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Business Plan 1
Consultation Report

March 2021



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Introduction

Western Power Distribution (WPD) consulted on the first draft of its RIIO-ED2 Business Plan over a five-month period between November 2020 and March 2021. The draft Business Plan (BP1) contained 67 commitments that had been produced further to feedback from stakeholders.

WPD adopted a range of different methods to engage with their stakeholders. The consultation was also split into a series of different phases:

1. Pre-consultation (final refinement of the commitments for BP1)
2. Formal consultation (reviewing the commitments to ensure they deliver the right outcomes and represent the right level of ambition)
3. Post-consultation (further refinement, including the development of a series of Delivery Strategies).

This report covers the feedback received during the formal consultation period that took place between 27 January and 2 March 2021. The purpose of the formal consultation was to understand stakeholders' priorities to ensure the commitments WPD was proposing delivered the outcomes they wanted and that the commitments reflected the appropriate scale of ambition to meet the requirements and challenges of the next Business Plan period. The consultation presented the following information:

- Options for investment and the costs
- The service improvement each investment option would deliver
- The impact on the average domestic electricity bill

WPD instructed EQ Communications, a specialist stakeholder engagement consultancy, to write up the feedback provided by stakeholders in the formal consultation phase of the BP1 consultation. Every effort has been made to faithfully record the feedback given. To encourage candour and open debate, comments have not been ascribed to individuals or organisations. Instead, where possible, notes have been made of the type of organisation each stakeholder represents.



Methodology

WPD consulted on the first draft of its Business Plan over a five-month period between November 2020 and March 2021. In total, WPD consulted with 2,437 stakeholders and customers as part of its BP1 consultation. The consultation was undertaken in three phases:

- **Pre-consultation** (final refinement of the commitments for BP1) – November / December 2020
- **Formal consultation** (reviewing the commitments to ensure they deliver the right outcomes and represent the right level of ambition) – January / February 2021
- **Post-consultation** (further refinement, including the development of a series of Delivery Strategies) – March 2021

Over the course of the consultation, WPD utilised nine different methods of engagement. Due to the restrictions imposed by the Covid-19 pandemic, these engagement sessions all took place online. The methods ranged from online workshops and webinars through to online response forms and social media polls. These techniques allowed for a range of different levels of engagement, from information provision through to collaboration and co-creation. Different types of stakeholders and customers were included. This has all been summarised in the table below.

Phase	Engagement method	Level	Number of stakeholders	Feedback reports	Stakeholder types represented
Pre-consultation	Senior Leadership Briefing Session (2020)	Involve	90	Internal report only	WPD senior leadership team
	Stakeholder workshops (commitment creation and playback)	Co-create	222	Reports available here	Usual full spectrum of stakeholders, including: <ul style="list-style-type: none"> • Utilities (e.g., E.ON UK) • Local authorities (e.g., South Hams District Council; Torfaen County Borough Council; Herefordshire Council; Powys County Council) • LEPs • Expert stakeholder groups and major customers (e.g., Centre for Sustainable Energy; MOZES; JRC)
Formal consultation	Webinar	Inform	86	This report	• Domestic customers
	Online consultation	Consult	35 (commitment questions)	This report	• Environmental groups
			54 (narrative questions) 1-13	This report	• Parish councillors
			6 long-form written responses (6)	This report	
			2 bilateral meetings	This report	• Citizens Advice • Welsh Assembly Government
			36 via wider staff surveys	This report	WPD employees
Bill payer / consumer surveys (Commitment options)	Consult	1,487	This report	End user consumers	
Online stakeholder workshop (Commitment options)	Consult	88	This report		
Post-consultation	Five stakeholder workshops on WPD's delivery strategies (including reviews of associated BP1 commitments)	Consult	257	Reports available here	Usual full spectrum of stakeholders (as above)
	Senior Leadership Briefing Session (2021)	Involve	74	Internal report only	WPD senior leadership team
Total stakeholder engagements on BP1:			2,437		



Formal Consultation

This report summarises the feedback received during the formal consultation phase, which took place between 27 January and 2 March 2021. In total, WPD consulted with 1,794 stakeholders and customers as part of the formal consultation period. Of these, a significant proportion (1,487) were responses to social media polls, with the remaining 307 participating via the other engagement methods: 86 attended the webinar, 133 responded to the online consultation, 2 participated in bilateral expert sessions and 88 attended the online workshop.

The 307 responses were given by 131 separate organisations: 55 organisations participated via the webinar, 20 responded via the online consultation, and 71 organisations participated via the online workshop. The reason for the differential is because some organisations participated via several different methods, some of the responses were from WPD employees, and some did not leave their name or organisation.

Stakeholders were asked to participate in the consultation via email. Over 7,500 stakeholders are held on WPD's database, all of whom were invited to take part via several emails over the course of the formal consultation period to ensure that they were given plenty of opportunities to participate. Ahead of any workshops, all stakeholders who have registered are contacted via telephone and email to remind them about the event to maximise participation.

The database undergoes an annual refresh to update contacts and to add additional stakeholders who have registered via the website or have worked with members of the WPD team over the last 12 months. In addition, the contact details of politicians are updated if there have been any local or national elections. To make sure that WPD remains on top of emerging issues in the sector, additional research is undertaken ahead of topic-specific engagements to enhance certain stakeholder categories to ensure they are up to date and comprehensive, or as new roles or stakeholder groups emerge.

The formal consultation sought to understand stakeholder and customer views on the 67 commitments in WPD's first draft Business Plan. Two types of commitment were presented to stakeholders and customers:

1. Those that presented a binary choice: 'yes – agree with the commitment', or 'no – want to suggest an alternative'; and
2. Those that presented a range of options: Option 1 (bill reduction), Option 2 (WPD's current view; bill remains the same), Option 3 and 4 (bill increase to varying degrees) and Option 5 (suggest an alternative).

This phase included the following methods of engagement:

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)

Where respondents opted to suggest an alternative, they were given the opportunity to express what this was either via an open text box (online consultation) or a breakout discussion (online workshop). In addition to the commitments themselves, the online consultation also asked some open questions relating to the Business Plan and the consultation.



Webinar

- 86 stakeholders participated in the webinar, representing 55 organisations, which took place on 3 February 2021.
- The purpose of the webinar was to give stakeholders an opportunity to learn more about the draft Business Plan to enable them to respond to the online consultation.
- The webinar did not provide an opportunity for feedback, although stakeholders were able to ask questions. The list of questions asked can be found in Appendix 5.

Online Consultation

- The online consultation was hosted on WPD's website. It provided stakeholders with information on each of the commitments and asked for their views.
- The online consultation also posed a series of open questions designed to get qualitative feedback on the consultation itself, as well as on the Business Plan.
- Stakeholders were able to complete and submit an online form. Alternatively, they were able to submit their comments via email.
- 131 respondents gave their feedback via the online consultation, representing 20 organisations. Of these, 29 submitted a response via the consultation email address, with the remainder responding via the online form.
- The stakeholder type and regional preference of the stakeholders was not asked as part of the online consultation, although most respondents confirmed their name and organisation.
- Of this total, 36 were WPD employees who were encouraged to respond to the online consultation.
- In addition two stakeholders requested online meetings to discuss their feedback on the Business Plan. These meetings were held via Zoom as bilateral expert sessions.
- The feedback was noted down and checked with each stakeholder prior to inclusion in this report. A summary of the feedback can be found in Section One.



Bill Payer / Consumer Surveys

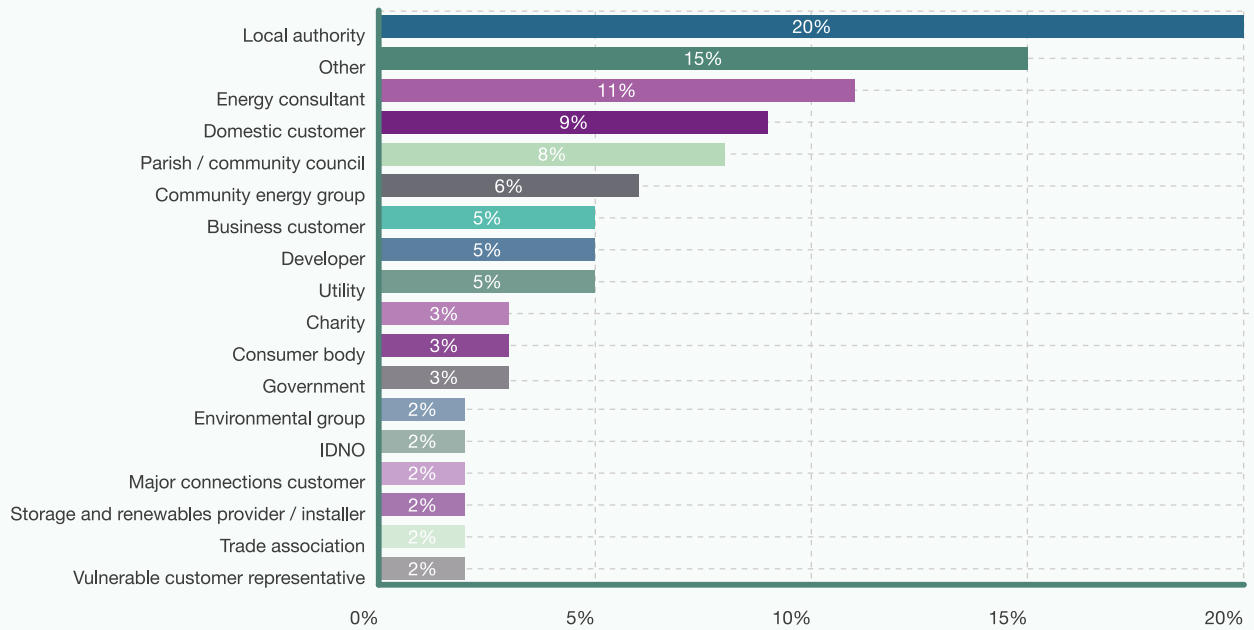
- WPD used its corporate Twitter account to pose a series of polls based on some of the commitments in the draft Business Plan. These polls were only asked for those commitments that presented a range of options. These polls were designed to collect quantitative feedback and did not provide opportunity for comment.
- In total, 1,487 responses were received. The profile of the respondents was not captured via the social media polls. For the purposes of the consultation, it has been assumed these represent the views of wider consumers or bill payers – although this cannot be corroborated.
- These questions were posed differently to those in the online consultation to ensure they were accessible for an online audience. The full list of questions and responses can be found in Appendix 4.

Online Stakeholder Workshop

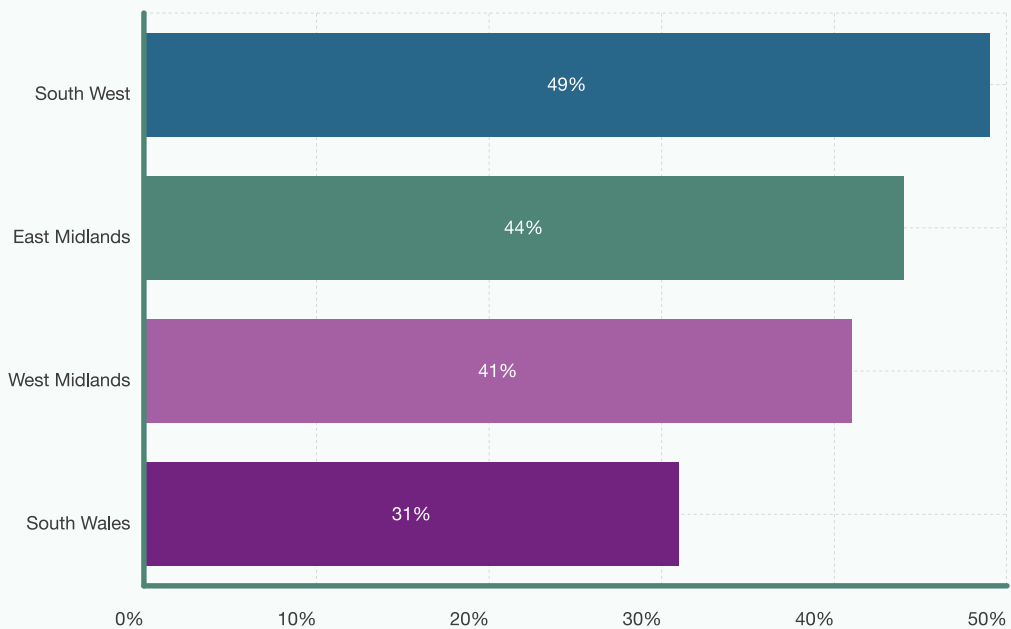
- The online stakeholder workshop was held on 2 March 2021. It was included in the formal consultation to enable stakeholders to submit their feedback easily.
- The workshop focused on quick-fire polling where stakeholders voted using survey software to identify their preferred option for each of the 67 commitments. Stakeholders were instructed not to answer if they felt they did not have enough information or expertise to take a view. The number of those who abstained has been set out under each commitment in this report.
- The voting was followed by smaller facilitated breakout sessions, where stakeholders were given an opportunity to suggest any alternative commitments they felt were missing where they had opted for 'no' (in the binary commitments) or 'Option 5' (in the commitments that presented a range of options).
- 88 stakeholders participated in the online workshop, representing 71 organisations.
- The workshop was attended by a range of different types of stakeholders. The largest proportion was local authorities (20%). However, the full breakdown can be found in the pie chart below.
- Stakeholders were asked to identify which regions were most relevant to them in the online survey. They could choose more than one region. 49% stated the South West was relevant, followed by 44% who answered East Midlands. These responses have been summarised in the graph below.



What type of stakeholder are you?



Which WPD region is relevant to you? (You are able to select more than one option).





Structure of the report

The structure of this report is based on the layout of the formal online consultation. The feedback has been written up according to the following structure. Section One summarises the qualitative feedback to Questions 1 to 13 of the online consultation. This was made up of a series of open-ended questions about the consultation and the content of BP1 that was asked as part of the online consultation. It also includes the qualitative feedback given by two stakeholders during bilateral meetings.

Sections Two to Four focus on the feedback gathered on each of the 67 commitments. Each section includes the commitments covered in one of the three Business Plan focus areas. This feedback is primarily quantitative, with stakeholders and customers voting on options for each of the commitments. The voting data has been supplemented by written and verbal feedback. This was gathered via direct consultation responses, the online stakeholder workshop, and the bill payer / consumer survey.

This has been summarised in the graphic below.

Section	Type of feedback	Source of feedback
Section One: Open questions	Qualitative feedback	<ul style="list-style-type: none"> Online consultation • Employees • Stakeholders Bilateral meetings
Section Two: Commitments – Meeting the needs of consumers and network users	Quantitative and qualitative feedback	<ul style="list-style-type: none"> Online consultation • Employees • Stakeholders Online stakeholder workshop Bill payer / consumer survey
Section Three: Commitments – Maintaining a safe and resilient network		
Section Four: Commitments – Delivering an environmentally sustainable network		

Of the 67 commitments, some presented a binary choice ('yes – agree with the commitment' or 'no – want to suggest an alternative') whilst others presented up to five different options relating to the level of ambition for the commitment. For commitments that presented different options, the report differentiates between the response from stakeholders (direct consultation or online workshop) and the response from the bill payer / consumer survey or from WPD employees via the online consultation.

The full results of the WPD employee responses to the online consultation and the bill payer / consumer survey have been included in Appendix 3 and 4, respectively.

Comments have not been ascribed to individuals or organisations. In the online workshop, participants have been anonymised, but their comments were noted down according to their stakeholder type. This has been noted against the verbatim comments in this report. The online consultation responses have not been assigned a stakeholder type, but it has been noted that they were responses given online.



Executive summary

Participants

- In total, WPD consulted with 1,794 stakeholders and customers as part of the formal consultation period.
- Of these, a significant proportion (1,487) were responses to social media polls with the remaining 307 participating via the other engagement methods: 86 attended the webinar, 133 responded to the online consultation, and 88 attended the online workshop.
- The 301 responses were from 131 separate organisations: 55 organisations participated via the webinar, 20 responded via the online consultation, and 71 organisations participated via the online workshop.
- In the online workshop, participants were asked to identify what type of stakeholder they were. 20% of participants represented local authorities, 11% described themselves as energy consultants, 9% identified as domestic customers, and 15% identified as 'other'. A full breakdown can be found in the Methodology section.
- In the online workshop, stakeholders were asked to identify which regions were most relevant to them in the online survey. They could choose more than one region. 49% stated the South West was relevant, followed by 44% who answered East Midlands. A full breakdown can be found in the Methodology section.

Section One: Open Questions

- In terms of reviewing previous stakeholder feedback, over half of respondents explicitly stated that they did not disagree with any of the feedback or consider any priorities to be missing. However, the major caveats were in relation to the need for WPD to be more ambitious when it comes to the environment – both with their own business carbon footprint and supporting others to achieve Net Zero.
- Respondents did feel Covid had led to a change in priorities and raised new issues that WPD should consider. In particular, this included concern that customers will be facing greater financial challenges in RIIO-ED2 and that there has been a change in energy consumption patterns due to homeworking that some viewed as semi-permanent.
- Respondents had mixed views on the layout and structure of the Business Plan, with some feeling it had a logical structure and was digestible, and others finding it confusing and hard to follow. Two stakeholders felt there was too much emphasis on reviewing WPD's past performance and another two stakeholders wanted a clearer narrative setting out the context and WPD's proposed response.
- Respondents also had mixed views on the content of the Business Plan, with two stakeholders feeling it was comprehensive and others raising topics they felt were missing – although for the most part each suggestion was only ever raised by one respondent.



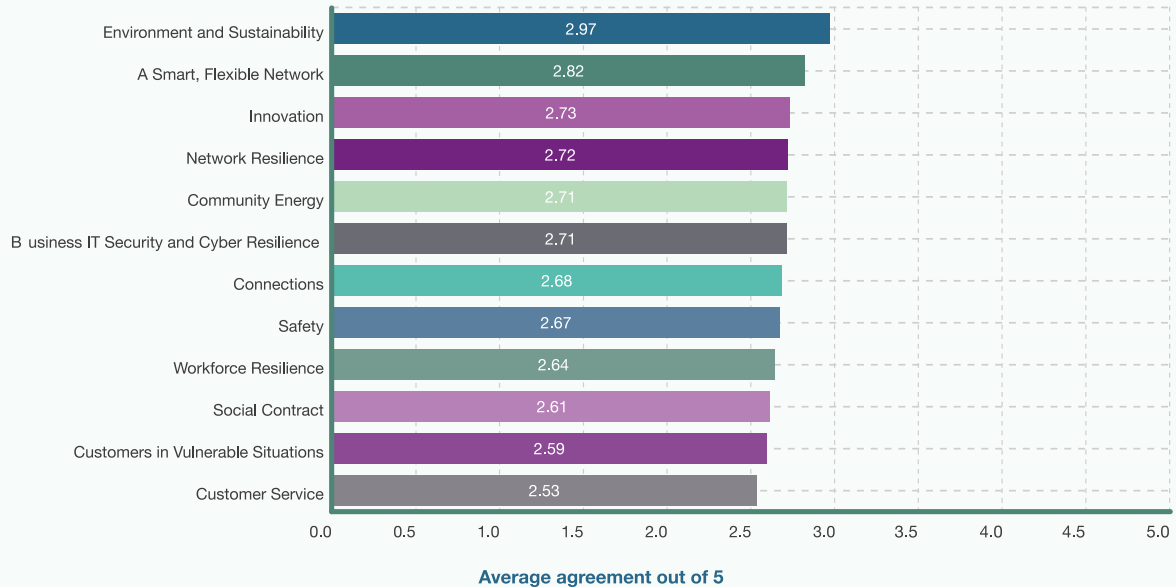
- In terms of WPD’s overall package of proposals for RII0-ED2, many respondents expressed explicit support, although some of these did urge WPD to demonstrate a greater level of ambition or to take a more radical overall approach. This was primarily in relation to enabling the country to meet its Net Zero commitments.
- In terms of customer bills, respondents generally accepted that bills would need to rise for the country to meet its net zero ambitions. It was noted that an increase in the next Plan period could lead to bill reductions in future. However, the impact on vulnerable customers was not overlooked, with respondents requesting that WPD consider putting support packages in place for those who would struggle with bill increases.
- In terms of low carbon technology uptake, generally stakeholders acknowledged that WPD’s best view was reasonable based on the available data, but there was a significant amount of scepticism about whether it would be enough to deliver the step change required for the country to achieve Net Zero.
- In terms of the proposed level of expenditure, respondents generally accepted that greater ambition would require a higher level of expenditure – but that this was a necessary consequence of the need to respond to climate change. In fact, several respondents felt the level of expenditure proposed was insufficient to meet the country’s net zero ambitions, with one noting that the cost of not achieving decarbonisation would be much higher.
- Respondents supported the ambition to build a smarter, secure, digitalised energy network largely on the basis that it would make the future more resilient. However, two respondents did caveat this by noting that investing in a smart network should not come at the expense of delivering capacity improvements.

Commitments – Overall

Stakeholders in the online workshop were asked whether they strongly agreed through to strongly disagreed on the following statement in relation to each of the 12 Business Plan topics: “I would like to suggest alternative commitments.” When the score was averaged out across the topics, the results were as follows:



To what extent do you agree with the following statement: “I would like to suggest alternative commitments for this area”?



Section Two: Commitments

Meeting the needs of consumers and network users

- When stakeholders in the online workshop were asked to vote on whether they wanted to suggest alternative commitments, the four topics in this area scored low. In ascending order, Customer Service ranked lowest of all topics across the Business Plan (2.53/5), followed by Customers in Vulnerable Situations (2.59/5) and Social Contract (2.61/5). The topic of Connections received a higher average score (2.68/5) but still came in the bottom half of the Business Plan topics. This indicates that relative to other areas, stakeholders felt these topics covered the commitments they wanted to see.
- Customer Service.** The majority of stakeholders agreed with WPD’s proposals for the seven commitments, either voting ‘yes’ where there was a binary choice or for Option 2 (WPD’s current view) – as did WPD employees and those in the social media polls for those that were voted on. In the comments, stakeholders felt these commitments covered the right issues and were comparable to the activities undertaken by other companies. When it came to proposing alternatives, it was suggested that WPD should do more for less or make the most of new technologies to improve performance without increasing the bill.
- Customers in Vulnerable Situations.** Unlike for Customer Service, the commitments in this area that presented a range of options received scores indicating that stakeholders wanted WPD to be more ambitious, as the combined votes for Options 3 and 4 (which would see a more ambitious programme along with a bill increase) were the most popular. This was even more so the case in the social media polls, although WPD employees were usually at odds, voting for Option 2 (WPD’s current views). In the comments, reasons for wanting to see more



ambition included that WPD should be leading the way in this area, as well as that the bill increase was negligible.

- **Connections.** Of the five commitments, stakeholders agreed with WPD's proposals for four of them, either voting 'yes' where there was a binary choice or Option 2 (WPD's current view). The majority of WPD employees also agreed with this position. However, the commitment to 'engage with 130 local authorities and local enterprise partnerships to understand their requirements for strategic investment...' was an outlier in that the largest proportion of stakeholders and responses via the social media poll wanted WPD to be more ambitious, voting Option 4. WPD staff disagreed, however, opting for WPD's current view (Option 2). No concrete alternative commitments were suggested, although several comments stressed that the future will require a different approach given the volume of new connection applications that will come forward.
- **Social Contract.** Stakeholders generally agreed with the four commitments, voting 'yes' or for WPD's current view – with Option 2 getting the largest proportion of votes even when the opportunity to be more ambitious (voting for Option 3 or Option 4) was combined. For the most part this was also reflected in the social media polls and the views of WPD employees, although respondents to the social media poll wanted to see the greatest level of ambition (Option 4) for the commitment about paid leave for volunteering to support local community initiatives. In terms of alternative commitments, it was suggested that WPD should look to its supply chain partners in order to deliver benefits to the communities in which the company operates.

Section Three: Commitments

Maintaining a safe and resilient network

- When stakeholders at the online workshop were asked to vote on whether they wanted to suggest alternative commitments, the topic in this area that scored the highest was Network Resilience (2.72/5), indicating that relative to other topics it was felt there were commitments missing. This topic ranked fourth highest across the 12 Business Plan topics. In descending order, Business IT Security and Cyber Resilience came next (2.71/5; joint fifth out of the 12 topics), then Safety (2.67/5; eighth out of the 12 topics) and finally Workforce Resilience (2.64/5; ninth out of the 12 topics).
- **Network Resilience.** There was not a consistent voting pattern for the seven commitments, suggesting that there were specific areas where stakeholders felt WPD needed to increase its ambition relative to others. For example, the largest proportion of stakeholders felt WPD's current ambition to restore 86% of customers within one hour was correct – voting Option 2. However, the majority wanted WPD to be more ambitious (total combined of Option 3 or Option 4) for the commitments relating to worst served customers and flood defences, showing that these topics were important to them. In both instances, respondents to social media polls agreed, although WPD staff felt the current view (Option 2) was correct. In terms of alternatives, stakeholders suggested additional commitments around power quality, the adoption of smarter technologies and resilience to climate change.
- **Business IT Security and Cyber Resilience.** The two commitments presented binary choices, with 96% of stakeholders agreeing with both of them and 4% wanting to suggest alternatives. While it was generally accepted as a high priority and a topic that is growing in importance, the comments were not extensive, although one stakeholder suggested a commitment to achieving external accreditation.



- **Safety.** As with Network Resilience, there was no voting pattern for the four Safety commitments, suggesting some were felt to require more ambition than others. For example, stakeholders felt comfortable with WPD's current view (voting Option 2) for the commitments to 'underground, insulate or divert overhead lines that cross school or other playing areas' and 'distribute safety advice information to stakeholders' – with WPD employees agreeing, although respondents in the social media poll wanted the highest level of ambition, voting Option 4 each time. However, both stakeholders and social media poll respondents urged WPD to be more ambitious for the commitment on educating children about electrical safety – with the highest proportion voting Option 4.
- **Workforce Resilience.** Stakeholders generally agreed with the two commitments, with the largest proportion voting 'yes' for the commitment relating to publishing an annual Diversity and Inclusion Plan and for Option 2 (WPD's current view) for the commitment to achieve external accreditation. That said, a large proportion of stakeholders (44%) did want to see greater ambition with the level of accreditation (voting Option 3 or Option 4) – and the largest proportion of social media poll respondents wanted the highest level of ambition too. In terms of alternative commitments, stakeholders suggested ones relating to workforce renewal, as well as improving and reporting on gender and BAME pay gaps.

Section Four: Commitments

Delivering an environmentally sustainable network

- When stakeholders in the online workshop were asked to vote on whether they wanted to suggest alternative commitments, all four topics in this area scored highly relative to the other Business Plan topics. They took all three of the top three spots, indicating that it was felt there were commitments missing in this area. Environment and Sustainability ranked highest of all 12 Business Plan topics (2.97/5). In descending order, a Smart, Flexible Network came next (2.82/5; second out of the 12 topics), then Innovation (2.73/5; third out of the 12 topics) and finally Community Energy (2.71/5; joint fifth out of the 12 topics).
- **Environment and Sustainability.** In all but one instance, where commitments presented options stakeholders wanted to see WPD be more ambitious. The combined vote for Option 3 and Option 4, which would see a more ambitious programme and a bill increase, received the highest proportion of votes – with respondents on social media supporting an increased level of ambition. In each instance, however, the largest proportion of WPD employees supported WPD's current view, voting Option 2. The anomaly was the proposed commitment to 'remove targeted overhead lines in AONBs'. In this instance, a slim majority of stakeholders voted for WPD's current view (Option 2) with a range of reasons given for this decision. In general, a range of alternative commitments were suggested, including: delivering a network that enables regional net zero ambitions; more support and information on how to decarbonise energy; biodiversity; installing three-phase supplies; and encouraging the update of solar PV.
- **A Smart, Flexible Network.** For the most part, for those commitments that presented different options, stakeholders wanted WPD to have a greater level of ambition – with the combined vote for Option 3 and Option 4 being greater than for Option 2 (WPD's current view). This applied to the commitments relating to whole systems, local energy surgeries for local authorities, updating WPD's Future Energy Scenarios, offering a flexible



alternative for connections offers with reinforcement, improving the volume of data available, and connecting LCTs. On the whole, the majority of WPD employees disagreed and voted for Option 2. It was noted that many of these commitments are interrelated.

- **Innovation.** The two commitments for this topic presented a binary choice. While the largest proportion agreed with each commitment, a significant minority (10%) wanted to suggest alternatives for the commitment ‘for each innovation project we will undertake a cost benefit assessment and implement into business practice’. In the comments, several wanted the carbon cost to be considered when undertaking a CBA. When stakeholders were asked whether they wanted to suggest alternatives, Innovation ranked highly. However, they did not provide many suggestions in the written and verbal feedback.
- **Community Energy.** Of the two commitments, the overwhelming majority of stakeholders voted ‘yes’ for the one presenting a binary choice (‘establish dedicated innovation projects for Community Energy schemes’) but wanted to see a greater level of ambition on ‘hold community energy surgeries’ – with the combined vote for Option 3 and Option 4 being larger than for WPD’s current view (Option 2). The majority of WPD employees and respondents on social media agreed with the current view and voted for Option 2. Some alternative commitments were suggested, including ensuring the capacity is available to connect and helping community groups to raise capital.



Section One

Open questions

Section One summarises the qualitative feedback to Questions 1 to 13 of the online consultation. This was made up of a series of open-ended questions about the consultation and the content of BP1 that was asked as part of the online consultation. It also includes the qualitative feedback given by two stakeholders during bilateral meetings. All comments were made online (except at the two bilateral meetings), so the verbatim comments have not been noted down by respondents.

Response to the proposed Commitments

1. In terms of what we have heard from stakeholders so far, do you disagree with any of the feedback or do you consider any key priorities to be missing?

In total, 49 stakeholders responded to this question. Of these, just over half (55%) explicitly stated they did not disagree with the feedback or consider any key priorities to be missing – although a proportion (22%) did have some caveats or additional comments to make. The majority of the caveats were in relation to the need to be more ambitious when it comes to the environment – including in relation to WPD’s own business carbon footprint but primarily in relation to their role in supporting the UK (and stakeholders) to achieve Net Zero. One stakeholder wanted to see a greater emphasis on fuel poverty, and another made some comments on the connections process, specifically on the need to continue to invest in self-serve facilities and consider charging for application engagement and budget estimates.

- “No. However, zero net carbon should be brought forward to 2030.”
- “Broadly agree, but [this] is missing reducing your negative impacts on the environment.”
- “It is the level of priority given to the environmental commitments that seems to be the issue in feedback we have seen in the workshops we have attended. This is not just about getting the operations of WPD to Net Zero as soon as possible, but also making every effort to support the transition to a net zero energy services system by Ofgem’s 2030 target.”
- “We would like to see greater recognition of the role of WPD as an enabler of local economic development and transition to Net Zero (i.e., not simply as a provider of innovative services, etc).”
- “With the increased focus nationally and by local councils on addressing climate change and achieving a carbon neutral future, this could warrant a clear and distinct approach and be elevated to a priority in its own right.”
- “Yes – this is an accurate representation of the priorities that matter most to me. I would like to see



greater focus on tackling fuel poverty. WPD already does a huge amount but can always do more.”

- “I agree that ‘stakeholders want more support to help customers navigate new and complex information around connecting low carbon technologies’. I would disagree, however, that connections customers should be burdened with the cost of [...] failing to invest in the expertise necessary to identify the appropriate connection solution, interpret the connection offer and project manage their connection [...] WPD has made an extraordinary volume and range of network data available in order that connections customers can self-serve. I believe pre-application engagement and budget estimates should be chargeable for major connections [...] I also disagree that time to quote is significant. Quality of quote is far more important, as is time to connect.”
- “We feel you have downplayed (a) the need for WPD to play its full leadership and enabling role in the transition of the electricity system to Net Zero and (b) the extent of change this requires in the skills and knowledge and capabilities within the company.”

The remaining 45% of respondents did not explicitly respond to the question but provided additional comments. These comments spanned a range of themes including the need for WPD, through its Business Plan, to: better understand the impacts of climate change on its assets; adequately invest in its workforce, particularly to meet the increased workload created by electrification; better consider the company’s impact in National Parks, by committing to underground schemes as well as reducing leaks; include a biodiversity action plan to help protect and enhance the environment; commit to collaborate more closely with local area planning teams; and address the issues of voltage irregularities on the network. Several stakeholders also raised the need for WPD’s Business Plan to be ambitious in its approach to achieving Net Zero, increasing the speed of decarbonisation through greater renewable energy use and encouraging energy efficiency.

- “Your understanding of wider weather issues on resilience and customer service impact need to be developed more. Climate change over the life of your assets is more than flooding, e.g., extreme heat impacts on equipment.”
- “No mention of investing in staff, which ultimately are WPD’s most valuable asset. We can’t deliver on the level of service outlined in the plan without empowering staff; they are not even listed in the definition of a stakeholder. If staff are encouraged to be the best they can be, the company will become the best it can be. The focus on targets disassociated from staff drives a negative cycle.”
- “More of a priority for increasing staff to deal with the increased workload of electric vehicles connections.”
- “Western Power’s environmental strategy (p. 97 of the Business Plan) is silent on biodiversity, with no associated core commitment, and the responsibility to protect the local and regional environment from damage by WPD’s activities appears to be specific to protected flora and fauna species.”
- “There is a significant need to work in collaboration and engage with the City Council’s local area planning



policy and inward investment teams combined with the LEPs to ensure the needs of the city and future ambitions are met. We would strongly support additional resource allocation for a flexible process to be incorporated into longer term local area planning as well as collaboration across geographical areas.”

- “The issue not represented by a core commitment relates to voltage irregularities that can lead to an increasing number of faults and interruptions on our equipment. We would prefer to see a commitment recognising when repeated incidents occur, with a view to reducing the number of customer impacts.”
- “More on allowing quicker decarbonisation of grid and greater renewable energy generation and use.”

2. Has there been any change in priorities, or emerging issues, for example as a result of Covid-19?

In total, 44 stakeholders responded to this question. Of these, only 23% felt there has not been any change in priority. The remaining 77% felt priorities had changed or new issues had emerged. This was primarily as a result of the Covid-19 pandemic, although the impact of Brexit and the green agenda were also raised as drivers of change.

In terms of what had changed, many stakeholders expressed concern that customers will be facing greater financial challenges and that we will see an increase in fuel poverty – beyond the end of the Covid-19 pandemic. Several stakeholders pointed to the changing energy consumption patterns brought on by the shift to homeworking, with some regarding these as semi-permanent. On the one hand, stakeholders saw this as a challenge as it puts more pressure on the need to have a consistently reliable network – for domestic properties, but also for rural and vulnerable customers. On the other hand, one stakeholder felt it presented an opportunity to stimulate the uptake of domestic low carbon technologies through incentives. Several stakeholders felt the pandemic had emphasised the importance of ensuring vulnerable customers have adequate support, with a few noting the role grassroots support networks and local authorities had played in providing effective support over the last year. The comment was made by several stakeholders that the use of open green spaces during the pandemic had further enhanced the need for undergrounding schemes to improve visual amenity. A number of stakeholders pointed out that the pandemic has served to reinforce the essential nature of the electricity supply, elevating the central role of electricity networks to the functioning of society.

Aside from the Covid-19 pandemic, one stakeholder implied Brexit would lead to a shortage in available labour for WPD. Other stakeholders stressed that the ambitious net zero target set by the government would mean WPD would need to prioritise delivering the infrastructure to support decarbonisation, particularly on the low voltage network.

- “The impact of Covid-19 on a large number of individuals’ income / more time at home means that a greater number of households will now be classed as in fuel poverty.”
- “The resilience of your service is critical to the flexibility of society and the economy to respond to unexpected external impacts.”
- “The increasing focus on ‘climate change’ plus the emphasis being placed by government on ‘Net Zero’ is driving industry and society to adjust to a zero-carbon future.”



- “Greater importance for community support and recognising the impact of Covid on vulnerable customers.”
- “Clearly there has been, and needs to be, extra concern for vulnerability of customers and their ability to deal with fuel poverty during the pandemic and probably for some time afterwards.”
- “More people are working from home and will likely continue to do so post Covid. This shifts the energy usage pattern, possibly significantly, which needs to be examined.”
- “It seems likely there is going to be continued pressure on domestic supplies moving forward with the decentralisation of the workforce. This leads to overall increased energy consumption and presumably less control of the source.”
- “More remote working potentially post Covid could see that number rise as more have to heat and power their homes throughout the year whilst working from home. This elevates an already high priority for our local authority and region to tackle.”
- “We think that there will be continuing hardship for several years caused by the economic consequences of Covid-19 and that this represents a further justification for the expansion of your work to support vulnerable consumers to improve their energy resilience.”
- “The events of the past year have increased the priority that should be given to visual amenity activities [...] as designated landscapes have played such an important role by providing a place for people to visit at times when lockdown restrictions have allowed over the last year.”
- “It is also clear that there needs to be a levelling up of access to wider communications [internet, social media, etc]. This would be on a geographical basis [rural and urban] and well as a vulnerability basis and including the customer income basis. What this means for electricity supply is currently uncertain, but a first estimate would be an expectation of improved reliability of supply and a vast increase in the power requirement.”
- “The local authorities are by far the best placed organisations to connect with residents and service users and due to their holistic person-centred approaches they are best placed to support families with poor access to heat and light. This has been demonstrated as a result of the pandemic and even strengthened with our grassroots networks specifically set up to support Covid-19.”
- “Potential for the change in working patterns to stimulate uptake of domestic low carbon technologies such as solar PV and heat pumps, if correct incentives provided.”
- “Yes, reduction in available labour constrained by business plan budgets, affecting productive outputs and reduced investments.”
- “The [...] emphasis being placed by government on ‘Net Zero’ is driving industry and society to adjust to a zero-carbon future [...] There will be a need for greater visibility and control of the LV layer in order to ensure stability of supply and minimise outages.”



- “Possibly to underline the essential nature of the electricity supply to society, especially more vulnerable customers with reliance on electronic communications both for working life and for staying in touch with each other. The need to accelerate all actions towards carbon neutrality.”

3. For each core commitment, is this an area of focus you want to be included in the Business Plan?

4. What option level would you prefer for each core commitment?

5. Are there alternative core commitments you would suggest?

The responses to questions 3, 4 and 5 that were submitted as part of the online consultation have been summarised underneath each of the 67 commitments set out below.

Presentation and accessibility of the plan

6. What are your views on the layout and structure of WPD’s draft Business Plan? How easy is it to understand and what would you change to make it clearer?

In total, 20 stakeholders responded to this question in the online consultation. Stakeholders expressed a range of views in terms of the layout and structure of WPD’s draft Business Plan. Several commented it had a logical structure and that the use of the 67 commitments meant it was easy to follow and digest. It was noted by several stakeholders that the Business Plan itself was very detailed and comprehensive. Several felt it was well written, with one feeling there was little jargon.

Conversely, other stakeholders felt the Business Plan was too long and found some of the layout confusing and hard to follow. As such, one stakeholder explicitly welcomed the summary document. It was felt by a couple of stakeholders, in contrast to the previous view, that actually there was too much jargon in the Plan, particularly for a less informed audience. Two stakeholders felt there was too much emphasis on reviewing WPD’s current performance. Two stakeholders commented on the need for WPD to present a clear narrative, clearly setting out the external context and WPD’s proposed response. One of these stakeholders suggested the use of an executive summary section as a potential solution.

Several stakeholders also took the opportunity to comment on the consultation documents and process. These stakeholders felt the consultation was difficult to access and found the structure confusing. One of these stakeholders expressed concern at the assumption all stakeholders had time to respond to a long online consultation.

- “The Business Plan is well written and set out. It was easy to understand. The consultation documents, however, were very confusing!”



- “The breakdown of the commitments and priorities along with the options for ambitions, WPD proposed ambitions and cost for further ambitions was also well laid out and easy to digest.”
- “Yes, I think you can follow it through well and no jargon so anyone could understand it.”
- “The plan is quite long but reasonably easy to understand. Summary document welcomed.”
- “Very technical in terms of language & process but comprehensive.”
- “I think it’s fair to say the WPD Business Plan 2023-2028 is an extremely detailed and informative document, and it is also clear to see that WPD have engaged extensively and taken stakeholder feedback onboard in the development of the Business Plan. I feel it was easy to understand and clear for the most part, but where there are certain acronyms or more technical detail it could ultimately be lost on stakeholders with less technical understanding, which should be considered for future plans.”
- “There seems to be a large amount of review of ED1 before you get into the ED2 submission.”
- “It still feels like an early draft with lots of different elements that aren’t yet organised to lead the reader through a clear narrative about what you’re going to have to do to meet the role society expects of you over the next decade and what changes that means you’re going to have to make. You need to explain much earlier the external context in which you are and will be operating and how significantly it is changing.”
- “There is a need for a clear executive summary which sets the context and the key recommendations which could not be readily seen in the format that one would expect of such a document (4 to 6 pages in length). This is particularly important when engaging with senior stakeholders from public bodies and business representative bodies.”
- “It is clear and easy to read. The consultation was tricky to access, however – it took a long time to find this form and the structuring of the online questions was unclear.”
- “Several [of our members] found the size and scale of the consultation off-putting. It was felt that a common implicit assumption in the consultation processes is that there are people out there who have significant time and energy and the interest to work their way through a weighty, technical and complex process.”
- “Well structured; could see how the 67 core commitments emerged without having to read the detail.”



7. What are your views on the content of the draft Business Plan document? is anything missing?

In total, 21 stakeholders responded to this question in the online consultation. Two stakeholders responded that they felt the content was comprehensive and covered everything they would expect to see in a business plan. The inclusion of links to additional information was singled out for praise. The consultation document was also praised by one stakeholder for including all the required information.

Individual stakeholders did raise a range of different topics they felt were missing from the draft Business Plan. For the most part these were suggested by one respondent only. This included more information on: costings and incentives; returns on investment and impact on shareholder dividends; delivering a network that responds to population growth; investment ahead of need; closer collaboration with local authorities (raised by two stakeholders); the impact of climate change on the network; working with stakeholders to enable the net zero transition; and reference to Environmental Impact Assessments and environmental risk management. One stakeholder urged WPD to adopt SMART targets for its commitments that focus on the outcomes the company is seeking to achieve.

- “Overall, the content is comprehensive for both consumers and commercial customers (public and private sector). The presentation of it is over-complicated.”
- “I thought the draft Business Plan broadly covered most areas I would expect to see within a plan of this nature. The addition of information and links to additional or complimentary WPD strategies was a particularly pleasing addition which I’m sure will be of value to many stakeholders. I don’t believe anything major was missing from the plan from what I could see.”
- “In addition, it’s not clear on costing information and what rewards WPD expects to gain.”
- “We would also like to see the commitments expressed much more clearly as SMART targets which relate to the outcomes achieved (specific and measurable impacts the intended activities will have) rather than inputs made (the amount of activity, e.g., calls made, meetings held, advice given, leaflets distributed).”
- “The consultation document appears to have all the information required for an informed response. The RIIO-ED2 workshop events have also been useful in providing the information required to make an informed response.”
- “The Business Plan could set out more clearly the extent of population growth through the WPD region and how key projects and expansion plans will be timed and delivered to correspond with this population growth.”
- “As elsewhere in this response, the main area that could be addressed is around the opportunities to unlock future development by investing ahead of need.”
- “We’re concerned we haven’t been able to detect an acknowledgment of the effect of climate change on your ability to maintain supplies through more extreme weather events or reference to activities you propose to mitigate such effects.”



- “Further clarity/consideration of how WPD can work with local authorities [...] to understand potential opportunities for joint working/initiatives would be useful. This would also enable opportunities to be reflected in emerging council strategies and priorities, where appropriate.”
- “Greater focus should be given to how WPD can work with stakeholders to enable the Net-Zero transition.”
- “No reference to an environmental impact assessment and environmental risk management.”
- “Be open and show what the returns per £ invested are and what you forecast the impact will be on dividends and share prices. Otherwise, it is somehow just more PR/whitewash?”
- “We would also like to see the commitments expressed much more clearly as SMART targets which relate to the outcomes achieved (specific and measurable impacts the intended activities will have) rather than inputs made.”

Delivering a low carbon future

8. What are your views on WPD’s overall package of proposals for RIIO-ED2 as currently set out? Are there aspects you: Strongly support? Would like to see changed? Consider to be missing?

In total, 24 stakeholders responded to this question as part of the online consultation. Of these, many expressed explicit support for the overall package. Whilst supportive, some of these respondents urged WPD to express greater ambition. Other stakeholders who did not praise the overall package also responded that they wanted WPD to take a more radical approach. This was primarily in relation to enabling the country to meet its net zero commitments by delivering the infrastructure required to decarbonise – both connecting low carbon technologies whilst at the same time enabling growth. Several stakeholders urged WPD to duly consider the opportunities of flexibility or other alternative measures to relieve grid capacity without the need for traditional reinforcement. Two stakeholders urged WPD to consider investing ahead of need to minimise constraints on the network. One stakeholder wanted to see WPD adopt a leadership position in the net zero transition by providing more advice and education to stakeholders given their expertise.

- “All looks good and progressive; I always wish for more investment with an ageing electrical infrastructure.”
- “Generally, the overall package is good, but not ambitious enough in supporting community energy and the transition to Net Zero.”
- “You need to put more emphasis on undergrounding your system. It costs money but makes people happy and increases system reliance and resilience at the same time.”
- “Nothing missing but detailed work plans around DSO will need to be the subject of very thorough



scoping, considering interdependencies within and outside the electricity sector, if they are to have a chance of being successful.”

- “Need to consider impacts of investment ahead of need as critical in some areas which are currently constrained.”
- “The changes are generally positive with the greater emphasis on network reinforcement and flexibility being very important for driving the required actions of a carbon reduction future.”
- “More radical overhaul of the system for connecting renewable generation is needed.”
- “I think the outlined commitments and priorities are very good and seek to tackle a broad area of improvements across the board which will be of benefit to the environment and customers served by WPD and its operations.”
- “Those parts that support the customers in its core activities and overall support is especially welcome. More emphasis on advice and education in the document would be positive. WPD are the experts and have a wealth of knowledge that can help shape a realistic change to the new energy world.”
- “WPD as an agent for zero carbon change is just not there; all I read is a network operator going through the motions.”
- “The core commitments all appear to cover all of the key priority areas [...] However [...] ensuring that connections can be completed efficiently and at a reasonable cost should be a leading focus for this price control period [...] as well as alternative measures to relieve grid constrained areas and promote green economic growth.”
- “We support the general themes of the Business Plan, but some important issues are missing [...] the changing dynamics of the economy, namely increased homeworking, increased use of electric vehicles [...] behavioural change and modal shift – plus the need for more dynamic interaction with industry bodies on how the energy and power infrastructure needs to service future growth.”
- “Somewhat half-hearted ambition in relation to transition to Net Zero.”
- “Generally [...] supportive but would like to see greater focus on accelerating net zero transition given [...] the current Business Plan covers a timeframe where focussed and decisive action is needed if we are to combat climate change.”
- “Opportunities to provide accelerated low carbon energy solutions are welcomed, however, we need to ensure the current grid capacity is capable of meeting current and future ambitions. Therefore, grid and planning issues are interlinked and if this is not resolved, there is a risk of significant backlash against renewables, jeopardising our climate commitments.”
- “We would encourage WPD to undertake ‘highly anticipatory investment’ (HAI), where demand is predicted to emerge long-term.”



9. Our aim is to keep bills as low as possible, but some of our commitments will incur additional costs that can't be fully offset by our efficiency savings. What are your views on the current impact of WPD's current view on customer bills?

In total, 24 stakeholders responded to this question as part of the online consultation. It was generally accepted that bills would need to rise in order to be able to deliver a net zero economy – and that an ambitious approach to decarbonisation was the right thing to do. Several stakeholders noted that there could be a longer-term benefit to accepting an increase in customer bills – with a rise in ED2 potentially being offset by a bill reduction in ED3 and beyond, in part due to the rise in innovations and smart technologies. However, the impact of a bill rise on some vulnerable customers was noted – with several urging WPD to consider putting further packages in place to support those struggling to pay their bills. In addition to these common themes, one stakeholder did ask about WPD's assumption on the return on investment they expect to make as a company and another suggested looking for investment capital from the market rather than from customers. One stakeholder felt unable to answer a question on cost at this stage in the consultation, although they noted some of the commitments and associated cost weightings were hard to compare.

- “Investment is required to satisfy and enhance net carbon zero targets, therefore we need to pay more so long as the projects are delivered to optimise value for money and [so long as] this is fully transparent to customers.”
- “One thing you can do is obtain investment capital from the markets not by levying it off your customers. That will reduce bills today and in the future.”
- “I am sure they understand what they are asking for costs money. I agree with all the commitments so would pay more for them to be actioned. In my opinion a lot of our customers will see it this way.”
- “Where there are additional costs that cannot be fully offset by efficiency savings, presumably [...] such costs would enable savings / customer value in ED3 or beyond.”
- “In terms of the balance between increasing costs and ability to pay, could environmental/social costs be utilised to effectively subsidise cost rises to fuel poor?”
- “A slight increase in bills to allow for net zero ambitions is a small price to pay.”
- “There are long term benefits to investment in key areas of importance for the region which will hopefully the offset initial rise in bills with longer term potential for smaller bills due to smarter and flexible networks.”
- “We would like to understand how the bill impact is driven by your assumptions about the returns WPD will make on its activities and whether we consider these fair in the light of the cost of capital and risks involved in your business.”
- “The commitments in this plan to actively monitor the customer base to identify customers in vulnerable



positions, and understand which customers are most able to absorb the impacts of increased bills, is a crucial element of this plan.”

- “As costs have not been shared until this final stage in the consultation, it has been difficult to assess and consider the balance of these issues in relation to the costs. At initial assessment, it appears that commitment weightings and levels of additional costs do not appear comparable. As an example – zero waste to landfill is the same cost impact of making an extra 100k phone calls a year.”
- “Not wishing to diminish the impact on the customer, particularly those on low income or with a vulnerability [...] but we consider it is important to deliver the highest level of ambition, particularly in delivering a zero-carbon future.”
- “Keeping bills as low as possible is welcomed, especially in Cornwall where the average salary is significantly below the national average. However, we acknowledge that this needs to be balanced against WPD’s ability to deliver a network that can facilitate a transition to net zero.”
- “If bills need to rise in order to finance more ambitious targets, then further support should be put in place to support customers who are least able to pay.”

10. What are your views on the process WPD has followed to determine the WPD best view? E.g. Are there any other stakeholders we should be engaging with, or datasets we should be using, to improve our approach?

Stakeholder views varied in answer to this question. Three stakeholders expressed explicit support for WPD’s process on the basis of the number of stakeholders engaged and the fact it exceeded anything else WPD had done before. Another praised the approach for being rational but did feel the resulting ‘best view’ was a little ‘conservative’.

Several stakeholders commented on the importance of ensuring that the process WPD follows delivers a best view that enables the country to achieve its net zero targets. Three stakeholders felt that WPD’s current best view would not enable them to meet the net zero target of 2030 that has been set by many local authorities, therefore meaning WPD’s view does not align with that of its stakeholders. As a result, one stakeholder was of the view that the regional uptake of low carbon technologies would outstrip the current ambition in WPD’s Business Plan.

Several stakeholders stressed the importance of the process of engaging and collaborating with local authorities to develop a regional approach to network planning (the Distribution Future Energy Scenarios). While one stakeholder praised WPD for its extensive engagement with local authorities to date and urged this to continue, another expressed concern that WPD had not truly understood the scale of regional disparity in terms of local network requirements, instead feeling that DNOs were guilty of reinforcing a top-down approach to managing the network. It was also suggested by one stakeholder that a government-led, regional approach is required and that this will require collaboration between WPD and local and regional government to respond to Local Area Energy Planning and spatial planning.

One stakeholder critiqued the process for not giving clear enough indications of the scale of certain problems or the risks involved, giving the example of contaminants and oil leaks as an area without sufficient context for stakeholders to be able to make informed decisions about the best option. Another stakeholder criticised WPD’s ED1 consultation



in relation to undergrounding schemes in National Parks and AONBs and expressed concern about the approach that will be taken in ED2.

In terms of other stakeholders WPD should be engaging with, one stakeholder felt commercial and industrial customers had been missed out of WPD's consultation to date. Another suggested WPD's own shareholders, as well as the Met Office.

- “Commercial and industrial clients appear to be missing from your documents; reference any details on the future with them.”
- “No, the stakeholders I met with were very impressed with the data and this is far ahead of anything they have done.”
- “WPD's best view won't meet 2030 net zero targets, meaning the plan doesn't align to many stakeholder ambitions.”
- “It seems like a rational approach but tends to be conservative.”
- “It's fair to say WPD have engaged with a large number of stakeholders and addressed a number of key policies, strategies and energy plans at a local, regional and national level when developing the Business Plan.”
- “We think you are not taking enough notice of the possibility that the rate of take-up will be influenced heavily by what is being done in particular localities by local authorities AND other institutions. We would anticipate that the rate of change will be far more uneven across your regions than you are currently anticipating and we don't think you know how to assess the likelihood of different areas going faster or slower [...] We think you should look to understand in much more depth what the conditions are locally (in engagement, action and governance arrangements – often beyond the local council itself) which will tend to shape what ends up happening in a locality.”
- “The process of engaging with the public sector is positive and needs to be continued as an iterative and ongoing process.”
- “Also of particular importance is being presented with an issue but no clear indication of the scale of the problem and the risks attached. This is particularly the case with reference to contaminants such as PCBs, sulphur hexafluorides, and oils in cables.”
- “A further focus on how WPD will engage with local authorities, business groups and investors when developing longer term plans needs to be outlined.”
- “It's important to recognise the likely acceleration of low carbon energy generation beyond what is predicted in the Business Plan as local authorities plan for a net zero carbon future. Key documents for consideration are current and emerging Local Development Plans and local authority climate / energy / environment strategies.”



- “National Parks and AONBs are a national asset and Ofgem WTP research determined expert allocations of customer willingness to pay to see landscapes improved and thereby set targets for DNO ambition. WPD then consulted on a set of options, all of which were below the full amount of allocation stipulated by Ofgem. This was not a transparent consultation and led to a biased choice in WPD’s Business Plan consultation. We entirely fail to understand WPD thinking on this matter.”
- “Very in-depth engagement from our perspective, to be commended. We look forward to continuing engagement.”
- “WPD’s current ‘best view’ won’t meet the local 2030 net zero targets. Whilst the Energy Strategy was originally written to be in line with the government’s 2050 net zero target, this has been superseded by the decisions taken by the local authorities to meet Net Zero by 2030.”
- “A move to a more strategic and planned approach to the provision of infrastructure and the deployment of LCTs will be required if net zero targets are to be met. This will need a government-led regional strategic planning and coordination function, working in partnership with DNOs/DSOs and developers. A key enabler of this will be a collaboration between local authorities and DNOs/DSOs on Local Area Energy Planning, enabling alignment and acknowledgement of local authority housing trajectories and spatial plans.”

11. Do you agree that WPD’s best view for low carbon technology uptake represents a likely and credible outcome?

In total, 23 stakeholders responded to this question as part of the online consultation. As a general rule, stakeholders acknowledged WPD’s best view was reasonable based on the available data but there was a significant amount of scepticism as to whether it would be enough to deliver the step change required for the country to achieve Net Zero. Some stakeholders emphasised how uncertain these predictions were, and others noted government policy was evolving very quickly in this area. Two separate stakeholders noted that the Distribution Future Energy Scenarios for their network area presented scenarios that they felt were lower than the anticipated uptake of LCTs. As a result, many of the stakeholders who responded to this question urged WPD to ensure that they remain as ambitious as possible to avoid a situation where the capacity of the electricity network becomes a blocker to achieving decarbonisation.

One stakeholder felt they were unable to respond as they were unclear on what WPD’s ‘best view’ for LCTs was. Another stakeholder sought clarity on what LCTs were included, urging WPD to prioritise those that deliver the best return on investment. One participant disagreed that WPD’s best view for LCT uptake represented a likely and credible outcome but did not provide a reason for that view.

- “Yes, but [this] needs to improve further.”
- “I am not sure what LCTs you include. To me you need to make sure that the LCTs which you support



are the best. That is not wind and solar which have structural limits (see above) but look at those which give the best return per £ invested unsubsidised.”

- “The higher view would better facilitate and enable the actions and changes required for a low carbon future.”
- “Likely to speed up!”
- “Broadly, WPD’s best view for low carbon technology is consistent with other views I have seen around the uptake of EVs, heat pumps, etc., and not too dissimilar to those which are identified within our regional energy strategies. I do believe with all of these areas we should all be committed and hold the ambition to progress and develop at pace towards Net Zero as soon as possible, so would always hope to see a slightly higher ambition than Option 3.”
- “Please don’t assume that hydrogen will reduce the demand on the electricity supply network; aim to meet the full demand by the chosen year (be it 2035, 2043 or 2050).”
- “I believe it represents an honest view but have not been convinced it is a likely outcome.”
- “We don’t think you have enough understanding of what might shift things away from that view (either generally or in particular locations) and therefore whether you will be able to keep ahead of changes, as you need to if you are to fulfil the role of enabler (and not blocker) of the net zero transition.”
- “Based on the DFES for those authorities in the SEMLEP area, the best view of low carbon technology uptake appears plausible. However, we cannot comment on the low carbon technology uptake forecasts in other parts of the WPD area. Furthermore, the potential changes in government policy regarding these technologies, government funding to de-risk investment in these technologies, and uncertainties around behavioural change make these projections highly uncertain.”
- “Yes, as long as it is kept under review due to the changes in public opinion and what technologies become available.”
- “Insufficient information at present to come to that conclusion.”
- “This is a tremendously difficult area to forecast accurately but with the increasing emphasis on climate change from government and local authorities declaring climate emergencies, this picture is likely to change significantly and potentially very quickly.”
- “Your work in this area is very thorough and I wouldn’t argue with it.”
- “NCC (Nottingham County Council) fed back on the DFESs and found that most scenarios for alternative technology uptake were a lot lower than we anticipate being required to reach CN28 (Carbon Neutral Nottingham 2028) – we would like to see DFESs developed which better reflect the scale of ambition and change required, which in turn ensure that the network is ready for these changes.”



- “Yes, in that WPD’s best view and associated RIIO-ED2 investment strategy will influence the rate of LCTs uptake with any deployment constrained to a level broadly reflective of the strategic grid reinforcement and flexibility investments made by WPD. However, with upgrades needed to the grid infrastructure within Cornwall to support the low carbon ambitions of reaching Net Zero by 2030 we think WPD’s ambition should be greater.”
- “The DFES scenario for renewables deployment in our area produces lower deployment levels for wind and solar PV than are required to meet the 2030 target, and the resource available.”
- “WPD’s best view is based on current demand and modelling with existing and planned policy. If we are to meet the decarbonisation targets set by the local authorities, it is likely that significantly higher levels of low carbon technologies will be required than are being modelled. It is felt likely that this is particularly the case for low carbon heating, due to the above average levels of off-gas grid properties in the Marches. Future government policy is also likely to be developed during the next couple of years, and the start of ED2, so some flexibility to enable LCT ambition to be increased should be included.”

12. In relation to investing for a low carbon energy future, what are your views on WPD’s current view proposals and the level of expenditure currently proposed?

In total, 21 stakeholders responded to this question as part of the online consultation. For the most part, stakeholders wanted WPD to be more ambitious when it comes to investing for a low carbon energy future. One stakeholder felt it was essential that all assumptions are based on Net Zero by 2030. Stakeholders generally recognised and accepted that greater ambition would require a higher level of expenditure but that this was necessary to decarbonise. Following on from this, several stakeholders therefore felt the level of expenditure currently being proposed was insufficient. Building on this, one stakeholder posed a rhetorical question to emphasise that there would be a negative impact on customer bills from not achieving Net Zero. One stakeholder urged WPD to establish a mechanism to subsidise the bills of fuel poor customers to offset any future bill increase.

Two stakeholders criticised WPD’s draft Business Plan as they did not feel it adequately set out the challenge faced by DNOs to deliver the network capacity required to facilitate the country’s transition to a zero-carbon future. Three stakeholders felt unable to comment on the level of expenditure on the basis that there was insufficient information presented, or that they lacked the expertise with which to do so.

- “Okay but needs more stretch.”
- “It is not ambitious enough.”
- “It is essential that the assumptions are based on Net Zero by 2030, and the network is able to accommodate the shift toward domestic electrification of heat, decentralised energy generation and



electrification of transport.”

- “Whilst it would have billing implications, the higher view would better facilitate and enable the actions and changes required for a low carbon future.”
- “Higher ambitions are the only ones that make any sense.”
- “I very much feel increased ambitions should be placed on this area within the Business Plan as investing for a low carbon energy future is key. If shared goals and ambitions can be aligned and developed in cohesion in a shorter timescale then I think we should be aiming higher than the proposed level of expenditure.”
- “Not enough information to know. If other infrastructure projects are a guide, you can easily multiply your best estimate by over 3 times.”
- “We aren’t in a position to comment on whether the level of expenditure currently proposed is sufficient (or excessive) to meet the best view. The numbers are too aggregated for such judgements to be made. We would like to see more detail on this in future business plan drafts (or at least in relevant annexes), including your assumptions about costs of different elements of the reinforcement needed.”
- “What are the consequences to the customer bills of getting it wrong?”
- “We are looking at a massive increase in demand for electricity from zero carbon sources, yet the Business Plan makes little reference to this challenge or the tight deadline in which we have to meet it.”
- “There is a need for WPD to be able to make the case to government for infrastructure investment to enable the implementation of the government’s 10 Point Plan. WPD will need to ensure it has sufficient capacity to be able to persuade government to release public funds to make crucial projects that will deliver significant economic benefits a reality. This Business Plan falls woefully short in meeting this challenge.”
- “It is difficult to comment on the level of expenditure as we rely on your professional expertise to identify the necessary levels.”
- “WPD’s current view proposals will likely need to be reappraised to reflect more ambitious levels of LCT deployment with a commensurate level of additional investment. It is, however, acknowledged that this level of LCT deployment will not happen without government leadership, regional strategic planning and coordination, additional public investment and enhanced collaboration between energy system participants and stakeholders.”
- “We are very concerned that the level of investment will be too low, since the ‘best view’ DFES scenario falls significantly short of supporting sufficient generation capacity to meet our 2030 target as above. We urge WPD to consider supporting a much higher level of Highly Anticipatory Investment (HAI) during this price period to 2028.”



- “As mentioned previously, it would be interesting to see if a mechanism could be developed whereby environmental / social costs can be utilised to effectively subsidise cost rises to the fuel poor.”

13. In relation to building a smarter, secure, digitalised energy network, what are your views on WPD’s current view proposal and the level of expenditure currently proposed?

In total, 20 stakeholders responded to this question in the online consultation. Nearly all respondents supported WPD’s proposal to build a smarter, secure, digitalised energy network on the basis it would make the future network more resilient by helping with constraints and strengthening the network’s flexibility and responsiveness. However, two stakeholders did caveat this by saying that investing in a smart network should not come at the expense of delivering capacity improvements. Only two stakeholders answered the question about the level of expenditure, both of whom felt that an additional 25p per bill should be spent to achieve the highest level of ambition in this area. One stakeholder felt the level of detail in the expenditure plans was insufficient to be able to make an informed judgement.

In addition, one stakeholder encouraged WPD to develop the role a smart network could have in helping to alleviate fuel poverty. Another stakeholder wanted to see a commitment to the use of remote sensing to help improve the efficiency and resilience of the network.

- “A smart digitalised network is the only way to go, and work to achieve it should be given the highest priority as so much benefit to other concerns in the Business Plan will result.”
- “Do not rely on a digitalised system any more than you have to. They are useful but regularly go wrong.”
- “Making the network smarter utilising data should help with grid constraints. However, this needs to go hand in hand with capacity improvements.”
- “All the moves to WPD becoming a more flexible and responsive network and network provider are positive.”
- “I think that based on the 25p increase we should be aiming higher to progress in this area as part of RIIO-ED2 business plans, as the benefits of doing so will far outweigh the 25p increase to customer bills.”
- “The level of detail in the expenditure plans as provided in this draft isn’t sufficient to form a view about whether these are sufficient or are based on them being efficiently incurred.”
- “Given the relatively small marginal bill impact of adopting a higher ambition, and the importance of high-quality data in WPD’s transition to a DSO, we consider the higher ambition preferable to the current view.”



- “The use of remote sensing to optimise the efficiency of the infrastructure is hinted at in the Strategy but there is no indication of undertaking work in this area. In fact, it would make sense to do so as it would help to maximise efficiency and help to reduce costs and enhance resilience for supply.”
- “We support proposals that ensure the future resilience of the network, particularly as population increases and a greater focus on electrical energy will impact on demand, so resilience will be extremely important.”
- “WPD should continue to deliver on their ambitions for building a smarter, secure, digitalised energy network, where possible enhancing both innovation and investment in this area to enable an accelerated delivery of net zero ambitions ahead of the government’s legally binding 2050 commitments.”
- “It is good to see this as a focus.”
- “It is also important to develop the role that a smart network can have in alleviating fuel poverty. Advances in a smarter network should be developed in order to work for the benefit of all, not just for those with a detailed understanding of the energy network.”
- “Making the network smarter with data should help with grid constraints, especially through the emerging flex markets. However, getting the network to where it needs to be should be a priority ahead of this.”

Long-form responses: Email and bilateral meetings —

In total, seven stakeholders provided long-form responses that did not fit under the questions set out in the consultation: two via bilateral meetings and five via email. The feedback provided in these responses has been reviewed and summarised under the three Ofgem themes. There were also some general comments, which have been summarised under their own subject heading below.

Meeting the needs of consumers and network users

- WPD were praised for considering customers in vulnerable situations as part of their strategy. However, it was suggested that there could be an option to use these funds more effectively via existing channels which could allow a lower cost per reach to customers in vulnerable situations and offer more substantial wrap-around holistic care.
- One stakeholder wanted to see greater cooperation between DNOs in tackling network connection and capacity issues, as many local authorities span two DNO licence areas.
- One stakeholder wanted to make sure that there is an emphasis on affordable connections.



- On Commitment 10, one stakeholder felt that more context was needed as it is difficult to quantify 30,000 PSR customers per year or ascertain the relevance of this figure. As an alternative commitment, it was suggested that WPD could have a target for PSR eligibility relative to the number of people on the PSR.
- On Commitment 14, the same stakeholder made a similar point in relation to the number of fuel poor customers targeted. As an alternative commitment, it was felt WPD could have a target relative to total fuel poverty, expressed in percentage terms.
- On Commitment 19, one stakeholder felt that local authority engagement once every three years was inadequate given the pace of change, so annual engagement was felt to be preferable.
- On Commitments 21–24 (Social Contract), one stakeholder felt that WPD needs to set out an accountability process, as the penalties for missed delivery are currently ambiguous.
- On Commitment 23, one stakeholder noted customers should not have to contribute to the ‘Community Matters’ Fund, but that instead this should be funded by the company and its shareholders.

Maintaining a safe and resilient network

- Commitment 30 was singled out for praise by one stakeholder who urged WPD to install the most efficient infrastructure possible now as it will prepare our energy system and mitigate the need for extensive costly reinforcement down the line.
- One stakeholder wanted to see more accurate forecasting of the volume of wayleave settlements required for ED2 to ensure greater accuracy of allowance for diversions than in ED1. This stakeholder offered the use of its members’ proprietary data on towers and poles to support this endeavour.
- On Commitments 25–31, one stakeholder commented WPD’s plan to improve resilience for worst served customers and invest beyond the current period was laudable. However, this rate of improvement would need evidencing. As an alternative commitment, it was suggested that WPD should continue exploring the crossover between worst served areas and areas with high rates of customer vulnerability, perhaps as an area of potential overlap with its Customer Vulnerability Strategy.
- On Commitment 35, one stakeholder questioned whether there are cheaper but equally effective routes of achieving public safety, for example via social media channels or SMS. It was felt that more justification was needed as to why distributing safety advice is an appropriate response to the high-level stakeholder feedback received.
- On Commitment 37, one stakeholder welcomed the idea of strengthening safety at schools, but it was noted that this commitment had not previously enjoyed much support from stakeholders – although no



further comment was provided on this.

- On Commitments 38–39, one stakeholder noted that there is a lack of specific diversity targets. WPD was encouraged to include specific targets on the gender pay gap and BAME representation, among others, in its commitments.

Delivering an environmentally sustainable network

- The proposal to look at lower cost alternatives to providing network capacity was welcomed by two stakeholders; in particular, the use of flexibility, local generation by community groups and battery storage was mentioned.
- One stakeholder requested that the DFES recognise the rurality of certain local authorities and the challenges this presents to enable the delivery of a low carbon future. Building on this, they wanted WPD to consider the decarbonisation of farming machinery, processing and transport which is especially important to the rural network.
- One stakeholder urged WPD to engage with local authorities, LEPs and developers at least once a year to support them with the delivery of low carbon connections.
- Support was expressed by one stakeholder for continued investment in newer and more efficient equipment to reduce technical losses and address the amount of generated waste 'going to the landfill'.
- With regard to Commitment 49, one stakeholder commented that WPD should use CTS-enabled cables as they perform better underground than conventional cables, with lower earth leakage.
- One stakeholder commented on Commitment 50, again suggesting that WPD use CTS-enabled cables as they provide the benefits of lower losses and increased capacity, without needing to increase the amount of copper, which has high carbon production costs.
- One stakeholder suggested that WPD include the need to reflect the whole lifetime cost of an asset, including financial and carbon costs as part of Commitment 64.
- One stakeholder suggested establishing an independent body responsible for enabling net zero infrastructure at a local level to help achieve integrated cross-vector working.
- The same stakeholder wanted to see the actions of others properly considered in a dynamic fashion. They proposed a much deeper working relationship between electricity DNOs and other actors in the local energy system on a day-to-day and detailed location basis, using digital, geospatial intelligence.
- One stakeholder felt that the role of DSO should be separated from the DNO as it has been for the ESO, and that it should be incentivised on customer outcomes.



- One stakeholder felt there was a disconnect between energy usage and decarbonisation messaging. It was felt a national funding programme should be established with funding provided at a local level to support all communities through a trusted and established route via local councils.
- The emphasis on providing more data was endorsed by one stakeholder who expressed support for additional spend in this area. It was noted that an area which needs to markedly improve is the provision of data that allows interoperability with other datasets with minimal additional effort, e.g., weather data. In future, for interoperability, the data needs to be designed to be of use to external systems.
- One stakeholder wanted to see WPD adopt a higher level of ambition for investment in a low carbon future to facilitate the connection of a higher proportion of electric vehicles and heat pumps.
- One stakeholder supported greater opportunities for community groups to engage with WPD to enhance their confidence and understanding of WPD processes and connection requirements.
- On Commitment 54, one stakeholder felt that it should be made clearer that the objective is 'flexibility first', i.e., that flexibility is the preferred option over conventional reinforcement on all schemes. Moreover, it was felt that WPD should not just conduct flexibility assessments but should pursue energy efficiency more widely to reduce demand and avoid reinforcement. It was suggested that an equivalent commitment needs to be embedded within the DSO strategy.
- On Commitment 57, one stakeholder felt that WPD had got the metrics wrong, with the general feeling being that 2% above the national average was too low and that this doesn't take into account regional disparities in take-up levels.
- On Commitment 62, one stakeholder noted the idea of supporting local authority energy plans was welcome, but there was a need to be mindful of the variations between plans.
- On Commitments 64–65 (Innovation), one stakeholder commented that there was no mention of learning from other companies' best practice, therefore the commitments seemed too internally focused. A suggestion was made to incorporate learning from other successful DNO projects into the existing commitments.
- On Commitments 66–67, one stakeholder questioned whether WPD could align with other organisations' vulnerability strategies and schemes to support those most in need, including those of Citizens Advice. It was also commented that WPD could perhaps do more to make the most of resources within community energy groups.



Overall

- One stakeholder felt that the current approach to stakeholder engagement undertaken by DNOs is insufficient to guarantee a fair outcome for customers. They suggested a range of activities, including: participating in forums arranged by others; basing incentives on delivering the best outcomes for customers of all energy vectors, not just electricity; offering cost estimates for LCTs without having to lodge a connection quotation request; and developing local area energy plans for each city in WPD's patch as a minimum.
- In terms of overall impressions on the Business Plan, one stakeholder commented that WPD's ambition to engage with the wider public early in the business planning process was welcome.
- One stakeholder wanted WPD to go for the maximum ambition on its commitments, as it was felt that efficiencies could level out the relatively small impacts on customer bills. It was commented that WPD could even go further in creating more stretching commitments as stakeholders can't always make ambitious proposals if they lack the expert knowledge needed to formulate them in the first place.
- In terms of the wording of the Business Plan, it was felt by one stakeholder that there was inordinate focus on delivery and that solid outcomes should be outlined instead. They noted the wording 'current view' came across as a 'middle ground and conservative' as well as being misleading as it sounds as if this view is directed by WPD rather than being shaped by stakeholder feedback.



Section Two

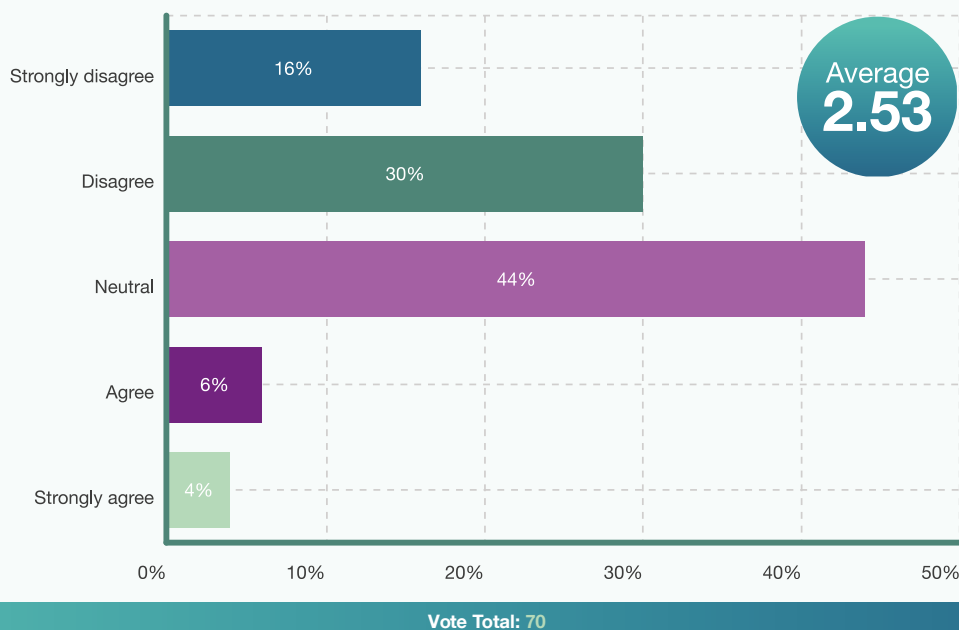
Commitments – Meeting the needs of consumers and network users

Section Two focuses on the feedback gathered on each of the commitments covered under Ofgem’s focus area of ‘meeting the needs of consumers and network users’. This feedback is primarily quantitative, with stakeholders and customers voting on options for each of the commitments. The voting data has been supplemented by written and verbal feedback where given. This was gathered via online consultation responses (stakeholders and WPD employees), the online stakeholder workshop, and the bill payer / consumer survey

Customer Service

WPD’s Business Plan 1 contained seven draft commitments for Customer Service. When asked in the online workshop whether they wanted to suggest alternative commitments for the topic of Customer Service, on average the largest proportion of stakeholders felt neutral (44%), with 30% disagreeing and 16% strongly disagreeing. 10% did, however, agree or strongly agree that they wanted to suggest alternatives. On average across the 12 Business Plan topics, Customer Service ranked lowest, suggesting that relative to the others, stakeholders felt it included the commitments they wanted to see.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Customer Service



When asked to comment, many stakeholders felt the list of commitments was the right one on the basis it covered all the main issues and was comparable to the activities undertaken by other companies. Three stakeholders did provide an indication of why some wanted to suggest alternatives. One felt there needed to be greater emphasis on doing more at lower cost. Another agreed, stating that new technologies presented an opportunity for WPD to



improve performance without raising prices. One stakeholder highlighted the significant rise in electric vehicle charge points that will be coming forward, suggesting that electric vehicles should be referenced in the commitments for Customer Service.

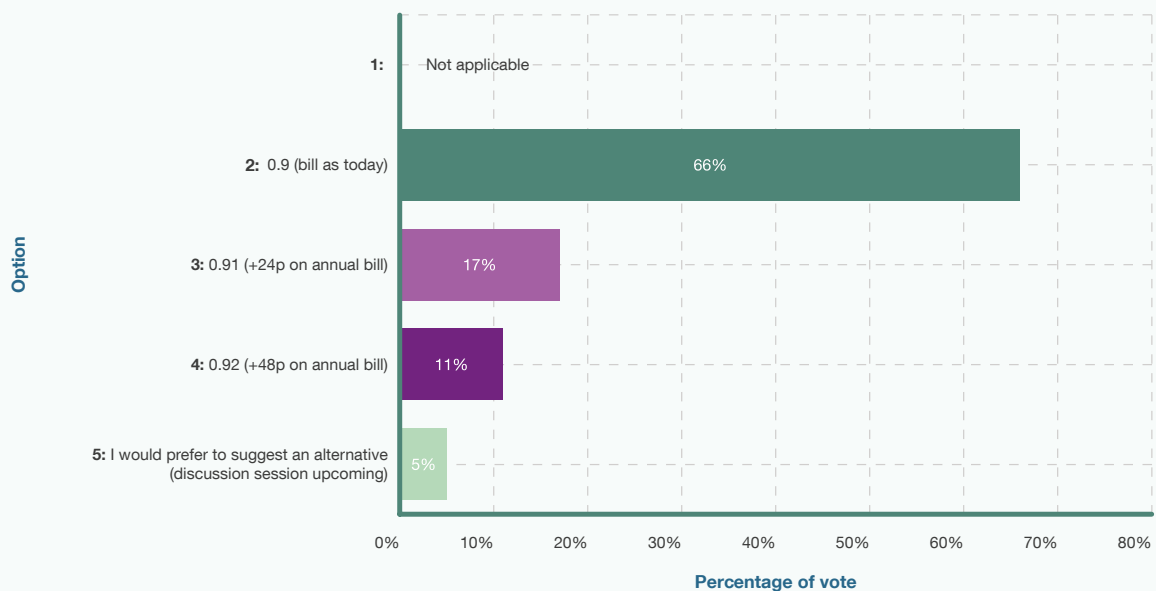
- “Those ones seem fine to me.” **Local authority**
- “Overall, they all seem fairly acceptable and non-controversial, but I just wanted to check where they are compared to what you’re delivering now. Is it an incremental change or a step change? But overall, they seem to be comparable to targets of other organisations in your industry.” **Government**
- “It all seems quite linear in thinking. A bit like if I want to go faster, I need a bigger engine. In the organisations I’ve worked in, including several multinationals, I would be expected to do more with less each year. There’s not enough translational thinking going on in this plan. Just emphasis on more cost.” **Community energy group**
- “Nothing missing from these commitments. WPD overachieve and I’ve had a very positive experience.” **Local authority**
- “Most issues are identified here. WPD show continuous improvement. One constraint is that WPD shouldn’t increase bills too much due to the financial issues of the country.” **Local Enterprise Partnership**
- “I was happy with these; I wouldn’t suggest anything different.” **Storage and renewables provider / installer**
- “I see a large problem looming on the horizon. As a member of the board of management of a block of flats I live in, I am waiting for someone to say in the next five years that their new car is arriving next week, and they need somewhere to plug it in. This is a problem you will have on many occasions, but WPD are being rather coy about it. Could electric vehicle charging be raised somewhere?” **Domestic customer**
- “My feeling with the options and why I ask for alternatives is that I think you should be more ambitious in terms of improving performance without raising prices. There must be alternative technologies coming along including AI that we can expect WPD to respond to. This is in relation to answering calls and social media.” **Local authority**
- “I think it’s fine. I can’t think of anything to add to that. You seem to be hitting all the areas of potential concern.” **Community energy group**
- “I think those are pretty good commitments quite honestly.” **Major energy user**



The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)

Commitment 1: Maintain a high standard customer satisfaction score across all key services areas



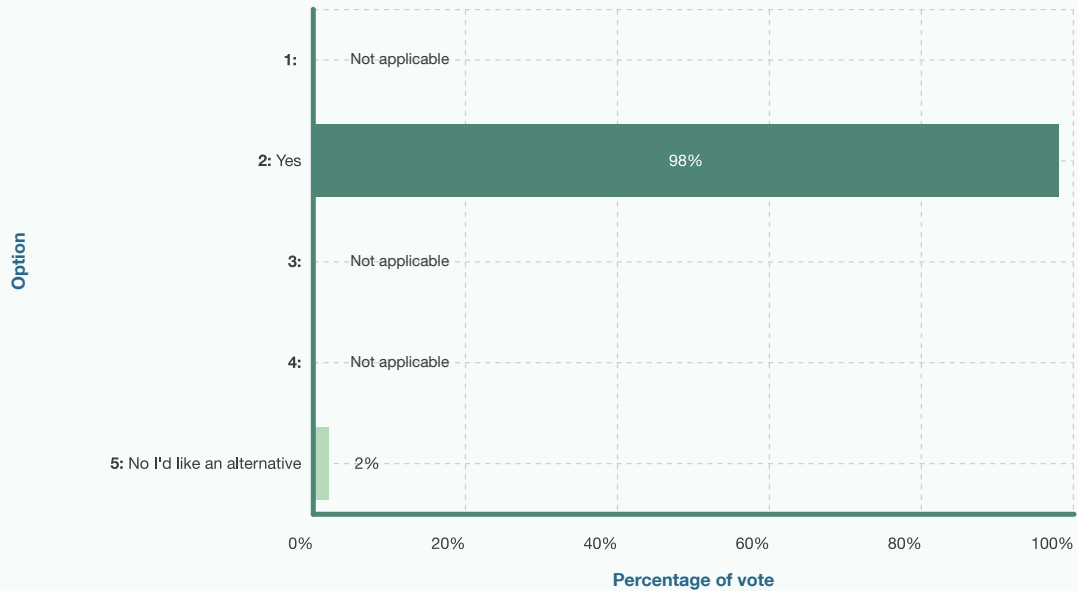
Consultation responses: 30 | Workshop: 68 | Total: 98

The majority of stakeholders (66%) voted for Option 2, which is to achieve a 90% satisfaction rate with the bill impact the same as today. Whilst 5% responded they wanted to suggest an alternative, only two stakeholders commented specifically on this commitment, with one urging more ambition and the other suggesting that call centre staff also chat to elderly customers to help prevent loneliness. This commitment was also tested in a social media poll. The majority of respondents (75%) voted for Option 2, in agreement with the views of stakeholders. The majority (67%) of WPD staff also voted for Option 2.

- “1% improvement seems modest. Aim for 95%.” **Online response**
- “Use call centre staff to chat to elderly people just to stop them feeling alone. Costs nothing.” **Online response**



Commitment 2: Achieve full compliance with the Customer Service Excellence Standard every year



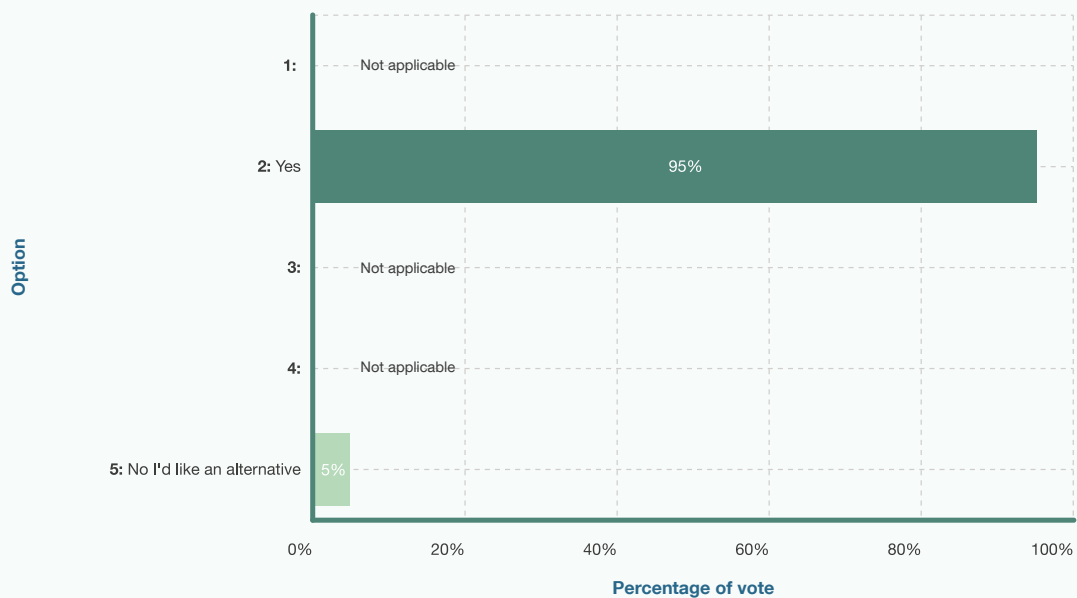
Consultation responses: 30 | Workshop: 70 | Total: 100

This commitment presented a binary choice. The overwhelming majority (98%) agreed with this commitment. Only one stakeholder commented specifically on this commitment, to ask for more context and how much it would cost.

- “I have no idea what the Customer Service Excellence Standard means so how can I say if it is a good thing? What does complying with cost mean?” [Online response](#)



Commitment 3: Answer calls within an average of four seconds and maintain an abandoned call rate of less than 1%, within our UK-based in-region Contact Centres



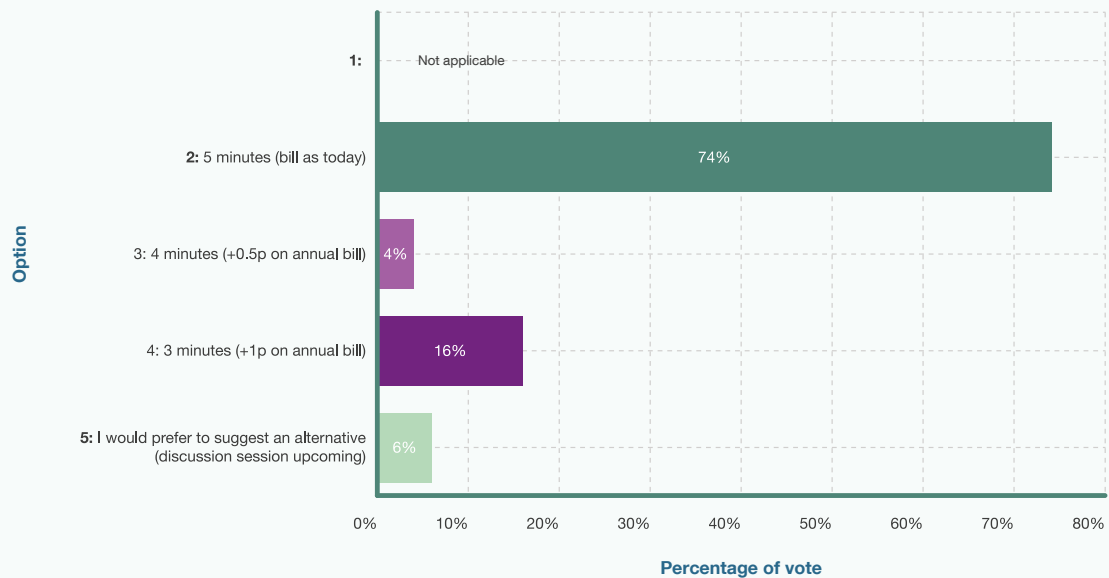
Consultation responses: 30 | Workshop: 68 | Total: 98

This commitment presented a binary choice. The majority (95%) agreed with this commitment, although 5% did want to suggest an alternative commitment. Stakeholders raised a range of comments. One stakeholder requested that the commitment include a response time for webchat. Another felt there should be an option to answer calls within 10 seconds to provide a reduced cost to the customer. Lastly, one stakeholder emphasised that the commitment should not be about the response time, but the time taken to resolve the issue.

- “I prefer interactive chat to phone calls, so I would like you to extend your pledge to respond to phone calls in 4 seconds to responding to webchat comments in 30 seconds. This would appeal to younger stakeholders.” **Connections provider**
- “There could have been an option to answer calls in 10 seconds in return for a cheaper bill for the customer.” **Energy consultant**
- “I want to know the proportion of people WPD assume have a mobile phone and can contact directly. Is it around about the 96% mark? What proportion are the vulnerable customers?” **Local authority**
- “Answering calls is one thing (a machine can do that). Resolving the issue of the caller is different and not seemingly addressed?” **Online response**



Commitment 4: Respond to social media enquiries and power cut reports quickly



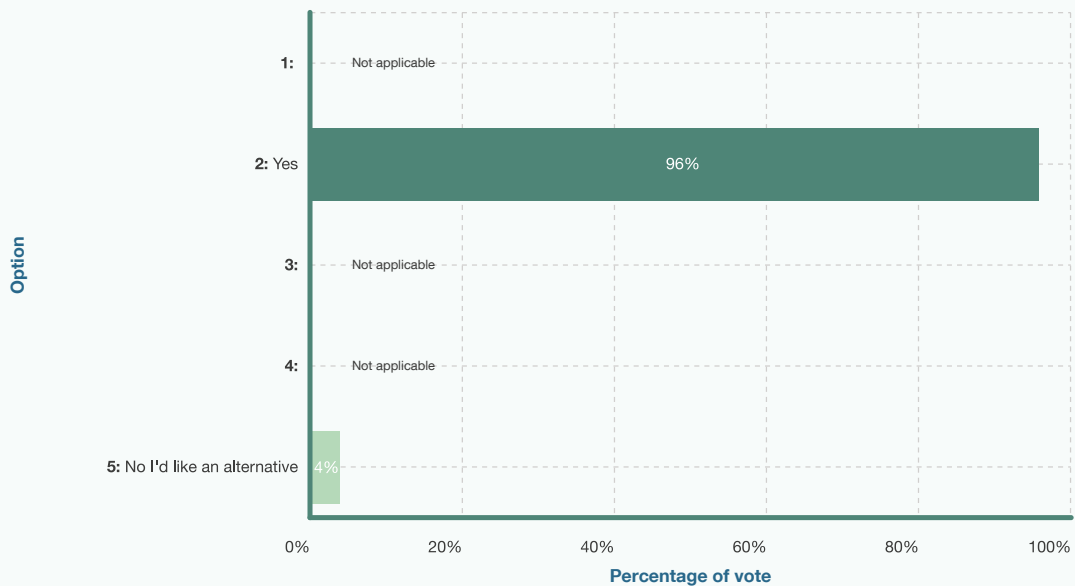
Consultation responses: 30 | Workshop: 70 | Total: 100

The majority of stakeholders (74%) voted for Option 2, which is for WPD to respond within five minutes, with the bill impact the same as today. 6% wanted to suggest alternative commitments. Three stakeholders questioned why this commitment and the proposed response covered both response to social media enquiries as well as power cut reports, with the inference they should be treated separately. One stakeholder expressed explicit support for the commitment. This commitment was also tested in a social media poll. The majority of respondents (78%) voted for Option 2, in agreement with the views of stakeholders. The majority (69%) of WPD staff also voted for Option 2.

- “Are social media enquiries and power cuts reported on the same timescales?” **Local authority**
- “I think it’s talking about two things: one about enquiries and one on power cut reports. I would have liked a quicker response on the latter. Is that what’s intended or is it social media power cuts?” **Domestic customer**
- “Responding to social media reports is one thing. What about the time to sort out a fault? Where is that in your scheme?” **Online response**
- “Very supportive of this, would like to see this ASAP.” **Online response**



Commitment 5: Provide greater insight on the planned work activity and interruptions on the network by creating an online viewer for our customers and stakeholders



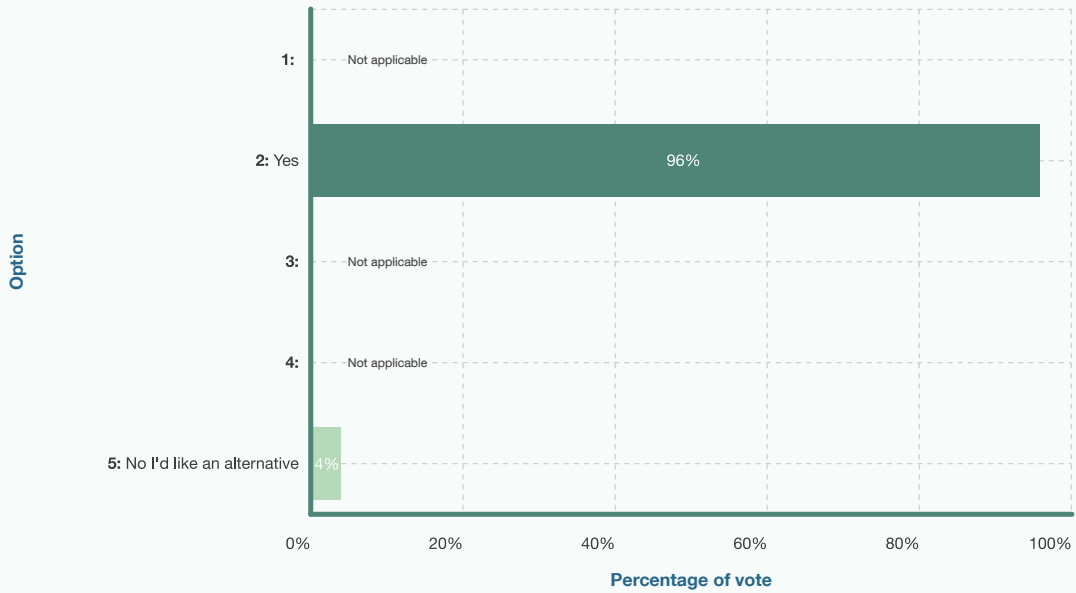
Consultation responses: 31 | Workshop: 71 | Total: 102

This commitment presented a binary choice. The majority (96%) agreed with the commitment. Only 4% wanted to suggest an alternative. In the comments, one stakeholder did not understand the commitment, with another questioning the need for another website to visit.

- “I am not being facetious. Does this mean being able to watch the workers at work? It sounds like it. You remember when there were CCTV in lifts first?” **Online response**
- “We’ve been referred to One Network. If that network is already available, do you need to create an online viewer? The more websites people have to visit, the more complex things become.” **Parish / community council**



Commitment 6: Achieve full compliance with the British Standard for Inclusive Service Provision every year



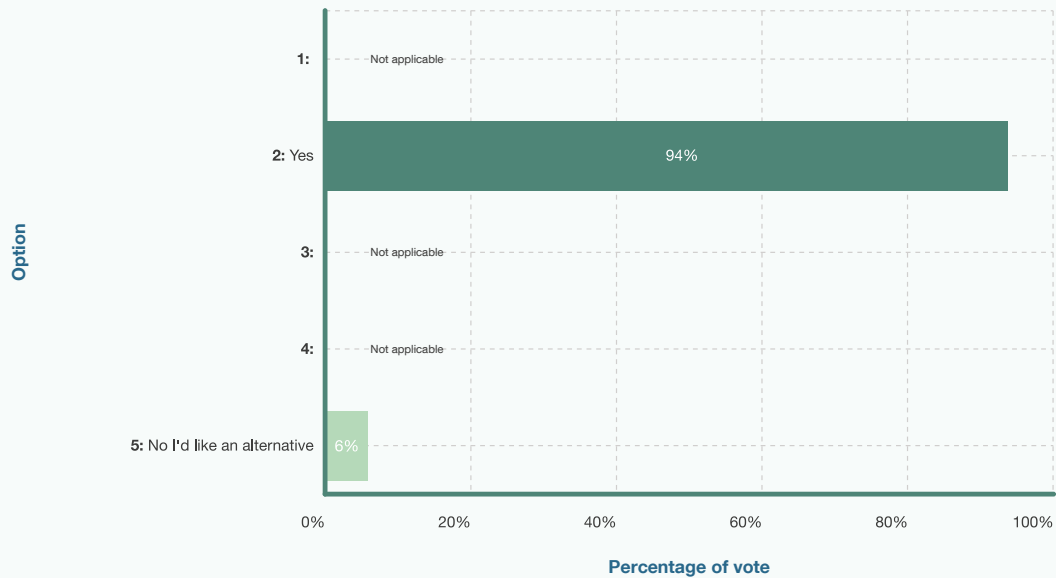
Consultation responses: 30 | Workshop: 70 | Total: 100

This commitment presented a binary choice. The majority (96%) agreed with the commitment whilst 4% responded they wanted to suggest an alternative. Only one commented and that was to seek further clarity on what it meant and how much it would cost.

- “No idea what this standard is or what it means or what it costs to comply.” [Online response](#)



Commitment 7: Resolve at least 90% of complaints within one day & resolve 99% of complaints within 31 days



Consultation responses: 30 | Workshop: 68 | Total: 98

This commitment presented a binary choice. The majority (94%) agreed with the commitment, although 6% wanted to suggest an alternative which, whilst still relatively low, represented the highest number of responses for this option for the commitments relating to Customer Service. In the comments, two stakeholders felt 31 days was a long time to resolve a complaint and urged more ambition and another wanted to understand how communication would be maintained during this time.

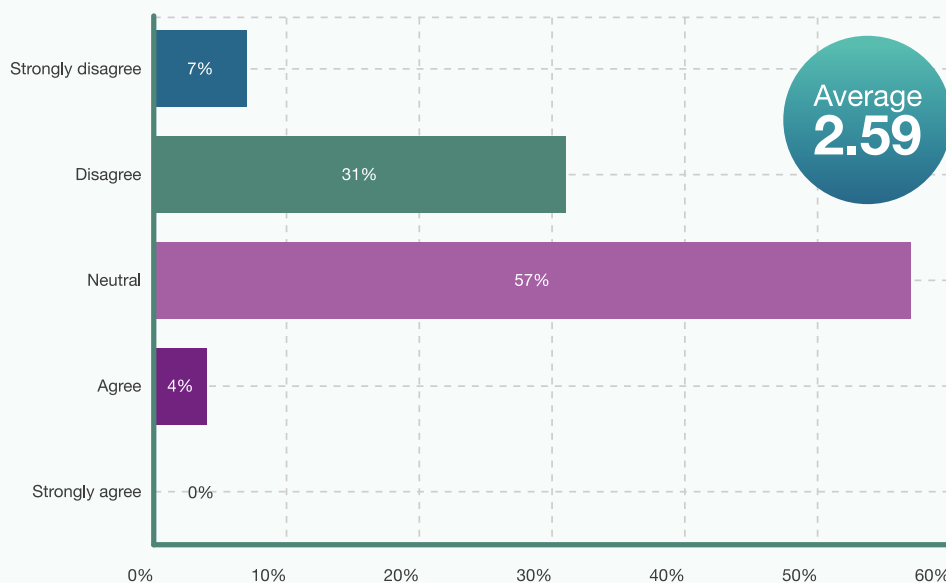
- “In terms of the one about resolving complaints, with regard to complaints that go on longer than one day, it’s not clear what level of communication is maintained between WPD and the customer in question. Can you clarify this?” **Local authority**
- “I agree with 90%, but I think 99% should be quicker than 31.” **Domestic customer**
- “31 days seems a long time to resolve a complaint. Surely WPD should be more ambitious here. I don’t know a specific target, but I think within 10 days as a maximum.” **Local authority**



Customers in Vulnerable Situations

WPD's Business Plan 1 contained eight draft commitments for Customers in Vulnerable Situations. When asked in the online workshop whether they wanted to suggest alternative commitments in this area, the most prevalent answer from stakeholders was neutral with 57% of the vote. 31% of stakeholders disagreed and 7% strongly disagreed. Only 4% agreed that they would like to suggest alternatives. On average, Customers in Vulnerable Situations ranked second lowest out of the 12 Business Plan topics, indicating that relative to other areas stakeholders felt the commitments covered what they wanted to see.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Customers in Vulnerable Situations



Vote Total: 68

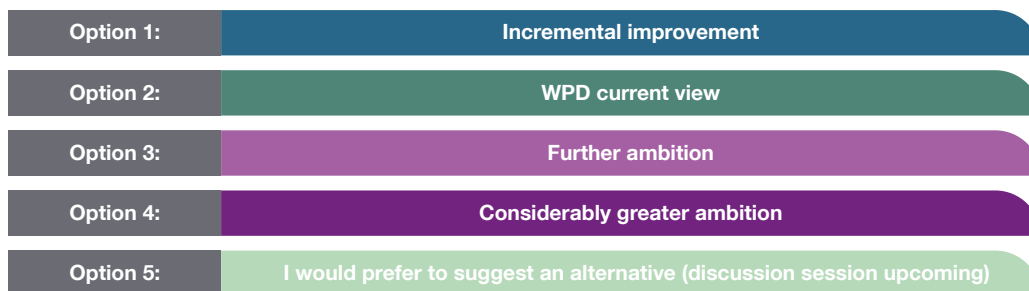
It was commented that several commitments in this area represented a negligible increase in customers' bills. The point was also made in the discussion session at the workshop that some of these commitments should be the responsibility of the supplier rather than the DNO. Notwithstanding this, some felt that WPD should lead the way in providing support for customers in vulnerable situations and should do more to identify different types of vulnerability.

- “I would have quite liked to have known what we do for an extra 5p to vulnerable customers. I would have liked to know what we would get for a higher stake. We need significant changes to people's comfort/bills and carbon emissions.” **Local authority**
- “Can we have a commitment to have a fit for purpose arrangement? At least in a moderately insulated home.” **Local authority**
- “Some of those things say it would add 3p to a bill. Some of these bills are £90 so it's difficult to give another response.” **Major energy user**
- “Do you actually go out to assess vulnerability or do you just take people at their word?” **Utility**

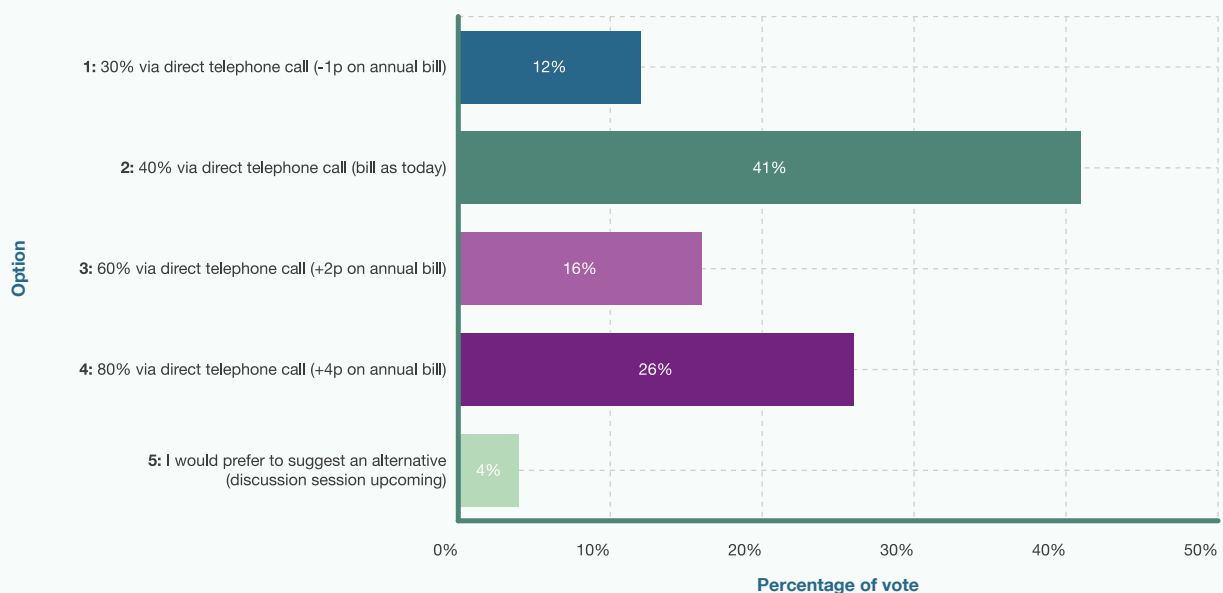


- “You should lead the way on temporary vulnerability. Some people are vulnerable at night but not during the day because of medical equipment.”
Parish / community council
- “We have a local scheme looking after vulnerable people. Do WPD speak with councils for adult care to see if further histories are available for people seeking help from you?” **Local authority**
- “I’m concerned responsibility seems to have been passed down to you as supplier from central government. Do you feed back to social services about vulnerable customers? I want to know how much responsibility you’re taking that would normally be down to government.” **Local authority**

The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.



Commitment 8: Proactively contact over 2 million Priority Services Register customers once every two years to remind them of the services we provide and update their records



Consultation responses: 27 | Workshop: 70 | Total: 97

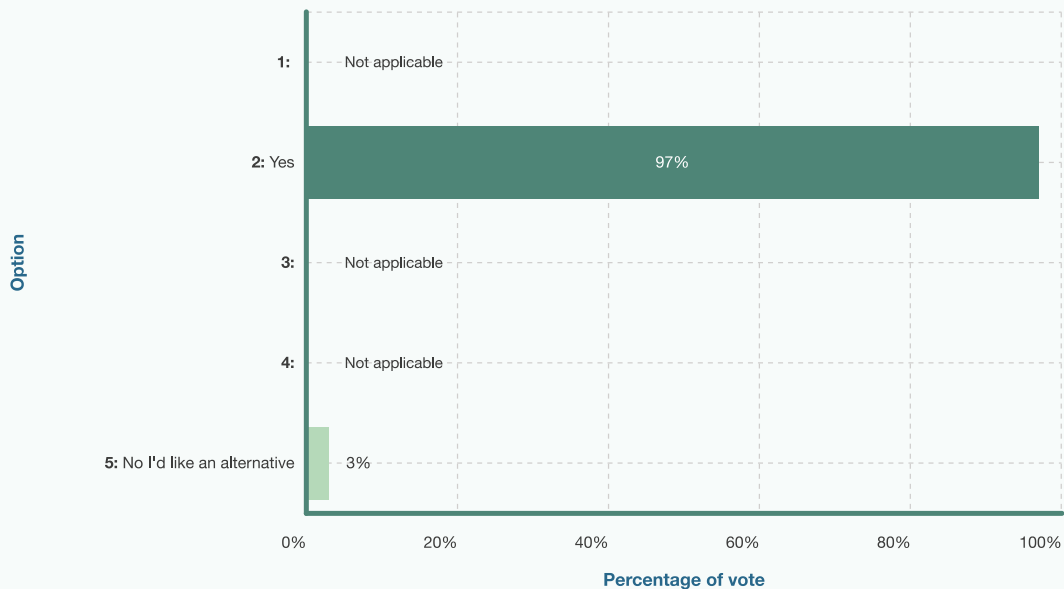


The most prevalent response to this commitment when stakeholders were asked to vote was for Option 2 (40% via direct telephone call) with 41%. However, the majority of stakeholders voted for WPD to go further, with 16% opting for Option 3 and 26% voting for Option 4. 4% of stakeholders voted for Option 5, stating that they would like to suggest an alternative commitment. In the discussions, most stakeholders focused on communications. It was felt that WPD should do more to promote awareness of the Priority Services Register and, whilst it was felt that calling customers was the best way to do this, one stakeholder made the point that there had been an increase in the number of scam phone calls in recent months, many of which targeted the most vulnerable in society. This presents a problem for WPD when endeavouring to contact those people most in need of additional support. The majority (56%) of WPD staff also voted for Option 2.

- “This is a moveable feast. People become vulnerable very quickly, so it’s difficult to keep track. Annually might not be a bad idea. The number of people that die every year in WPD’s area is very large. You need to check every so often so that they’re no longer on the register.” **Energy consultant**
- “On the PSR, we used it a few years back when someone was very ill, and I don’t know whether the register was properly communicated with us at the time in terms of what we can expect from being on the PSR. I think what it actually means to be on the PSR could be better communicated to customers on the PSR.” **Local authority**
- “This is ambitious, but there is always room for improvement. If bills go up but WPD can improve on figures, that would be fine. WPD could contact PSR customers directly as letters don’t have the same impact. Phone calls are ok but is there another alternative?” **Local authority**
- “Yes, I was aware of the Priority Services Register. I think it’s a standout feature of how WPD engage with their customers. It’s excellent and needs to continue and the more resource that can be put into it the better. That’s where you can see the priorities of the company and where the heartbeat lies.” **Vulnerable customer representative**
- “I think it’s a brilliant idea, but all the questions were about phoning. Because we are having so many scam phone calls at the moment, some people like my mum who would be on the list wouldn’t answer the phone if they didn’t recognise the number.” **Parish / community council**
- “I assume these are the elderly or infirm customers? You were quite good about telling her when there would be works affecting her home.” **Online stakeholder**



Commitment 9: Achieve a ‘one-stop-shop’ service for vulnerable customers joining the Priority Services Register so that they only have to register with WPD once to be registered automatically with their energy supplier, water company and gas distributor



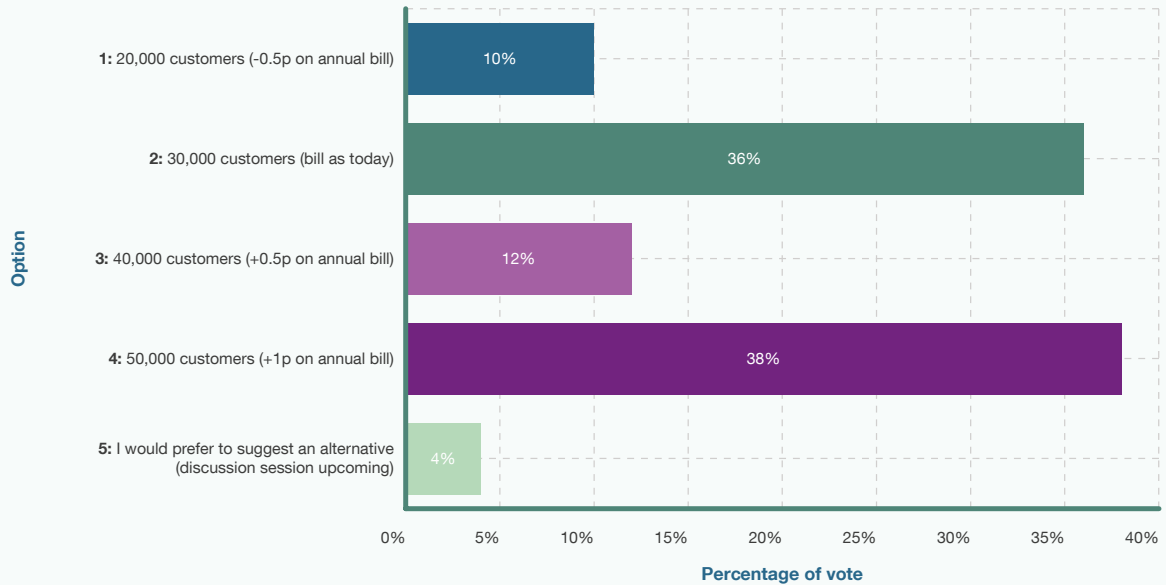
Consultation responses: 28 | Workshop: 68 | Total: 96

The vast majority of stakeholders who voted on this commitment voted for Option 2 (97%), representing ‘yes’ in this binary vote. Only 3% voted for Option 5, to suggest an alternative commitment. When discussing this commitment, it was commented that utilities who participate should include telecoms providers in addition to gas distribution networks and water companies.

- “Keeping the options up to date will be very difficult, because people switch providers often.” **Developer**
- “Sounds like a good idea but offers the potential for each organisation to say they are not the one [responsible]. You don’t include telecoms – why not?” **Online stakeholder**



Commitment 10: Identify and engage hard-to-reach vulnerable customers each year to join the Priority Services Register within RIIO-ED2



Consultation responses: 28 | Workshop: 70 | Total: 98

36% of stakeholders voted for Option 2, agreeing with WPD's proposed level of ambition in response to this commitment: 30,000 customers. However, the majority felt that WPD should go further in ED2, with 12% voting for Option 3 (40,000 customers) and 38% voting for Option 4 (50,000 customers). 4% of stakeholders voted for Option 5, indicating that they wanted to suggest an alternative commitment. It was suggested that there could be a commitment related to the number of people who are not being identified and the point was made that Covid-19 was likely to result in an increase in the number of people requiring additional support. It was commented that more should be done to promote the PSR so, perhaps, there should be an additional commitment related to promoting awareness of the PSR as well as one related to working with trusted partners such as Citizens Advice. However, the majority (64%) of WPD staff disagreed, and opted for Option 2. This commitment was also tested in a social media poll. The majority of respondents (57%) voted for Option 4, as the majority of stakeholders did – though not to the same extent.

- “One that springs to mind which is difficult to assess is: how many people are we missing? You’re trying to make contact with people who are slipping through the net. Should there be a target around trying to estimate the number of people who aren’t being captured this way? It’s trying to measure the unmeasurable. You said you have 7.9 million customers and if 25% are vulnerable, are there different levels of vulnerability within the vulnerable demographic you’ve identified?”

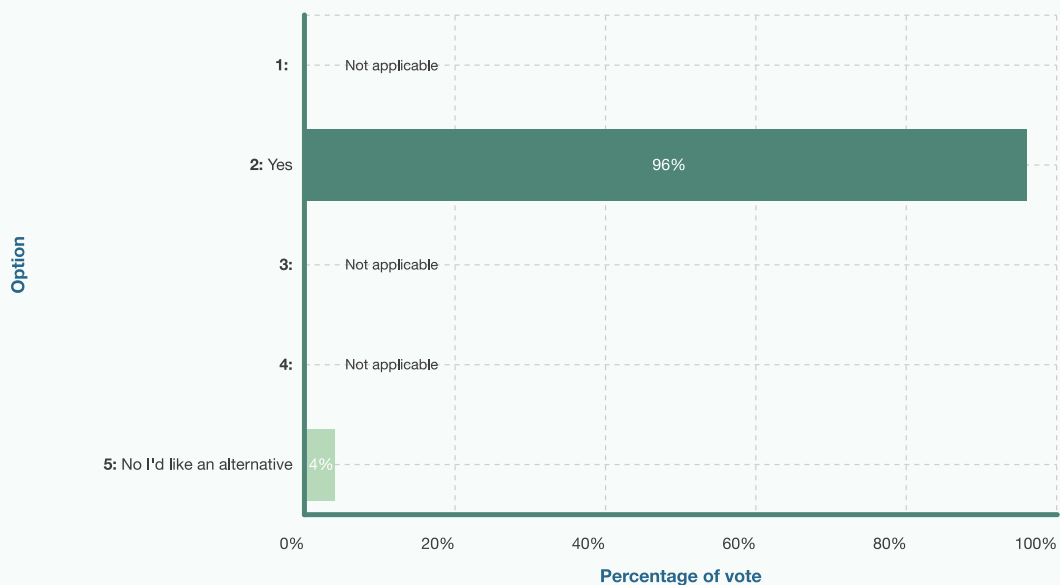
Storage and renewables provider / installer

- “This could go further even if it warrants small increase in bills to support that. There is an increase in vulnerable customers due to the pandemic which warrants going further in reaching people via local authorities.” **Local Enterprise Partnership**



- “Awareness is lacking. People think their whole bill goes to WPD. We need to make them aware of what WPD’s role is. They should be reaching out to PSR people through Age Concern, who can tell them what WPD offer.” **Local authority**
- “If you’re contacting the vulnerable directly, they’re less likely to ignore and think you’re spamming them. If it came from CAB or a co-op, they’d be more likely to respond.” **Local authority**
- “What are the criteria for joining the register? Surely all people within the criteria need to be contacted. Either they meet the criteria, or they don’t. If they do then they must be on the register.” **Online stakeholder**

Commitment 11: Work with expert stakeholders, including our Customer Panel and referral partners, to annually refresh our understanding of ‘vulnerability’ and co-create an ambitious annual action plan



Consultation responses: 27 | Workshop: 71 | Total: 98

96% of stakeholders voted for Option 2 (yes) for this commitment. The remainder opted for Option 5, stating that they wished to suggest an alternative. When asked to discuss this commitment, it was suggested that regular Zoom calls with relevant partner organisations would be helpful in order to give WPD greater insight into the changing nature of vulnerability.

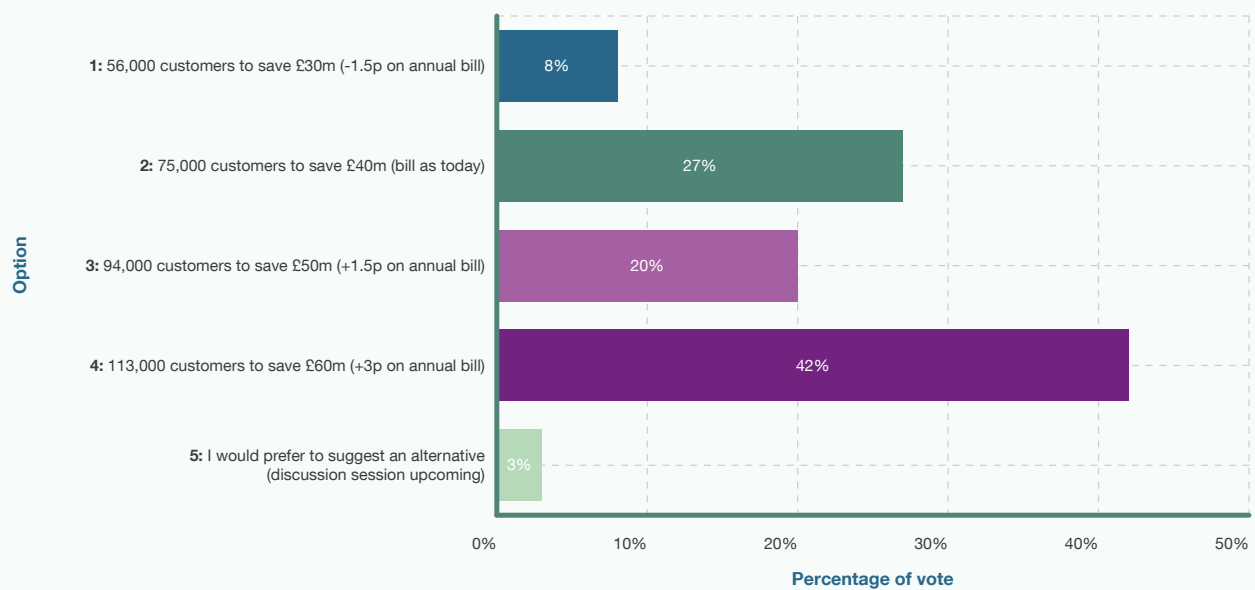
- “Point 11 is the most important. There’s no point throwing money unless you know what you’re dealing with and forms of vulnerability. Working through third party agencies is important to help make contact



with these. Phoning and letters isn't effective. There needs to be a proactive approach.” **Local authority**

- “Weekly Zoom meeting with all agencies who work with these groups are useful to understand vulnerable groups.” **Local Enterprise Partnership**
- “The above suggestion is the ideal forum to understand what vulnerability is.” **Domestic customer**
- “I want to know what refreshing our understanding of ‘vulnerability’ means. This seems a bit vague. We have a concept of continuous improvement here. It is assumed that vulnerability after 5 years will be very different from vulnerability at the start of a period.” **Local authority**

Commitment 12: Support fuel poor customers to make savings on energy bills over RIIO-ED2



Consultation responses: 27 | Workshop: 69 | Total: 96

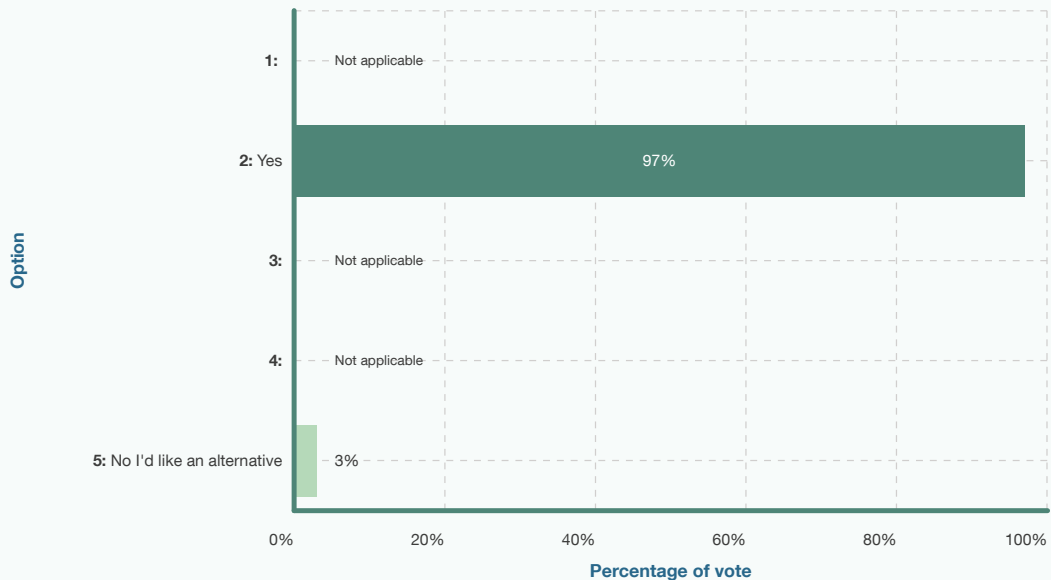
The most popular answer when stakeholders were asked to vote on this commitment was Option 4 (113,000 customers to save £60m) with 42% of the vote. Only 8% voted for Option 1 (56,000 customers to save £30m) with Option 2 (75,000 customers to save £40m) and Option 3 (94,000 customers to save £50m) garnering 27% and 20%, respectively. 3% voted for Option 5, indicating that they would like to suggest an alternative. In written and verbal feedback, alternatives tended to focus on working with partners to deliver benefits to fuel poor customers, with the examples of Citizens Advice and Age UK given. One stakeholder also commented that suppliers should play a greater role in this area. This commitment was also tested in a social media poll. The majority of respondents (42%) voted for Option 4, in agreement with the views of stakeholders. However, the majority (58%) of WPD staff disagreed and opted for Option 2.



- “Commitments 12,13 and 14 – I wonder why the suppliers aren’t doing this.” **Local authority**
- “Fuel poverty is a major issue, but it’s more of a network issue. I would like to see more explicit links to other organisations that can help you. WPD can identify pockets of fuel poverty, but solving the problem requires collaboration.” **Connections provider**
- “Just on fuel poverty generally: there needs to be more context as to why it’s needed to support poor customers and is beneficial to them but there’s a benefit to every one of them consuming less in terms of lowering emissions across the country. It’s good to stress both the benefits to them and to everyone to combat suggestions of handouts.” **Community energy group**
- “I agree with that point entirely. The context not raised was whether local authorities or not-for-profits should be doing rather this than WPD making a profit from it.” **Energy consultant**
- “We have to be realistic and practical. What total monies would the 1p increase create if added to everyone’s bill? We should involve third parties such as Age UK, Citizens Advice and let charities be involved so they can help to spread the news and offer support. Silver surfers are more in tune than we imagine.” **Local authority**
- “Commitment 12 is a better way of nationally making something happen. There needs to be a way of taking trial innovations to aid the fuel poor who are struggling to pay their bills. Then they can benefit rather than only those who can afford to engage in the new energies.” **Domestic customer**
- “Yes. Work out the cost per kilowatt hour of different energy sources and promote the cheapest. [...] If prepayment is an expensive option, will you promote alternatives? Or make pre-payment cheaper? It is counter intuitive that the person paying in advance should pay a much higher rate per kilowatt hour. You have their money before they switch on a light.” **Online stakeholder**
- “Too technical [...]” **Online stakeholder**



Commitment 13: Develop a model to identify the capabilities of vulnerable customers to participate in a smart, low carbon future. Use this to maximise participation, remove barriers to entry and encourage collaboration with the wider industry



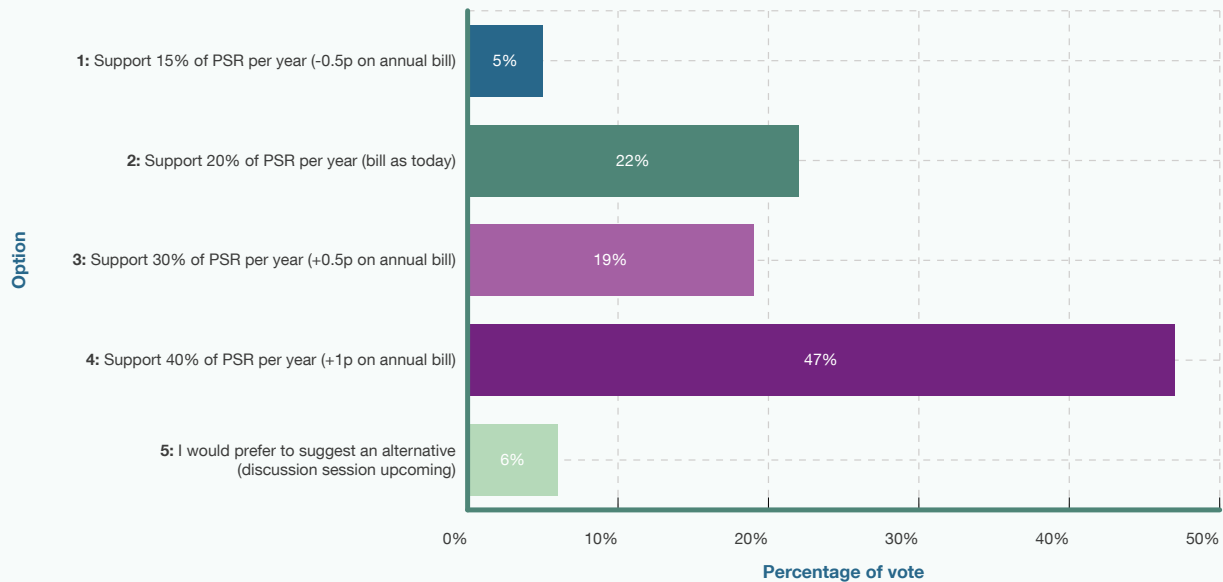
Consultation responses: 28 | Workshop: 68 | Total: 96

The vast majority of stakeholders (97%) endorsed this commitment, opting for Option 2 in this binary vote. The remainder opted for Option 5 – to suggest an alternative. In the written feedback it was noted that smart meters have the potential to save customers a good deal of money, the implication being that WPD should do more to promote their benefits.

- “Does this mean smart meters? Please! HMG worked out that an average household could save about £11 a year if I am not mistaken by sitting watching the thing and switching on and off accordingly. Meanwhile, all such users have to switch to monthly metering and payment by direct debit. What is the impact of that on WPD, etc., cash flow and risk?” **Online stakeholder**



Commitment 14: Provide vulnerable and fuel poor customers with specific support and education in relation to the smart energy transition



Consultation responses: 29 | Workshop: 66 | Total: 95

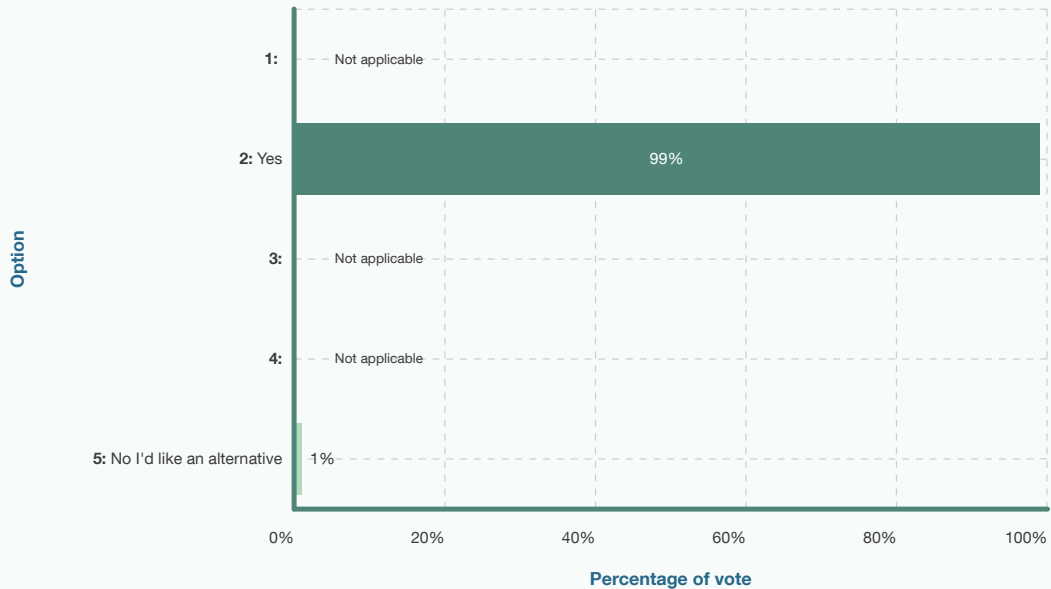
When asked to vote on this commitment, the most prevalent response with 47% of the vote was Option 4: Support 40% of PSR per year. Option 2 (Support 20% of PSR per year) garnered 22% of the vote and 19% voted for Option 3: Support 30% of PSR per year. A comparatively high proportion (6%) voted for Option 5, to suggest an alternative commitment. In the written and verbal feedback, it was commented that partner organisations, including local authorities and charities, could be used. One stakeholder made the point that customers should not be ‘bombarded’ by leaflets and text messages so perhaps a different approach is required. This commitment was also tested in a social media poll. The majority of respondents (53%) voted for Option 4, in agreement with the views of stakeholders. However, the large majority (64%) of WPD staff disagreed and opted for Option 2.

- “In relation to Commitment 14, lots of people are already doing work in this area. We need to ensure that there’s a coordinated approach so there aren’t loads of different companies contacting these vulnerable customers. Utilise local authorities or combined authorities. Could you combine Commitments 9 and 14? Have one place people can access and know they will get good advice and a consistency of language and clarity with no repetition.” **Local authority**
- “I agree with the above. Work with charities doing it already, for example, the Centre for Sustainable Energy.” **Storage and renewables provider / installer**
- “Does this mean bombarding them with leaflets and SMS messages to go smart meter? It is not any significant benefit to the customers and implying that there is an obligation to do so as some organisations do is downright devious.” **Online stakeholder**
- “This sounds socially divisive; why should a vulnerable customer be excluded in any way?” **Online stakeholder**



- “Why should I have to pay any more for you to contact me? I am 88 years of age and already struggle financially. You should aim to do more for no extra charge.” **Online stakeholder**

Commitment 15: Take a leading role in initiating collaboration with a range of industry participants to share best practice and co-deliver schemes to ensure vulnerable customers are not left behind by the smart energy transition



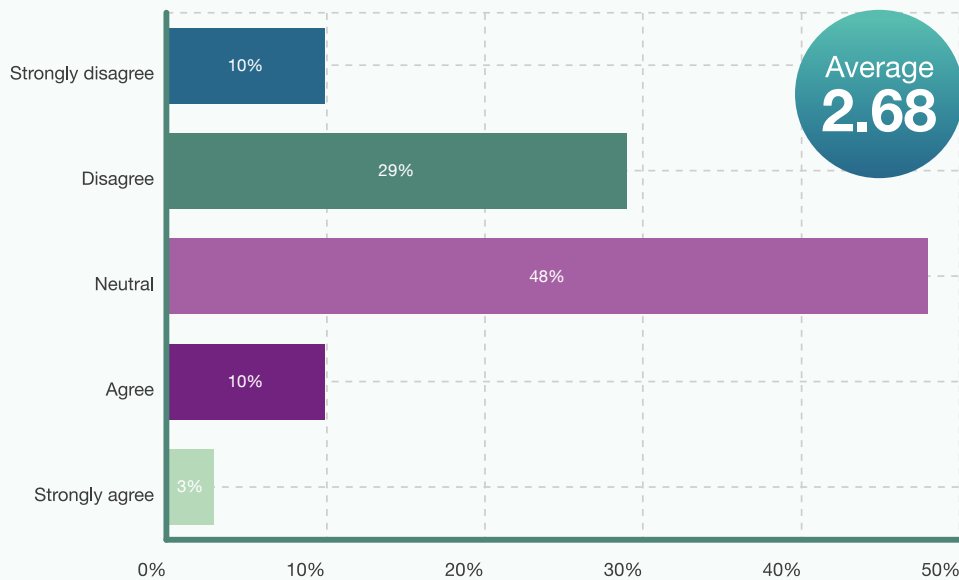
Consultation responses: 26 | Workshop: 67 | Total: 93

99% of stakeholders endorsed this commitment when asked to vote 'yes' or 'no', Although 1% of stakeholders voted to suggest an alternative commitment, no written or verbal feedback on what that alternative might be was given.



Connections

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Connections



Vote Total: 62

When asked to propose alternative commitments, stakeholders did not suggest anything concrete but several stressed that the future will require a different approach given the volume of new connections that are going to be required. There was a desire among these stakeholders to see WPD take a more proactive approach to managing connections which in turn would require more internal resource. In addition, one stakeholder wanted to see options that improved performance without increasing cost. Another stakeholder requested more granular information to be able to better understand the commitments.

- “To follow up on that, in the second edition of the Business Plan, will you explain this at a more granular level so we can see what WPD are aiming for?” **Domestic customer**
- “I think we are not being offered the option that WPD will improve itself without adding a cost to the bill. My view is that WPD should be increasing targets to improve within the cost constraints.”
Local authority
- “Don’t be constrained by how connections are done today. The volumes are going to be much bigger.”
Domestic customer
- “[You need] internal resource capacity in the DSO team or other to discuss non-BAU connection options (e.g., demand ANM, integrating with flexible power contracts ahead of time). And sharing these options to planners and new connection applicants.” **Online stakeholder**
- “Understanding requirements is too passive; you need to promote change.” **Online stakeholder**

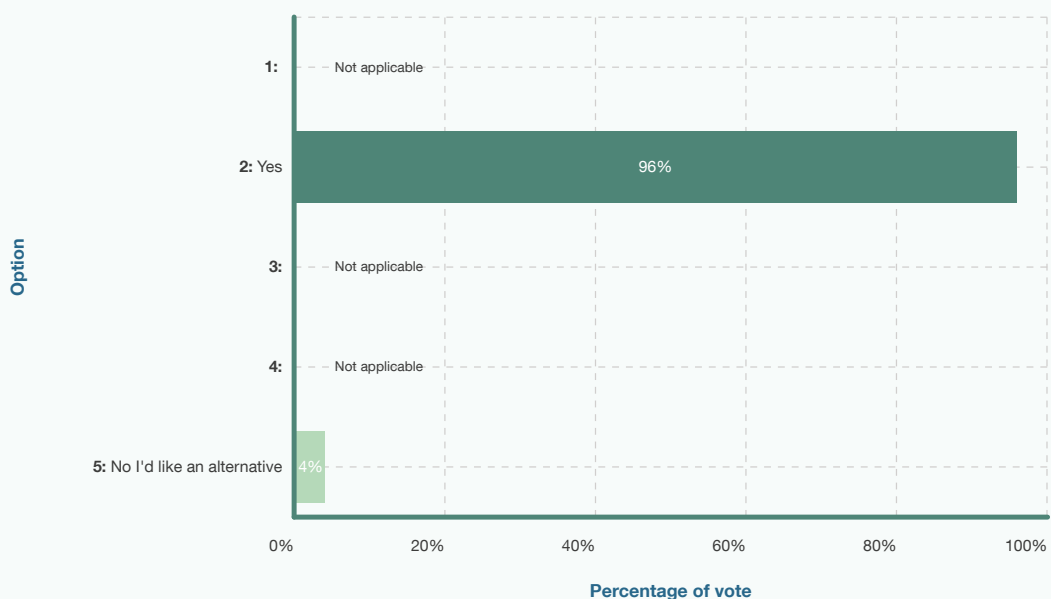


- “WPD must break out of the ‘we will only respond to planning inputs’ mindset. WPD should be actively engaging with local communities, e.g., in respect of domestic PV and electric vehicles, and use tariff differentials to a) encourage use of all the spare capacity in the street-level network and b) provide increases in this capacity in a targeted and well-publicised way. Similarly, using conservative estimates for heat pumps, PV and EV reinforces public apathy and is ultimately to WPD’s commercial disadvantage.” **Online stakeholder**

The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)

Commitment 16: We will develop our connections process and improve availability of information so that customers wishing to connect can easily comprehend the process and follow a simple set of rules to apply for a connection



Consultation responses: 33 | Workshop: 66 | Total: 99

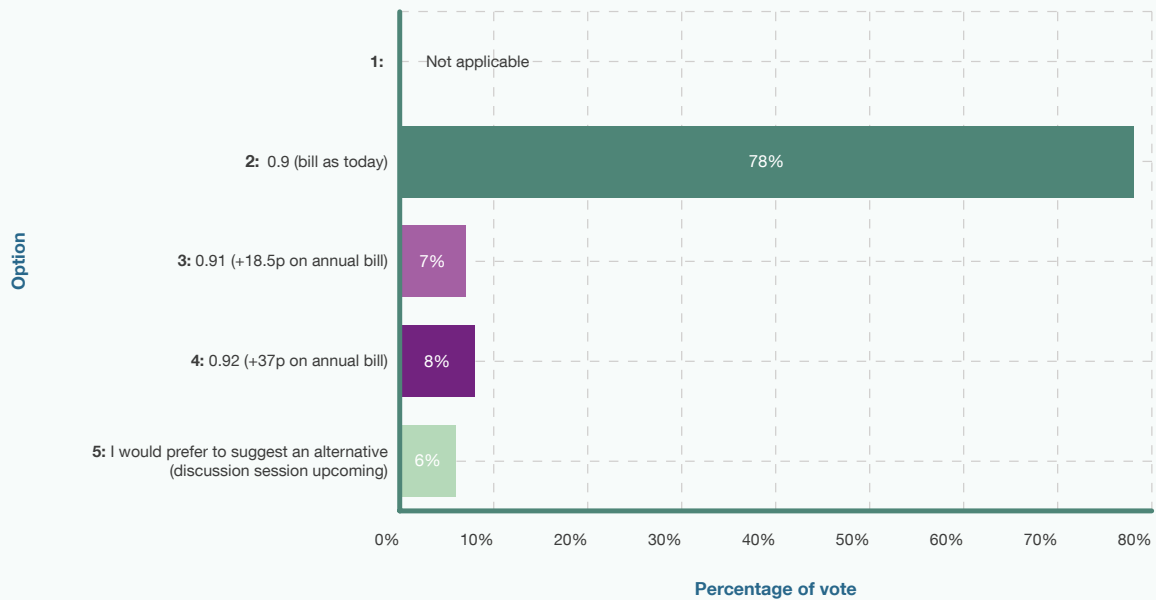


The majority of stakeholders (96%) agreed with this commitment, with only 4% wanting to suggest alternatives. Several stakeholders explicitly supported the provision of more information to improve network visibility and transparency. One stakeholder wanted this commitment to include information for commercial connections. One stakeholder stressed the low level of understanding among some connections customers (e.g., local authorities) and the need to improve this understanding. Another wanted the commitment to include more specifics to be able to establish whether it would deliver value for money. One stakeholder noted that the vast increase in connection requests that will be coming forward in future means it is important WPD is able to meet the current demand.

- “Visibility in terms of network conditions would be good. I know you have a capacity map but improved granularity around that would be beneficial that so connections can be checked in advance rather than before you start the connections process.” **Energy consultant**
- “I agree. More transparency on the existing network would be useful.” **Developer**
- “Without specifics it’s difficult to know whether to invest it or not. Who doesn’t want things easier, but what are you going to make easier for me and what is the benefit?” **Community energy group**
- “We need to think of the level of current connections rather than the future. The connections process will move vastly in volume and WPD will need to meet current connections before this happens.” **Domestic customer**
- “My concern is over the availability of information regarding the cost and speed of commercial connections. That’s going to be important moving to a zero-carbon grid. I assume that Ofgem will want to see performance in terms of commercial connections as well as domestic ones.” **Community energy group**
- “Are there any numbers that can be attached to that?” **Local authority**
- “The cost to connect is not well understood at the moment, that needs to be improved. Maybe it’s education and training, not just understanding their requirement, but understanding what they don’t understand. I work for a local authority, but my background is low carbon. The understanding of the whole process and the pitfalls of connections is new to me and a lot of my colleagues.” **Local authority**



Commitment 17: Maintain a high standard average customer satisfaction for connections



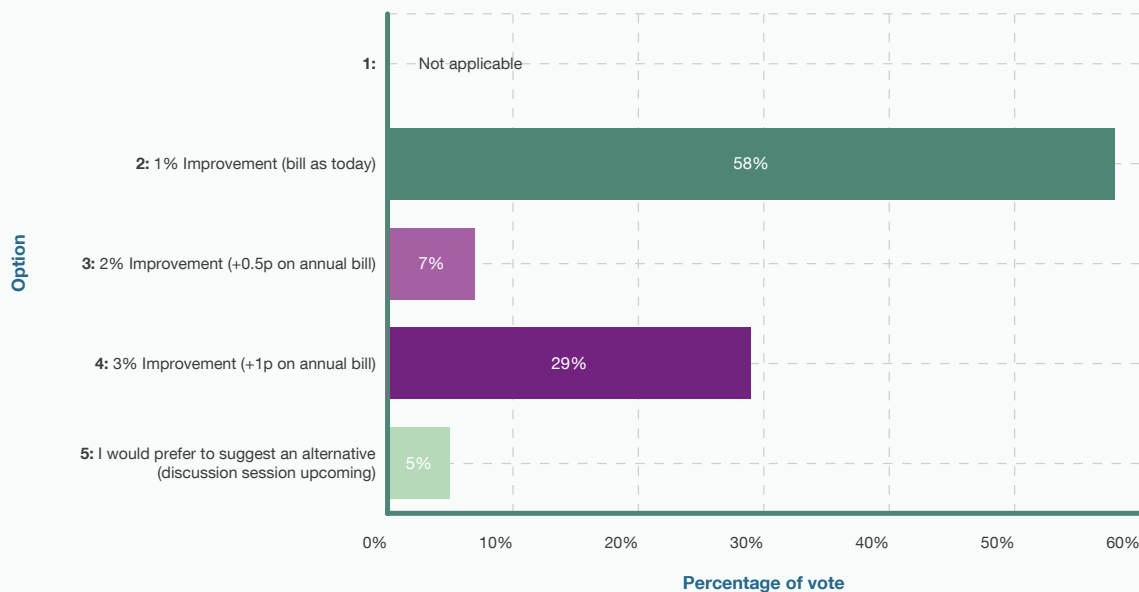
Consultation responses: 33 | Workshop: 62 | Total: 95

The highest proportion of stakeholders (78%) wanted WPD to maintain a 90% customer satisfaction score for connections – maintaining the same level as today. 6% wanted to suggest an alternative commitment, although it was not clear from the comments what the alternative would be. One stakeholder felt if the 90% satisfaction score included major energy users this would be a step forward. Another stakeholder recognised that achieving the last few percentage points is always difficult but urged the highest level of ambition. One stakeholder pointed out that the customer profile would be varied, e.g., being both a consumer and a generator. The significant majority (78%) of WPD staff agreed and opted for Option 2.

- “We would welcome 90% response. 90% would be a major step forward for major energy users. I feel like this would drive the industry forward.” **Major energy user**
- “A 3% improvement seems modest; it is always harder to get the last few % but you should aim at least at 3%.” **Online stakeholder**
- “What are you assuming about the customer? Are you taking on board that they may well wish to be a generator as well as a consumer?” **Online stakeholder**



Commitment 18: Improve our performance against Time To Quote (TTQ) and Time To Connect (TTC) for LCTs from RIIO-ED1 Level



Consultation responses: 32 | Workshop: 64 | Total: 96

Whilst the greatest proportion of respondents (58%) wanted to see a 1% improvement on WPD's performance against Time To Quote and Time To Connect for LCTs, a relatively large proportion (29%) did want to see the highest level of ambition for this commitment (3% improvement). 5% wanted to suggest an alternative. This commitment generated a lot of verbal and written feedback. Several explicitly stated the TTQ needs to be improved, with one also noting the TTC could be improved on. Several stakeholders felt the commitment was primarily aimed at smaller customers and wanted it extended to take larger customers into consideration. Two stakeholders stressed how important understanding connections costs was for customers, with one noting WPD also needs to be more aware of local authority timelines for projects and costs. Two stakeholders felt the key here is consistency so that customers can better understand what to expect. Finally, one stakeholder felt that only seeking percentage improvements underestimates the step change required to deliver on Net Zero and urged a more ambitious approach. The majority (67%) of WPD staff agreed and opted for Option 2.

- "Time to get connections and quotes could be improved on." **Local authority**
- "The commitment around the Time To Quote is in relation to smaller customers but I didn't see one in relation to major customers, so I'd welcome one on that." **Developer**
- "Utilities are capable of radical action. Percentage improvements are incompatible with green aspirations and zero targets. Rather than simply improve your timings, you could aim to do a certain number of quotes online in mere minutes. This means more ambition with new services. For things like EV and heat pumps, rather than just meet targets, you could overdeliver." **Connections provider**
- "WPD does well generally, and the connection time is fine. It's the quote time that takes too long. They

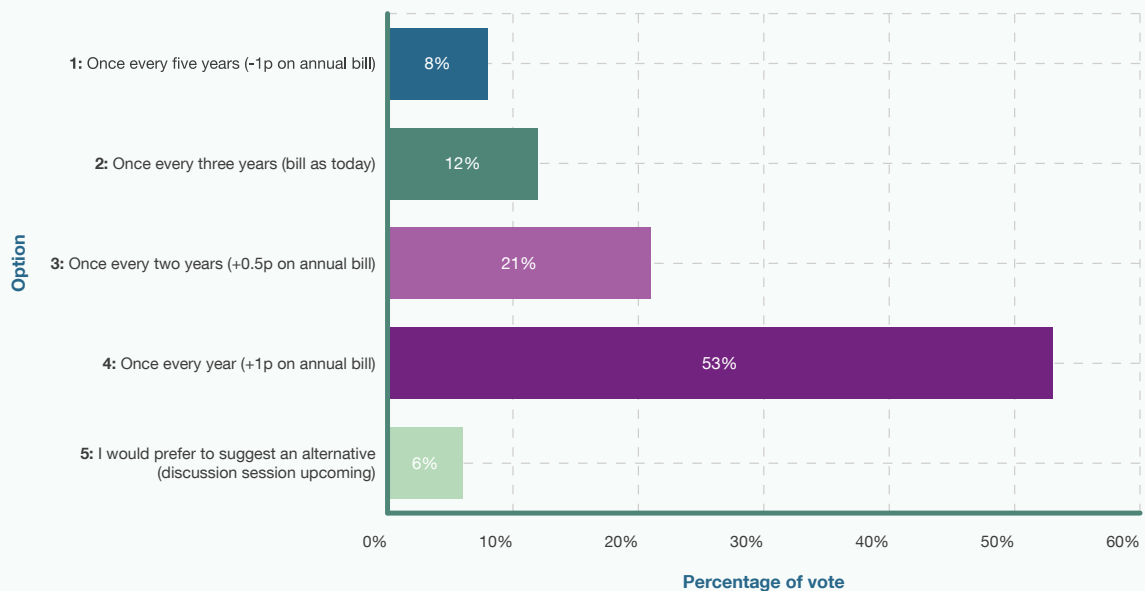


say it will take 5 weeks – it’s exactly 5 weeks and never earlier, and this needs a lot of improvement. Local authorities have constraints on when they need to spend the funding by so quotes need to be quicker.” **Local authority**

- “WPD need to be more aware of council and transport timelines for spend and projects.” **Local Enterprise Partnership**
- “I don’t feel like large customers are covered by this. The focus is on small companies (clear language, etc.) but less on the companies that already have lots of experience. There’s no focus on delivery either. Across the DNOs the delivery process needs cohesive project management and reviews on connections and needs to be more outcome-focused. Take into account the whole gamut of connections revision in terms of size and number.” **Storage and renewables provider / installer**
- “Echoing the last comment from a commercial / community end, I’d say understanding the potential forward cost of connections is a barrier to forming projects. The DNOs could publish agnostic data on every single application and offer, giving the cost of that against the kW connection and start building up an easily accessible database for customers to see roughly what the cost might be for a connection in an area.” **Local enterprise partnership**
- “I think consistency is a big deal with Time To Quote and Time To Connect. We need to know what to expect.” **Storage and renewables provider / installer**
- “I’d like to see consistency of timescales and processes. I know it’s difficult as one size doesn’t fit all, but it’s good to know when applying for a connection that you can expect it within a certain time frame and know what that time frame is.” **Storage and renewables provider / installer**
- “You don’t say what the current achievement is. Is 4 days good? Go for 3% minimum.” **Online stakeholder**
- “Staff are at breaking point – if you want to improve times, you need more staff.” **Online stakeholder**



Commitment 19: Engage with 130 local authorities and local enterprise partnerships to understand their requirements for strategic investment in terms of changes in demand or network use



Consultation responses: 35 | Workshop: 62 | Total: 97

The greatest proportion of respondents (53%) wanted WPD to be as ambitious as possible with this commitment, voting Option 4 (engaging with local authorities one every year). The second highest (21%) wanted Option 3 (once every two years). 6% of stakeholders wanted to suggest an alternative. In the written and verbal feedback, stakeholders supported the need for a commitment to engage with local authorities to understand their capacity requirements. In fact, two stakeholders urged WPD to broaden the scope, with one suggesting it include Local Enterprise Partnerships, and another suggesting other interested parties such as water companies. This commitment was also tested in a social media poll. The majority of respondents (46%) voted for Option 4, in agreement with the views of stakeholders. However, the majority (56%) of WPD staff disagreed, and opted for Option 2.

- “Are you thinking of engaging individually with these bodies, or multilaterally?” **Local authority**
- “I’d like to raise a point about having a strategic interlock with LEPS, particularly when it comes to things like the electrification of transport. When it comes to things like the decarbonisation of heat, none of it feels joined up with LEPS. There needs to be more transparency and you need to highlight this interlock more clearly.” **Major energy user**
- “Extend this to other interested parties, such as water companies.” **Utility**
- “We’d love to have yearly dialogue as a two-way process.” **Local authority**
- “The point about engaging with local authorities is strategic. In terms of investment, it is probably not something that should be discussed with local authorities every year. Pinch points could come up every



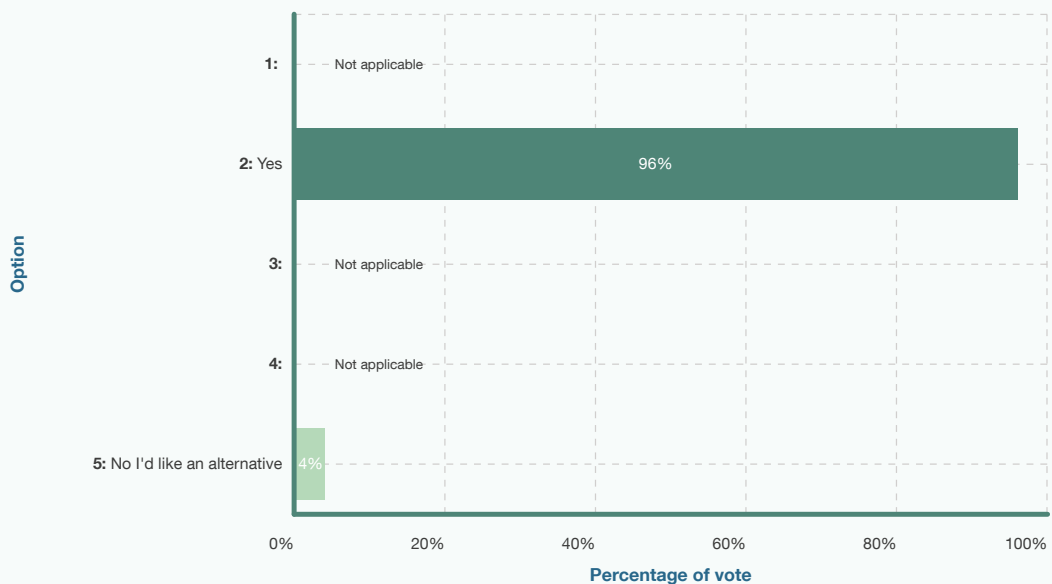
year, for example as a building development comes up.” **Local authority**

- “This is absolutely crucial. Strategic investment is key. In Cornwall we have the ability to produce an enormous amount of energy, but we need investment to take advantage of that.”

Community energy group

- “This requires the highest ambition.” **Online stakeholder**
- “With the development of ambitious energy strategies for each Welsh region and the Mid Wales Growth Deal, conversations around shared ambitions and strategic investment will be at the forefront over the coming months and years, so closer working with WPD, SPEN, etc., will be key.” **Online stakeholder**

Commitment 20: Improve cross border working practices between WPD, Independent Distribution Network Operators, National Grid Transmission and the Energy System Operator. Also promote competition in connections



Consultation responses: 32 | Workshop: 65 | Total: 97

This commitment presented a binary choice. The majority (96%) supported WPD’s proposed commitment. Only 4% wanted to suggest an alternative. In the written and verbal feedback, one stakeholder wanted to see other DNOs explicitly included in the commitment. One stakeholder wanted more exacting targets rather than to just ‘improve’. Two stakeholders commented on the reference to competition in connections, with one supporting the commitment to promote them if it means more time and money and another feeling it deserved to be a separate commitment in and of itself.

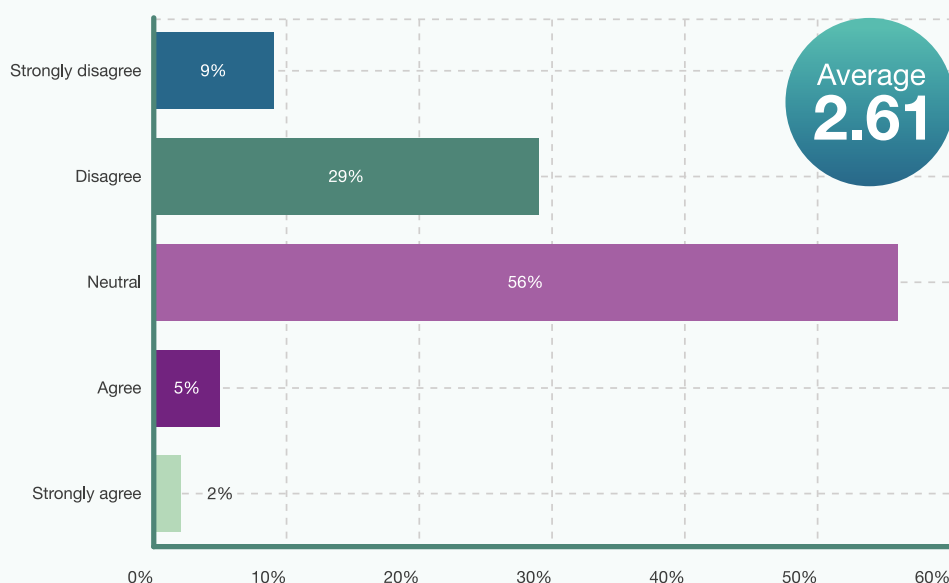


- “Cross border working is sensible, and I’m sure there are interactions with other DNOs, I wondered whether that’s intended? This could need beefing up in the language, though I agree with the sentiment.” **Developer**
- “It’s rather nebulous; you can’t get your teeth into it. I’d like more stretching and targets to achieve rather than just improve.” **Domestic customer**
- “Does promoting competition in connections mean more time and money? If so, yes [I support this commitment].” **Online stakeholder**
- “The competition in connections bit does seem like it has been tagged on – should it not be a separate commitment?” **Parish / community council**
- “Do you have a NPS assessment to inform this?” **Online stakeholder**

Social Contract

WPD’s Business Plan 1 contained four commitments for Social Contract. When asked in the online workshop whether they wanted to suggest alternative commitments in this area, the most prevalent answer from stakeholders was neutral, with 56% of the vote. 29% of stakeholders disagreed and 9% strongly disagreed with this. Only 7% were of the view that they would like to suggest alternatives, voting agree (5%) or strongly agree (2%). On average, the topic of Social Contract ranked tenth out of the 12 Business Plan topics, indicating that relative to other topics stakeholders felt it covered the commitments they wanted to see.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Social Contract



Vote Total: 66



A number of stakeholders commended WPD for proposing to have a social contract, stating that it was a good way to build trust. In terms of alternative commitments, it was suggested that WPD should look to its supply chain partners in order to deliver benefits to the communities in which the company operates.

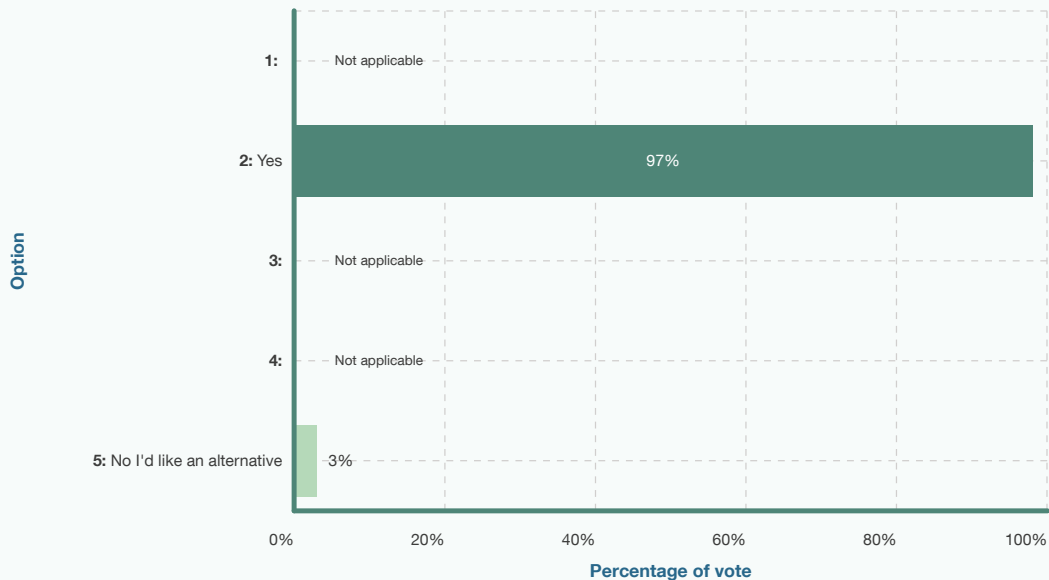
- “With a lot of it, I would like to see a lot of collaboration with WPD and local councils. I feel like everyone needs to pull together on these types of things. Everything should go to a central pot for collaboration.”
IDNO
- “The public sector is being directed to engage and commit to social value through its procurement strategy and processes. Many other large organisations are following suit. WPD should consult on and publish its procurement strategy, including how it is ensuring its supply chain is as committed to social, environmental and wellbeing values and commitments as WPD are.” **Online stakeholder**
- “A green commitment is probably needed.” **Local authority**
- “Some sort of social contract would be very positive.” **Parish / community council**
- “It’s already been said – these are difficult to argue against. They’re apple pie and good thoughts and we agree. The devil is in the detail, so how much and who pays. It’s not there at the moment.”
Domestic customer
- “I think the social contract seems very commendable.” **Local authority**
- “There’s some subtlety that needs adding to this. This should be closely linked to the work of the business. It’s about reassuring us that you’re not just going out and painting a community hall as virtue signalling, but properly linking social commitments to your industry and how you operate.”
Local authority
- “For me it’s all about trust. People don’t trust the Big Six. People don’t know who WPD are. You need to put some work in to help communities understand who you are and how you can help people.”
Community energy group

The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)



Commitment 21: Publish annual reports in a simple, easy to understand format, setting out WPD's total expenditure, the impact on customer bills and actual regulatory returns



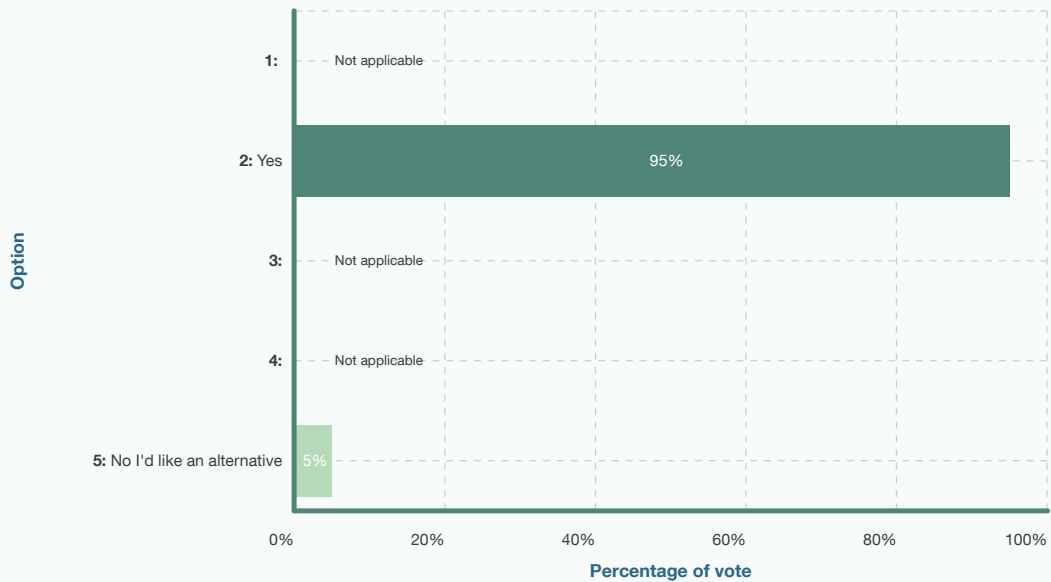
Consultation responses: 29 | Workshop: 66 | Total: 95

When stakeholders were asked to vote on whether they agreed with this commitment, 97% voted yes. The remaining 3% opted for Option 5, indicating that they would like to suggest an alternative commitment. In the written and verbal feedback, one stakeholder suggested that information on WPD's rate of return on investment should be included as well as the sources of investment capital and benefits to stakeholders. It was also suggested by one stakeholder that a simple, easy to follow format should include information on how WPD's activities directly impact customers.

- “And include the rate of return on £ invested as well as the sources of investment capital and benefits to shareholders, i.e., dividends and the change on share values over the year compared to the previous year.” **Online stakeholder**
- “This is still a ‘charity’ model – it does not make WPD proactive in community change.” **Online stakeholder**
- “On Commitment 21, the question I thought of was: how do you know what you’re publishing is impacting people? In other words, how do you know that they are understanding it in an easy and simple way? It’s easy to write this one but how do you measure this?” **Local authority**



Commitment 22: We will, as a minimum, maintain our prime Environmental, Social and Governance (ESG) rating from a recognised agency



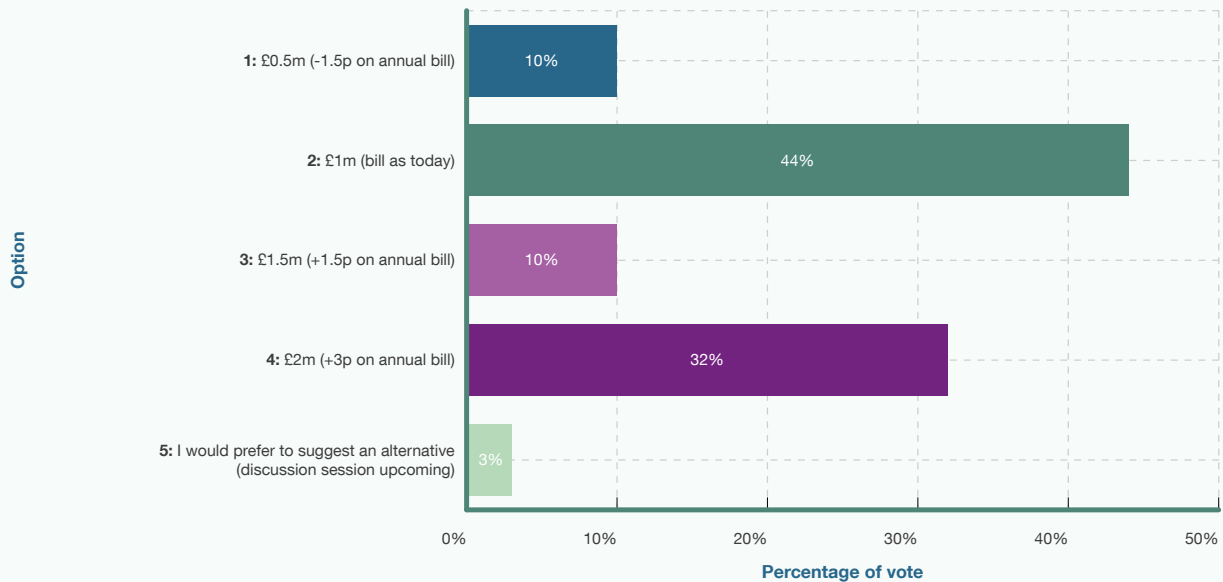
Consultation responses: 30 | Workshop: 66 | Total: 96

Commitment 22 was asked as a binary question, with 95% voting 'yes', they agreed with the commitment. 5% of stakeholders voted for Option 5, indicating that they would like to suggest an alternative commitment. One stakeholder who responded online suggested that zero carbon performance should also be recorded.

- “What is the agency? Or can you chop and change to get a better result?” **Online stakeholder**
- “With WPD permission, staff could volunteer to help with many local causes.” **Online stakeholder**
- “Delivery is not the question; zero-carbon performance reporting is more important – by postcode sector.” **Online stakeholder**



Commitment 23: Support local people in our communities via an annual 'Community Matters' Fund



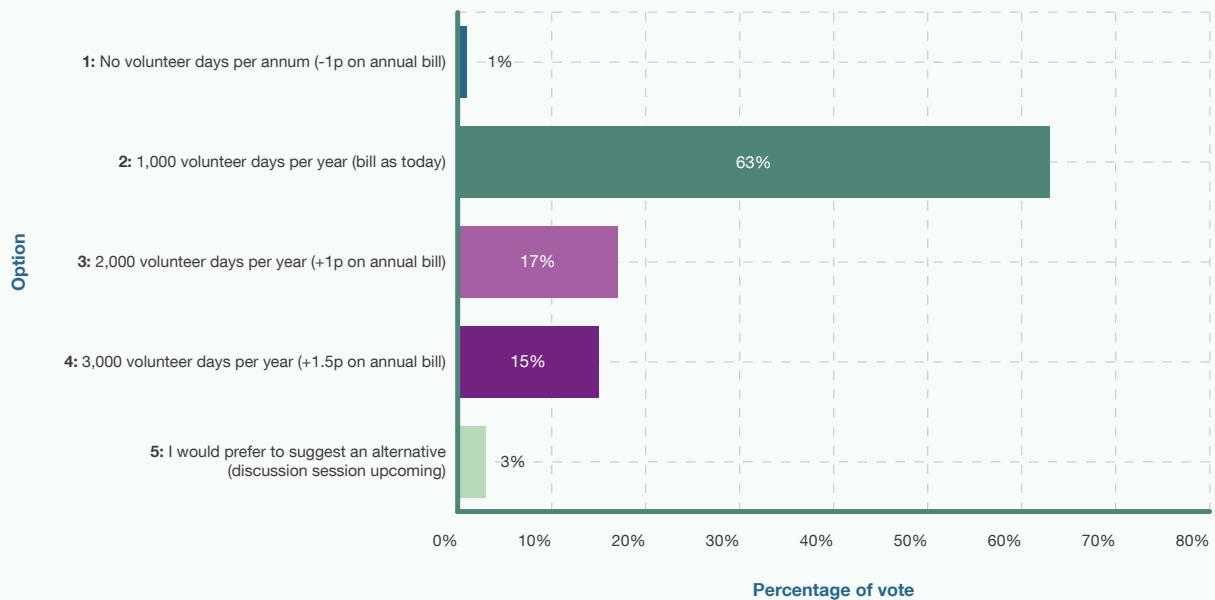
Consultation responses: 32 | Workshop: 65 | Total: 97

When asked to vote on this commitment, the most prevalent response was Option 2 (£1m) with 44% of the vote. 10%, however, voted for Option 1 (£0.5m), although a further 10% voted for Option 3 (£1.5m) and 32% wanted WPD to go even further, voting for Option 4: £2m. 3% of stakeholders voted for Option 5, stating that they would like to suggest an alternative commitment. In terms of alternatives, it was suggested that more detail could be put into this commitment. However, one stakeholder had reservations about whether it was appropriate that customers' money should be given to activities of this nature. This commitment was also tested in a social media poll. The majority of respondents (46%) voted for Option 2, in agreement with stakeholder views. The majority (64%) of WPD staff also agreed and chose Option 2.

- “Nice idea. What does it achieve for the community? Or is it just a slush fund?” **Online stakeholder**
- “Make more people aware of the In This Together campaign and make it a ‘build Britain better’ campaign for the future.” **Online stakeholder**
- “Commitment 23 just says ‘support local people’ but doesn’t say how much. There are words round it in the document. It says a contribution to community funds based on WPD performance in Commitment 22 or 21. If you do well, you put less in; if you do bad, you put more in. I’ve seen this type of thing before.” **Domestic customer**
- “That sounds good. It threw me that to ask customers to pay more to do this seemed an odd process. It comes back to the more WPD spends, the more profit it makes, and this should be broken. It needs to be in the spirit of the social contract.” **Energy consultant**



Commitment 24: Provide staff with paid leave to volunteer to support local community initiatives associated with vulnerability and environmental initiatives



Consultation responses: 29 | Workshop: 64 | Total: 93

When asked to vote on this commitment, the most prevalent response was Option 2 (1,000 volunteer days per year) with 63% of the vote. Only 1% of voters opted for no volunteer days per year (Option 1). 17% of stakeholders opted for Option 3 (2,000 volunteer days) and 15% wanted WPD to go even further, giving up 3,000 volunteer days per year. 3% voted for Option 5, stating that they would like to suggest an alternative commitment. It was commented that WPD should report on its work in this area and one stakeholder made the suggestion that WPD should be involved in projects relevant to the company or ones that make use of its staff experience, for example in engineering. The majority (61%) of WPD staff agreed and opted for Option 2. This commitment was also tested in a social media poll. The most frequent answer was Option 2 (1,000 volunteer days per year).

- “Good if it means they spend their days planting trees and perhaps even helping others to grow seedlings, like schools for planting?” **Online stakeholder**
- “We have volunteer groups on the common and we’re always looking for people. We offer a day in a nice atmosphere, pruning trees, looking after nature. We’re suffering from lack of funds and changes in farming, so we need volunteers.” **Parish / community council**
- “Paid leave is good, but you must also commit to report on what you’ve achieved. We have a similar scheme with a 10% uptake rate, but we forget to report, and so people question its value. 1,000 volunteer days is ultimately a strong news story.” **Connections provider**
- “We have a similar scheme with 2 days leave a year. We do report it, but the issue is people don’t use



it.” **Utility**

- “Other companies incentivise staff by offering time off for community work. Some staff would like it, and some wouldn’t. It might be something you could take to the staff to offer instead of the stakeholders?”

Storage and renewables provider / installer

- “Well, the companies need to aim a little higher. For example, in Stoke on Trent we have 2 days per employee per year.” **Major energy user**

- “In relation to Commitment 24, there’s a lot going on anyway. It should be about getting a ‘good bang for your buck’ in terms of volunteering. For example, doing talks in schools and offering advice on careers in engineering. This is more impactful than pond dipping.” **Local authority**



Section Three

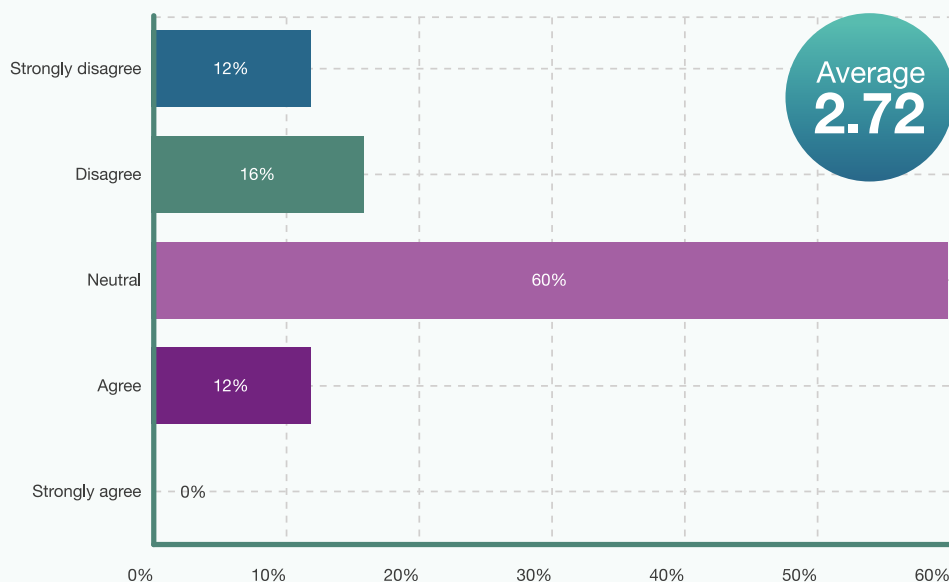
Commitments – Maintaining a safe and resilient network

Section Three focuses on the feedback gathered on each of the commitments covered under Ofgem’s focus area of ‘maintaining a safe and resilient network.’ This feedback is primarily quantitative, with stakeholders and customers voting on options for each of the commitments. The voting data has been supplemented by written and verbal feedback where given. This was gathered via online consultation responses (stakeholders and WPD employees), the online stakeholder workshop, and the bill payer / consumer survey.

Network Resilience

WPD’s Business Plan 1 contained seven draft commitments for Network Resilience. When asked in the online workshop whether they wanted to suggest alternative commitments for the topic of Network Resilience, on average 28% of stakeholders disagreed or strongly disagreed, demonstrating they supported the proposed commitments as they stand. The largest proportion (60%) felt neutral. 12% did, however, agree or strongly agree that they wanted to suggest alternatives – which relative to other topics was quite high. As an average, this topic ranked fourth highest across the 12 Business Plan topics, indicating that relative to other topics stakeholders felt there were commitments missing.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Network Resilience



Vote Total: 58

When asked to propose alternative commitments, stakeholders did raise a range of different topics. Several stakeholders noted there were no commitments relating to power quality and there was a desire for a commitment to both improving overall power quality as well as to recording when irregular power flows take place. Several stakeholders felt WPD needed to be more ‘forward looking’ and take ‘smarter approaches’ in this area. For example,



several stakeholders wanted to see a commitment to new technologies, such as increased network automation to reduce the potential for outages. It was also noted WPD needed to increase the use of data to help improve the health of the network.

Two stakeholders raised the impact that climate change was going to have on WPD's network, with one noting it will become hard for WPD to stand still in its network performance and the other suggesting a commitment around network adaption in response to climate impacts. One stakeholder wanted WPD to commit to using batteries at substations to provide back-up generation. One stakeholder wanted the increased pressure on the network from the growth in electric vehicles referenced in a commitment under Network Resilience. Lastly, one stakeholder wanted to see an online tracker so customers can get live updates on the status of faults.

- “Seek to exploit the potential for increased network automation to further reduce the propensity for outage.” **Online stakeholder**
- “I think in the next five years the incidence of extreme weather and flooding is likely to increase. To continue to provide the continued level of service will cost a significant amount more. It's important to clarify to your customers that the resistance against you will be stronger. You will no longer be able to stand still.” **Local authority**
- “One of the key points is one of the ways to buffer. Start having batteries at substations because you then have a back-up. Please can this be included as a sensible response to turbulent weather rather than dismissing it because it's deemed as generation.” **Local authority**
- “You focus on power cuts and total loss of supply, but there's no recognition of voltage irregularity issues. We record incoming supply to all sites, and frequently irregularities will cause our plant to trip. There is no record of 0 voltage events.” **Utility**
- “I endorse doing something about power quality. This may not be a big issue now, but it will be in ED2 with innovations sensitive to power issues, such as solar power. This will help you be more forward-looking.” **Connections provider**
- “As far as dealing with irregularities is concerned, you are within the regulations, but these regulations are too broad for our equipment.” **Utility**
- “Start recording irregularities and gathering evidence.” **Connections provider**
- “Is something on climate change missing here? Things like adaptations to network and the frequency of severe weather and how it might impact the network, etc.” **Local authority**
- “I was expecting WPD to be a leading light in the industry in a lot of these areas. It's difficult to tell which ones you are leading in and which you need to catch up in. Some clarification on whether it's possible to make these improvements.” **Domestic customer**
- “This has been captured well. Nothing to add.” **Local authority**
- “Maintaining the current level of performance is the main requirement. This is all focused on how WPD are



achieving against current goals, instead of looking forward. I don't see application of new technologies, e.g., improving assets for the use of data. WPD need to bring this out at a high level instead of focusing on how it is currently doing things." **Domestic customer**

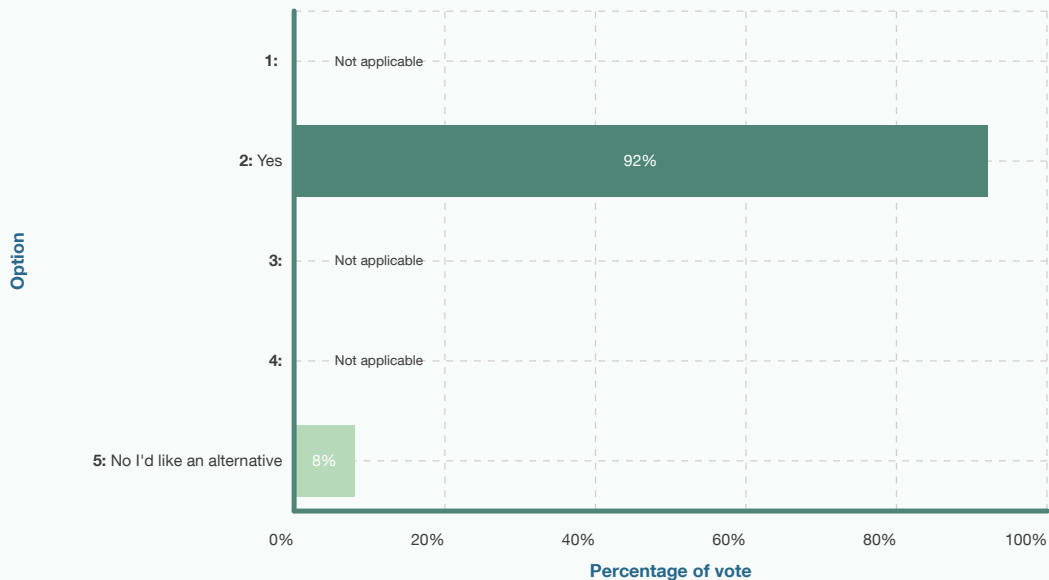
- "It's very important to invest and improve the health of the network using data, heat maps, strategic assets management tools, and here this isn't demonstrated at a high level." **Domestic customer**
- "I concur with the above; I need to see the details to comment on changes." **Local authority**
- "I also agree. These headings are similar to ones we've had for a considerable time. We need to look at smarter approaches." **Local Enterprise Partnership**
- "Should WPD include comments on electric vehicle charging in terms of investing to improve the overall health of the network? Each street has a loading on the mains cable that may be 40 – 80%. To impose electric vehicle charging on top of this will cost a lot of money. I am surprised it isn't included as a major problem." **Domestic customer**
- "One of the things internet companies seem to do reasonably well is that you can go onto a website and find out if the problem is with your provider or local mast and you can usually track the fault. Is there a way WPD could track the fault on the internet? So, if there is an outage you could go onto a site which would give you an idea of a timescale?" **Major energy user**
- "The low voltage system in the centre of the village of Praze-an-Beeble in Cornwall is in a very poor condition and needs urgent refurbishment and replacement. This system is fed from three separate transformers which all interconnect, so a phased plan to replace and modernise this network would be easy but beneficial to this village in the case of high voltage faults on any of the three HV feeds coming into this rural village." **Online stakeholder**

The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)



Commitment 25: On average fewer and shorter power cuts in RIIO-ED2 than RIIO-ED1



Consultation responses: 21 | Workshop: 58 | Total: 79

This commitment was presented as a binary choice. 92% agreed with the commitment, while 8% wanted to suggest an alternative. In the verbal and written feedback, one stakeholder suggested the use of enhanced network automation, and two suggested the use of undergrounding to improve reliability. One stakeholder felt they were experiencing an increasing number of power cuts and challenged WPD on what improvement they were offering.

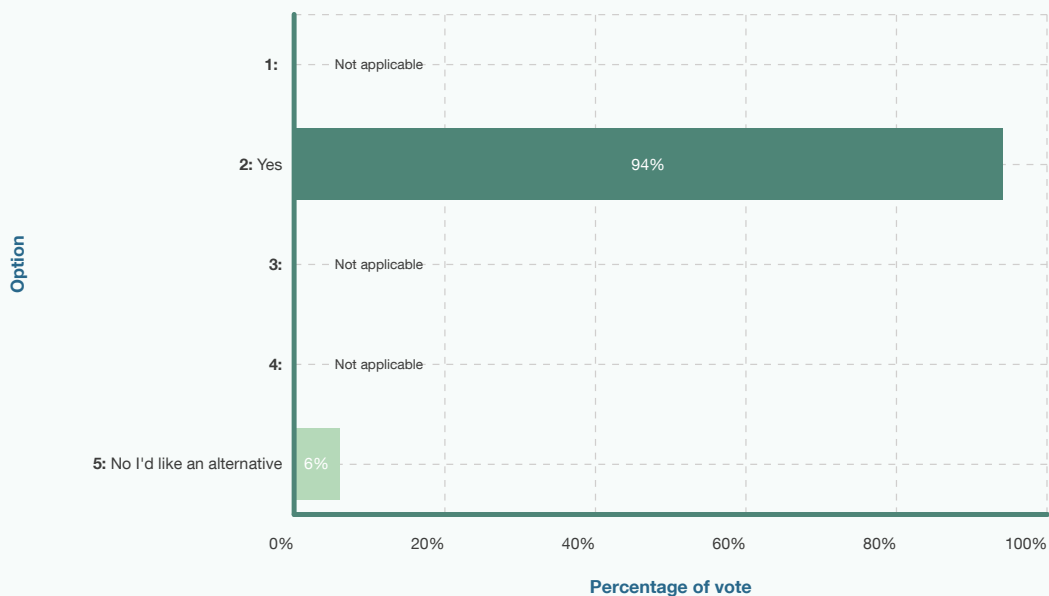
- “Target proactive advancement plus 10%, leveraging the opportunity of enhanced network automation, monitoring and control to facilitate real-time asset performance and allow equipment to be maintained effectively and / or replaced independent of failure.” **Online stakeholder**
- “If the average power cut is 24 minutes every two years, there must be lots somewhere who get none to balance off the ones we get. Improving the system by putting cables underground should reduce this automatically and progressively. No trees or wind underground.” **Online stakeholder**
- “In a rural area, we must be worse than average, with many more than one power cut in two years and several longer than 24 minutes. This ignores the worst event when a third party causes the loss of power. The number of power cuts reduced for the first few years with WPD and now it has been increasing, so what improvement are you offering? None, as far as I can tell.” **Online stakeholder**
- “On network resilience, I wonder whether putting overhead cables underground would improve the ability to improve that resilience. I wonder what the underground benefits would be to resilience.” **Local authority**



- “Coming from an organisation that represents landowners, I concur with the idea of undergrounding where necessary to minimise disruption. Also, underground faults are more difficult to detect.”

Consumer body

Commitment 26: Reduction of tree related faults on HV and EHV overhead network due to use of LIDAR in RIIO-ED2 thus reducing the impact on the customer



Consultation responses: 21 | Workshop: 57 | Total: 78

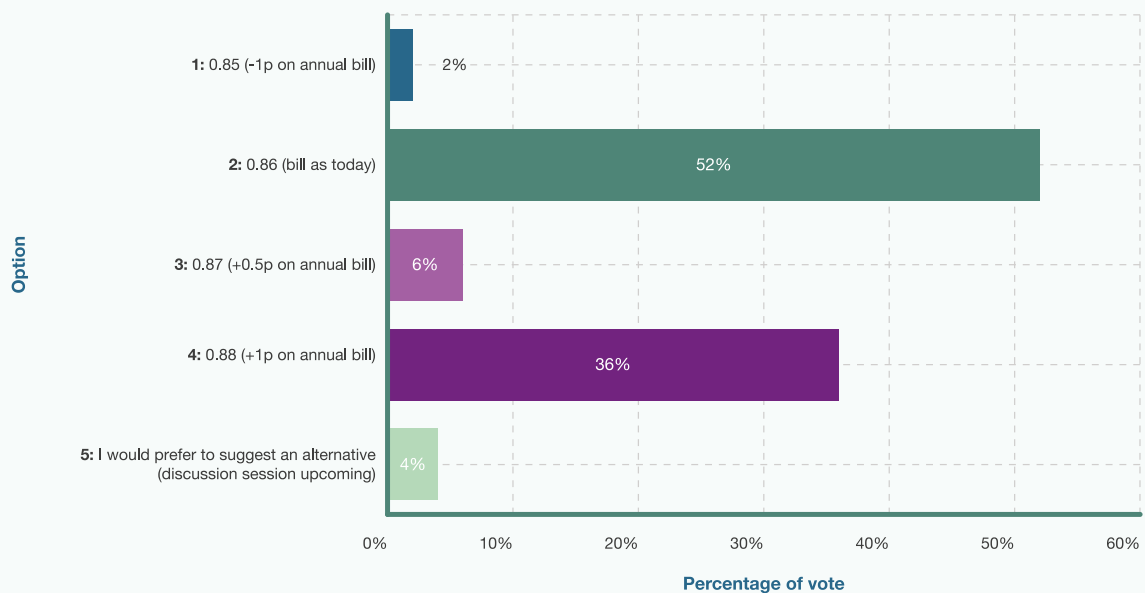
This commitment was presented as a binary choice. 94% agreed with the commitment, while 6% wanted to suggest an alternative. In the verbal and written feedback, one stakeholder suggested LV networks also be considered in ED2 given the increase in embedded generation, another restressed the need for undergrounding to help reduce tree-related faults, and one stakeholder noted the importance of sensitive tree management in the process. Other comments related to confirmation that trees and foliage does have an impact on reliability, concern about LIDAR delivering value for money and an observation that LIDAR technology is not new.

- “With the increase in embedded generation in the LV layer, perhaps there is merit in an increased priority being put on this part of the network.” **Online stakeholder**
- “See above about undergrounding and availability of trees, and wind underground.” **Online stakeholder**
- “I represent a rural community and we get problems with power outages in relation to trees and lightning strikes.” **Parish / community council**



- “It’s a balance between chopping back the trees severely and having them too close to the lines.”
Energy consultant
- “One that stuck out to me in terms of how it’s presented is LIDAR. It looks as if it is new, but it’s been around for 20 plus years. If you’re not doing that already then I’d be quite shocked.” **Storage and renewables provider / installer**
- “Most of our assets are in the Forest of Dean, so I’d be curious about the impact of foliage on assets.”
Business customer
- “I work with this technology and I’m curious to know how it can give you an accurate spread of this data. It doesn’t seem like the most value-for-money way of doing this.” **Local authority**

Commitment 27: Continue to have focus on restoring HV supplies quickly (that are not automatically restored) within one hour



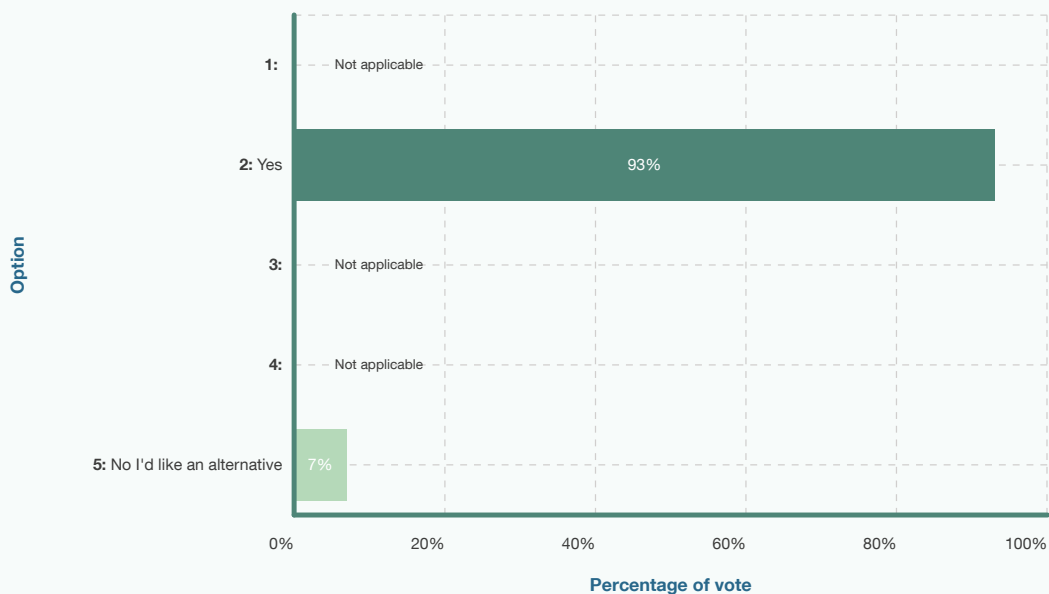
Consultation responses: 25 | Workshop: 58 | Total: 83

Over half (52%) of stakeholders agreed with WPD’s proposed ambition for this commitment, voting for Option 2 – restoring 86% of supplies within one hour. However, a significant proportion (36%) wanted WPD to be more ambitious, voting for Option 4 – restoring 88% within an hour. Only 4% wanted to suggest an alternative. There was minimal verbal and written feedback for this commitment, with one stakeholder seeking further clarity and another encouraging WPD to be even more ambitious and achieve 90% supply restored with an hour. The majority (69%) of WPD staff opted for Option 2. This commitment was also tested in a social media poll. The majority of respondents (46%) wanted WPD to be much more ambitious, and voted for Option 4, in contrast to the views of stakeholders and staff.



- “What does the scale of improvement for each customer roughly look like?” **Online stakeholder**
- “Go for 90%; it should cost 2 pence per customer per year.” **Online stakeholder**

Commitment 28: We will aim to restore customer supplies in RIIO-ED2 within 12 hours under normal weather conditions



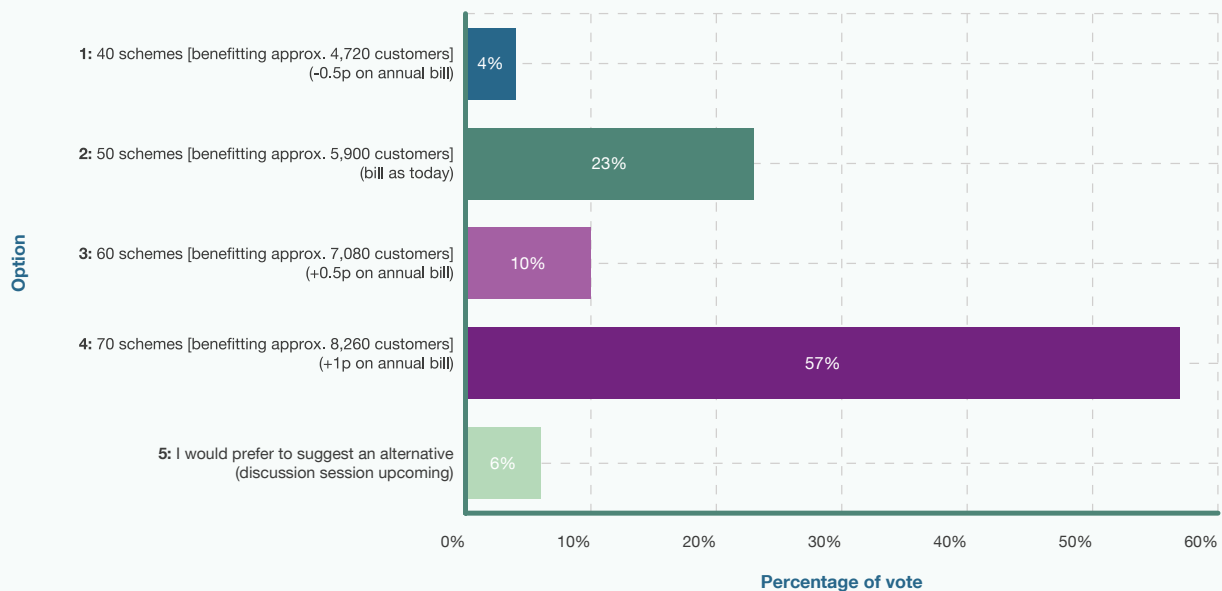
Consultation responses: 24 | Workshop: 58 | Total: 82

This commitment presented a binary choice, with 93% of stakeholders supporting the commitment as it stands and 7% wanting to suggest an alternative. The verbal and written feedback on this commitment was, however, minimal. One stakeholder noted WPD should focus on restoring supplies in abnormal weather conditions when disruption is more likely. One stakeholder felt 12 hours was unambitious and WPD should aim for something less. Another noted that restoring night-time outages should be prioritised.

- “Surely the time when supplies get disrupted is when the weather is abnormal? Say that under abnormal conditions and you are achieving something worthwhile.” **Online stakeholder**
- “12 hours is very long, especially in winter. Perhaps something better than 12 hours should be your target, even if the percentage achievement is lower.” **Local authority**
- “Yes, I would suggest the average office worker with a fully charged laptop and phone won’t be too badly affected. It’s more important to make a promise to fix a power cut at night. I would suggest this as an added commitment or detailed within an existing commitment.” **Major energy user**



Commitment 29: Carry out work that improves network reliability for our worst served customers (those experiencing 12 or more higher voltage power cuts over a 3 year period)



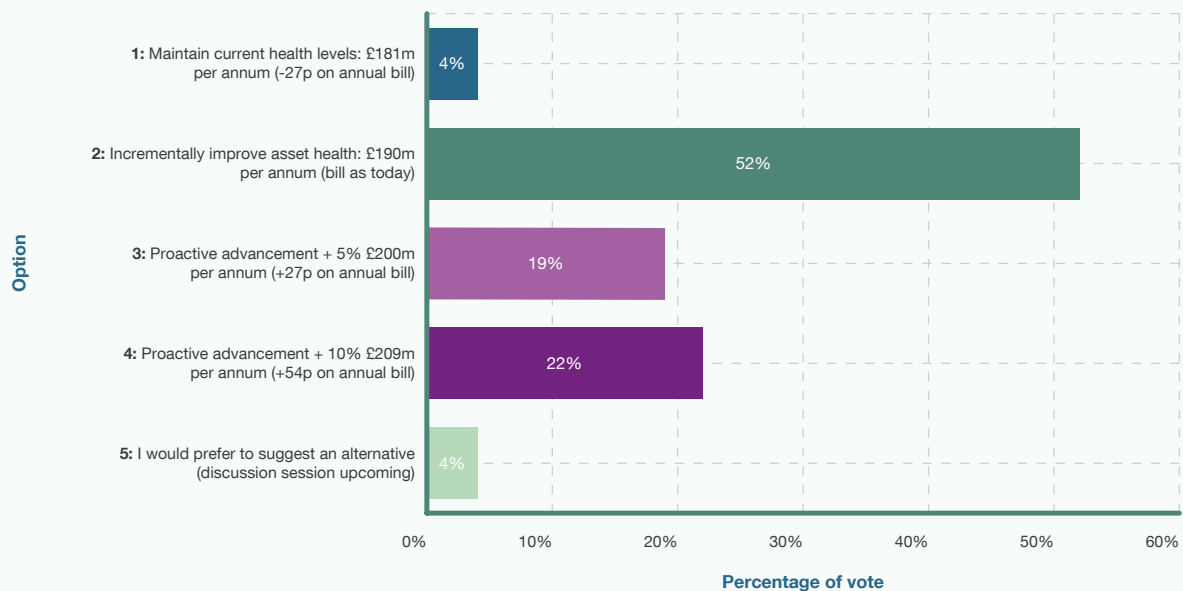
Consultation responses: 25 | Workshop: 57 | Total: 82

While 23% of stakeholders supported WPD’s proposed commitment, a significant majority (57%) wanted WPD to be as ambitious as possible here voting for Option 4 – 70 schemes, benefitting 8,260 worst served customers. Only 4% of stakeholders wanted WPD to do less in this area. 6% wanted to suggest an alternative. In the written and verbal feedback, one stakeholder urged WPD to explore the potential for network automation to improve restoration times for worst served customers. One stakeholder wanted WPD to not only go for the most ambitious level, but to complete the schemes urgently. Two stakeholders felt the number of worst served customers needed some context (i.e., as a proportion) to be able to properly assess the commitment. This commitment was also tested in a social media poll. The majority of respondents (64%) voted for Option 4, in agreement with the views of stakeholders. However, the majority (61%) of WPD staff disagreed and opted for Option 2.

- “Explore the potential for increased network automation to improve power restoration times with targeted deployment to those areas most prone to outages.” **Online stakeholder**
- “Not only carry out but complete urgently. Go for 70 schemes but see comments on capital above!” **Online stakeholder**
- “Give a proportion of customers rather than a number.” **Local authority**
- “I had no sense of what that meant, and whether the ambition should go further. Worst served customers – that seems like a priority area.” **Developer**



Commitment 30: Invest to improve the overall health of the network and develop a measure of overall asset health. Report annually to stakeholders the impact of our investments



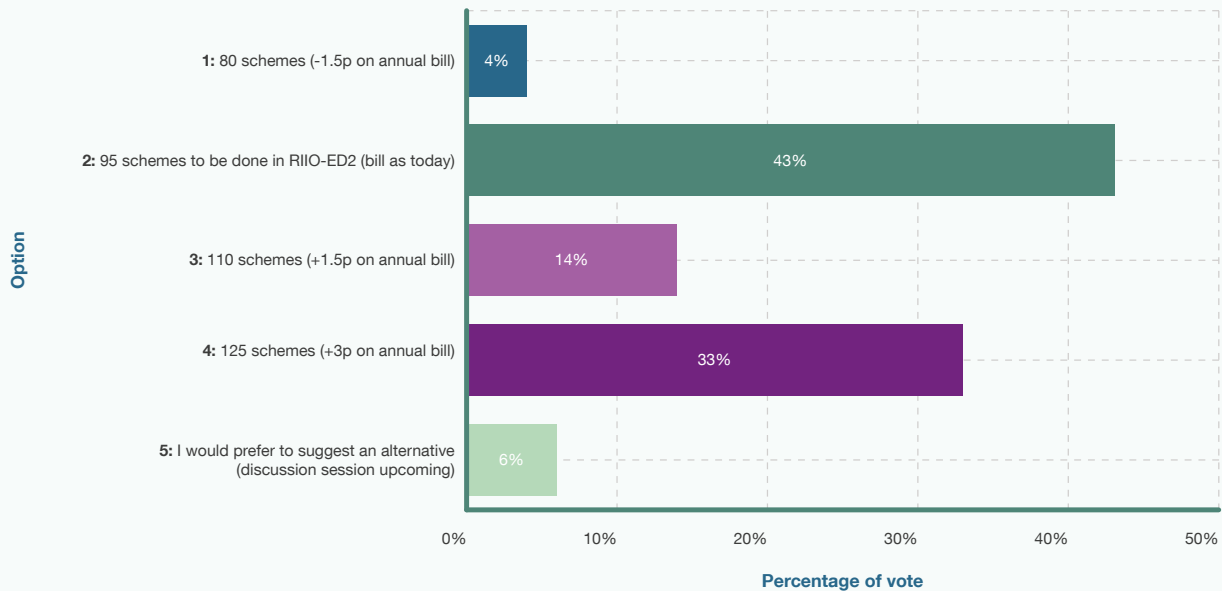
Consultation responses: 25 | Workshop: 56 | Total: 81

The majority (52%) supported WPD’s current proposals for this commitment – incrementally improving asset health and therefore keeping the bill impact as today. There was little written or verbal feedback on this commitment, with only one stakeholder seeking to understand the outcome of the different investment options and another discussing depreciation of the network assets. The majority (67%) of WPD staff agreed and opted for Option 2. This commitment was also tested in a social media poll. The majority of respondents (47%) wanted WPD to go much further and voted for Option 4, in contrast to the views of staff and stakeholders.

- “I have a memory of a meeting with WPD where I asked if you depreciate assets and the reply being no you just replace when they go wrong. Tell me that is not the case? You should amortise them over a known life span and have a sinking fund to replace.” **Online stakeholder**
- “On asset health – can you quantify how much healthier you will make the network as a result of your investment? What is the likely impact on power cut reduction?” **Online stakeholder**



Commitment 31: We will continue to install further flood defences to reflect updated data from the Environment Agency



Consultation responses: 25 | Workshop: 58 | Total: 83

The largest proportion of stakeholders (43%) supported WPD’s current view for this commitment – voting for Option 2: maintaining the current bill impact and implementing 95 flood schemes. However, a significant proportion (33%) wanted WPD to be as ambitious as possible in this area, voting for 125 flood defence schemes (Option 4). Only 4% wanted to see WPD’s work in this area reduced from current levels, while 6% wanted to suggest alternative commitments. In the written and verbal feedback, two stakeholders felt the numbers quoted required more context and the commitment needed to focus on what would be achieved. Three stakeholders felt WPD should also seek to influence planning decisions – addressing the symptom and not the cause. One stakeholder expressed concern about the increase in flooding in their area and supported this commitment. The majority (67%) of WPD staff agreed and opted for Option 2. This commitment was also tested in a social media poll. The majority of respondents (57%) wanted WPD to be much more ambitious and voted for Option 4, in contrast to the views of stakeholders and staff.

- “You might also lean on the EA not to allow development in flood plains. They have a bad idea whereby any development of less than 0.5 Ha is OK so any number of 0.499s can occur, and they take no account of the cumulative impact.” **Online stakeholder**
- “Installing – that seems to address the symptom and not the cause. I’m wondering if doing something further upstream will address some of the problems. This may future-proof rather than raising the barriers every few years.” **Storage and renewables provider/installer**
- “On problems with flooding, can’t they challenge any planning on difficult terrain?” **Local authority**
- “I think regarding flood resilience, I live in mid Wales and we notice it’s getting wetter, with more storms and rivers rising more quickly. I know this has been on the agenda for years now but it’s incredibly



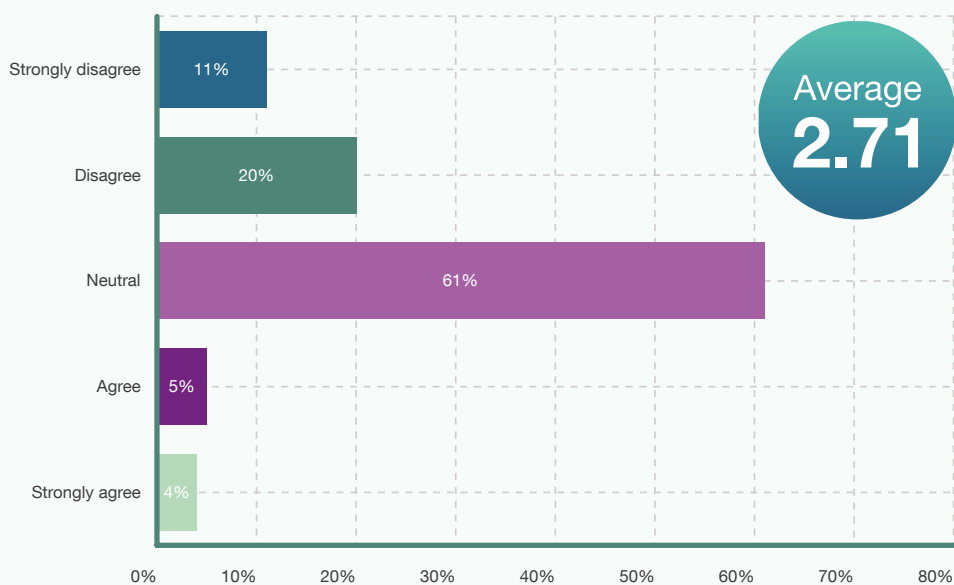
important to ensure that enough resource as possible is put in to protect the most vulnerable from inundation by water. It's a massive effort to rebuild after a flood.” **Consumer body**

- “You have installed flood defences and done risk analysis, so please be more specific in what you’re going to achieve with the money spent rather than just say you’re going to spend money. This point applies to a lot of them.” **Domestic customer**
- “The numbers are given without details or context. Same for burying cables under playing fields – it’s hard to judge something like this without broader context.” **Community energy group**

Business IT Security and Cyber Resilience

WPD’s Business Plan 1 contained two draft commitments for Business IT Security and Cyber Resilience. When asked in the online workshop whether they wanted to suggest alternative commitments, on average 31% of stakeholders disagreed or strongly disagreed, demonstrating that the majority endorsed the proposed commitments as they stand. The largest proportion (61%) felt neutral, with 9% voting agree or strongly agree (that they wished to suggest alternatives). On average, this topic ranked joint fifth out of the 12 Business Plan topic areas.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Business IT Security and Cyber Resilience



Vote Total: 56



One stakeholder suggested that the company should see external accreditation in this area, for example by working towards ISO (International Organization for Standardization) certification. There were few specific commitments suggested in this area, but there was acknowledgement that this was a high priority and one that was growing in importance as the electricity network becomes smarter.

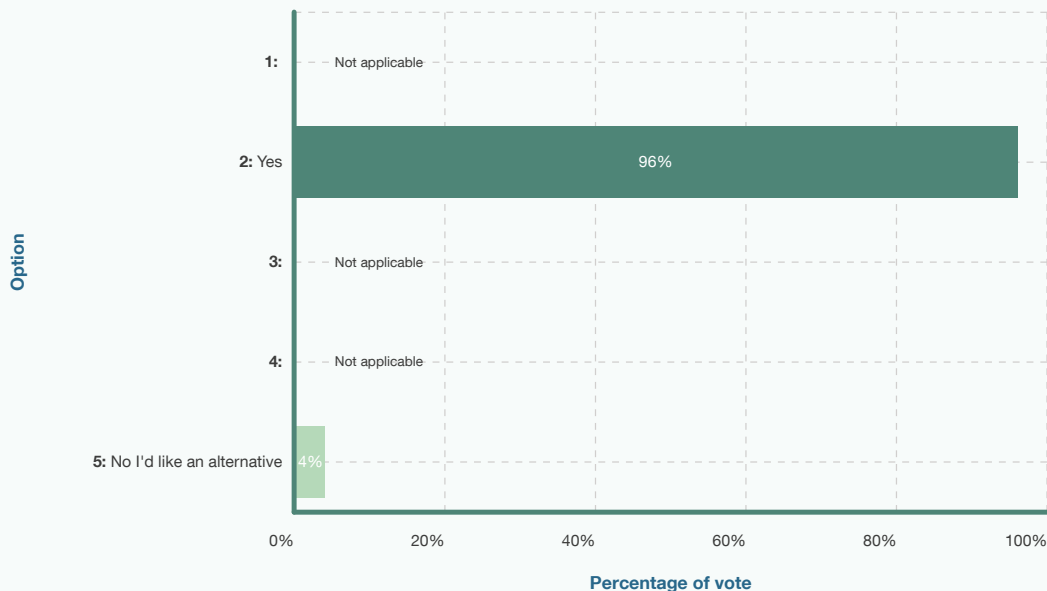
- “There are ISO standards now to help businesses to design their systems to ensure they are cyber resilient. Has WPD implemented this or is this planned? It’s not just about your network. If you have sloppy developers writing sloppy code, this can negatively affect you by opening back doors.” **Major connections customer**
- “You’ve got to keep ahead of the game. These threats are ever-evolving.” **Consumer body**
- “Commitment 32 is very clear, and there’s a metric associated with it. 33 is a bit less clearly defined. What does ‘enhance’ really mean and what’s the metric on this one?”
Storage and renewables provider / installer
- “They should reword to not just spend money or assess but aim for zero events in both of them.”
Domestic customer
- “Something on protecting customer data / how we make sure our customer data isn’t got at because we have vulnerable people on databases, that would be helpful.” **Local authority**
- “On IT systems, you need to consider how easy it is for people to hack. If we’re having a one touch shop, this is exposing more people and data if there is a successful cyberattack.” **Local authority**
- “This needs to be of top priority. We need to recognise how important this is.” **Local Enterprise Partnership**
- “The fact that you’re looking at it is great, but we need to see the details.” **Local authority**
- “The more that we decarbonise the grid, the more important this becomes.”
Major connections customer
- “If we’re talking about smart grids then you’re opening yourself up to needing more and more security. It’s a problem right now, but it’s going to grow fast, and you need to be prepared.” **Community energy group**
- “The potential implications of a cyberattack, particularly for people’s trust and engagement with a zero-carbon grid, are major. As soon as there’s a cyberattack that affects average household users, you’ll lose all public support for smart metering.” **Community energy group**
- “I think it’s pretty good you’ve got this, as I think lots of companies are not so hot on this and I think it’s essential.” **Parish / community council**



The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)

Commitment 32: Continually assess emerging threats to enhance cyber security systems to ensure no loss of data or network interruption from a cyberattack



Consultation responses: 25 | Workshop: 57 | Total: 82

96% of stakeholders voted that they agreed with this commitment, with the remaining 4% voting to suggest an alternative. It was suggested by one stakeholder that WPD's systems need to be flexible and continually updated in order to cope with the increasing demands placed on the network in terms of new technologies being connected and increased automation.

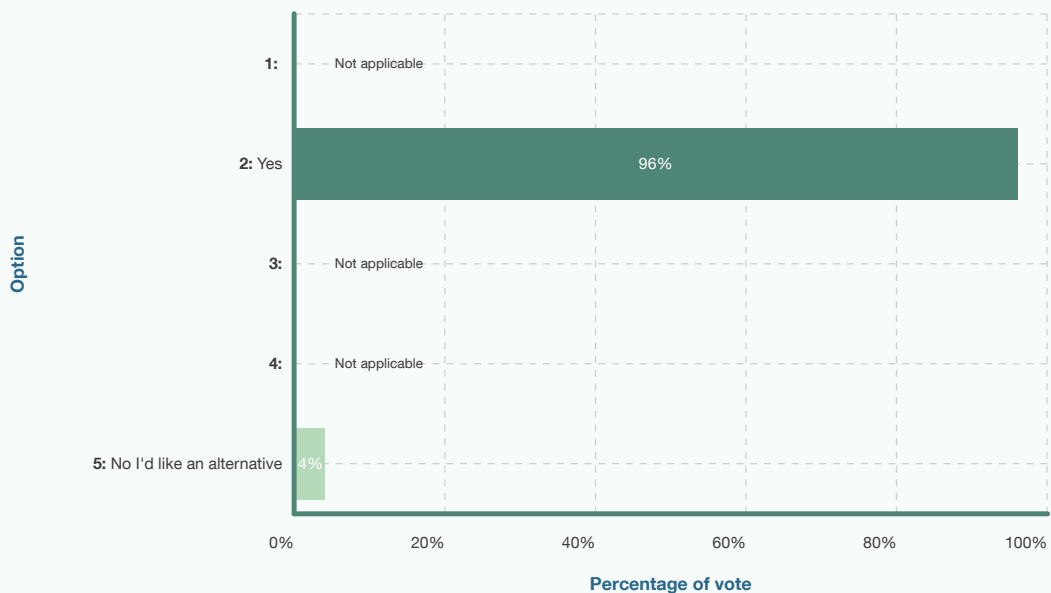
- “Minimise reliance on cyber systems; they will always be vulnerable, especially the ones which get upgraded or improved once in a while until they periodically crash. Banks suffer from this most noticeably, but all such systems have the same vulnerabilities.” **Online stakeholder**
- “In the act of moving towards a more actively managed network with increased automation of



assets, appropriate investment will need to be made to the operational control capability to ensure that it is sufficiently resilient and secure to allow the network to address the demands of increases in DERs (Distributed Energy Resources) and EVs. Therefore, sufficient design flexibility needs to be accommodated in the proposals to ensure that the changing demands of the consumer and public policy can be addressed.” **Online stakeholder**

- “I was wondering whether you’re using mystery shoppers – independent people – to get into your systems?” **Local authority**
- “What’s important is threat monitoring and identification. WPD need to talk about the increase in deployment of IP enabled units for network control and monitoring. Every time you put a unit into the network it becomes a threat point, and these will increase in the next regulatory period.” **Domestic customer**

Commitment 33: Enhance the resilience of our IT network security by upgrading our disaster recovery capability to ensure continuity of our operations



Consultation responses: 25 | Workshop: 59 | Total: 84

96% of stakeholders voted in support of this commitment, although 4% voted to suggest an alternative. However, no specific alternatives were suggested either verbally or via the online consultation.

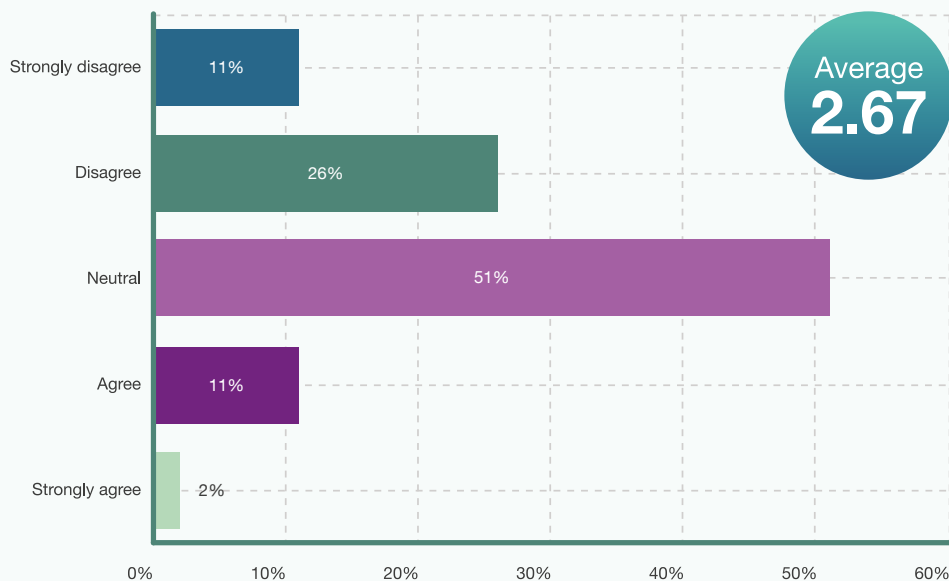


- “Minimise reliance on such systems – they are not reliable enough.” **Online stakeholder**
- “As more domestic local generation is added to the network, as well as smart housing systems, the potential for domestic cyberattack is much increased. This element of the network must also be considered.” **Online stakeholder**

Safety

WPD’s Business Plan 1 contained four draft commitments for Safety. When asked in the online workshop whether stakeholders wanted to suggest alternative commitments for this topic, 11% strongly disagreed and 26% disagreed, demonstrating they supported the proposed commitments as they stand. The largest proportion (51%) voted neutral. 13%, however, agreed or strongly agreed that they wanted to suggest alternatives. On average, Safety ranked eighth out of the 12 Business Plan topics, suggesting relative to others, stakeholders felt comfortable with the proposed commitments.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Safety



Vote Total: 57

In terms of additional commitments, one stakeholder made the point that WPD’s supply chain and contractors ought to adhere to the same high standards for safety as the company itself. It was also noted that the changing nature of the electricity network means that consumers will, in the future, increasingly become generators, which is something WPD should be aware of from a safety perspective.



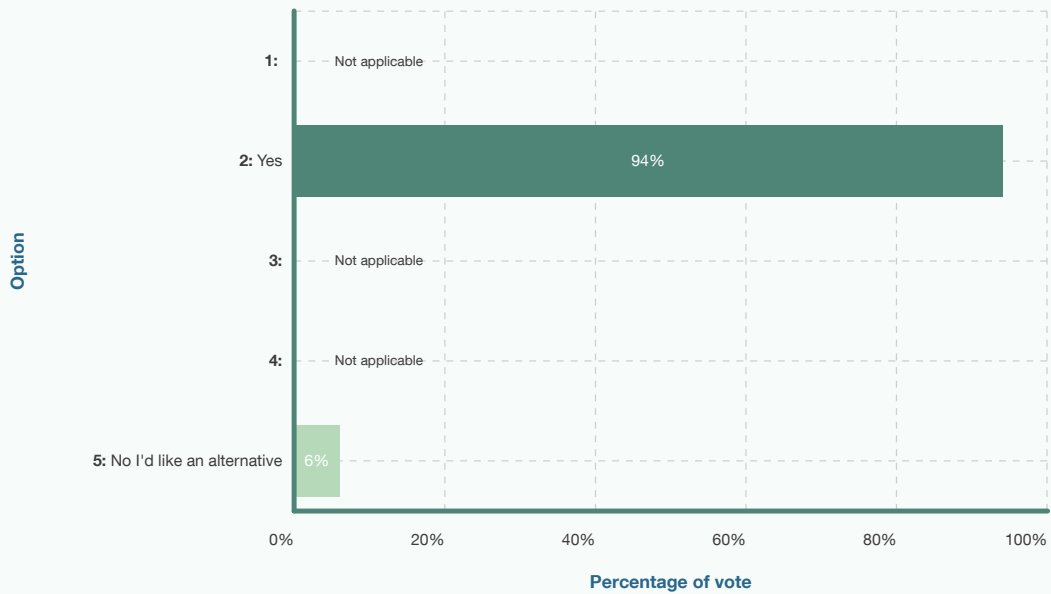
- “Important as consumers become generators – a lot more risk.” **Online stakeholder**
- “We hear quite a lot about the government doing another study, but I want to hear the outputs. I would always rather the money went into implementation. Just running a safer organisation, that doesn’t tick the boxes, so much as sounding like you’re doing the right thing.” **Emergency services**
- “Just a comment on the photo you put up at the start of that section: if I used that internally, I’d be thrown out the room! The guy in the photo is working on a ladder but he’s got no hands on it and he’s stood above the harness line. In terms of a classic ‘how not to do it’, this would be it!” **Storage and renewables provider / installer**
- “What about working with some of the other companies who work for WPD? It feels a lot like WPD telling people what do to and not a lot of listening from what I can see.” **Major energy user**

The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)



Commitment 34: Undertake an additional Staff Safety Climate Survey during RIIO-ED2



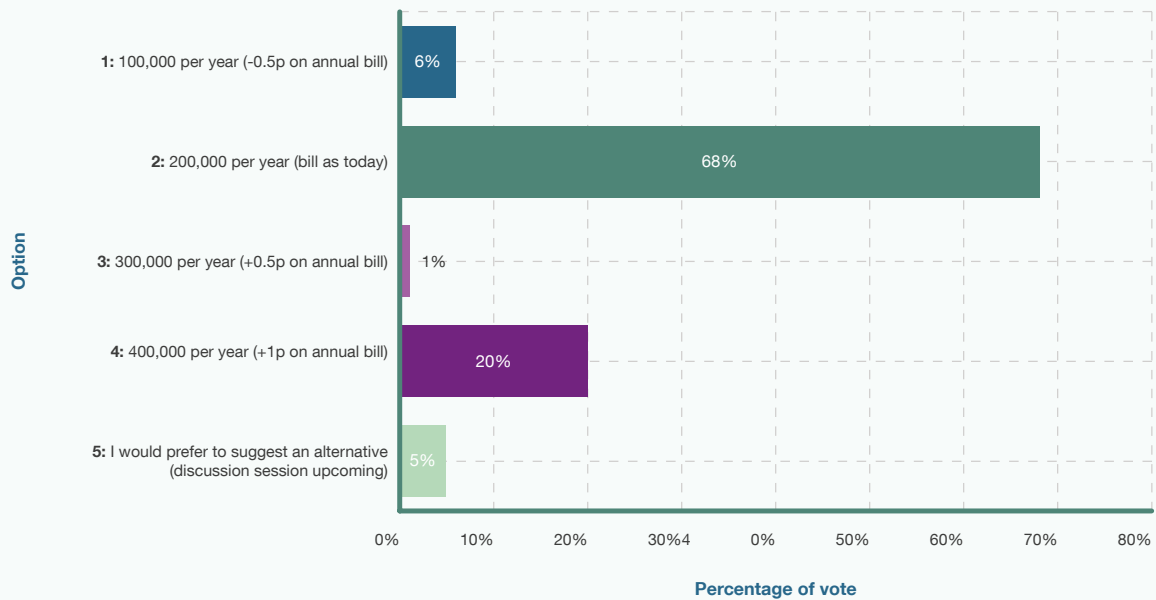
Consultation responses: 27 | Workshop: 56 | Total: 83

There was a good deal of support for WPD’s commitment to undertake an additional staff climate survey in RIIO-ED2, with 94% voting in favour of this. 6%, however, voted that they would like to suggest an alternative commitment. When asked for their comments, one stakeholder said that they found this commitment to be somewhat unambitious and that the company should carry out a survey of this nature more often.

- “Just once in five years? Surely every year?” **Online stakeholder**
- “Undertaking just one additional SSCS sounds unambitious. You could do two or three and have yourself a series of data points, not just one.” **Connections provider**



Commitment 35: Distribute safety advice information to stakeholders



Consultation responses: 28 | Workshop: 57 | Total: 85

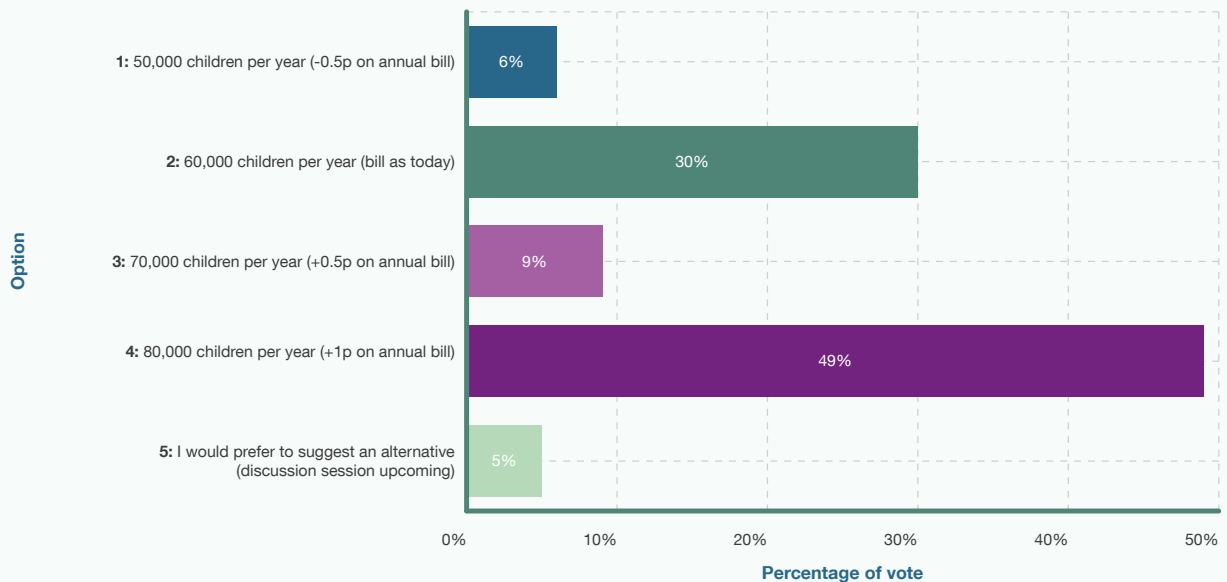
There was a good deal of support for WPD’s proposed commitment to distribute 200,000 leaflets per year to stakeholders, with 68% of stakeholders voting for this option. Only 6% of stakeholders wanted the company to do less in this area, voting for Option 1: 100,000 leaflets per year. The next most prevalent response was Option 4: 400,000 leaflets per year, with 20% of the vote. Only 5% of stakeholders chose Option 5 (suggest an alternative commitment). The significant majority (75%) of WPD staff agreed and opted for Option 2. This commitment was also tested in a social media poll. The majority of respondents (45%) wanted WPD to be much more ambitious and voted for Option 4, in contrast to the views of stakeholders and staff. When asked to suggest alternative or additional commitments in this area, some stakeholders were of the view that WPD should include something more measurable in terms of the impact of this advice, as it was commented that many people would receive a leaflet but may not take the time to read it.

- “Do not stick your fingers in the light socket, OK, but what about economic safety?” **Online stakeholder**
- “In terms of distributing safety notices, just sending out more information doesn’t quite stick. And it’s about being slightly more imaginative. That may be encompassed in Commitment 35, but it’s worth flagging.” **Emergency services**
- “Around the commitment to distribute information to stakeholders, is this quantifiable? Are you aiming to send out x number of pamphlets? Social media metrics are very difficult in terms of measuring the level of engagement. Should there be a metric on the number of downloads, for example? With leaflets, people just pick them up and put them in the recycling, but number of downloads would imply that people actually want the information enough to download and read it. However, I recognise that leaflets may be the only way of reaching some people.” **Storage and renewables provider / installer**



- “I’m looking at the telegraph pole outside my house and there are three safety stickers (warnings of death) rather than just one. So there has to be something about the efficacy of what we do, not just more leaflets. How are we measuring the efficacy of what we’re going to do on this? Three seems over the top.” **Community energy group**

Commitment 36: Educate a minimum number of children per year about avoiding danger from electricity



Consultation responses: 26 | Workshop: 53 | Total: 79

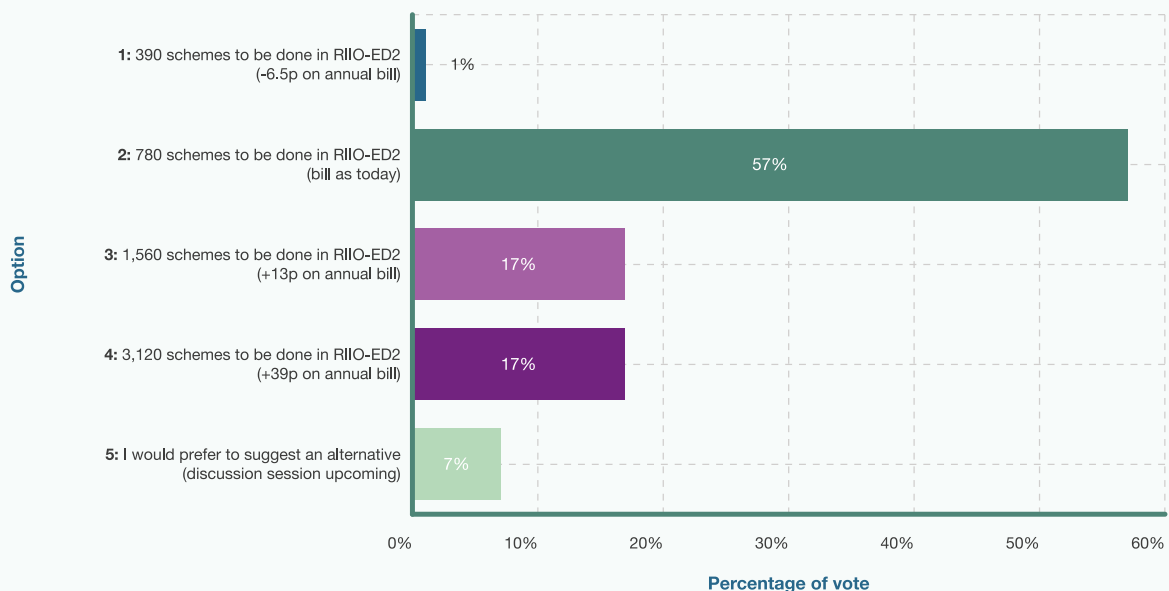
30% of stakeholders supported WPD’s draft commitment to educate 60,000 children per year about avoiding danger from electricity, voting for Option 2. The most prevalent response, however, with 49% of the vote, was Option 4: educate 80,000 children per year. 5% voted for Option 5, which is a comparatively high figure. When asked to suggest commitments, one stakeholder suggested using videos to share advice to a greater number of children. This commitment was also tested in a social media poll. The majority of respondents (66%) voted for Option 4, in agreement with the views of stakeholders. However, the majority (56%) of WPD staff disagreed and chose Option 2.

- “Pinching wire is dangerous. Don’t play in the substations. Why do people throw pairs of shoes over electric wires? I have seen this in many countries, not just the UK.” **Online stakeholder**
- “I’d echo this point. Children are our next generation and our greatest resource for the future. We should be protecting them at all cost. And in terms of publicity, it won’t come across well. We need a more positive way to contribute.” **Local authority**



- “What do you mean by educate a minimum number of children? What is the minimum number? This terminology doesn’t sit well.” **Local authority**
- “It’s hard to measure the effect of a KPI like this (talking to school children) as I don’t know how many schools you’re going to. If you quantified it differently, it would be more tangible.” **Domestic customer**
- “On educating a minimum number of children, we should be aiming for all the children not just the minimum. It’s just the wording of it.” **Domestic customer**
- “WPD shouldn’t put a number on how many children and should go to every single school. You can reach all of them now with home schooling.” **Local authority**
- “WPD can visit schools via the local authority.” **Local authority**
- “Could there be an information pack for schools with a video and information that schools could share with their pupils?” **Local authority**

Commitment 37: Underground, insulate or divert overhead lines that cross school or other playing areas



Consultation responses: 27 | Workshop: 54 | Total: 81

The majority of stakeholders supported WPD’s draft commitment, with 57% of stakeholders voting for Option 2 to underground, insulate or divert overhead lines that cross school or other playing areas in 780 locations in ED2. The next most prevalent responses to the vote were Option 3 (1,560 schemes) and Option 4 (3,120 schemes), which both scored 17% of the vote. 7% of stakeholders voted for Option 5, stating that they would prefer to suggest an alternative commitment. In this connection, several stakeholders stated that safety was of paramount importance, so



WPD's approach shouldn't be based solely on school or other playing areas but on other areas where the electricity network posed a danger to children. The majority (58%) of WPD staff agreed and chose Option 2. This commitment was also tested in a social media poll. The majority of respondents (58%) wanted WPD to be even more ambitious, and voted for Option 4, in contrast to the views of staff and stakeholders.

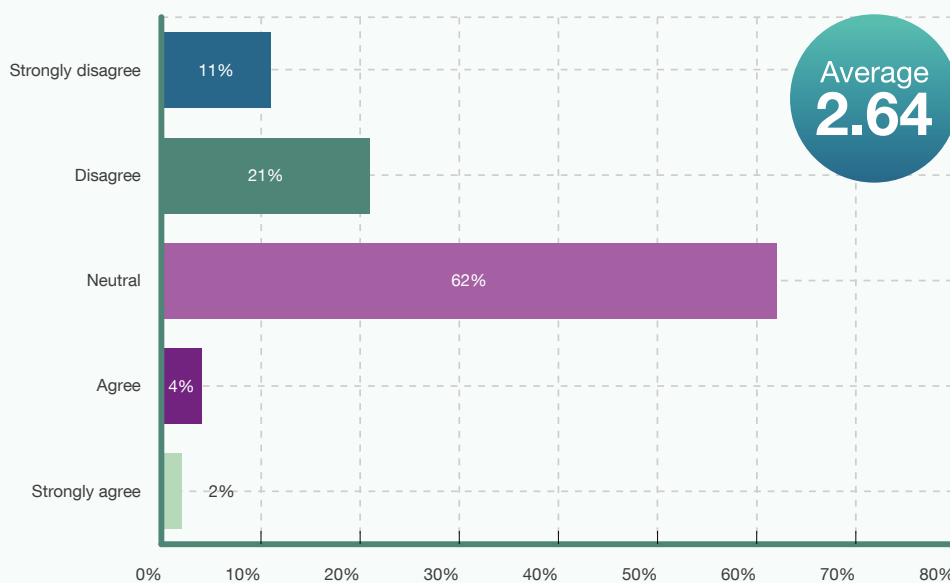
- “Not just school areas; progressively underground all wires.” **Online stakeholder**
- “We were given a choice of increasing the numbers of schemes to avoid lines crossing playgrounds, etc. I would have thought all of them would be in the next plan if they were to do with safety. We shouldn't be putting off something for another 6 or 7 years. We ought to be protecting the children and put it in the plan.” **Major energy user**
- “Diverting overhead lines, it doesn't quite tell us the number. We wouldn't want any, of course. But on [Commitment] 36, would the plan be to actually hit that target? Whether it's electronic contact, social media or contacting these schools directly?” **Local authority**
- “It's good but it would be better to know how many of these lines you've got and the timescale to clear them. Because as far as I'm concerned, you clear all in the next period.” **Domestic customer**
- “It would be useful if we knew the extent of the issue that the commitment is addressing. We need to have a better idea of whether it is a reasonable number.” **Local authority**



Workforce Resilience

WPD's Business Plan 1 contained two draft commitments for Workforce Resilience. When asked in the online workshop whether stakeholders wanted to suggest alternative commitments for this topic, 32% disagreed or strongly disagreed, demonstrating they supported the proposed commitments as they stand. The largest proportion (62%) voted neutral. Only 6% agreed or strongly agreed that they wanted to suggest alternatives. On average, Workforce Resilience ranked ninth out of the 12 Business Plan topics indicating that relative to other topics it was felt the commitments here covered what was required.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Workforce Resilience



Vote Total: 53

In the written and verbal feedback, several suggestions for new commitments were raised. This included workforce renewal, with one stakeholder wanting a commitment to engaging with further education institutions and developing apprenticeship schemes to encourage the new generation. Four stakeholders also raised the gender and / or BAME pay gap, wanting to see a commitment to improving pay gaps and regularly reporting on them.

- “We aren’t seeing many engineers or resources coming through. The equality and inclusion aspect is great, but is there anything specific you need to do about refreshing the workforce? This covers further education and engaging with the apprentice scheme to make the sector more appealing for newcomers.” **Connections provider**
- “I think on the original slide it showed that females were being paid less than males. I thought that this should be a commitment because it’s unacceptable. If a female is doing the same job as a male, then they should be paid equally.” **Major energy user**
- “What typically tends to happen to women is they take a break and then they don’t prosper after they



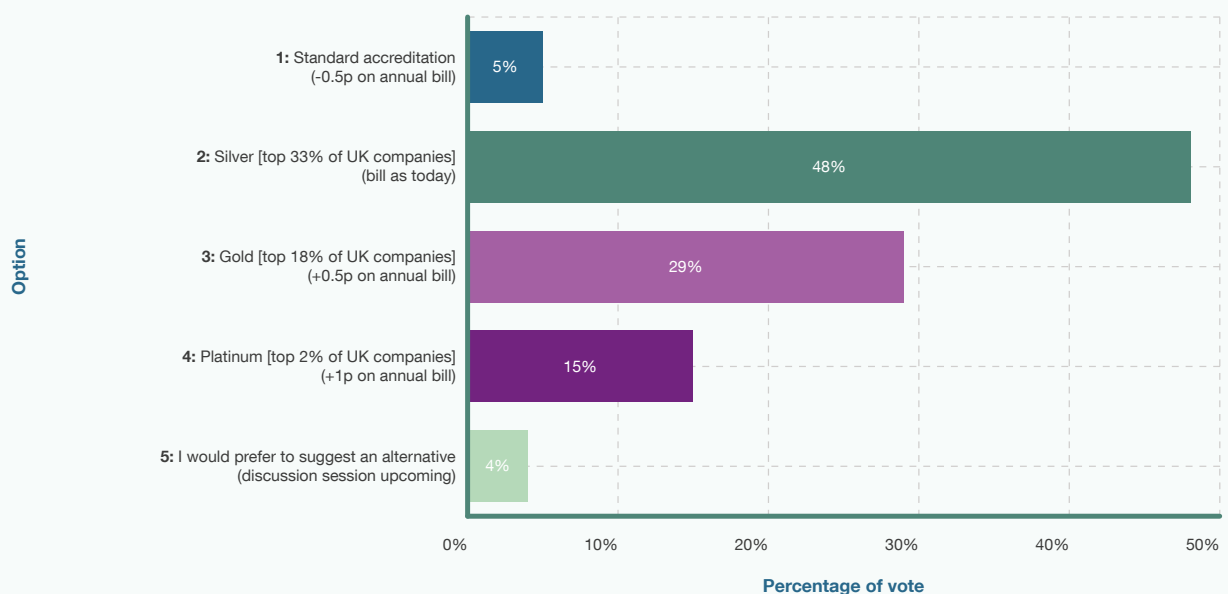
come back. Be generous with your provisions for females, so they don't lose much when they come back. It's about ensuring the pay is the same, but also addressing the issue that women take time out and don't seem to progress. But also make sure paternity is the same as maternity." **Local authority**

- "It's worth having targets, otherwise there's nothing pushing you towards doing it. I didn't see anything on the gender pay gap." **Local authority**
- "BAME pay gap reporting." **Online stakeholder**

The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)

Commitment 38: Demonstrate exceptional embedded employment practices by achieving accreditation with Investors in People by the end of RIIO-ED2



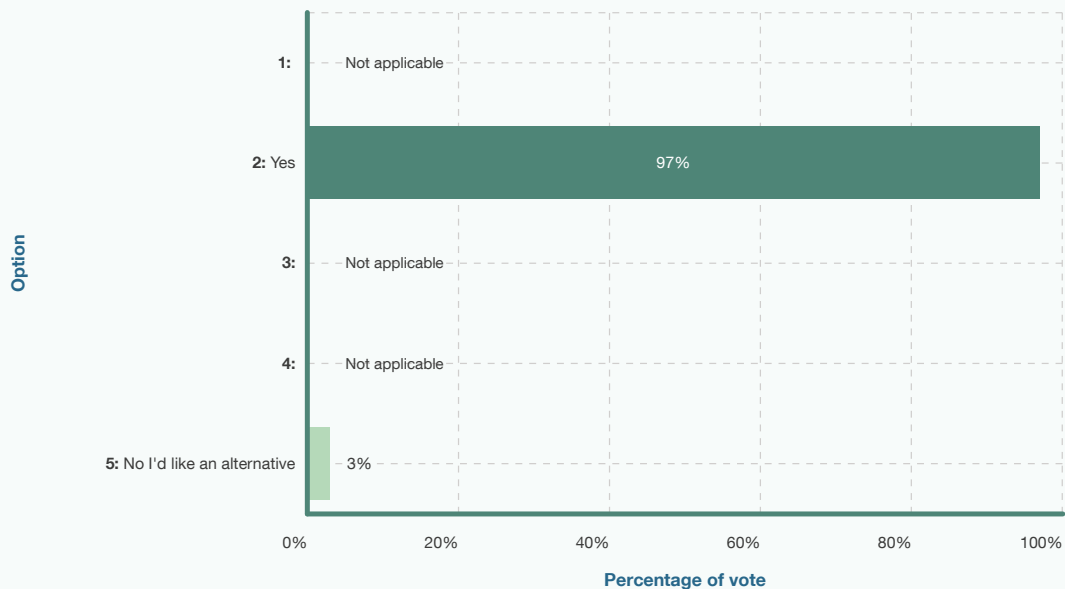
Consultation responses: 26 | Workshop: 56 | Total: 82



The largest proportion (48%) agreed with WPD’s proposed commitment, voting for the company to achieve the silver accreditation (Option 2). However, a significant proportion wanted WPD to be more ambitious in this area, with 29% voting for gold accreditation (Option 3) and 15% even voting for the platinum accreditation (Option 4). 4% wanted to suggest alternative commitments, but no alternatives were suggested in the written feedback. Instead, one stakeholder expressed surprise that WPD did not already have this accreditation, and another sought further clarification on what the different accreditation means. One stakeholder noted that the voting meant there was a lot of ambition for WPD to go further in this area. In line with stakeholder views, the most prevalent answer among WPD staff was Option 2 (39%). This commitment was also tested in a social media poll. The majority of respondents (40%) wanted WPD to go much further, and voted for Option 4, in contrast to the views of stakeholders and staff.

- “You mean you don’t have this already? I am surprised.” **Online stakeholder**
- “It would be good to know what the gold and platinum award gives one above the silver, because things have moved on since I’ve retired, and it would be good to know what benefit it gives the employers / employees and customers.” **Domestic customer**
- “Just to say that I noticed the number of people who wanted to go up a step (gold/platinum), so it shows you that a lot of people do want you to improve.” **Local authority**

Commitment 39: Publish annually our updated Diversity & Inclusion Action Plan & Performance



Consultation responses: 26 | Workshop: 51 | Total: 77

This commitment presented a binary choice. Nearly all stakeholders (97%) supported this commitment with only 3% wanting to suggest an alternative. In the written and verbal feedback, one stakeholder sought confirmation that the Plan covers gender and disability, as well as ethnicity. One stakeholder stressed that the reporting needed to apply up to board level. Lastly, one stakeholder challenged WPD to commit to publishing targets, rather than just a report.



- “Is this just racial or does it include gender, disability, etc.?” **Online stakeholder**
- “The acid test is that the people working there should reflect the community.” **Energy consultant**
- “This should also apply up the line to a board level.” **Local authority**
- “You see other energy companies publishing diversity targets rather than committing to publish a report. I think it should be as well as. Commitment to targets rather than just the report. But do both.” **Energy consultant**



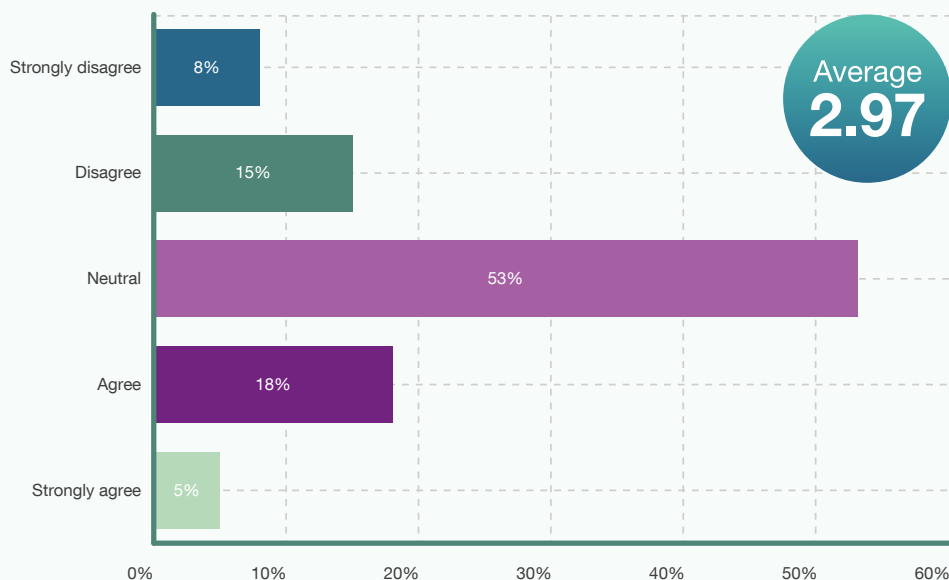
Section Four Commitments – Delivering an environmentally sustainable network

Section Four focuses on the feedback gathered on each of the commitments covered under Ofgem’s focus area of ‘delivering an environmentally sustainable network’. This feedback is primarily quantitative, with stakeholders and customers voting on options for each of the commitments. The voting data has been supplemented by written and verbal feedback where given. This was gathered via online consultation responses (stakeholders and WPD employees), the online stakeholder workshop, and the bill payer / consumer survey.

Environment and Sustainability

WPD’s Business Plan 1 contained ten draft commitments for Environment and Sustainability. When asked in the online workshop whether stakeholders wanted to suggest alternative commitments for this topic, 23% disagreed or strongly disagreed, demonstrating they supported the proposed commitments as they stand. The largest proportion (53%) voted neutral. However, 23% agreed or strongly agreed that they wanted to suggest alternatives – relative to other topics this was a high proportion. On average, Environment and Sustainability ranked highest out of all 12 Business Plan topics, indicating stakeholders felt there were commitments missing for this topic.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Environment and Sustainability



Vote Total: 60

In the written and verbal feedback, several additional commitments were put forward. Firstly, two stakeholders suggested a commitment about delivering a network that enables regional net zero ambitions. Building on this, one stakeholder wanted to see WPD provide more support and information to individuals and organisations on how to decarbonise their energy consumption. Two stakeholders noted that there were no commitments relating to biodiversity in the draft Business Plan and urged WPD to address this. Other suggestions included the proposal by



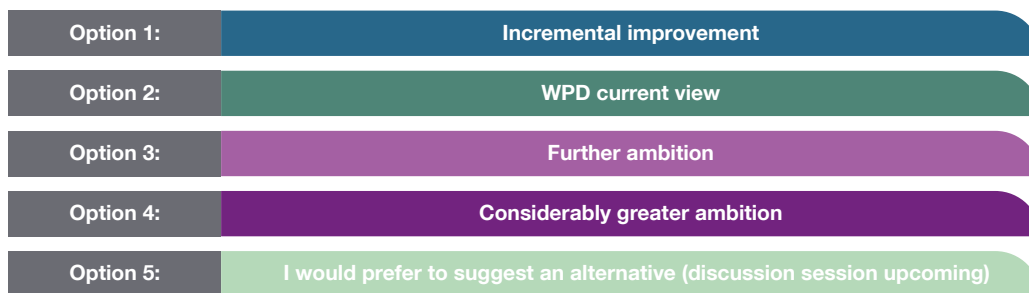
one stakeholder to ensure all new or upgraded domestic connections are three-phase to provide the future capacity required for electrification. Three stakeholders wanted WPD to commit to doing more to encourage the uptake of solar PV, such as working collaboratively with housing developers and putting pressure on government to improve national policy in this area. One stakeholder wanted to see more of an emphasis on decarbonising the network in rural areas. Finally, one stakeholder questioned who should pay for the reduction in WPD's business carbon footprint – feeling it was perhaps inappropriate for the customer to have to pick up this business cost.

- “There is no commitment here to provide a network that allows for net zero ambitions across your regions.” **Online stakeholder**
- “All new / upgraded domestic connections at street level are to use a three-phase cable, even if only one phase is connected at present. This is to encourage and reduce the cost of future enhancement in smart housing / EV as grid element.” **Online stakeholder**
- “I feel there has been a huge area that’s been missed. One of the major problems is housing developers are being actively discouraged from putting solar on their roofs because of grid capacity. This is lunacy. It is why batteries are so great, so that you can work collaboratively with the grid and developers. Also, perhaps you can work with other people actively to use your substations as places to locate solar.”
Local authority
- “The commitments here seem to be more about urban areas and villages, so you could add the electrical decarbonisation of rural areas to your plan as well. This could involve three-phase lines.”
Connections provider
- “There is nothing about biodiversity in the plan and replanting trees to mitigate the action you take. You could also tap into opportunities to support microgrids.” **Local authority**
- “I agree that maybe something around biodiversity could be added. I also didn’t understand the consistency of these.” **Energy consultant**
- “My suggestion is to collaborate with local climate groups. As a councillor, we have lots of people wanting to know how they can help. Can we signpost them to get the answers they want? For example, a leaflet or booklet from WPD that we can pass on providing information on climate change in terms of electricity. Making clear(er) what channels are available for both individuals, organisations and activist groups to approach WPD on efficiency and climate change advice in their local area. Share corporate knowledge with the local authorities and beyond.” **Local authority**
- “The commitments relating to business carbon footprint – shouldn’t the costs be picked up by WPD rather than consumers’ bills? Rather than hiking up consumers costs, WPD should use their profit.”
Local authority
- “I know you’re working closely with local authorities who all have different zero carbon targets. Would it be more efficient to operate regionally? To prioritise and decarbonise areas that have the most ambitious targets first.” **Community energy group**

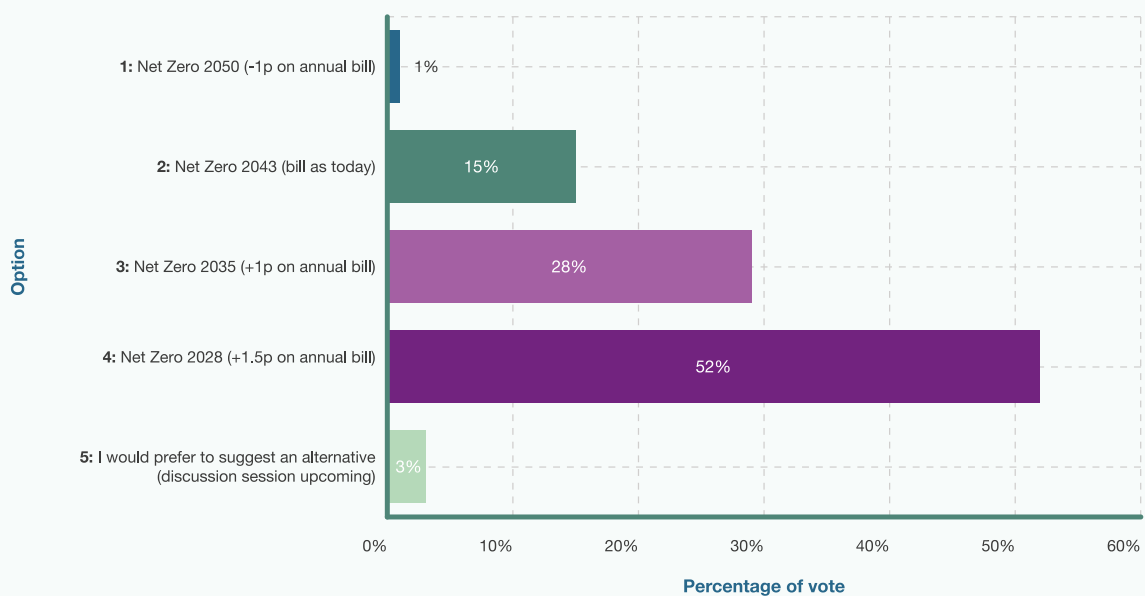


- “Rooftop PV is very important and there should be more upwards action towards government.”
Local Enterprise Partnership
- “I agree with the above: the local government should include this in their planning policies.”
Local authority

The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.



Commitment 40: Reduce internal Business Carbon Footprint to be Net Zero by following a verified Science-Based Target to limit the climate impact of our activities



Consultation responses: 28 | Workshop: 58 | Total: 86

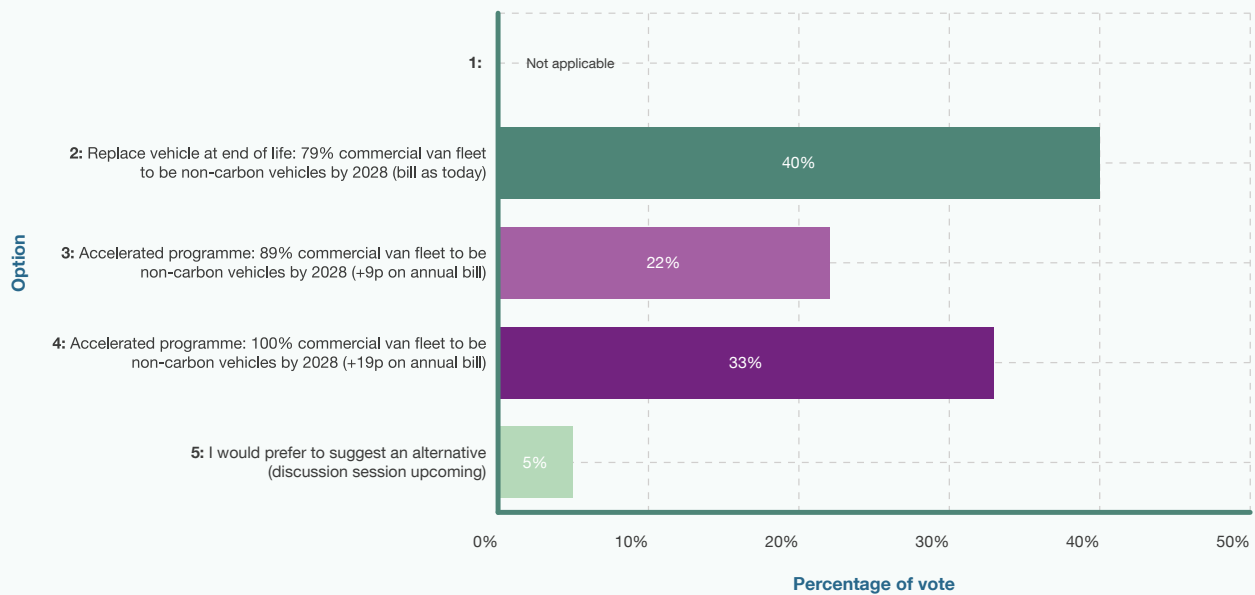


The majority of stakeholders (52%) voted for Option 4 for this commitment, demonstrating they wanted WPD to be as ambitious as possible – achieving Net Zero by 2028. 3% said they wanted to suggest an alternative commitment. In the written and verbal feedback, several stakeholders sought clarity on what the commitment meant – for example, how WPD intended to achieve this, what the cost implication is and whether it just related to their carbon footprint or the whole of the UK. As one stakeholder pointed out, WPD would not achieve Net Zero if there were still SF6 losses on the network. One stakeholder suggested splitting the commitment in two, having one commitment to reduce WPD’s own carbon footprint and one commitment to support the country to do the same. One stakeholder urged WPD to ‘do something drastic’ to be able to achieve Net Zero even sooner than 2028. This commitment was also tested in a social media poll. The majority of respondents (61%) wanted WPD to be more ambitious, and voted for Option 4, in agreement with the views of stakeholders. However, the majority (47%) of WPD staff disagreed and chose Option 2.

- “Does this mean get as many electric vehicles as you can? Yes. If it means forcing innocent customers to go digital for their billing, no.” **Online stakeholder**
- “WPD to achieve as a business, or supporting the UK as a whole to achieve Net Zero?” **Utility**
- “This should be two commitments. We’ll also need a date on both. Locally, us councils have 2030 as our target, which is ambitious.” **Local authority**
- “I think they should be able to support the UK to meet its targets sooner than 2043. It’s also about understanding costs. Commitments get made, but without the appreciation of the cost element.” **Utility**
- “Why can’t you do something drastic like put an extra pound on the bill and address everything ahead of 2028?” **Utility**
- “You could say Net Zero by 2028 but still have SF6 losses beyond that. So that’s not Net Zero.” **Energy consultant**



Commitment 41: Replace our transport fleet with non-carbon technology where practical



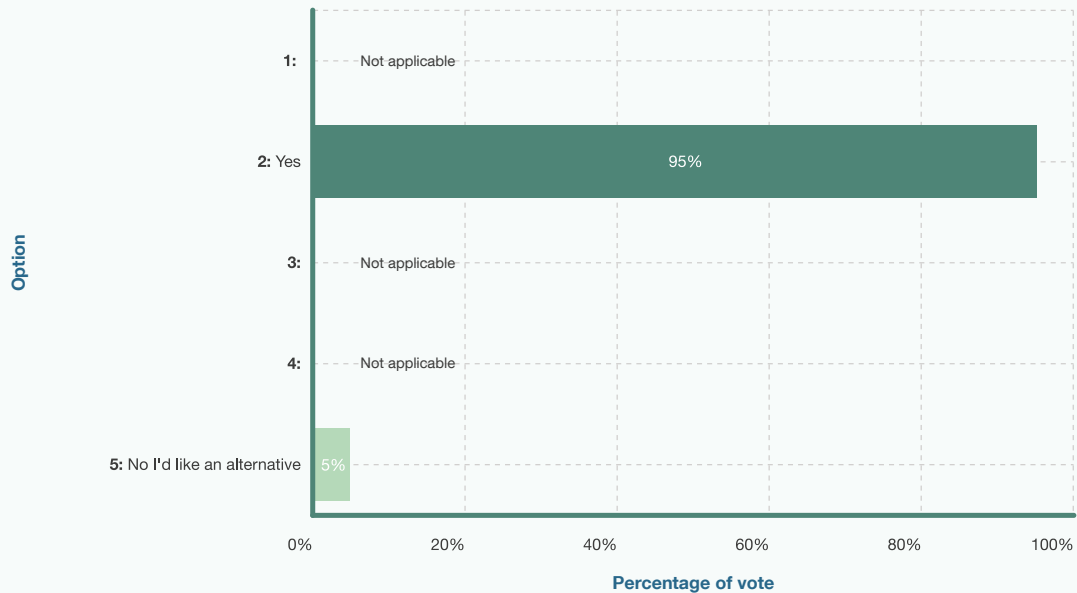
Consultation responses: 28 | Workshop: 57 | Total: 85

The largest proportion (40%) agreed with WPD's proposed commitment, voting for Option 2: replace vehicles at end of life. However, a significant proportion wanted to see more ambition with 22% voting for Option 3 (an accelerated programme, with 89% of fleet to be non-carbon vehicles by 2028) and 33% voting for Option 4 (an accelerated programme with 100% of fleet vehicles non carbon by 2028). 5% wanted to suggest an alternative commitment. In the verbal and written feedback, one stakeholder urged the company to lead the way by ensuring the fleet vehicles operated as vehicle to grid and / or battery back-up. One stakeholder asked what was done with the vehicles that were replaced. One stakeholder questioned whether it should be the customer that pays for this. This commitment was also tested in a social media poll. In the poll, 49% opted for Option 2 and the same proportion chose Option 4. The majority (67%) of WPD staff chose Option 2.

- “Very good. Will you have charging points at all offices and workstations?” **Online stakeholder**
- “What new electrical connections will be installed for the new commercial fleet of vehicles and will this include battery back-up and vehicle-to-grid as a leading company exemplar?” **Online stakeholder**
- “What do you do about vehicles that you replace? This needs to be considered.” **Utility**
- “I am struggling on Commitment 41 because there is an increase expected from the consumer if WPD as the organisation have a zero-emission fleet. I don't know if other businesses ask for their customers to pay for this. I don't think WPD should be asking this question; it should be done.” **Local authority**



Commitment 42: Install renewable local generation at all suitable offices and depots



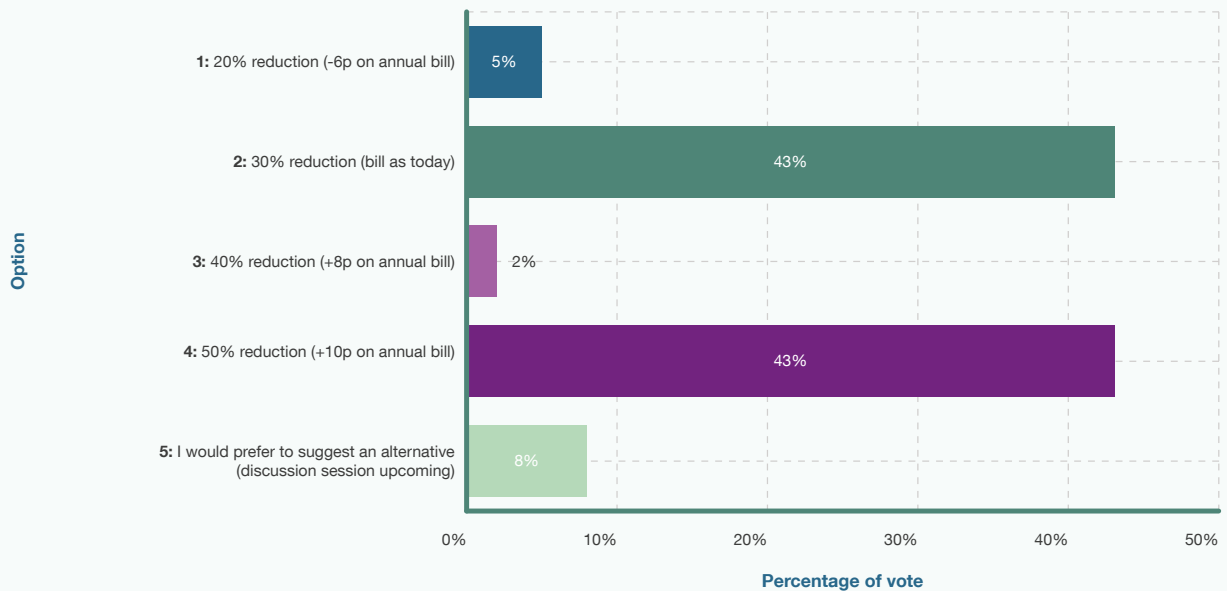
Consultation responses: 27 | Workshop: 56 | Total: 83

This commitment presented a binary choice to stakeholders. 95% agreed with the commitment, while 5% wanted to suggest an alternative. In the written and verbal feedback, one stakeholder suggested also looking at biogas and biofuels to provide greater reliability to wind and solar schemes. Another stakeholder urged WPD not to greenwash, stating that renewable generation should be installed at offices where it is a good idea – not just as a PR exercise.

- “Solar panels only work by day when the sun shines. Wind only works 25% of the time. You could make the septic tanks into anaerobic digestion and have fuel cells to use the gas and sell on the solid sludge to people for garden manure.” **Online stakeholder**
- “How will it be cleaned and recycled?” **Online stakeholder**
- “Local generation on WPD buildings sounds like a good thing, but I think you have to avoid the temptation to greenwash things. In many cases, it’s probably better to get energy from the network. So, do it where it’s a good idea, not just where it looks good.” **Energy consultant**



Commitment 43: Reduce leaks from fluid filled cables



Consultation responses: 27 | Workshop: 60 | Total: 87

One third of stakeholders (43%) wanted a high level of ambition on this commitment, voting for Option 4: 50% reduction in leaks from fluid filled cables. The same proportion (43%) voted for Option 2, which related to WPD’s proposed ambition to deliver a 30% reduction in leaks. 8% of stakeholders wanted to suggest an alternative commitment. In the written and verbal feedback, several felt they needed more information to understand the scale of the challenge and the impact of each level of investment. One stakeholder explicitly stated that the benefit needs to be balanced against the substantial cost. Four stakeholders did urge WPD to be ambitious with this commitment, seeing it as a priority area for the company – with two requesting that WPD reduce these leaks to zero. One suggested WPD gradually remove them over several regulatory periods as it is too much to achieve in one price control. Another stakeholder wanted the commitment to include something about removing the cables safely. Finally, one stakeholder felt this Commitment (43) should be combined with Commitments 44 and 45. However, the majority (67%) of WPD staff disagreed and chose Option 2.

- “Go for 50% reduction.” **Online stakeholder**
- “Establish a long-term goal to simply get rid of these leaks. Rather than trying to fix the worst ones, you should gradually remove them. This is something you can’t fix in one regulatory period.” **Connections provider**
- “There is no measure of the size of the problem in the document.” **Utility**
- “Be more ambitious. Rather than reducing these leaks, you could aim to have zero leaks. I also feel this should be the responsibility of the company. It’s unfair it’s all pushed onto the customer.” **Local authority**
- “On 43, 44 and 45, they seem like kind of silo commitments. I’d prefer an overarching one that looks at



the risk of each and allocates money as per risk to the environment. Make them a bit more stretching.”

Domestic customer

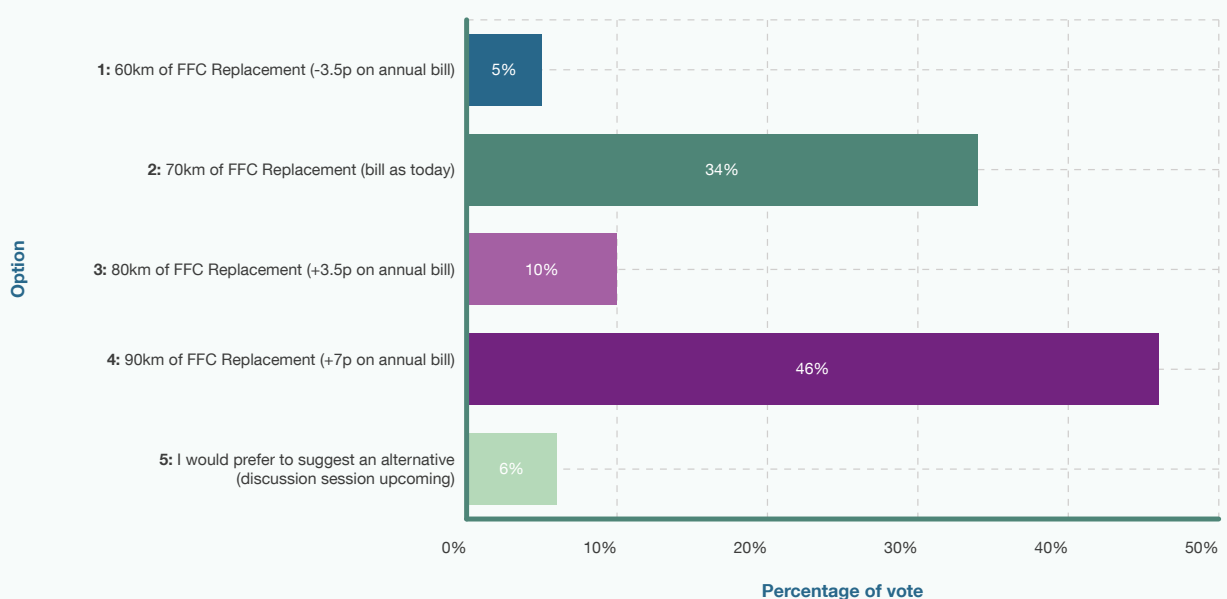
- “It is only pressure leaks that can be easily removed. Changing cables would cost around 3 million pounds. You need to balance costs with what you might benefit. This could be unpopular and very expensive.” **Parish / community council**

- “It’s difficult to see the impact of achieving these against the cost; for example, I don’t know how many kilometres of fluid filled cables you have, so don’t know if this is a challenging task or not.”

Domestic customer

- “SF6 and fluid filled cables are the main priority and should be out of the network ASAP. We need to see this disappearing from the questions.” **Local Enterprise Partnership**
- “Reducing leaks should be a priority.” **Local authority**
- “On our leaks, there must be something on getting rid of it safely.” **Local authority**
- “The options were to reduce it. My alternative option is rather than reduce the leaks, try and remove it completely.” **Storage and renewables provider / installer**

Commitment 44: Replace the poorest performing Extra High Voltage fluid filled cables (FFC) on our network



Consultation responses: 27 | Workshop: 56 | Total: 83

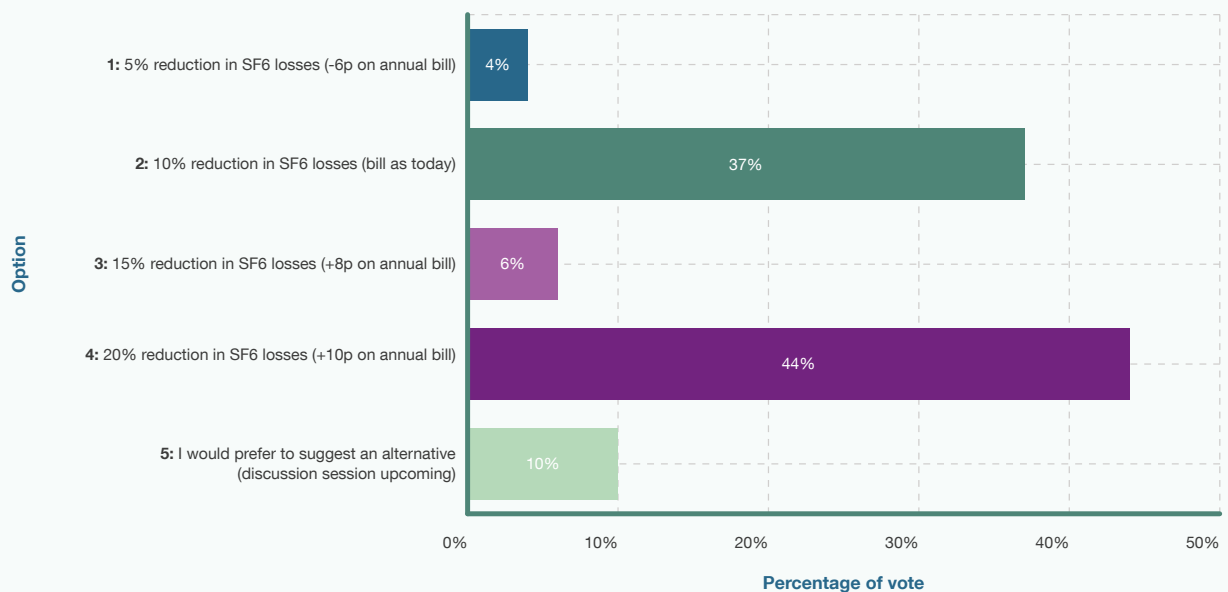


The largest proportion of stakeholders (46%) voted for the greatest level of ambition for this commitment: replacing 90km of fluid filled cables (Option 4). The second highest proportion (34%) agreed with WPD's current level of ambition, voting for WPD to replace 70km of fluid filled cables (Option 2). 6% wanted to suggest alternative commitments. In the verbal and written feedback, one stakeholder requested more context to understand the proportion of cable this would replace. One stakeholder wanted to ensure that whatever replaced these cables was carbon neutral. Two stakeholders expressed concern about what would be done with the old cables and felt that they should not be left in the ground. The majority (72%) of WPD staff disagreed with stakeholder views and opted for Option 2.

- “This comes back to my comments about writing assets off over time and replacing them. If you are not doing this, you are surely poor managers.” **Online stakeholder**
- “Recover cables from the ground that are no longer used whenever overlaid.” **Online stakeholder**
- “WPD need to look at cost and effect. What happens to old cables / material? Are we adding to a problem that isn't as severe as it's being made out to be?” **Local authority**
- “Surely the poorest performing EHV fluid filled cables are at a fault. It is not about replacing technologies; it is about repairing them. Will the replacements be carbon neutral?” **Domestic customer**
- “In terms of the length of cable being removed on an annual basis, unless you know what the overall lengths are, it is difficult to know whether the target is ambitious or not.” **Local authority**



Commitment 45: Reduce SF6 losses from that in RIIO-ED1



Consultation responses: 26 | Workshop: 56 | Total: 82

The largest proportion of stakeholders (44%) wanted to see a high level of ambition for this commitment, voting for Option 4: a 20% reduction in SF6 losses. The second highest proportion (37%), however, agreed with WPD’s current level of ambition, voting to reduce SF6 losses by 10% (Option 2). 10% wanted to suggest an alternative commitment – which was a relatively high percentage compared to other commitments. In the written and verbal feedback, three stakeholders sought greater clarity to understand the scale of the problem. One stakeholder urged WPD to work in collaboration with industry partners on this issue. Another stakeholder suggested WPD look at alternative equipment that does not include any SF6. The majority (53%) of WPD staff chose Option 2.

- “See my comments about asset management.” **Online stakeholder**
- “36,750 LPA is an appalling figure – it’s about 2 large road tankers full. What fraction of this is SF6?” **Online stakeholder**
- “Isn’t this an industry issue where the ENA should be taking leadership? Collaborate with industry partners.” **Major energy user**
- “It’s not clear how big an impact each of these options has. For example, SF6. It’s a small part of your overall footprint, so it would be good to see that you’re phasing it out. But spending all of your funds on leakage might not be the right way forward.” **Local authority**
- “The SF6 standard is 5% currently. It’s almost impossible to get to 2.5%. So how are you going to reduce these losses? Go back to oil?” **Parish / community council**
- “We need to eradicate SF6 and stop oil flooding, but I don’t know the scale of the problem so it’s hard



to answer. They are all high priority; how quickly can WPD do this?” **Domestic customer**

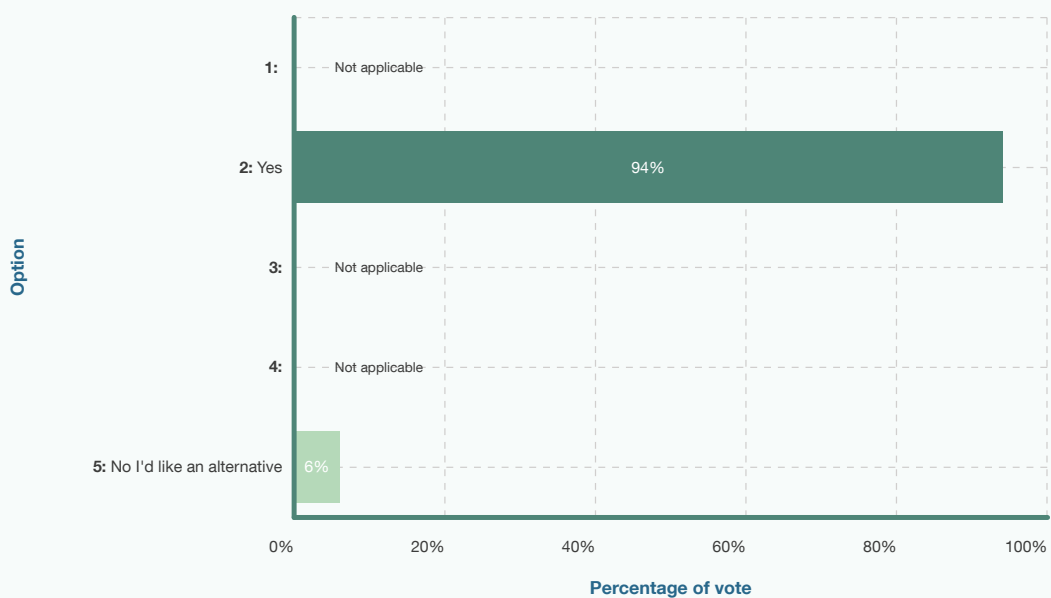
- “Is there an option to use less equipment that contains SF6?”

Storage and renewables provider / installer

- “I think companies like Schneider and Siemens still have gas in their switches. Could you advise on alternative equipment to be adopted by providers?”

Storage and renewables provider / installer

Commitment 46: All PCB contaminated equipment will be removed from the WPD network by 2025



Consultation responses: 26 | Workshop: 58 | Total: 84

This commitment presented a binary choice. 94% of stakeholders agreed with the commitment, while 6% wanted to suggest an alternative. In the written and verbal feedback, one stakeholder urged WPD to focus on replacing PCB contaminated equipment near groundwater sources, as they present the highest risk. Another stakeholder questioned whether removing the equipment is the right thing to do as it will just move it somewhere else without it being disposed of properly. One stakeholder wanted to understand what the equipment would be replaced with, and another expressed concern that WPD would not be able to commit to replacing it all without being able to sample it because it is sealed.

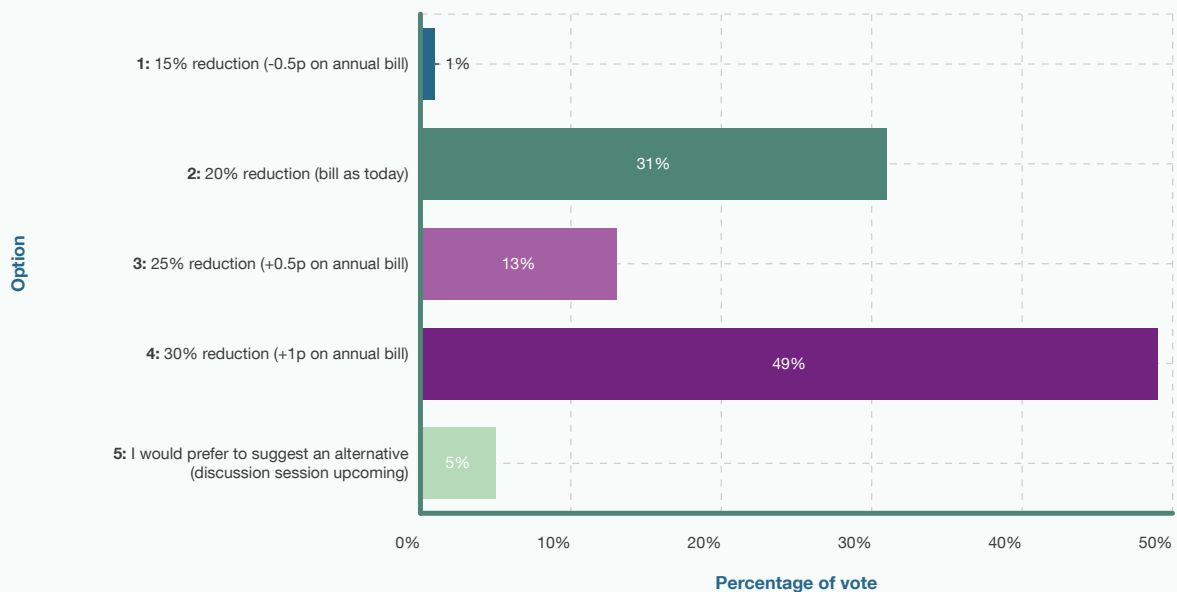
- “The one that worries me is that you have a lot of equipment that you can’t actually sample. I think according to the new EU regulation, anything over a litre I think has to be sampled but it’s sealed, so



I don't know how you can make a commitment to remove everything in this area if you can't actually sample it." **Storage and renewables provider / installer**

- "In terms of removals, I would relate it as well to where there's ground water sources. Proximity to ground water should be a priority. I think we should try and stamp out PCBs as soon as possible. I've had both parents die of cancer and I know there's health risks in that area." **Local authority**
- "In terms of PCB contaminated equipment being removed, is this a wise decision? If WPD breaks their necks to finish this by 2025, it will mean that in some depot somewhere there will be PCB impregnated items until someone thinks about disposing of them. Is it wise to put the date on it instead of just putting a label on these and being aware of them being there?" **Domestic customer**

Commitment 47: Reduce tonnage of waste per £ total business expenditure



Consultation responses: 26 | Workshop: 57 | Total: 83

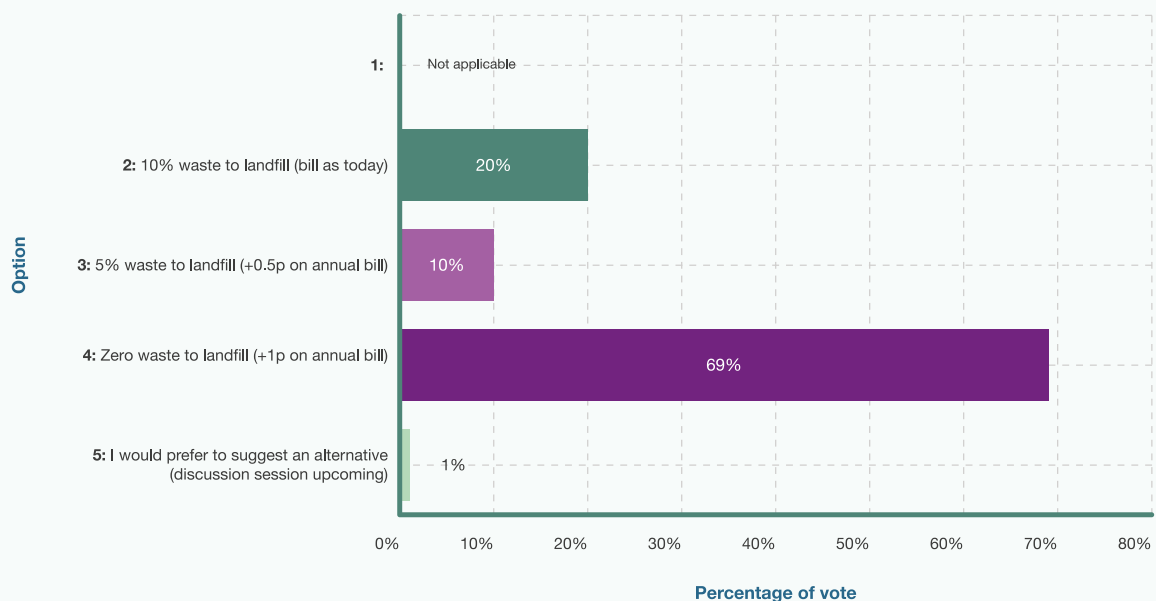
The majority (49%) wanted the greatest level of ambition for this commitment, voting for a 30% reduction in tonnage of waste (Option 4). 5% wanted to suggest an alternative commitment, but in the verbal and written feedback only one comment was made, which was that the commitment should also include recycling any waste that is produced. However, the majority (67%) of WPD staff disagreed with stakeholder views and chose Option 2.



- “Is none of your waste recycled? Surely you should be reducing waste produced and recycling that which is produced? It should also yield a bit of money.”

Online stakeholder

Commitment 48: Reduce the volume of waste we send to landfill (excluding hazardous waste)



Consultation responses: 26 | Workshop: 60 | Total: 86

The vast majority of stakeholders (69%) wanted the highest level of ambition for this commitment, voting for Option 4 (to achieve zero waste to landfill). Only 1% wanted to suggest an alternative commitment. Of the written and verbal comments, four expressed explicit support for zero waste to landfill. Other comments included prioritising types of waste, so it is clear which ones are being targeted. One stakeholder wanted separate reference to what would be done with hazardous waste. Finally, one stakeholder encouraged WPD to allocate any non-recyclable material to be used to create energy from waste. This commitment was also tested in a social media poll. The majority of respondents (52%) wanted WPD to be more ambitious and voted for Option 4, in agreement with stakeholder views. However, the majority (69%) of WPD staff disagreed and opted for Option 2.

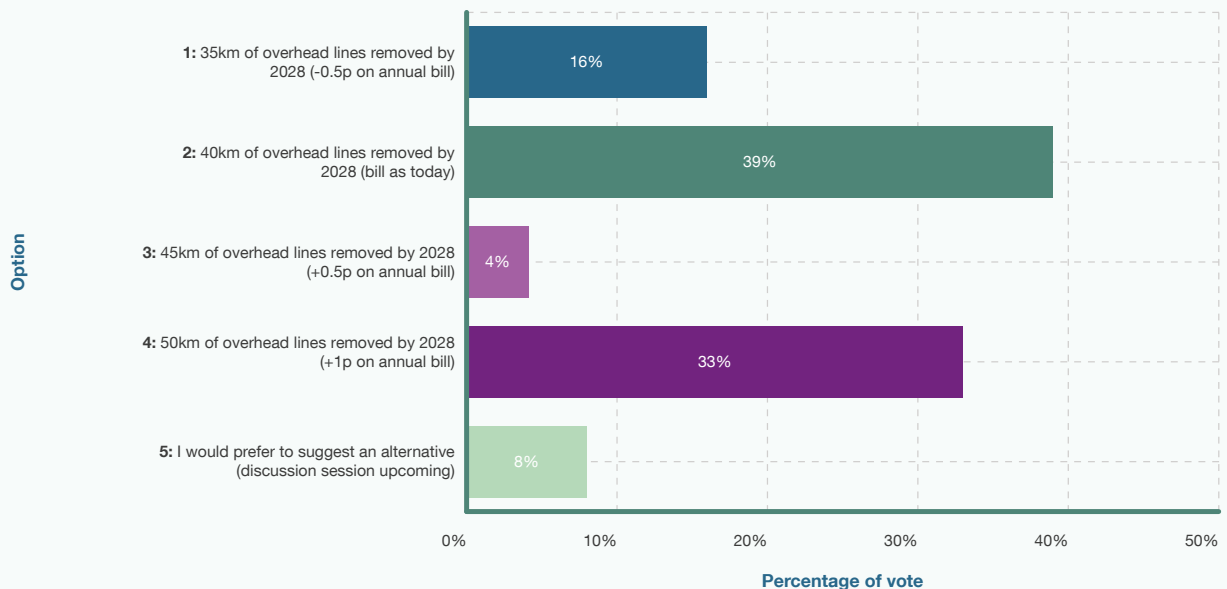
- “I.e., recycle it? OK, go for zero landfill.” Online stakeholder
- “On the waste to landfill, what would be helpful is prioritisation of types of waste. Which ones are you going to target and what are the alternatives? You need a sense of priority on these in terms of dealing with waste. You need to know what your waste is and how you’ll manage it. Also, focus on reuse, so



make sure you're using recyclable products.” **Local authority**

- “There should be a commitment of zero waste to landfill, and this should include household waste.” **Local authority**
- “I would like a separate bit for hazardous waste and perhaps eliminating it.” **Domestic customer**
- “I think we should be committed to zero waste to landfill. There’s got to be that commitment.” **Major energy user**
- “I agree that zero waste is fantastic. However, we would like to promote that whatever can’t be recycled would come to Energy for Waste. It’s not the answer to everything but it’s a use for that which would usually be gotten rid of. We have facilities in most of your areas now. While we can’t take the material directly, we want to put energy back into the network with the energy we produce. Producing energy from waste is 30% better than landfill. We have a problem in this country, and this is one of the ways to deal with it.” **Utility**

Commitment 49: We will remove targeted overhead lines in Areas of Outstanding Natural Beauty



Consultation responses: 27 | Workshop: 58 | Total: 85

The votes for this commitment were quite evenly spread among the different options. In fact, unlike most other commitments, there was a sizeable vote (16%) for Option 1 – to reduce the level of ambition from what is currently delivered. The largest proportion (39%) agreed with WPD’s current proposal to remove 40km of overhead lines. However, one third (33%) wanted the highest level of ambition, voting for Option 4 – removing 50km of overhead lines.

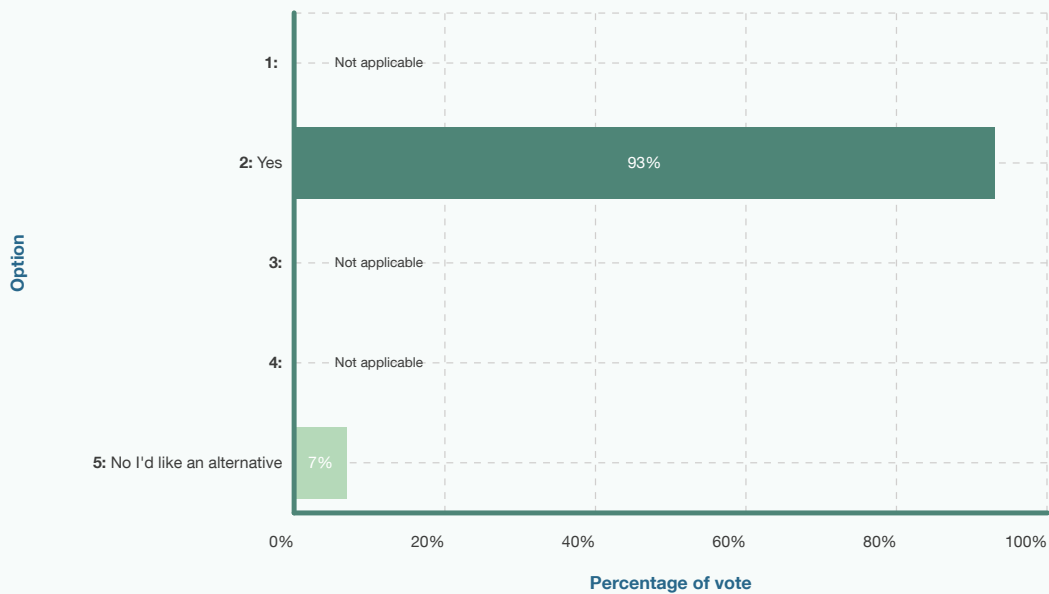


8% also wanted to suggest alternative commitments. In the written and verbal feedback, in general stakeholders expressed support for undergrounding lines in AONBs, with one noting the dual benefit of also helping network resilience. However, one stakeholder noted that areas aside from AONBs also deserved consideration. Another noted that the negative impacts on biodiversity needed to be taken into consideration. One stakeholder felt that this commitment was not the highest priority at this current time. In addition, one stakeholder urged more creative and innovative approaches to funding undergrounding as the current costs are prohibitive. One stakeholder noted that WPD had made very slow progress on this in the current price control, stating that this should not be used as justifications for setting lower targets for the next period. The majority (69%) of WPD staff agreed and chose Option 2. This commitment was also tested in a social media poll. The significant majority of respondents (70%) wanted WPD to go even further and voted for Option 4, in contrast to the views of stakeholders and staff.

- “Not only in AONB – [underground] all overhead lines. You might prioritise AONB but as part of a bigger scheme.” **Online stakeholder**
- “WPD does not have a good track record for delivering visual amenity projects. Information included in the Ofgem consultation document from last year (see Table 44 on p.152) shows clearly that WPD is underspending in the current period compared to most other DNOs. For example, while some of the other DNOs have spent more than 40% (and up to 66%) of the allowance to date in the regions they are responsible for, spending in all of the WPD regions is considerably less than average and in one case [EMIDS] is only just over 1% of the allowance. In our view, WPD should not be allowed to use the slow progress in the current price control period as a justification for setting lower targets for the next period.” **Online stakeholder**
- “It’s the AONB where you have to underground. I always thought that was a separate fund that Ofgem has which you took money from, rather than being part of the Business Plan?” **Local authority**
- “We have a lot of overhead electrical cables; we wanted to move 1 or 2 and then they hit us with a bill that was quite horrific to put the cables underground. What are you going to commit to in order to make this easier? We would welcome reducing the poles, but we’ve got to come up with sensible innovation funding. We need to think creatively outside the box as to how the funding can work.” **Local authority**
- “The one on AONBs is great in terms of the visuals but what’s the alternative? Burrowing into ground may have harmful effects on vegetation. I understand doing something for the visual effect, but the alternative can be worse for natural vegetation. In AONBs there’s a high chance that these areas will have valuable vegetation underground, too.” **Local authority**
- “Firstly, putting cables underground would solve the issue of the visual impact. Secondly, it would also have practical benefits because you will not have to keep cropping trees that are infringing on power lines.” **Business customer**
- “I greatly support AONBs but don’t see this as high priority in present circumstances.” **Local Enterprise Partnership**



Commitment 50: Where a low voltage mains cable is required it will be a minimum size of a 300mm² cable and the smallest pole mounted transformer size will be 50kVA single phase to reduce technical losses We will remove targeted overhead lines in Areas of Outstanding Natural Beauty



Consultation responses: 26 | Workshop: 60 | Total: 86

This commitment presented stakeholders with a binary choice. 93% supported the commitment, with 7% wanting to suggest an alternative. In the written and verbal feedback, one stakeholder sought further clarity on what the current level of network losses is. One stakeholder urged a very high level of ambition so that losses were reduced to almost nothing. The other comments related to ensuring that the sizes did not limit future load growth. One stakeholder expressed surprise that single-phase cables are still being used, having understood that all future cables would be three-phase.

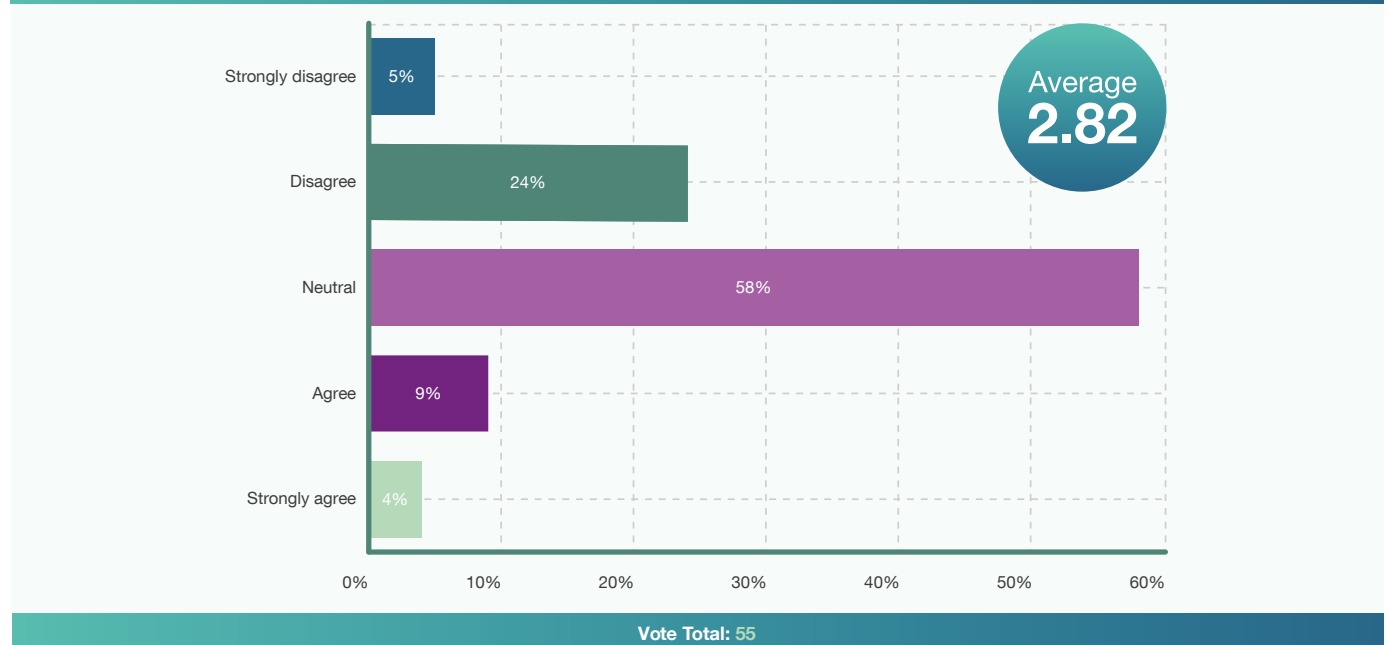
- “Could this mean overcapacity in some rural areas where population is not that dense? A cast iron rule might not be the best idea.” **Online stakeholder**
- “What is the overall loss from the distribution network? Could we have a target to reduce that?” **Local authority**
- “I’m assuming that those sizes are based on the assessment of future load growth?” **Storage and renewables provider / installer**
- “I recall from a previous stakeholder workshop that all new systems will be three-phase for heat pumps, so I’m questioning why we’re still talking about single-phase here.” **Consumer body**
- “Reduce losses to 0.001%. This is not impossible; look at the emissions restrictions placed on North Sea platforms.” **Online stakeholder**



A Smart, Flexible Network

WPD's Business Plan 1 contained 13 draft commitments for A Smart, Flexible Network. When asked in the online workshop whether they wanted to suggest alternative commitments for this topic, 29% of stakeholders either disagreed or strongly disagreed, demonstrating they supported the proposed commitments as they stand. The largest proportion (58%) voted neutral. 13% agreed or strongly agreed that they wanted to suggest alternatives. On average, this topic ranked second across all 12 Business Plan topics, indicating stakeholders wanted to suggest different commitments for a smart, flexible network.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for A Smart, Flexible Network



It was commented that many of the commitments in this area are interrelated. It was also commented that WPD should promote flexibility services but that this should not involve the curtailment of supply, which can impact the viability of new schemes. The same stakeholder suggested that there should be a radical overhaul of the current system in order to facilitate more renewable energy, thus minimizing curtailment. It was suggested by one stakeholder that WPD engages with the motor industry as the increase in EVs will provide a source of energy storage, which could be useful for electricity networks in order to manage the system. One stakeholder made the point that a definitive commitment should be devised based on the number of charge points or LCTs connected to the electricity grid. This stakeholder stated that they would like to see WPD be more ambitious in this area.

- “All of these core commitments are commendable but there are a lot of interdependencies and detail to be considered in order to realise success. For example, re Commitment 51 on flexibility procurement, service terms must be ‘stackable’ in order for them to support a meaningful investment case. Similarly, alternative flexible connection options must be supported by network access / availability terms that make them bankable to new service providers. These features of DSO have to be properly addressed in order to do justice to ‘flexibility first’.” **Online stakeholder**



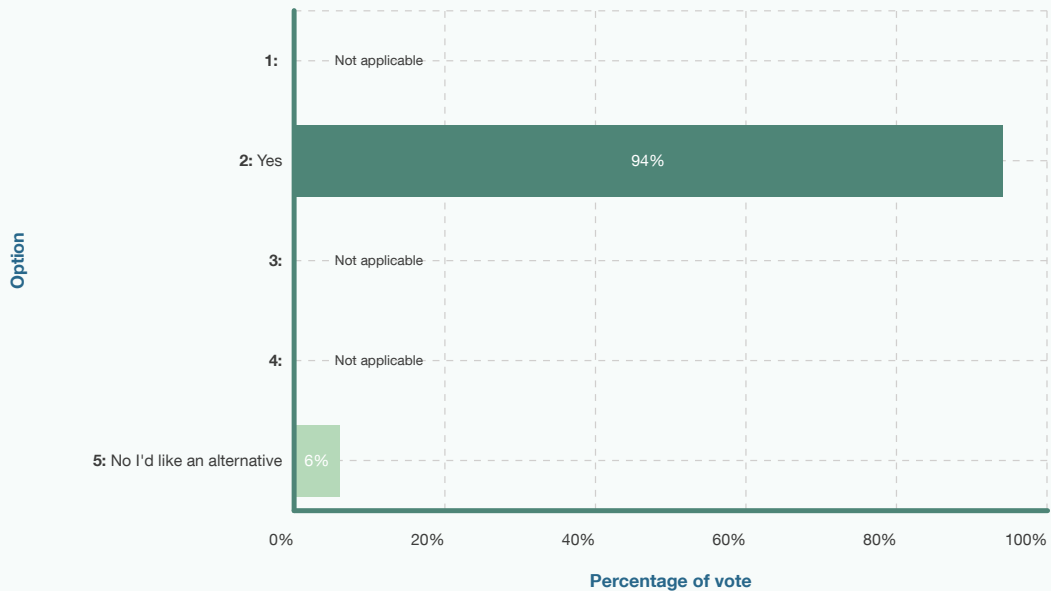
- “In Cornwall we’ve got thousands of tons of lithium and we need to make sure we’re taking advantage of the resources we have.” **Community energy group**
- “Whilst flexible connections sound good, they normally entail a curtailment of supply of some sort which can affect the economics of installations now we don’t have a Feed-in Tariff. A more radical overhaul is needed where the grid is reinforced to allow for greatly increased renewable generation with minimal curtailment.” **Online stakeholder**
- “For this package, it was necessary to refer to the Business Plan for explanation of the terms used.” **Online stakeholder**
- “We’ve got the opportunity to take advantage of a smart flexible network to achieve zero carbon and do it quickly. As EVs roll out and become dominant, we’re going to have millions of big batteries trundling round the country and all plugging into the grid at the same time. We need to start talking to car companies leading this roll-out right now to strategise how we can work together to head off potential problems in 5 years’ time.” **Community energy group**
- “There are truly not an attributable number of schemes if by co-operating you achieve a more efficient system, as the answer would be to integrate all the systems!” **Online stakeholder**
- “I think you need to change approach and accept that bills will need to rise to get the country to the Net Zero it must get to and in a more ambitious time frame. This means Ofgem have to change the rules too. You simply have to use all options available to allow customers to connect generation with or without export limitation, to allow ALL heat pumps desired and car chargers. This will require all the new flexibility tech you can muster plus grid investment ahead of immediate need. The current system does not offer this and perhaps the current intentions will not be fast enough or simply accepted that government will need infrastructure project spend and bills will need to be higher.” **Online stakeholder**
- “I’d like to see an output that says how many electric vehicles the network will be able to connect and at what cost? You are saying you’ll be more ambitious than the national average, but if others are slow this isn’t that ambitious.” **Online stakeholder**

The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)



Commitment 51: Create and implement simple, fair, and transparent rules and processes for procuring DSO flexibility services and introduce a customer satisfaction monitor to measure the effectiveness of our actions



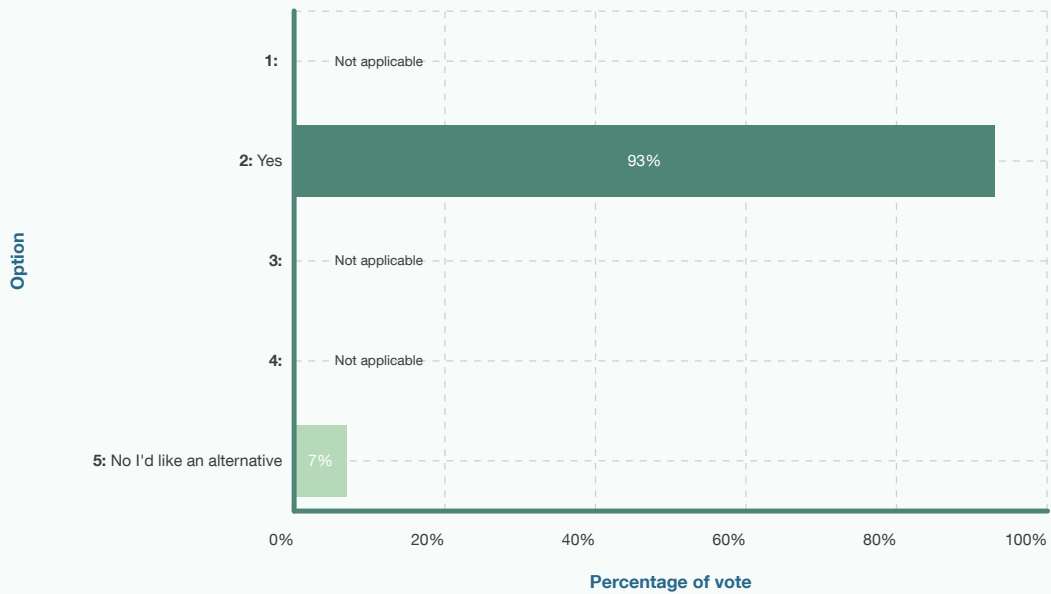
Consultation responses: 25 | Workshop: 58 | Total: 83

94% of stakeholders supported this commitment in the online vote, although 6% – a comparatively high proportion – voted that they would like to suggest an alternative commitment. One such commitment involved having customer representatives on WPD’s Board of Directors in order to provide external scrutiny.

- “Perhaps you should have some customer representatives on your Board of Directors? One for industrial, one domestic, one for local government, etc.?” **Online stakeholder**



Commitment 52: Produce forecasts of potential flexibility requirements in order to undertake a flexibility tender every 6 months



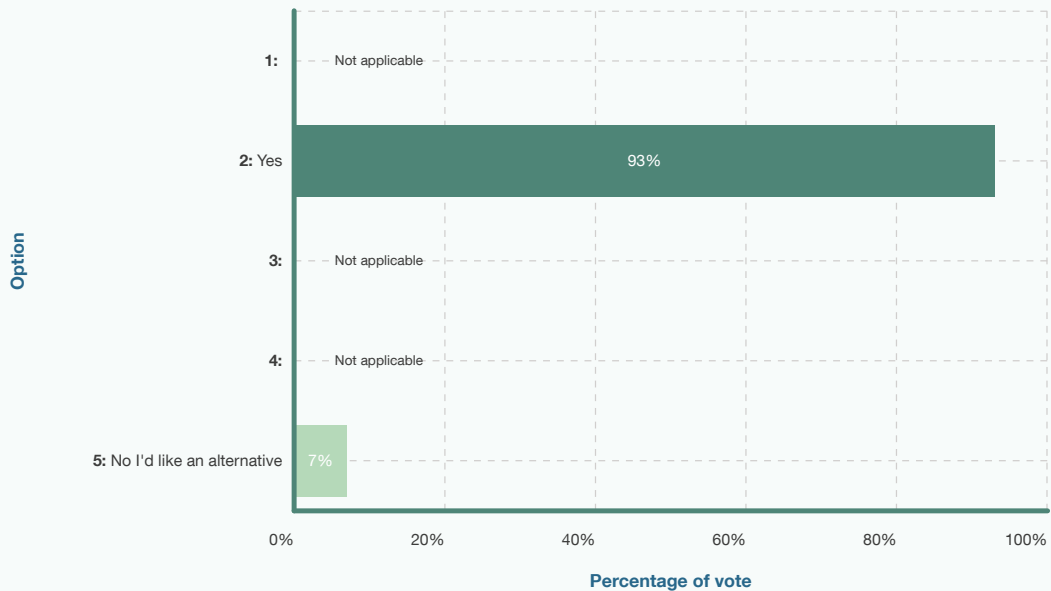
Consultation responses: 27 | Workshop: 57 | Total: 84

93% of stakeholders supported WPD's draft commitment to produce forecasts of potential flexibility requirements in order to undertake a flexibility tender every 6 months, although 7% of stakeholders voted to suggest an alternative commitment. When asked for suggestions, one stakeholder suggested that the company's approach should be aimed at encouraging more renewable generation.

- “Do you mean a forecast every six months or a tender?” **Online stakeholder**
- “This must not be limited to a planning-data driven approach; it must encourage renewable local generation.” **Online stakeholder**



Commitment 53: Develop a standard to be measured against (using external scrutiny) to demonstrate that we act as a neutral market facilitator to enable accessibility to multiple markets



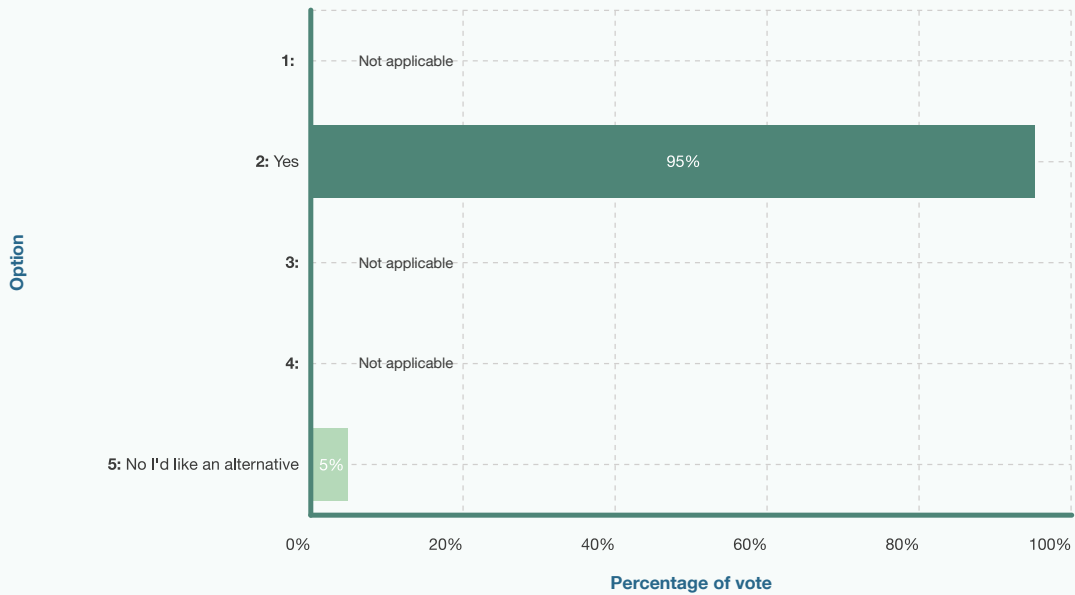
Consultation responses: 25 | Workshop: 57 | Total: 82

This commitment presented a binary choice to stakeholders. 93% agreed with the commitment, although 7% wanted to suggest an alternative. In the written and verbal feedback, it was suggested that the company takes an open-source approach, with the only limitation being individuals' personal data.

- “Do you not do business with everyone and anyone already? Presumably, you offer the same terms across the board. If not, that is very bad.” **Online stakeholder**
- “This should be ‘open source’. The only limitation should be the prevention of identifying an individual consumer’s pattern of consumption and generation, for reasons of personal security.” **Online stakeholder**



Commitment 54: 100% load related reinforcement (primary) decisions include an assessment of flexibility alternatives



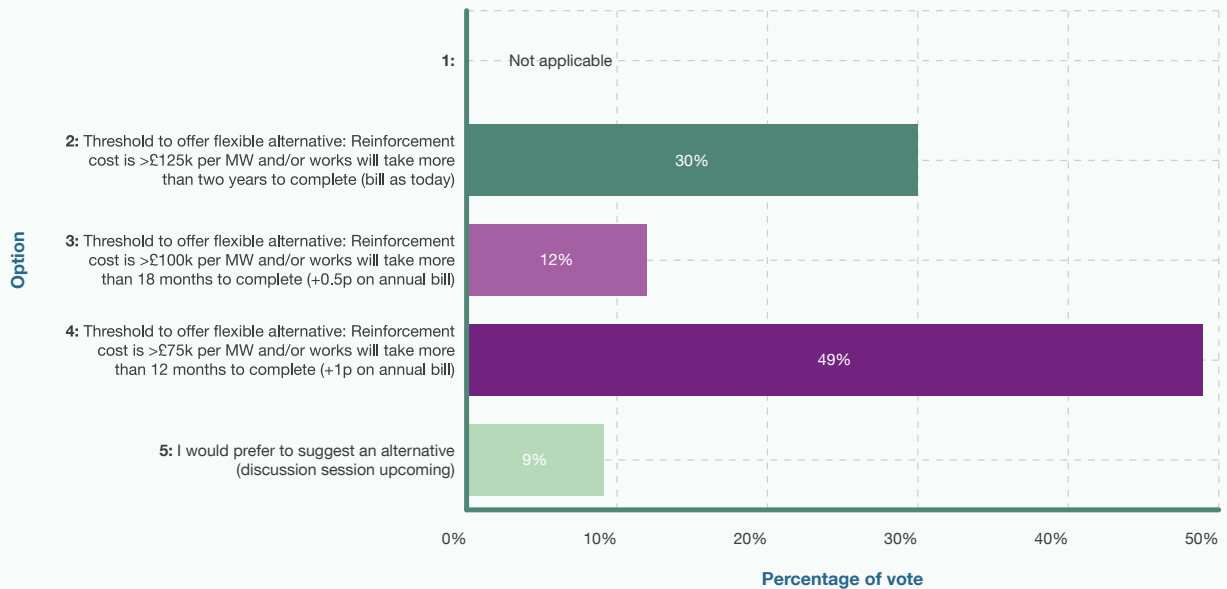
Consultation responses: 28 | Workshop: 54 | Total: 82

The vast majority of stakeholders (95%) supported WPD's draft commitment for 100% load related reinforcement (primary) decisions to include an assessment of flexibility alternatives, although one online respondent questioned why this commitment only applied to primary decisions.

- “Why only primary decisions?” **Online stakeholder**



Commitment 55: 100% load related reinforcement (primary) decisions include an assessment of flexibility alternatives



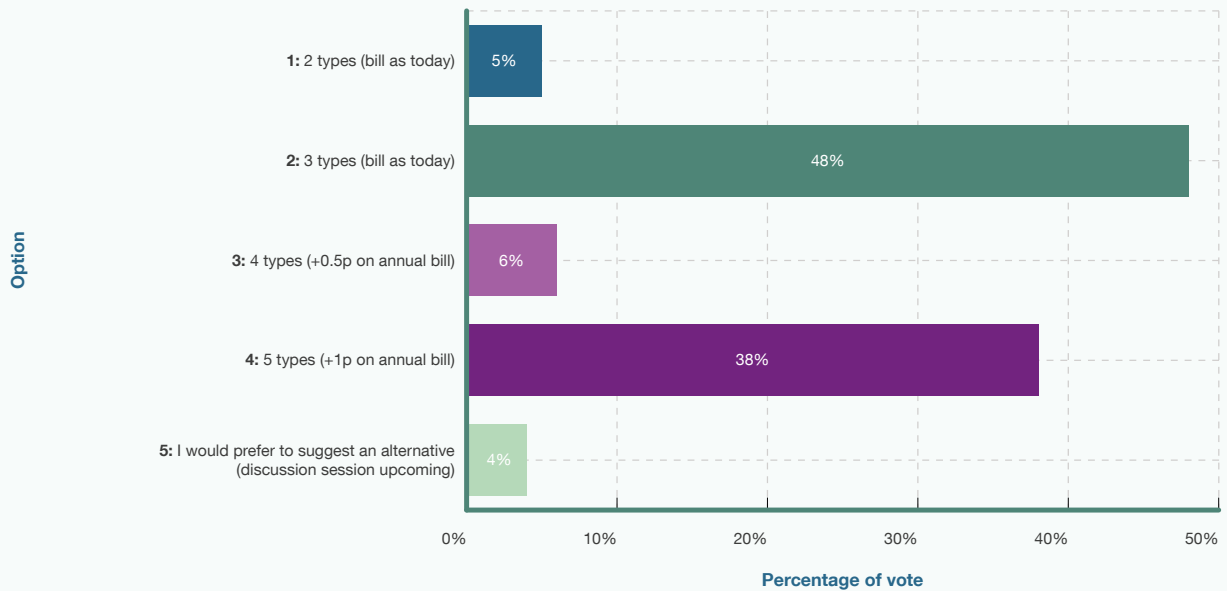
Consultation responses: 27 | Workshop: 55 | Total: 82

When asked to vote on options in this area, 30% of stakeholders voted for Option 2 where the threshold to offer a flexible alternative has a reinforcement cost of more than £125k per MW and/or works will take more than two years to complete (bill as today). However, the most prevalent response with 49% of the vote was Option 4 (a reinforcement cost of more than £75k per MW and/or works will take more than 12 months to complete). 9% opted to suggest an alternative commitment. In the verbal feedback one stakeholder was of the view that WPD should be offering a flexible option irrespective of whether reinforcement is requirement. The significant majority (75%) of WPD staff disagreed with stakeholder views and chose Option 2.

- “I don’t understand what this means.” **Online stakeholder**
- “I’m a bit confused on Commitment 55. I don’t see why you have to wait to reinforce. You should require that before giving people the option for flexible alternatives. You should be offering those whenever, not just when needing reinforcement. So, it’s in the wording again.” **Domestic customer**



Commitment 56: Increase the range of options for flexible connections



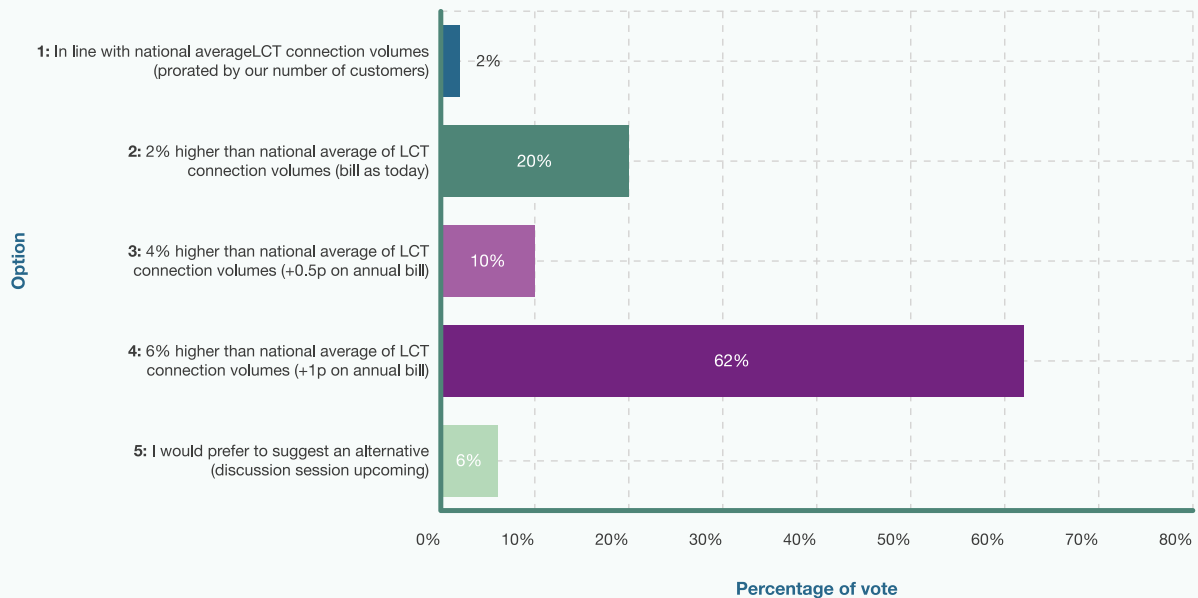
Consultation responses: 27 | Workshop: 55 | Total: 82

When asked to vote on the range of options for flexible connections, the most prevalent response given by stakeholders was Option 2 (3 types) with 48% of the vote. The next most prevalent answer with 38% of the vote was for 5 types. Only 4% of stakeholders stated that they would like to suggest an alternative. When stakeholders were asked to suggest an alternative, it was suggested that these options should be provided at a postcode or community group level. The significant majority (75%) of WPD staff agreed with stakeholders and chose Option 2.

- “It sounds like flexible alternatives are things which might or might not work as well as reinforcement? So, customers trade off cost for reliability and then complain when it doesn’t work?” **Online stakeholder**
- “This is needed at a postcode and community group level.” **Online stakeholder**



Commitment 57: Make it as easy as possible for our customers to connect LCTs, such that WPD connects more than the national average connecting in the UK (prorated by our number of customers)



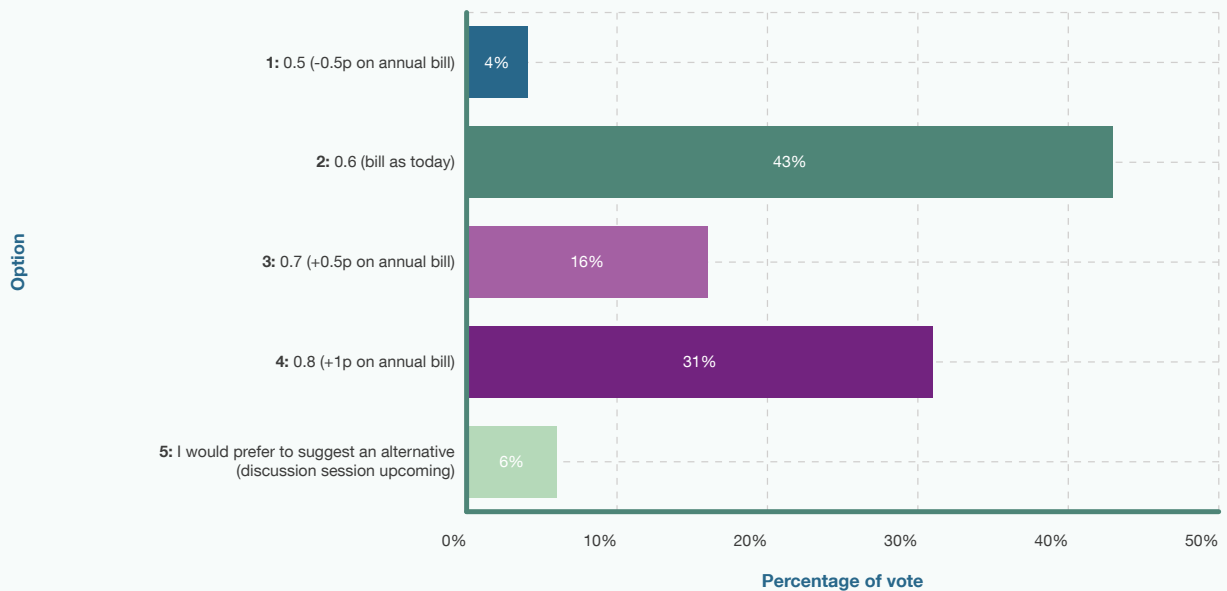
Consultation responses: 27 | Workshop: 57 | Total: 84

20% of stakeholders supported WPD's draft commitment to aim for 2% higher than national average of LCT connection volumes under this commitment. However, the majority (62%) voted for Option 4: 6% higher than the national average. 6% of stakeholders voted to suggest an alternative commitment. In the discussions, the point was made that this commitment would benefit from clarification as it could include very small sources of generation such as an individual solar panel. However, the majority (69%) of WPD staff disagreed with stakeholder views and chose Option 2.

- “You mean pro rata by our number of customers. So, if every customer had a single solar panel, you would be well above average? What is your system for connecting charging systems for electric vehicles? I know people who are struggling with that domestically.” **Online stakeholder**
- “A commitment of £22 million to electrical vehicles is a small amount. Where is this money going?” **Business customer**
- “Farms with a single-phase supply are excluded from innovation, whereas a three-phase supply would open up ample opportunities.” **Connections provider**



Commitment 58: Improve the volume of data available via an interactive API (Application Programming Interface) relative to all data made available (e.g., via spreadsheets and fixed format reports)



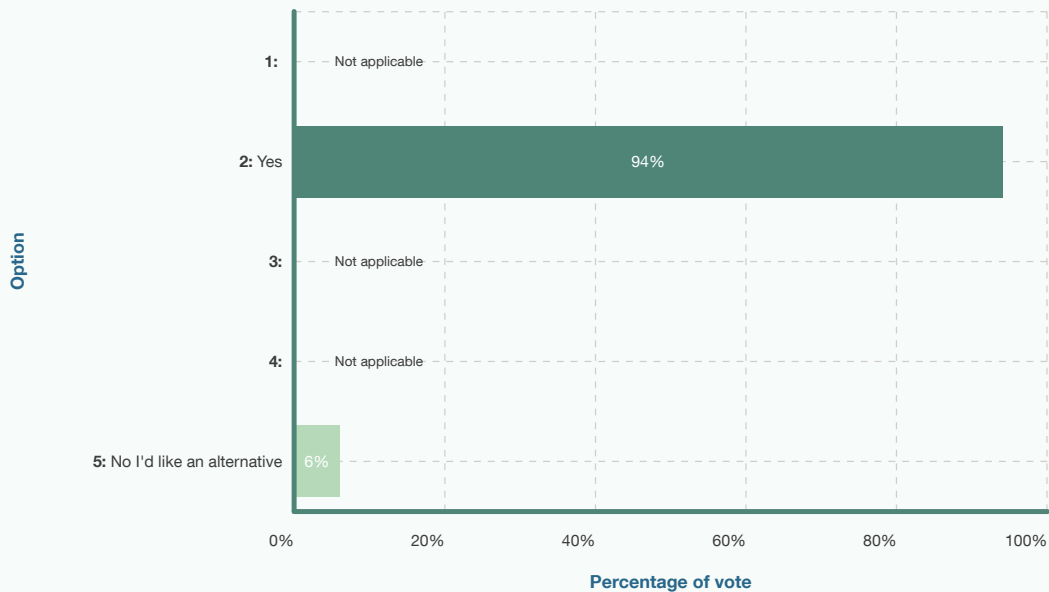
Consultation responses: 27 | Workshop: 54 | Total: 81

When stakeholders were asked to vote on this commitment, the most widely supported option (43%) was Option 2: for WPD to increase the volume of data available via API by 60%. 6% of stakeholders voted for Option 5, preferring to suggest an alternative commitment. No specific commitments were suggested, although it was commented that investment in systems of this nature would prove invaluable in the future. The majority (72%) of WPD staff agreed with stakeholder views and chose Option 2.

- “More data – whatever for? Information overload is not different in effect to voltage overload.”
Online stakeholder
- “On Commitment 58, what you’re doing here is a one-off cost and if one system is set up it will be invaluable to WPD to use every year, but the cost will remain year on year and that’s now right.”
Local authority



Commitment 59: Introduce a customer satisfaction monitor to measure data availability, ease of access and usefulness, improving from the baseline throughout RIIO-ED2



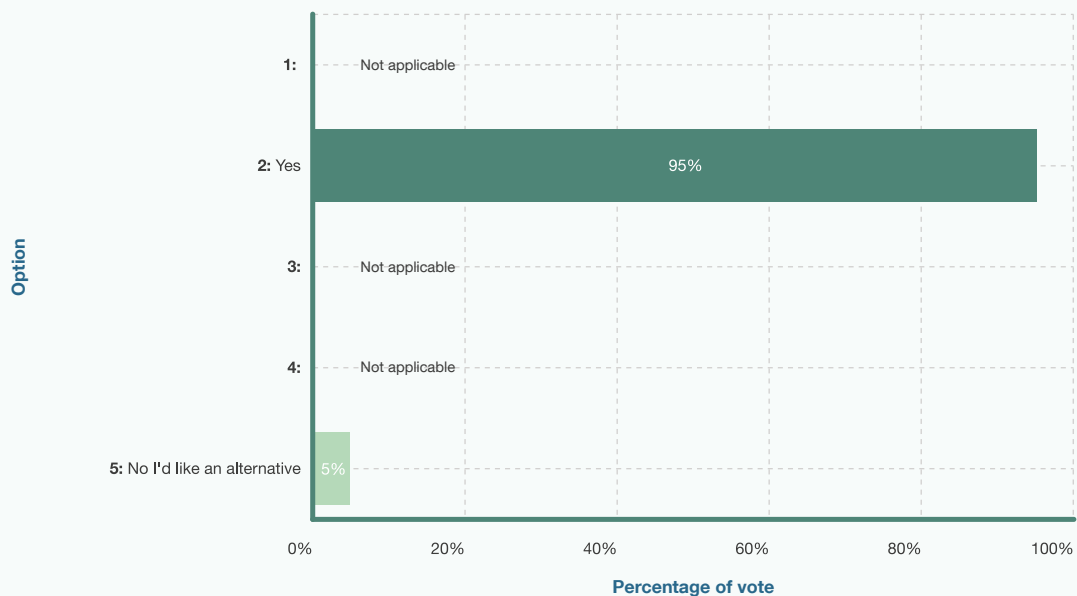
Consultation responses: 25 | Workshop: 54 | Total: 79

94% of stakeholders supported WPD's proposed commitment to introduce a customer satisfaction monitor to measure data availability, ease of access and usefulness, improving from the baseline throughout RIIO-ED2. 6%, however, voted to suggest an alternative commitment in this area. It was commented by one stakeholder that, in order to achieve Net Zero, there would be a requirement for all technical approaches to be used freely and that ease of access would play a vital part in this.

- “People need connections to be able to generate or respond themselves to the net zero ambition. This will require all tech approaches to be freely used and will require careful costs thinking so not to stop deployment. Currently, as an example, export limiters should be offered in all cases where clients can't get the PV system sizes they want – and the array sizes not then limited by WPD. Explain also what a flexi option would be and what potential opportunity there is to be part of that and/or the costs of this. But clients must have the grid and ahead of need. If this is not available, then there must be free thinking on solutions and not blockages as is the case now.” **Online stakeholder**
- “Presumably, this is for bulk users of the system not domestic customers?” **Online stakeholder**
- “The survey should be done fairly soon as it might affect what you want to do in Commitments 56, 57 and 58.” **Domestic customer**



Commitment 60: Using data from updated DFES and stakeholder insight to publish a Long Term Development Statement and a Network Development Plan annually



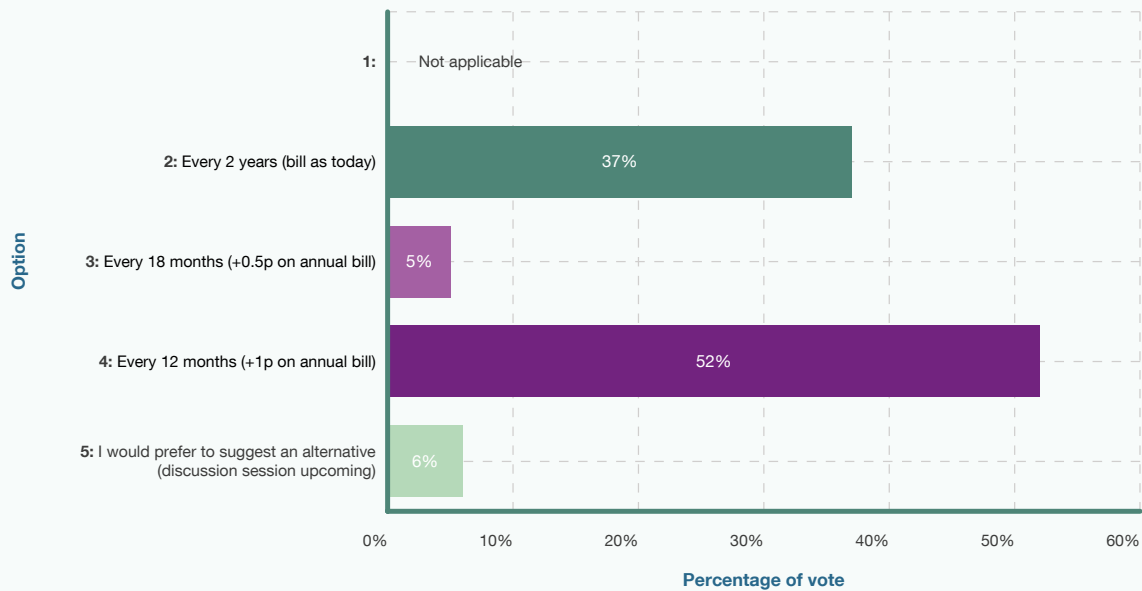
Consultation responses: 26 | Workshop: 53 | Total: 79

There was a good deal of support for WPD's draft commitment to use data from updated DFES and stakeholder insight to publish a Long Term Development Statement and a Network Development Plan annually, with 95% of stakeholders voting in support of this. 5% of stakeholders voted to suggest an alternative commitment. One stakeholder stated that this is one of the single most important commitments for WPD as data and insight from relevant stakeholders will be required in order to help the company to plan effectively. It was added by this stakeholder that this commitment is perhaps somewhat simplistic given how important it is. Another stakeholder made the point that the commitment could be expanded in order to contribute to local authorities' own net zero ambitions.

- “Why?” **Online stakeholder**
- “There’s nothing here about contributing to the net zero aims of local authorities in WPD regions or making them possible. Also, I’m very confused as more collaboration leads to better information leads to greater efficiency, but bills go up? Why don’t bills go down in that situation? You’re mixing up two different things.” **Energy consultant**
- “This is one of the fundamentally most important areas in the Business Plan as this is where most change will happen in the future and it requires a business plan all of its own. We need to focus on data and its availability at a higher level. WPD will have to invest highly to make this happen. This commitment seems simplistic.” **Domestic customer**



Commitment 61: Engage with stakeholders and the Electricity System Operator to update WPD's Distribution Future Energy Scenarios for all four licence areas



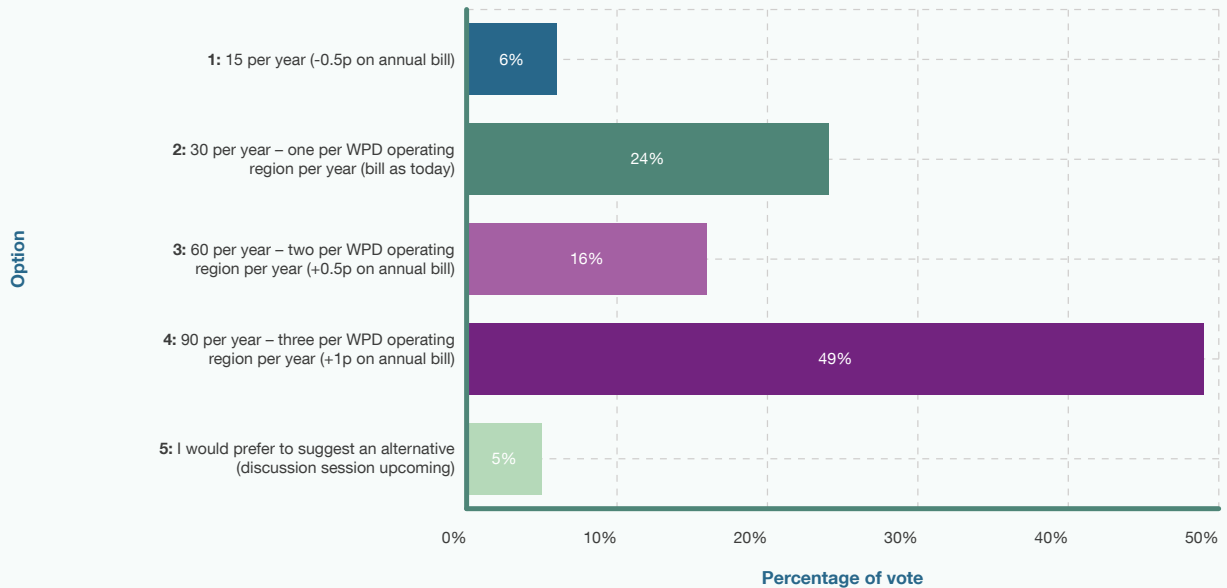
Consultation responses: 29 | Workshop: 52 | Total: 81

A sizeable proportion (37%) of stakeholders supported WPD's draft commitment to engage with stakeholders and the Electricity System Operator to update WPD's Distribution Future Energy Scenarios for all four licence areas every two years. However, over half of stakeholders (52%) voted for WPD to do this every 12 months. 6% of stakeholders voted to suggest an alternative commitment. Although no specific commitments were given, the point was made that more relevant stakeholders should be engaged with in order to give WPD the most accurate picture of future demand and generation. However, the large majority (83%) of WPD staff disagreed with stakeholder views and chose Option 2.

- “Endless consultation. If you do the job right now, surely this should only be an occasional tweak?” **Online stakeholder**
- “This is the only way forward.” **Online stakeholder**
- “We have Mid Wales Energy Strategy and a carbon positive strategy going live imminently along with the Mid Wales Growth Deal progressing at pace, with the UK and WG working closely with our DNOs as these initiatives' progress is of paramount importance to look at a holistic picture right down to local energy planning.” **Online stakeholder**



Commitment 62: Hold Local Energy Surgeries for local authorities, supporting them to develop their local energy plans



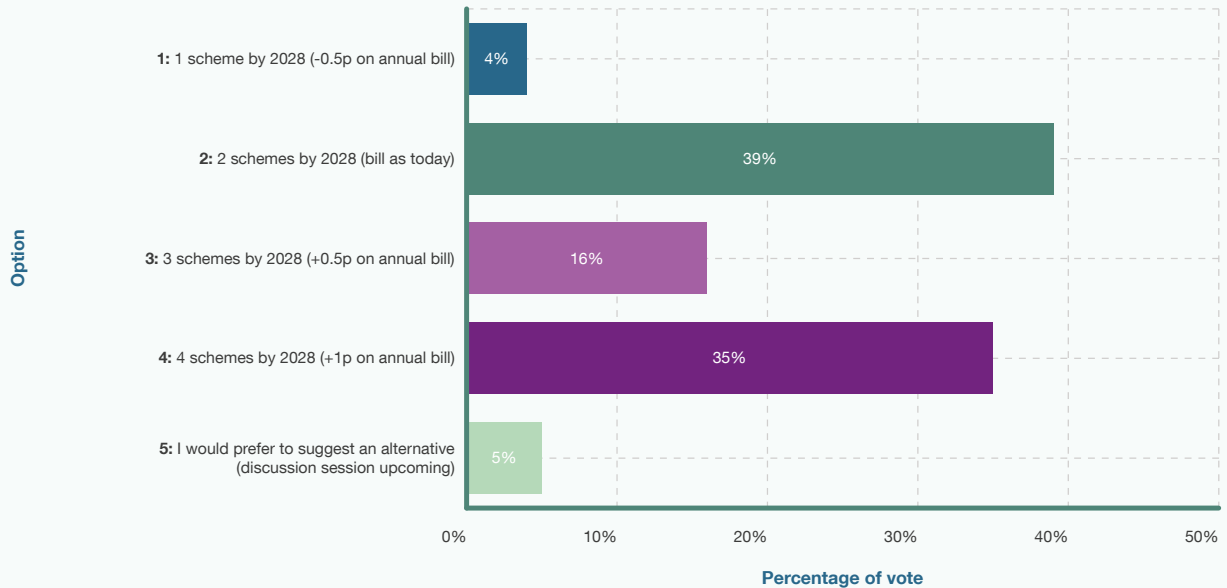
Consultation responses: 29 | Workshop: 54 | Total: 83

24% of stakeholders voted in support of WPD’s draft commitment to hold 30 Local Energy Surgeries for local authorities, supporting them to develop their local energy plans. However, 49% of stakeholders voted for the company to hold 90 such surgeries in ED2. A minority 5% of stakeholders voted to suggest an alternative commitment. One stakeholder commented that WPD should be in continual contact with local authorities in order to shape its future plans. It was suggested by another stakeholder that the company should have a commitment to partner with other relevant organisations in order to raise awareness of other topics relevant to the green agenda. However, the majority (72%) of WPD staff disagreed with stakeholder views and chose Option 2 (30 per year).

- “Are WPD not in continuous contact with local authority officers, e.g., Cornwall Council? If not, you should be.” **Online stakeholder**
- “If I took a Coventry perspective, you’re partnering with us anyway but it’s worth noting existing arrangements with other organisations. At my organisation, I’ve been trying to raise awareness of water management, for example. There could be something here about partnership working.” **Local authority**
- “This needs to support the consumer as a generator.” **Online stakeholder**
- “On Commitment 62, if we’re holding surgeries for local communities, will there be any financial help?” **Local authority**



Commitment 63: Undertake whole system collaboration schemes with other DNOs and the ESO



Consultation responses: 27 | Workshop: 52 | Total: 79

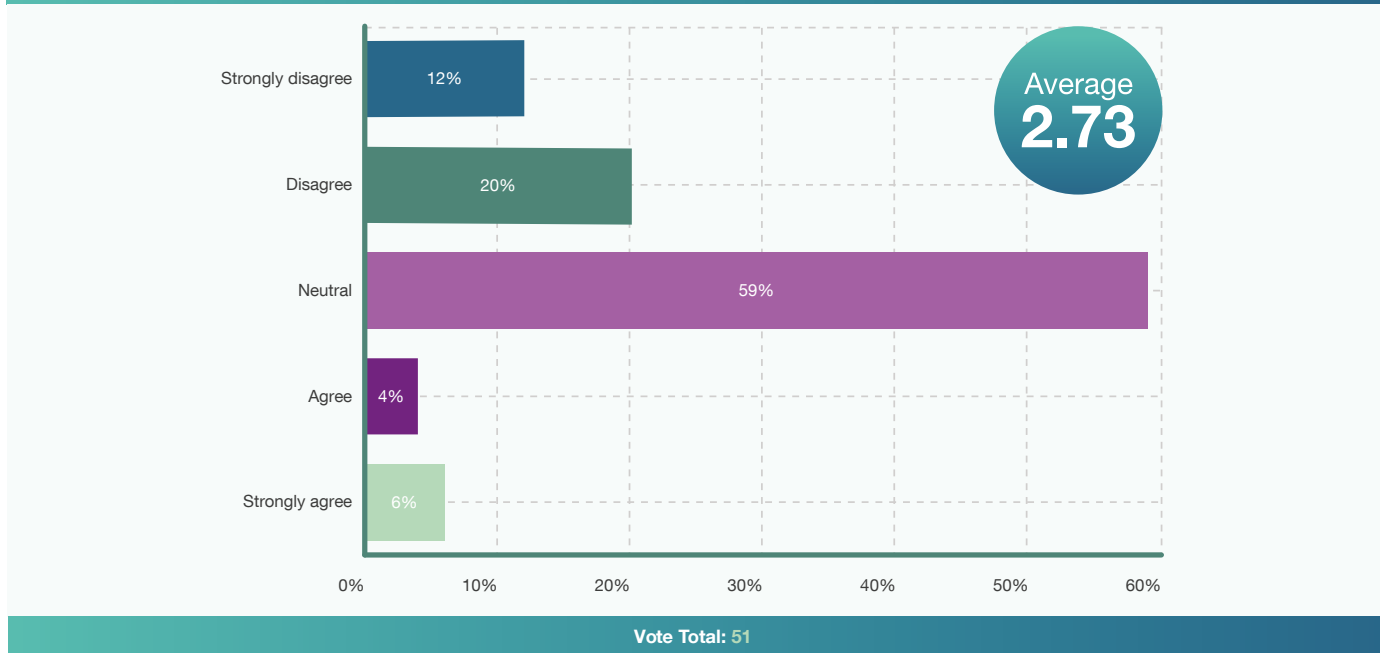
When asked to vote on WPD's draft commitments with regard to undertaking whole system collaboration schemes with other DNOs and the ESO, 39% of stakeholders voted for the company to undertake 2 schemes within the next Business plan period (Option 2). However, 35% voted to have 4 schemes by 2028 (Option 4). Although 5% of stakeholders voted to suggest an alternative commitment, no alternatives were suggested in the discussions or submitted online. However, the significant majority (86%) of WPD staff disagreed with stakeholder views and chose Option 2.



Innovation

WPD's Business Plan 1 contained two draft commitments for Innovation. When asked in the online workshop whether they wanted to suggest alternative commitments for this topic, 32% of stakeholders either disagreed or strongly disagreed, demonstrating they supported the proposed commitments as they stand. The largest proportion (59%) voted neutral. 10% agreed or strongly agreed that they wanted to suggest alternatives. On average, Innovation ranked third out of the 12 Business Plan topics, demonstrating that stakeholders felt there were commitments missing.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Innovation



The written and verbal feedback did not provide many suggestions for alternatives. One stakeholder expressed concern that the commitments were not 'particularly new' and another praised WPD for its work in innovation.

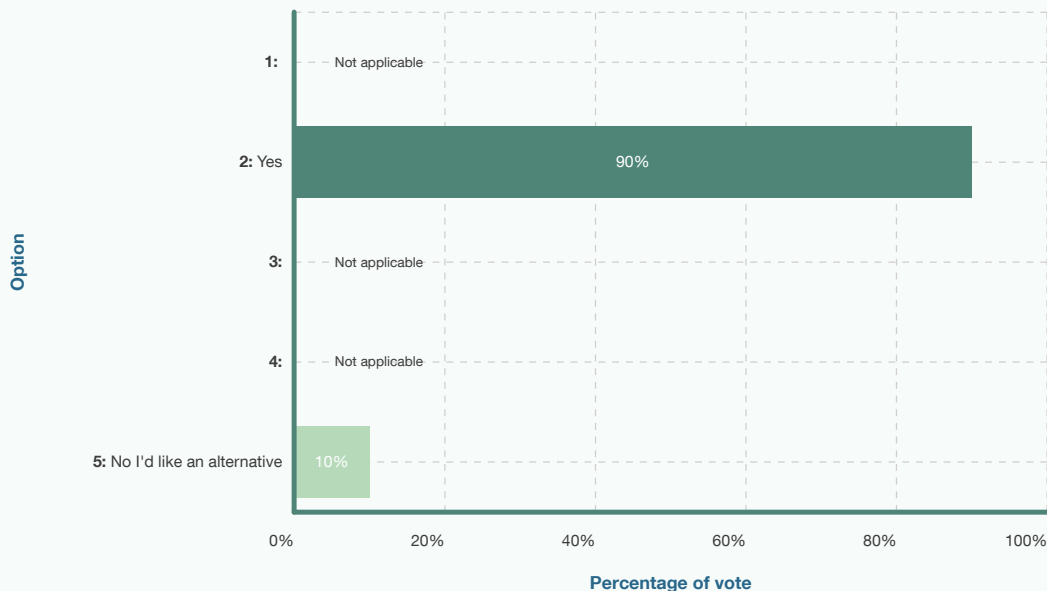
- “What worries me here is that neither of them are particularly new, though I recognise that you do have to do a CBA for the ENA projects.”
Storage and renewables provider / installer
- “WPD are doing well in innovation.” **Local authority**



The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)

Commitment 64: For each innovation project we will undertake a cost benefit assessment and implement into business practice to improve efficiency and effectiveness of assets, operations and customer service



Consultation responses: 17 | Workshop: 51 | Total: 68

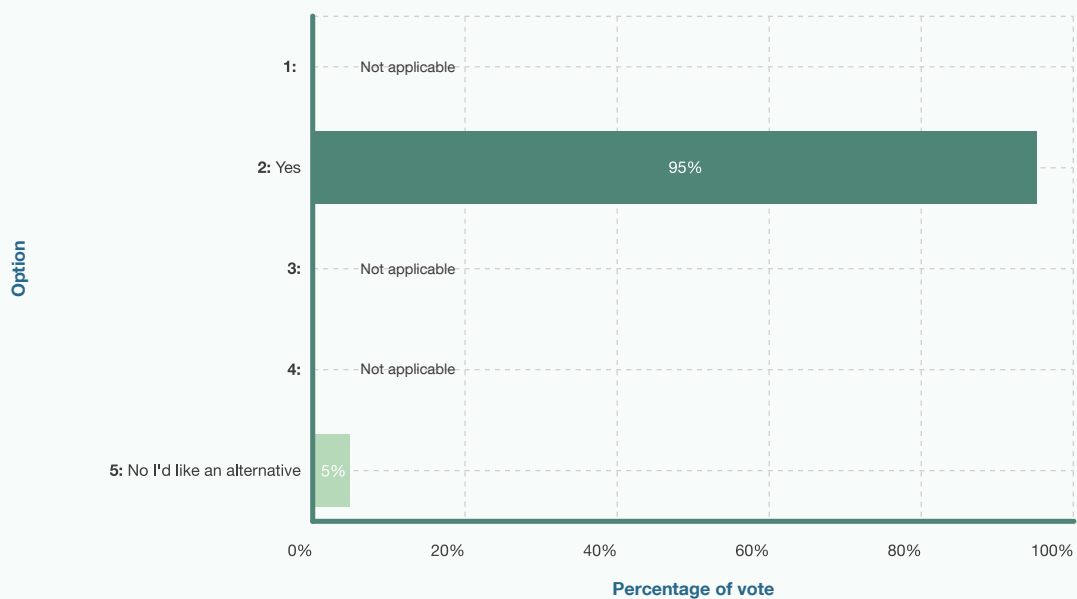
This commitment presented a binary choice to stakeholders. 90% supported it, although 10% wanted to suggest an alternative – which was a relatively high percentage compared to the voting results for the other binary commitments. In the written and verbal feedback, three stakeholders expressed explicit support for WPD’s commitment to implement innovation projects into business as usual, although one urged them to make sure they were reporting on it – including in the cost benefit analyses. Two stakeholders encouraged WPD to consider the carbon cost alongside the financial cost when undertaking the cost benefit analyses.

- “As stated, WPD and the government will have to accept that Net Zero will require cost and that delay will hamper ability to meet the target. These changes will have to not keep thinking cost benefit but carbon benefit and agility for the customers to make the changes needed to power use.” **Online stakeholder**



- “Good. Make sure to include the return per pound invested and to consider all alternatives on that basis before proceeding.” **Online stakeholder**
- “The application for business as usual is great, but please report on this. This also applies to a cost-benefit assessment.” **Connections provider**
- “Include the carbon cost as well to ensure you’re looking at both financial and environment savings.” **Local authority**
- “What’s happened in the past ten years is there have been good innovations, but they don’t get used. WPD should commit to taking the best ideas and scaling them up. Implementing them is what needs to be demonstrated, otherwise the money gets lost.” **Domestic customer**

Commitment 65: Develop an interactive ‘innovation ideas portal’ aimed at stakeholders submitting ideas for new innovation projects



Consultation responses: 14 | Workshop: 51 | Total: 65

This commitment was also presented as a binary choice. 95% supported the commitment, with 5% wanting to suggest alternatives. There was limited written and verbal feedback on this draft proposal. One stakeholder suggested the portal is also used for WPD to put forward its own ideas. Another stakeholder expressed support for this commitment, particularly given the recent interest in the sector from those traditionally outside of the industry, such as parish councils.

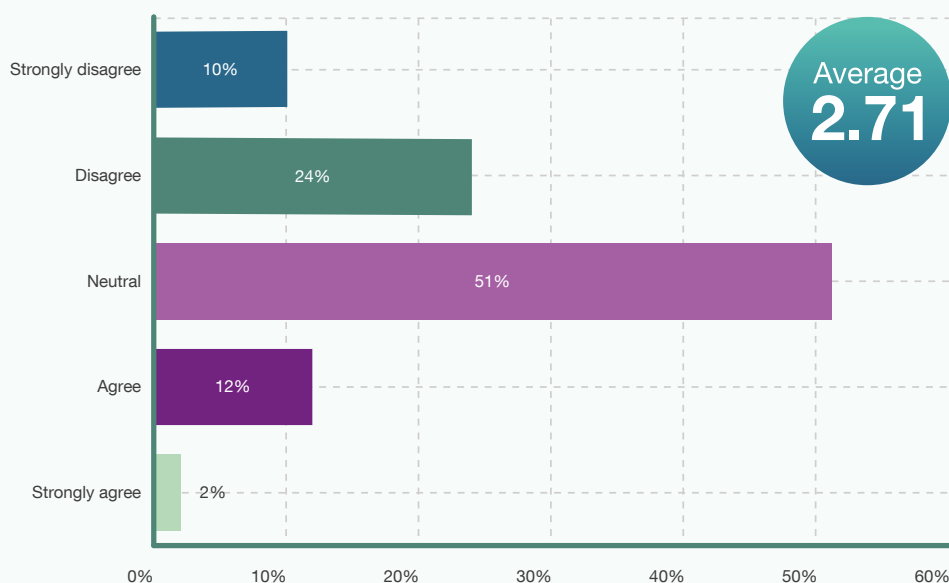


- “For trying out your own new ideas on stakeholders as well?” **Online stakeholder**
- “It wouldn’t do any harm. Most people have ideas that they can’t develop. You can’t expect fully finished ideas. It would be a nice thing to have, particularly as parish councils seem to be getting more into this. It would lead to interesting thoughts.” **Energy consultant**

Community Energy

WPD’s Business Plan 1 contained two draft commitments for Community Energy. When asked in the online workshop whether they wanted to suggest alternative commitments for this topic, 34% of stakeholders either disagreed or strongly disagreed, demonstrating that they supported the proposed commitments as they stand. The majority (51%) voted neutral, while 14% agreed or strongly agreed that they wanted to suggest alternatives. On average, Community Energy ranked joint fifth among the 12 Business Plan outputs.

To what extent do you agree with the following statement: I would like to suggest alternative commitments for Community Energy



Vote Total: 49

In the written and verbal feedback, several additional commitments were suggested. Two stakeholders stressed that it ultimately comes down to WPD ensuring the capacity is available for community energy groups to connect to the network – without prohibitive costs. One stakeholder felt WPD should help community energy projects to raise the capital required to deliver their schemes. Another stakeholder felt WPD should commit to working with organisations that support social enterprises like community energy groups, as well as working with the groups directly. Lastly, one stakeholder wanted WPD to attend local community energy events, as well as hold their own surgeries.



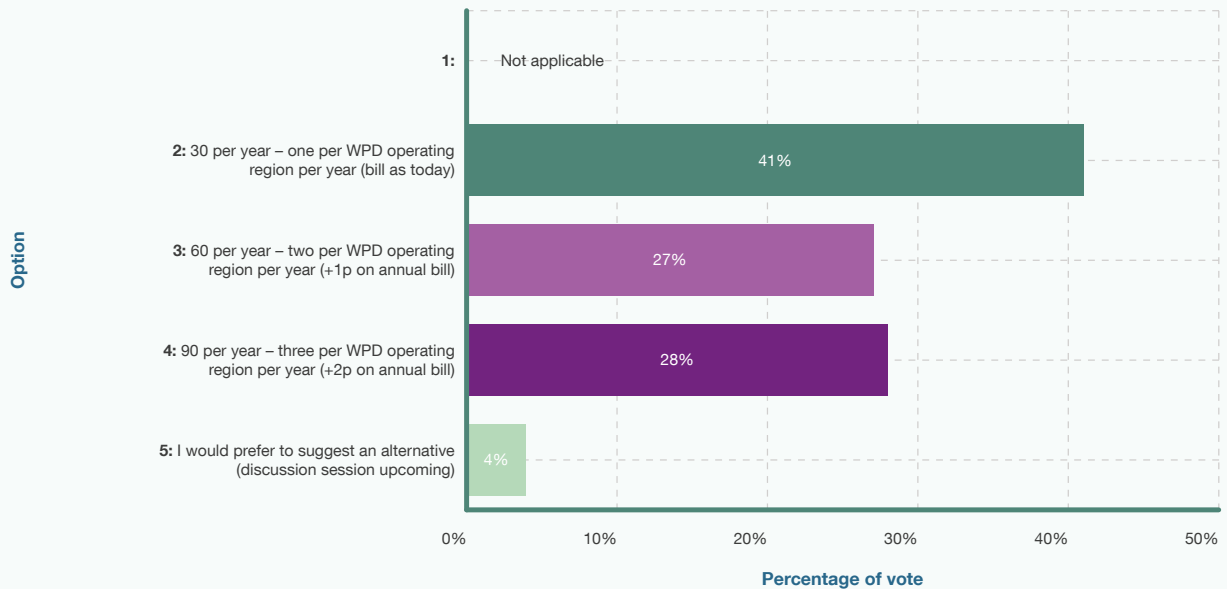
- “We have a community group trying to do their bit on green energy. Financial brick walls exist, of course, but also the infrastructure in our region. So, I’m less interested in new surgeries, rather when the South Herefordshire infrastructure grid are likely to benefit from these commitments? We’re unable to move forward because of that constraint.” **Domestic customer**
- “We need something concrete to say, ‘don’t worry, we’ll have capacity by this date’. For example, to put in the three-phase line cost.” **Domestic customer**
- “It would be really useful to link in with networks that support social enterprise, like Coventry University. So, don’t just provide training but work with organisations that support social enterprise.”
Local authority
- “Most community energy groups tend to have shares. They raise money by having shared ownership. The community energy group I belong to is in a working-class area and we won’t do that because it excludes poorer people. We raise funds through various other investors and schemes. When it comes to getting smart grids moving, we simply don’t have the funds. It would be hugely helpful if WPD could step in and help community energy projects to raise the money needed.” **Community energy group**
- “At Chacewater Community Energy Group we organise public events, in which we look at renewable energy. We’re having one this August and we’d love WPD to be there.” **Community energy group**

The voting results on the options for each commitment, along with any specific written or verbal feedback, have been set out under each of the commitments below.

Option 1:	Incremental improvement
Option 2:	WPD current view
Option 3:	Further ambition
Option 4:	Considerably greater ambition
Option 5:	I would prefer to suggest an alternative (discussion session upcoming)



Commitment 66: Hold Community Energy Surgeries for local Community Energy groups



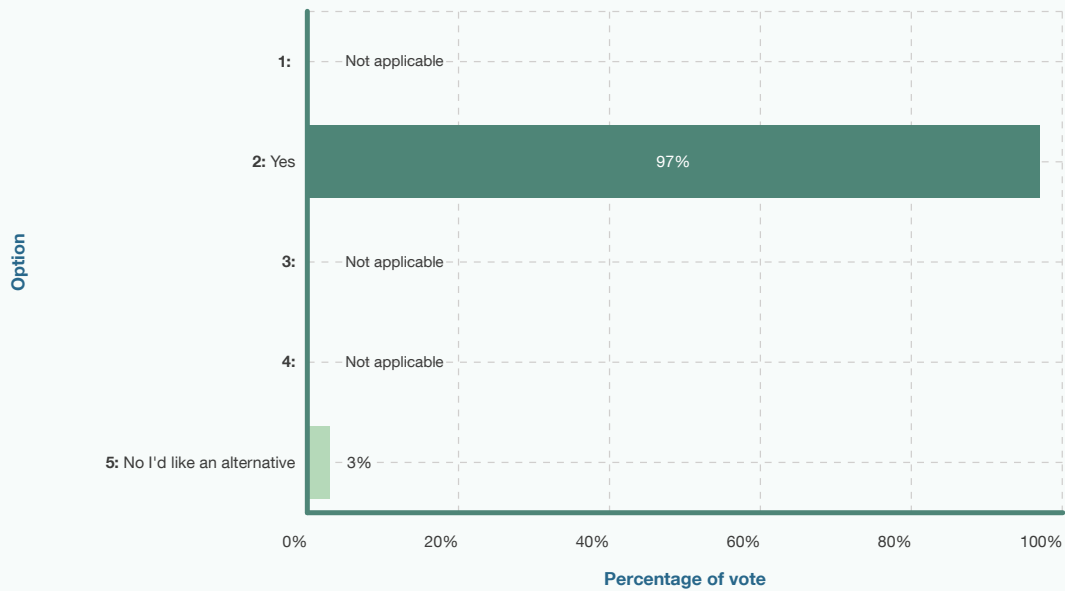
Consultation responses: 23 | Workshop: 51 | Total: 74

The largest proportion (41%) felt WPD's current proposals displayed the right level of ambition – voting for WPD to hold 30 community energy surgeries a year (Option 2). However, a sizeable proportion (27% and 28%) called for greater ambition, voting for Option 3 and Option 4, respectively. Only 4% wanted to suggest an alternative commitment. The written and verbal feedback on this draft proposal was limited. One stakeholder urged transparency and openness about when WPD holds these surgeries. Another stakeholder felt the surgeries should only be a stopgap whilst WPD delivers self-help facilities for community energy groups. The majority (69%) of WPD staff agreed with stakeholders and opted for Option 2. This commitment was also tested in a social media poll. The significant majority of respondents (82%) also voted for Option 2, in agreement with stakeholders and staff.

- “OK but be more open about what you say than [you have at] previous ones I have been to.”
Online stakeholder
- “On Commitment 66 and on some others above, the expectation should be that instead of continuous surgeries, you develop self-help facilities so that people can help themselves and don't need surgeries. That should be the aim. Surgeries are a stopgap.” **Domestic customer**



Commitment 67: Establish dedicated innovation projects for Community Energy schemes



Consultation responses: 23 | Workshop: 52 | Total: 75

This commitment presented stakeholders with a binary choice. 97% supported the commitment, with 3% wanting to suggest an alternative. There was limited verbal or written feedback, with one stakeholder seeking clarification as to what the commitment meant.

- “Why? Support the development and implementation of community energy schemes, yes. But dedicated innovation projects? I’m not sure what that means.” **Online stakeholder**



Appendix 1 Participants

In total, 131 organisations participated in WPD's BP1 consultation. These have been set out in the table below. Of these, a total of 55 organisations participated via the webinar, 20 responded via the online consultation, and 71 organisations participated via the online workshop. Some organisations participated via two or more of the consultation methods.

4D Economics	Dudley Metropolitan Borough Council
Anglian Water	EA Technology
Babcock Networks Limited	Electric Corby
Bassetlaw District Council	Electricity North West
Bath & North East Somerset Council	Element Energy
Bath & West Community Energy	Energist Solutions Ltd
Birmingham City Council	Energy Systems Catapult
Brecon Beacons Park Society (Friends of Brecon Beacons National Park)	Enertechnos
Brush Switchgear	Engage Consulting
BUUK Infrastructure	Enzen
Caerphilly County Borough Council	EON Energy
Campaign to Protect Rural England - Peak District & South Yorkshire	ESB Networks
Cantab	Friends of Pembrokeshire Coast National Park
Caplor Energy	FTI Consulting
Capula	Geldards LLP
Cardiff Council	Granby cum Sutton Parish Council
Centre for Sustainable Energy	Gridserve Sustainable Energy
Chacewater Community Energy Group	Helpful Digital
Chapmanbdsp	Herefordshire Council
Citi	Hitachi Power Grids
Citizens Advice	Hope4U
Citizens Advice Plymouth	Hopton and Coton Parish Council
Citizens Advice South Somerset	IBM
CLA Cymru	Innovate UK Regional Energy System Operator (RESO) project
Climate Change Group associated with Woburn Sands Town Council	Jacobs Group
CoGen	Kelvatek
Cornwall Council	Kier
Costain	Kirklington Parish Council
Coventry City Council	Land Compensation Agent Group
Devon County Council	Larkfleet Homes
Doble Powertest	Law Debenture
Dorstone Parish Council	Leighton and Eaton Constantine Parish
	Lickey and Blackwell Parish Council
	Lincolnshire County Council



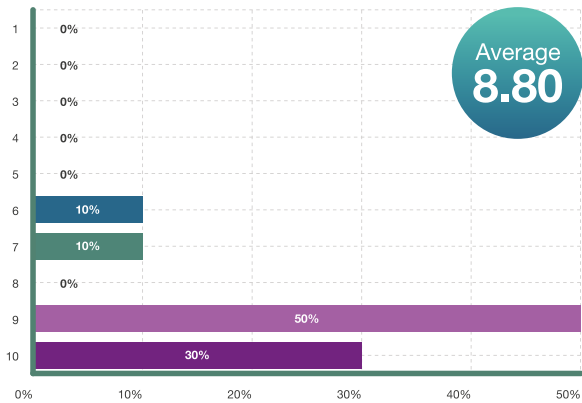
Lucy Electric
Major Energy Users' Council
Malvern Hills District Council
Marches Energy Action (MEA)
Mendip District Council
Midlands Energy Hub (Nottingham City Council)
Morrison Utility Services
MOZES
National Grid
National Grid ESO
National Police Estates Group
Network Plus
Nokia
Nortech Management Ltd
North East Derbyshire District Council
North Kesteven District Council
North Northamptonshire Joint Planning & Delivery Unit
North Somerset Council
North Somerset Local Councils Association
North West Leicestershire District Council
Nottingham City Council
Ofgem
Olveston Parish Council
Open University
Parthenon
PassivSystems
Planet A Solutions CIC
Power Electrics
Powys County Council
PS Renewables
Public Sector Pension Investment
Regen
Rhondda Cynon Taf County Borough Council
Roadnight Taylor
Scottish Government
Setwork
Severn Trent Water
Sirio Multilateral Strategies Ltd
Siston Parish Council
Smart Grid Consultancy Ltd
Solihull Metropolitan Borough Council
Somerset County Council
South Gloucestershire Council
South Holland District Council
South Northamptonshire Council
South Somerset District Council
South West Water
SP Energy Networks
Sustainable Direction Ltd
TDS Group
Thames Water Utilities Limited
The Exmoor Society
The Green Valleys CIC
UK Power Networks
UK Power Solutions
Vantage Leasing Ltd
Walsall Council
Welsh Government
West Midlands Combined Authority
West of England Combined Authority
Western Power Customer Engagement Group
Whitwick Parish Council
WSE Operational (Freedom)
Wychavon District Council
ZPN Energy



Appendix 2 Workshop feedback

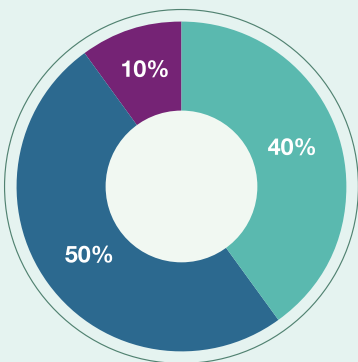
After the online workshop, stakeholders were asked to complete a short feedback form. In total, 10 completed a feedback form. The feedback was as follows:

Overall, how satisfied were you with today's workshop?



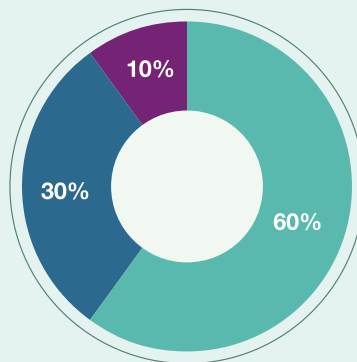
“ Really enjoyed the event. All your staff are extremely articulate and put their points across very clearly. ”

Overall, did you find this workshop to be:



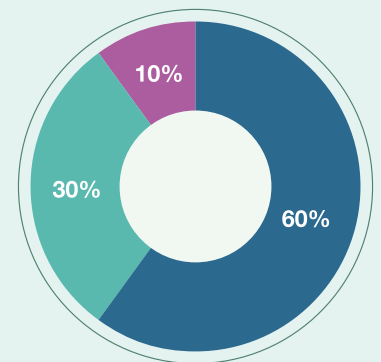
Very interesting
Interesting
Neutral
Not that interesting
Not interesting at all

Did you feel that you had the opportunity to make your points and ask questions?



Strongly agree
Agree
Neutral
Disagree
Strongly disagree

Did we cover the right topics for you on the day?

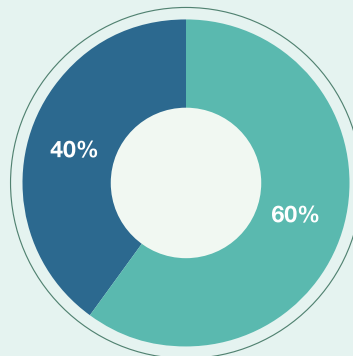


Strongly agree
Agree
Neutral
Disagree
Strongly disagree

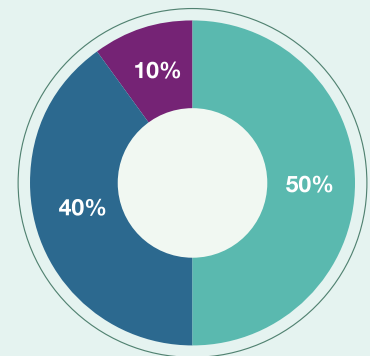


“ I am very impressed by WPD and your determination to do your very best for your customers and for the environment. I hope others follow your example. ”

What did you think of the way the workshop was chaired by your facilitator?



How well do you think the online format worked?



Comments

- “All worked well, seamless presentation and opportunity to make points.”
- “Lots worked well – mainly not having to drive anywhere to participate – and covered a lot.”
- “Really pleased community energy was mentioned but not enough discussed on how WPD will engage and support. And, also, opportunities for microgrids – maybe the national grid is no longer viable?”
- “Very well facilitated.”
- “Needed more time, though.”
- “I felt the breakout sessions were a bit unnecessary – not sure much was gained from them that the Slido survey / consultation responses did not already provide.”
- “I thought all the software worked well from WPD’s side.”
- “One of the best I’ve been on. Very well executed... bravo.”



Appendix 3 WPD employee responses

The full results of the responses by WPD employees to the online consultation can be found in the table below. It includes the total number of respondents for each option, as well as a percentage of the overall vote. For brevity, the table does not list the commitment in full. The commitments are numbered for reference in the sections above.

Name	Option 1	Option 2	Option 3	Option 4	Option 5
Core Commitment 1	0	24	7	5	0
	0%	67%	19%	14%	0%
Core Commitment 2	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 3	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 4	0	25	2	6	3
	0%	69%	6%	17%	8%
Core Commitment 5	0	33	0	0	3
	0%	92%	0%	0%	8%
Core Commitment 6	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 7	0	35	0	0	1
	0%	97%	0%	0%	3%
Core Commitment 8	1	20	7	7	1
	3%	56%	19%	19%	3%
Core Commitment 9	0	35	0	0	1
	0%	97%	0%	0%	3%
Core Commitment 10	1	23	3	9	0
	3%	64%	8%	25%	0%
Core Commitment 11	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 12	2	21	3	10	0
	6%	58%	8%	28%	0%
Core Commitment 13	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 14	3	23	1	9	0
	8%	64%	3%	25%	0%
Core Commitment 15	0	35	0	0	1
	0%	97%	0%	0%	3%
Core Commitment 16	0	34	0	0	2
	0%	94%	0%	0%	6%
Core Commitment 17	0	28	1	5	2
	0%	78%	3%	14%	6%
Core Commitment 18	0	24	3	5	4
	0%	67%	8%	14%	11%
Core Commitment 19	2	20	7	7	0
	6%	56%	19%	19%	0%



Name	Option 1	Option 2	Option 3	Option 4	Option 5
Core Commitment 20	0	35	0	0	1
	0%	97%	0%	0%	3%
Core Commitment 21	0	35	0	0	1
	0%	97%	0%	0%	3%
Core Commitment 22	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 23	4	23	2	7	0
	11%	64%	6%	19%	0%
Core Commitment 24	2	22	4	7	1
	6%	61%	11%	19%	3%
Core Commitment 25	0	34	0	0	2
	0%	94%	0%	0%	6%
Core Commitment 26	0	34	0	0	2
	0%	94%	0%	0%	6%
Core Commitment 27	2	25	2	7	0
	6%	69%	6%	19%	0%
Core Commitment 28	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 29	1	22	3	10	0
	3%	61%	8%	28%	0%
Core Commitment 30	1	24	3	7	1
	3%	67%	8%	19%	3%
Core Commitment 31	2	24	3	7	0
	6%	67%	8%	19%	0%
Core Commitment 32	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 33	0	35	0	0	1
	0%	97%	0%	0%	3%
Core Commitment 34	0	32	0	0	4
	0%	89%	0%	0%	11%
Core Commitment 35	1	27	3	5	0
	3%	75%	8%	14%	0%
Core Commitment 36	1	20	4	10	1
	3%	56%	11%	28%	3%
Core Commitment 37	2	21	6	6	1
	6%	58%	17%	17%	3%
Core Commitment 38	1	14	8	11	2
	3%	39%	22%	31%	6%
Core Commitment 39	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 40	2	17	9	8	0
	6%	47%	25%	22%	0%
Core Commitment 41	0	24	4	7	1
	0%	67%	11%	19%	3%
Core Commitment 42	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 43	2	24	3	7	0
	6%	67%	8%	19%	0%



Name	Option 1	Option 2	Option 3	Option 4	Option 5
Core Commitment 44	2	26	3	5	0
	6%	72%	8%	14%	0%
Core Commitment 45	2	19	5	9	1
	6%	53%	14%	25%	3%
Core Commitment 46	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 47	1	24	2	9	0
	3%	67%	6%	25%	0%
Core Commitment 48	0	25	4	7	0
	0%	69%	11%	19%	0%
Core Commitment 49	2	25	1	8	0
	6%	69%	3%	22%	0%
Core Commitment 50	0	34	0	0	2
	0%	94%	0%	0%	6%
Core Commitment 51	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 52	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 53	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 54	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 55	0	27	4	5	0
	0%	75%	11%	14%	0%
Core Commitment 56	1	27	2	5	1
	3%	75%	6%	14%	3%
Core Commitment 57	1	25	3	7	0
	3%	69%	8%	19%	0%
Core Commitment 58	1	26	3	5	1
	3%	72%	8%	14%	3%
Core Commitment 59	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 60	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 61	0	30	4	2	0
	0%	83%	11%	6%	0%
Core Commitment 62	2	26	4	4	0
	6%	72%	11%	11%	0%
Core Commitment 63	1	31	1	3	0
	3%	86%	3%	8%	0%
Core Commitment 64	0	35	0	0	1
	0%	97%	0%	0%	3%
Core Commitment 65	0	36	0	0	0
	0%	100%	0%	0%	0%
Core Commitment 66	0	25	4	6	1
	0%	69%	11%	17%	3%
Core Commitment 67	0	36	0	0	0
	0%	100%	0%	0%	0%



Appendix 4 Bill payer / consumer surveys

The full results of the bill payer / consumer surveys can be found below. These were the questions asked via social media polls. The total number of respondents to each question has been noted in the table. Only those commitments that presented a range of options were tested in this online polling but not all commitments that presented a range of options were tested.

Question	Options	Results	Total votes
Customer service is very important to us and we constantly strive to improve, while keeping costs low. Our current customer satisfaction score is 89%. Which score would you like us to aim for in future? (The change in cost to annual bills for selecting each option is in brackets)	90% (no extra cost)	74.60%	189
	91% (+24p)	7.40%	
	92% (+48p)	18%	
We're committed to supporting vulnerable customers and through our actions each year, 20,000 hard-to-reach people join our Priority Services Register. In future, how many would you like to see us target? (The impact on cost to annual bills for selecting each option is in brackets)	20,000 (save -0.5p)	5.60%	54
	30,000 (no extra cost)	31.50%	
	40,000 (+0.5p)	5.60%	
	50,000 (+1p)	57.40%	
We're committed to helping fuel poor customers make savings on their energy bills, with 70,000 customers saving £25m in the last 5 years. What level of support would you like us to provide in future? (The change in cost to annual bills for selecting each option is in brackets)	56,000 customers to save £30m (save 1.5p)	10.90%	64
	75,000 customers to save £40m (no extra cost)	31.30%	
	94,000 customers to save £50m (+1.5p)	15.60%	
	113,000 customers to save £60m (+3p)	42.20%	
We strive to provide vulnerable customers on our Priority Services Register (PSR) with specific smart energy support and education. What level of support do you feel we should provide in the future? (The change in cost to annual bills for selecting each option is in brackets)	15% of PSR per year (save 0.5p)	5.60%	36
	20% of PSR per year (no extra cost)	30.60%	
	30% of PSR per year (+0.5p)	11.10%	
	40% of PSR per year (+1p)	52.80%	



Question	Options	Results	Total votes
<p>To ensure local energy requirements in our regions are understood and feed into our long-term plans in an effective way, we engage with 130 authorities on an ad hoc basis, to understand their investment requirements for changes in network use. How often do you think we should hold the meetings? (The change in cost to annual bills for selecting each option is in brackets)</p>	Once every 5 years (save 1p)	12.20%	74
	Once every 3 years (no change to bill)	28.40%	
	Once every 2 years (+0.5p)	13.50%	
	Once every year (+1p)	45.90%	
<p>We pride ourselves on being a socially responsible business and supporting local vulnerable communities. Via our 'Community Matters' Fund, we have so far donated £1m. How much would you like to see us donate during the next phase?</p>	£0.5m (save 1.5p)	8.80%	57
	£1m (no change to bill)	45.60%	
	£1.5m (+1.5p)	15.80%	
	£2m (+3p)	29.80%	
<p>To expand the impact, scope and reach of our community and charity initiatives, we are looking to set up a staff volunteering scheme to support our communities. How many staff volunteering days per year do you think we should offer? (The change in cost to annual bills for selecting each option is in brackets)</p>	None (save 1p)	4.50%	66
	1,000 days (no change to bill)	30.30%	
	2,000 days (+1p)	18.20%	
	3,000 days (+1.5p)	47%	
<p>Minimising disruption to customers and restoring power as quickly as possible is our responsibility. Our focus remains on restoring supplies at high voltage within 1 hour, currently at 85%. What percentage would you like to see us reach? (The change in cost to annual bills for selecting each option is in brackets)</p>	85% (save 1p)	15.40%	78
	86% (no change to bill)	29.50%	
	87% (+0.5p)	9%	
	88% (+1p)	46.20%	
<p>We currently have 48 schemes operating to improve our network in areas that experience more power cuts than average. How many schemes would you like us to manage in future? (The change in cost to annual bills for selecting each option is in brackets)</p>	40 schemes – benefit 4,720 customers (save 0.5p)	6.90%	58
	50 schemes – benefit 5,900 customers (no change to bill)	22.40%	
	60 schemes – benefit 7,080 customers (+0.5p)	6.90%	
	70 schemes – benefit 8,260 customers (+1p)	63.80%	
<p>We currently invest £180m a year to improve the overall health of our network. How much would you like us to spend in future? (The change in cost to annual bills for selecting each option is in brackets)</p>	£181m per year (save 27p)	12.40%	129
	£190m per year (no change to bill)	24%	
	£200m per year (+27p)	17.10%	
	£209m per year (+54p)	46.50%	



Question	Options	Results	Total votes
<p>In recent years we've installed flood defences at 72 substations to reduce the risk of power cuts. How many schemes would you like to see us achieve in the future? (The change in cost to annual bills for selecting each option is in brackets)</p>	80 schemes (save 1.5p)	6.70%	89
	95 schemes (no change to bill)	19.10%	
	110 schemes (+1.5p)	16.90%	
	125 schemes (+3p)	57.30%	
<p>Keeping our customers safe, especially those that need to work in close proximity to our equipment, is paramount. We currently distribute safety advice information to 200,000 stakeholders per year. How many would you like to see us target annually? (The change in cost to annual bills for selecting each option is in brackets)</p>	100,000 (save 0.5p)	16.70%	42
	200,000 (no change to bill)	31%	
	300,000 (+0.5p)	7.10%	
	400,000 (+1p)	45.20%	
<p>We currently educate around 60,000 children about the dangers of electricity each year. How many would you like to see us target per year? (The change in cost to annual bills for selecting each option is in brackets)</p>	50,000 (save 0.5p)	10.40%	67
	60,000 (no change to bill)	23.90%	
	70,000 (+0.5p)	0%	
	80,000 (+1p)	65.70%	
<p>Our priority is to reduce the risk of harm to the public, especially children. So, we propose to introduce schemes to underground, insulate or divert overhead lines that cross school or other play areas between 2023-2028. How many schemes would you like us to complete during this time? (The change in cost to annual bills for selecting each option is in brackets)</p>	390 (save 0.5p)	6.30%	48
	780 (no change to bill)	27.10%	
	1,560 (+13p)	8.30%	
	3,120 (+39p)	58.30%	
<p>Our customers receive excellent service as a result of a motivated, skilled and knowledgeable workforce. We are currently credited as being in the top 33% of UK companies (silver) by Investors in People. Which accreditation do you think we should aim for? (The change in cost to annual bills for selecting each option is in brackets)</p>	Standard (save 0.5p)	9%	78
	Silver (no change to bill)	30.80%	
	Gold/Top 18% (+0.5p)	20.50%	
	Platinum/Top 2% (+1p)	39.70%	
<p>Our current proposal is for our internal business carbon footprint to be Net Zero by 2043. By which year would you like to see us achieve Net Zero? (The change in cost to annual bills for selecting each option is in brackets)</p>	2050 (save 1p)	12.30%	81
	2043 (no change to bill)	18.50%	
	2035 (+1p)	8.60%	
	2028 (+1.5p)	60.50%	



Question	Options	Results	Total votes
To reduce the carbon impact of our transport fleet, we aim to replace a proportion of our end-of-life commercial vans and make them non-carbon by 2028. How much of our fleet would you like to see us replace by 2028? (The change in cost to annual bills for selecting each option is in brackets)	79% (no change to bill)	48.80%	41
	89% (+9p)	2.40%	
	100% (+19p)	48.80%	
To ensure our service for customers is delivered in an environmentally responsible way, we aim to reduce the amount of waste we send to landfill. Which of these % waste to landfill would you like to see us achieve in future? (The change in cost to annual bills for selecting each option is in brackets)	10% (no change to bill)	37.50%	48
	5% (+0.5p)	10.40%	
	0 (+1p)	52.10%	
To improve the look of the landscape in beauty spots in our region, we have removed 29km of overhead lines in Areas of Outstanding Natural Beauty. How much would you like to see us remove by 2028? (The change in cost to annual bills for selecting each option is in brackets)	35km (save 0.5p)	9.90%	81
	40km (no change to bill)	18.50%	
	45km (+0.5p)	1.20%	
	50km (+1p)	70.40%	
We currently respond to customers who contact us via Facebook, Twitter and WhatsApp with enquiries or power cut reports within 6-7 minutes. What response time would you like to see us achieve in future? (The change in cost to annual bills for selecting each option is in brackets)	5 minutes (no change)	78.00%	68
	4 minutes (+0.5p)	1.00%	
	3 minutes (+1p)	21.00%	
We propose to hold 30 community energy surgeries and local community energy groups per year, to educate and support scheme developments when connecting to our network. How many do you think we should hold annually? (The change in cost to annual bills for selecting each option is in brackets)	30 (no change to bill)	82.00%	39
	60 (+1p)	10.00%	
	90 (+2p)	8.00%	



Appendix 5 Webinar questions

The following table includes a list of the questions asked by respondents during the webinar.

QUESTION
I have heard that in order to have capacity for the anticipated energy from Hinkley, Western Power is unable to support small scale renewable energy providers to connect to the grid. You are therefore preventing the creation of renewable energy supplies in Somerset. Please comment.
What customer engagement have you taken up and how did they feed into what your commitments should be?
You are aiming for the government target of Net Zero by 2050. There is lots of evidence that that is too late, and we should aim for 2030. Can you increase your ambition please?
How do you get to a £96 bill? I live in a standard 4 bed house with oil heating and mine is £1,200 per year.
How do you reconcile running diesel vehicles after the government embargo with the 2043 target?
Will WPD take into account the WG commissioned energy strategies, their priority focus areas, objectives, etc., for each of the regions in investment decisions moving forward?
Does the Business Plan address the move from DNO to DSO and whether these two areas need to be retained under one company or separated like NGET and NGESO?
Will you send a link for the consultation comment?
Decarbonisation comes with lots of caution (reliability, brownouts, power quality, cost, etc., concerns) and improving the scenario analysis along with transition strategy. Would you be able to plan for an earlier target, say 2035?
How do you factor in planned growth in local authority Development Plans?
If stakeholders overwhelmingly call for higher targets across all or many of the 13 core commitments, which will result in higher bill costs – can you explain in a bit more detail how WPD will balance this and make a final decision on what will be submitted to Ofgem? Does Ofgem set a cap on the potential investment level?
The country is committed to Net Zero and this will require a huge increase in power for people to be able to generate clean power / install heat pumps and charge their electric cars. This is happening now and will need to be done by millions of homes and business. How will you invest ahead of this need to make it possible and how does that tie into the current restrictive Ofgem rules?
With an ageing workforce and 35% of the talent pool in the field retiring within the next 5 years, how are you going to ensure you meet these targets?
What does the Business Plan say about WPD's view on anticipatory investment on the network, i.e., investment now to tackle forecasted demand? How does flexibility fit into that view?
Isn't it that the developer pays for any additional capacity requirement for development? So looking at heat pumps this will be a major cost to developers, i.e., looking at Congleton, etc.
What impact does Ofgem's recent announcement on the Access Significant Code Review being delayed until after the RIIO-ED2 plan submission have on WPD's plans for ED2? How will WPD be ensuring that the plan is flexible enough to permit investment ahead of need to ensure that networks are facilitating Net Zero?



QUESTION
Have you not undertaken direct engagement with domestic and business customers and not just part of your wider stakeholder engagement?
Mark - you mention EV and heat pumps. What about connecting new RE generation to the grid? And do you have any future electricity consumption figures?
Have you engaged with IDNOs on ADMD loading for EV and heat pumps?
What is the date you can say that all smart meters are reliable and can change supplier easily?
What would WPD need (from partners/government, etc.) to hit Net Zero significantly earlier? Is 2030 theoretically doable and what do you need to get there?
So, with Bristol's ambition, do they therefore attract more funding, and so less for other local authorities with less ambition? And how do we help LAs to raise that ambition?
What is the level of efficiency you have built into your plan so far (both ongoing and embedded efficiency)?
Do you feel most customers (consumers and business) understand enough about heat pumps and their role with decarbonisation?
No wind, no sun – how do you propose to meet demand when you will have to deliver 10-15 times the amount of electricity to each customer? Wood burning is inefficient and poisonous. Why is this pushed as 'green'?
What is the impact of flexible (traditional) solutions in offsetting the need for traditional wire solutions?



Appendix 6 Consultation workshop vote totals

TOPIC / AREA	COMMITMENT	MAX SESSION VOTES	VOTES ON COMMITMENT	DIFFERENCE
1.1 Customer Service	Commitment 1: Maintain a high standard customer satisfaction score across all key services areas	71	68	3
1.1 Customer Service	Commitment 2: Achieve full compliance with the Customer Service Excellence Standard every year	71	70	1
1.1 Customer Service	Commitment 3: Answer calls within an average of four seconds and maintain an abandoned call rate of less than 1%, within our UK-based in-region Contact Centres	71	68	3
1.1 Customer Service	Commitment 4: Respond to social media enquiries and power cut reports quickly	71	70	1
1.1 Customer Service	Commitment 5: Provide greater insight on the planned work activity and interruptions on the network by creating an online viewer for our customers and stakeholders	71	71	0
1.1 Customer Service	Commitment 6: Achieve full compliance with the British Standard for Inclusive Service Provision every year	71	70	1
1.1 Customer Service	Commitment 7: Resolve at least 90% of complaints within one day & resolve 99% of complaints within 31 days	71	68	3
1.2 Customers in Vulnerable Situations	Commitment 8: Proactively contact over 2 million Priority Services Register customers once every two years to remind them of the services we provide and update their records	71	70	1
1.2 Customers in Vulnerable Situations	Commitment 9: Achieve a 'one-stop-shop' service for vulnerable customers joining the PSR so that they only have to register with WPD once to be registered automatically with their energy supplier, water company and gas distributor	71	68	3
1.2 Customers in Vulnerable Situations	Commitment 10: Identify and engage hard-to-reach vulnerable customers each year to join the Priority Services Register within RIIO-ED2	71	70	1
1.2 Customers in Vulnerable Situations	Commitment 11: Work with expert stakeholders, including our Customer Panel and referral partners, to annually refresh our understanding of 'vulnerability' and co-create an ambitious annual action plan	71	71	0
1.2 Customers in Vulnerable Situations	Commitment 12: Support fuel poor customers to make savings on energy bills over RIIO-ED2	71	69	2
1.2 Customers in Vulnerable Situations	Commitment 13: Develop a model to identify the capabilities of vulnerable customers to participate in a smart, low carbon future. Use this to maximise participation, remove barriers to entry and encourage collaboration with the wider industry	71	68	3
1.2 Customers in Vulnerable Situations	Commitment 14: Provide vulnerable and fuel poor customers with specific support and education in relation to the smart energy transition	71	66	5
1.2 Customers in Vulnerable Situations	Commitment 15: Take a leading role in initiating collaboration with a range of industry participants to share best practice and co-deliver schemes to ensure vulnerable customers are not left behind by the smart energy transition	71	67	4



TOPIC / AREA	COMMITMENT	MAX SESSION VOTES	VOTES ON COMMITMENT	DIFFERENCE
1.3 Connections	Commitment 16: We will develop our connections process and improve availability of information so that customers wishing to connect can easily comprehend the process and follow a simple set of rules to apply for a connection	66	66	0
1.3 Connections	Commitment 17: Maintain a high standard average customer satisfaction for connections	66	62	4
1.3 Connections	Commitment 18: Improve our performance against Time To Quote (TTQ) and Time To Connect (TTC) for LCTs from RIIO-ED1 Level	66	64	2
1.3 Connections	Commitment 19: Engage with 130 local authorities and local enterprise partnerships to understand their requirements for strategic investment in terms of changes in demand or network use	66	62	4
1.3 Connections	Commitment 20: Improve cross border working practices between WPD, Independent Distribution Network Operators, National Grid Transmission and the Energy System Operator. Also promote competition in connections	66	65	1
1.4 Social Contract	Commitment 21: Publish annual reports in a simple, easy to understand format, setting out WPD's total expenditure, the impact on customer bills and actual regulatory returns	66	66	0
1.4 Social Contract	Commitment 22: We will, as a minimum, maintain our prime Environmental, Social and Governance (ESG) rating from a recognised agency	66	66	0
1.4 Social Contract	Commitment 23: Support local people in our communities via an annual 'Community Matters' Fund	66	65	1
1.4 Social Contract	Commitment 24: Provide staff with paid leave to volunteer to support local community initiatives associated with vulnerability and environmental initiatives	66	64	2
2.1 Network Resilience	Commitment 25: On average fewer and shorter power cuts in RIIO-ED2 than RIIO-ED1	58	58	0
2.1 Network Resilience	Commitment 26: Reduction of tree related faults on HV and EHV overhead network due to use of LIDAR in RIIO-ED2 thus reducing the impact on the customer	58	57	1
2.1 Network Resilience	Commitment 27: Continue to have focus on restoring HV supplies quickly (that are not automatically restored) within one hour	58	58	0
2.1 Network Resilience	Commitment 28: We will aim to restore customer supplies in RIIO-ED2 within 12 hours under normal weather conditions	58	58	0
2.1 Network Resilience	Commitment 29: Carry out work that improves network reliability for our worst served customers (those experiencing 12 or more higher voltage power cuts over a 3 year period)	58	57	1
2.1 Network Resilience	Commitment 30: Invest to improve the overall health of the network and develop a measure of overall asset health. Report annually to stakeholders the impact of our investments	58	56	2
2.1 Network Resilience	Commitment 31: We will continue to install further flood defences to reflect updated data from the Environment Agency	58	58	0
2.2 Business IT Security and Cyber Resilience	Commitment 32: Continually assess emerging threats to enhance cyber security systems to ensure no loss of data or network interruption from a cyberattack	59	57	2



TOPIC / AREA	COMMITMENT	MAX SESSION VOTES	VOTES ON COMMITMENT	DIFFERENCE
2.2 Business IT Security and Cyber Resilience	Commitment 33: Enhance the resilience of our IT network security by upgrading our disaster recovery capability to ensure continuity of our operations	59	59	0
2.3 Safety	Commitment 34: Undertake an additional Staff Safety Climate Survey during RIIO-ED2	57	56	1
2.3 Safety	Commitment 35: Distribute safety advice information to stakeholders	57	57	0
2.3 Safety	Commitment 36: Educate a minimum number of children per year about avoiding danger from electricity	57	53	4
2.3 Safety	Commitment 37: Underground, insulate or divert overhead lines that cross school or other playing areas	57	54	3
2.4 Workforce Resilience	Commitment 38: Demonstrate exceptional embedded employment practices by achieving accreditation with Investors in People by the end of RIIO-ED2	56	56	0
2.4 Workforce Resilience	Commitment 39: Publish annually our updated Diversity & Inclusion Action Plan & Performance	56	51	5
3.1 Environment and Sustainability	Commitment 40: Reduce internal Business Carbon Footprint to be Net Zero by following a verified Science Based Target to limit the climate impact of our activities	60	58	2
3.1 Environment and Sustainability	Commitment 41: Replace our transport fleet with non-carbon technology where practical	60	57	3
3.1 Environment and Sustainability	Commitment 42: Install renewable local generation at all suitable offices and depots	60	56	4
3.1 Environment and Sustainability	Commitment 43: Reduce leaks from fluid filled cables	60	60	0
3.1 Environment and Sustainability	Commitment 44: Replace the poorest performing Extra High Voltage fluid filled cables (FFC) on our network	60	56	4
3.1 Environment and Sustainability	Commitment 45: Reduce SF6 losses from that in RIIO-ED1	60	56	4
3.1 Environment and Sustainability	Commitment 46: All PCB contaminated equipment will be removed from the WPD network by 2025	60	58	2
3.1 Environment and Sustainability	Commitment 47: Reduce tonnage of waste per £ total business expenditure	60	57	3
3.1 Environment and Sustainability	Commitment 48: Reduce the volume of waste we send to landfill (excluding hazardous waste)	60	60	0
3.1 Environment and Sustainability	Commitment 49: We will remove targeted overhead lines in Areas of Outstanding Natural Beauty	60	58	2
3.1 Environment and Sustainability	Commitment 50: Where a low voltage mains cable is required it will be a minimum size of a 300mm ² cable and the smallest pole mounted transformer size will be 50kVA single phase to reduce technical losses	60	60	0
3.2 A Smart, Flexible Network	Commitment 51: Create and implement simple, fair and transparent rules and processes for procuring DSO flexibility services and introduce a customer satisfaction monitor to measure the effectiveness of our actions	58	58	0
3.2 A Smart, Flexible Network	Commitment 52: Produce forecasts of potential flexibility requirements in order to undertake a flexibility tender every 6 months	58	57	1
3.2 A Smart, Flexible Network	Commitment 53: Develop a standard to be measured against (using external scrutiny) to demonstrate that we act as a neutral market facilitator to enable accessibility to multiple markets	58	57	1



TOPIC / AREA	COMMITMENT	MAX SESSION VOTES	VOTES ON COMMITMENT	DIFFERENCE
3.2 A Smart, Flexible Network	Commitment 54: 100% load related reinforcement (primary) decisions include an assessment of flexibility alternatives	58	54	4
3.2 A Smart, Flexible Network	Commitment 55: Ensure that connection offers with a reinforcement requirement are given the option of a flexible alternative	58	55	3
3.2 A Smart, Flexible Network	Commitment 56: Increase the range of options for flexible connections	58	55	3
3.2 A Smart, Flexible Network	Commitment 57: Make it as easy as possible for our customers to connect LCTs, such that WPD connects more than the national average connecting in the UK (prorated by our number of customers)	58	57	1
3.2 A Smart, Flexible Network	Commitment 58: Improve the volume of data available via an interactive API (Application Programming Interface) relative to all data made available (e.g., via spreadsheets and fixed format reports)	58	54	4
3.2 A Smart, Flexible Network	Commitment 59: Introduce a customer satisfaction monitor to measure data availability, ease of access and usefulness, improving from the baseline throughout RIIO-ED2	58	54	4
3.2 A Smart, Flexible Network	Commitment 60: Using data from updated DFES and stakeholder insight to publish a Long Term Development Statement and a Network Development Plan annually	58	53	5
3.2 A Smart, Flexible Network	Commitment 61: Engage with stakeholders and the Electricity System Operator to update WPD's Distribution Future Energy Scenarios for all four licence areas	58	52	6
3.2 A Smart, Flexible Network	Commitment 62: Hold Local Energy Surgeries for local authorities, supporting them to develop their local energy plans	58	54	4
3.2 A Smart, Flexible Network	Commitment 63: Undertake whole system collaboration schemes with other DNOs and the ESO	58	52	6
3.3 Innovation	Commitment 64: For each innovation project we will undertake a cost benefit assessment and implement into business practice to improve efficiency and effectiveness of assets, operations and customer service	51	51	0
3.3 Innovation	Commitment 65: Develop an interactive 'innovation ideas portal' aimed at stakeholders submitting ideas for new innovation projects	51	51	0
3.4 Community Energy	Commitment 66: Hold Community Energy Surgeries for local Community Energy groups	52	51	1
3.4 Community Energy	Commitment 67: Establish dedicated innovation projects for Community Energy schemes	52	52	0



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