: Breakdown of PSR Needs Codes on WPD's PSR

6.11. WPD's PSR has 1.9 million customers registered, each having one or more PSR Needs Code amounting to over 4 million individual Needs Codes recorded. The table below shows the breakdown of these 4 million Needs Codes:

PSR Needs Codes	% of Total Needs Codes on PSR	PSR Needs Codes	% of Total Needs Codes on PSR
Nebuliser and Apnoea monitor	1.8%	Careline/telecare system	1.8%
Heart, lung & Ventilator	1.3%	Medicine refrigeration	2.9%
Dialysis, feeding pump & automated medication	0.3%	Oxygen Use	0.2%
Oxygen Concentrator	1.0%	Poor sense of smell	0.3%
Blind	0.5%	Restricted hand movement	1.1%
Partially sighted	2.4%	Families with young children 5 or under	5.6%
Stair lift, Hoist, Electric bed	3.0%	Mental Health	4.4%
Pensionable Age	28.5%	Female presence preferred	0.2%
Physical impairment	11.1%	Temporary - Life changes	0.3%
Unable to communicate in English	0.6%	Temporary - Post hospital recovery	0.2%
Developmental condition	2.2%	Temporary - Young adult householder	0.1%
Unable to answer door	5.7%	Hearing impairment (inc Deaf)	6.4%
Dementia(s) and cognitive development	1.6%	Speech impairment	4.1%
Chronic/serious illness	11.6%	Water dependent	0.3%
MDE Electric Showering/ and bathing	0.5%		

Stakeholder engagement appendices

6.12. 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

6.13. 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

6.14. 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.

6.15. 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

6.16. 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.

6.17. 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 – Fuel Poverty Best Practice Workshop (2021): Feedback Report

6.18. On 23 September 2021, WPD hosted an online fuel poverty best practice workshop with stakeholders. The purpose of the workshop was to gather feedback on the following topics: refinements to Customer Vulnerability Strategy commitments, a smart and fair future, sharing best practice and delivery and effective reporting.

6.19. This summary report details the feedback received, and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads/41562>

Appendix CV04 – Consumer Vulnerability and Social Contract Strategy Workshop (2021): Feedback Report

6.20. 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.

6.21. This summary report details the feedback received, and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40581>

Appendix CV05 – Customer Service, Consumer Vulnerability and Social Contract Workshop (2021): Feedback Report

- 6.22. On 15 September 2021, WPD hosted a virtual workshop to seek feedback from stakeholders on our RII0-ED2 Business Plan, focusing on the following topics: customer service; customer vulnerability; and the Social Contract. The purpose of the workshop was to obtain stakeholder views on proposed refinements to the Business Plan following the publication of our Business Plan 2023 – 2028 First Submission.
- 6.23. This summary report details the feedback received, and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads/41553>

Appendix CV06 – Synthesis Report 1: Phase 1 Preliminary Engagement

- 6.24. 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.
- 6.25. 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.
- 6.26. The report and can be found on our website at <https://yourpowerfuture.westernpower.co.uk/downloads-view/40620>

Appendix CV07 – Synthesis Report 2: Phase 2 Business Plan Development

- 6.27. 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.
- 6.28. This report builds on the previous ‘preliminary engagement’ work completed by exploring the detailed stakeholder opinions around each priority, including proposed commitments.
- 6.29. The report and can be found on our website at <https://yourpowerfuture.westernpower.co.uk/downloads-view/40623>

Appendix CV08 – Synthesis Report 3: Phase 3 Defining Outputs

- 6.30. 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.
- 6.31. This stage builds on the previous “Business Plan Development” work by exploring detailed stakeholder opinions around draft outputs and measures.
- 6.32. The report and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40626>

Appendix CV09 – Synthesis Report 4: Phase 4 Business Plan Refinement

- 6.33. 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.
- 6.34. This stage builds on the previous “Defining Outputs” work by testing stakeholder opinions around draft commitments and their ambition.
- 6.35. The report and can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40629>

Appendix CV10 – Synthesis Report 5: Phase 5a Business Plan acceptance and Phase 5b Business Plan gap analysis

- 6.36. 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.
- 6.37. This stage builds on the previous “Business Plan Refinement” work by testing stakeholder acceptability of the Business Plan and refining commitments in light of gap analysis.
- 6.38. 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/41580>

Appendix CV11 – Social Contract Development Research: Qualitative Insights (Accent)

- 6.39. 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.
- 6.40. 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

- 6.41.** In order to ensure that our Customer Vulnerability Strategy was truly co-created with our stakeholders, we have engaged them throughout its development and refinement. Our Business Plan Supplementary Annex SA-05, Giving customers a stronger voice: Enhanced engagement, details the process we have gone through, and the full range of options proposed and considered by stakeholders in the development of our strategies and Business Plan core commitments. This includes the acceptance testing and gap analysis stages, completed following our Business Plan first submission in July 2021.
- 6.42.** For example, 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 (performance at the time of consultation was based on the five years 2015-2020).

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

Appendix CV12 – First draft Business Plan Consultation Document

- 6.43.** 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.
- 6.44.** 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.
- 6.45.** The document can be found on our website at: <https://yourpowerfuture.westernpower.co.uk/downloads-view/40647>

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