



WESTERN POWER DISTRIBUTION

Consumer Vulnerability Strategy and Social Contract
Workshop – Feedback Report

23 February 2021



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Introduction

On 23 February 2021, Western Power Distribution (WPD) hosted a workshop to seek feedback from stakeholders on the following topics: WPD’s Consumer Vulnerability Strategy and the Social Contract.

Because of Covid-19 restrictions, the workshop was hosted online. It consisted of short presentations given by WPD representatives, each followed by round-table discussions. Stakeholders were also asked to indicate their views on a range of proposals for the Business Plan using Slido, an electronic voting system, which allowed WPD to obtain quantitative as well as qualitative feedback.

The session was split into three main workshops. These are shown below:

- **Workshop One: Our Consumer Vulnerability Strategy (Part 1)**
- **Workshop Two: Our Consumer Vulnerability Strategy (Part 2)**
- **Workshop Three: Social Contract**

WPD had recently published the first draft of its Business Plan for 2023–2028, which contains 67 core commitments. As part of its Business Plan requirements, Ofgem has requested all DNOs develop a set of individual strategies and action plans for key topics – known as ‘delivery strategies’ – to ensure that they are delivering on stakeholders’ expectations and to demonstrate that they will meet the baseline requirements set by the regulator. This workshop focused on one of these delivery strategies – Consumer Vulnerability. It also looked at the development of WPD’s Social Contract.

WPD instructed EQ Communications, a specialist stakeholder engagement consultancy, to independently facilitate the workshops and to take notes of the comments made by stakeholders. Every effort has been made to faithfully record the feedback given. In order to encourage candour and open debate, comments have not been ascribed to individuals. Instead, notes have been made of the type of organisation each stakeholder represents.

[The full presentation can be found here.](#)

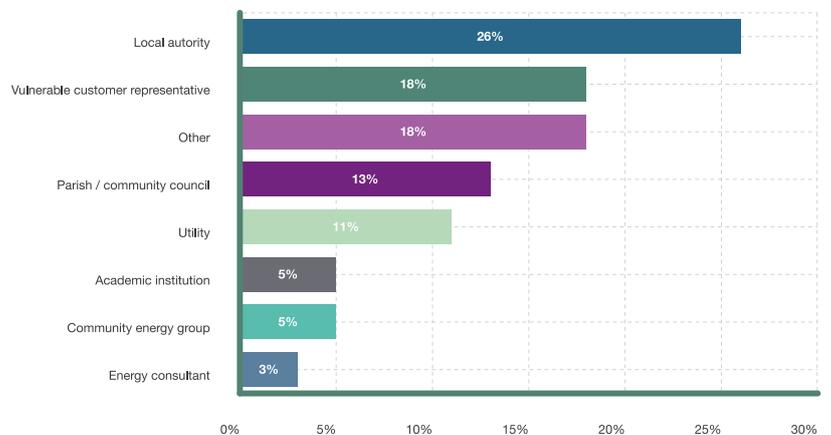


Executive Summary

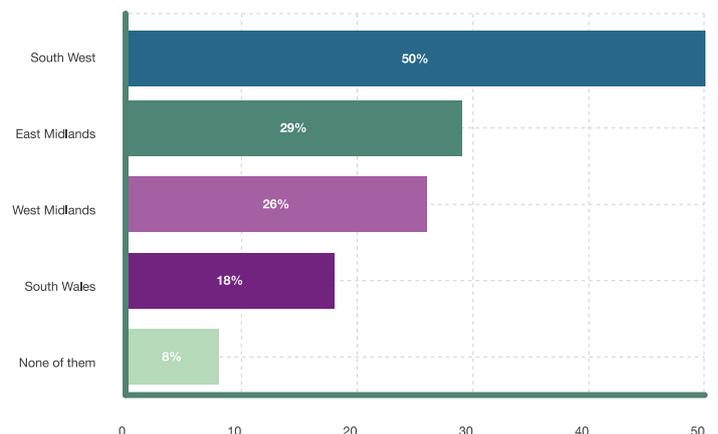
Participants

- A total of 37 stakeholders participated in the workshop, representing 31 organisations.
- The largest proportion of participants represented local authorities (26%), followed by vulnerable customer representatives (18%). 13% of stakeholders represented parish or community councils and 11% represented utilities, with a smaller proportion of stakeholders representing academic institutions (5%), community energy groups (5%) and energy consultants (3%).
- Half of the delegates stated that the South West region was relevant to them, followed by 29% who reported that the East Midlands was relevant, with 26% for the West Midlands and 18% for South Wales.
- 20% of attendees who filled out a feedback form told us that they found the workshop to be 'very interesting' with 70% opting for 'interesting'.

What type of stakeholder are you?



Which WPD region is relevant to you?





Workshop One

WPD's Consumer Vulnerability Strategy (Part 1)

The first session began with an introduction from Richard Allcock, Stakeholder Engagement Manager. Richard gave an overview of WPD's stakeholder engagement programme and the business planning process for RIIO-ED2. Following the introductory presentation, Alex Wilkes, External Affairs Manager, introduced the first workshop.

- There was broad consensus that the focus areas for WPD's current vulnerability strategy were on the right lines, although many stakeholders had questions about how these would be delivered in practice.
- There was much discussion of collaboration among organisations, with many stakeholders suggesting that data-sharing between utility companies would improve the efficiency of WPD's strategy.
- There was widespread support for WPD's efforts to maintain a wide range of communication formats, with stakeholders stressing that a varied approach was needed in order to engage with all vulnerable customers.
- Stakeholders were asked to vote on whether they agree that WPD's proposals for Ofgem's baseline expectations are ambitious enough on a scale of 1 (strongly disagree) to 5 (strongly agree). The results revealed that stakeholders felt that WPD was showing a relatively high level of ambition in its proposals related to Ofgem's baseline expectations to provide a range of communication formats and meet a minimum standard of Accessibility AA (3.89 out of 5), to provide a wide range of support in relation to supply interruption (3.79 out of 5) and to provide dedicated lines for PSR customers (3.76 out of 5).
- At the other end of the scale, stakeholders felt that WPD could go further with its proposals on the data and information strategy (3.42 out of 5) and maintaining a good understanding of relevant social issues (3.34 out of 5). With regard to the former, stakeholders commented that contacting all customers on the PSR every two years was too infrequent considering the pace of change in the sector. The lowest-scoring area was proactive and targeted advertising of the PSR (3.22 out of 5).



Workshop Two

WPD's Consumer Vulnerability Strategy (Part 2)

Alex Wilkes also presented the introduction to the second workshop, this time focusing on how WPD's Consumer Vulnerability Strategy would aim to understand new forms of vulnerability and achieve an embedded approach.

- There was much debate over how WPD should use a partnership approach to understand new forms of vulnerability. The relationship between WPD and energy suppliers came up several times, with suggestions that the company should do more to educate customers on its own role and explain how it differs from energy suppliers, in addition to working more closely with energy suppliers to address vulnerability.
- There was widespread concern that vulnerable customers in particular would not see the smart transition as relevant to their lives, with suggestions that partnering with agencies working with vulnerable customers was vital to engaging vulnerable groups.
- The electronic vote suggested that stakeholders felt that WPD could raise its ambition for its actions under Ofgem Principle Four, rating WPD's level of ambition 3.32 out of 5 for its proposals for the expectation to embed commitment to protecting customers' interests in the company culture and 3.06 for its proposals for the expectation to seek opportunities to protect vulnerable customers throughout its capabilities.
- The highest-scoring area under Ofgem Principles Three and Four was 'have an extensive network of partnerships' (3.63 out of 5), indicating that stakeholders are relatively happy with the level of ambition of WPD's proposals for this baseline expectation. The consensus seemed to be that WPD was showing decent ambition in its plans to partner with other organisations, but that there was room for improvement in some areas.



Workshop Three

Social Contract

Eleanor Patey, Social Obligations Officer, introduced the third workshop, giving stakeholders background information on WPD’s Social Contract, which had been developed with input from stakeholders, and setting out the proposed structure.

- There was widespread support for the scope and creativity of WPD’s proposals for their Social Contract, but many stakeholders had concerns about how the measures would be implemented in practice.
- Several additional focus areas were suggested for the Social Contract, including sustainability and climate change adaptation.
- WPD’s commitments under the ‘Responsible Employer’ heading were welcomed but were felt by many to be expressed in somewhat vague terms, with calls for more measurable data and concrete targets.
- There was widespread support for WPD’s local focus in its plans under the ‘Resilient Communities’ heading.
- Reaction to WPD’s plans under the ‘Protected Environment’ heading was mixed, with some stakeholders feeling that WPD should go further and others saying that the success of the proposals would depend very much on how they were delivered.



Workshop One

WPD's Consumer Vulnerability Strategy (Part 1)

Summary

Following the introductory presentation, Alex Wilkes, External Affairs Manager, introduced the first workshop, explaining that WPD was asking for stakeholders' help in generating a sector-leading and effective Consumer Vulnerability Strategy.

He outlined the five key steps of WPD's approach and explained how these have improved the company's understanding of vulnerability; increased the accuracy of Priority Services Register (PSR) data; improved power cut services, including new innovations; made progress in addressing fuel poverty and cold homes; and supported WPD's ambition to leave no customer behind in a smart future.

Alex explained that stakeholders had identified 20 key focus areas for WPD to deliver in its Consumer Vulnerability Strategy, which include wide-ranging actions such as 'tackle root causes of fuel poverty' and 'innovate to ensure the energy transition is fair and accessible'. He then introduced Ofgem's strategy framework, which consists of four high-level principles:

Ofgem has set out 14 baseline expectations underlying these four high-level principles, ranging from 'proactive and targeted advertising of the PSR' to 'have an extensive network of partnerships'. During the first two workshops, stakeholders were asked for their views on whether the company's proposed



1. Support vulnerable customers through sophisticated management, promotion and maintenance of the PSR



2. Maximise opportunities to deliver support through smart use of data



3. Understand new forms of data



4. Embed the approach to protecting the interests of vulnerable customers through company operations



actions meet each of the 14 baseline standards, whether there were areas in which WPD should go further or make different commitments, and what specific targets, measures and performance levels they wanted to see. The first workshop covered the baseline expectations under the first two high-level principles, while the second workshop covered the expectations under Ofgem principles three to four.

REASONS FOR ATTENDING

Many stakeholders attended the workshop to represent the interests of vulnerable customers. Specific areas of concern for vulnerable customer representatives included meeting the needs of people who rely on oxygen supply and those of people with dementia or mental illness and improving access to utility companies for vulnerable customers. A number of local authority representatives were keen to help WPD identify and reach out to vulnerable customers with a view to alleviating fuel poverty and helping fuel-poor customers with the transition to decarbonisation. There was interest from vulnerable customer representatives, utility companies and business customers in sharing data among organisations so as to make their work with vulnerable customers more efficient.

WPD'S CURRENT VULNERABILITY STRATEGY

There was broad consensus that the focus areas for WPD's current vulnerability strategy were on the right lines, but many stakeholders wanted to know how these proposals would be delivered in practice. The importance of partnerships and collaboration was a recurrent theme during the discussions. Stakeholders wanted to know whether WPD would be working with energy suppliers on the proposals, and some questioned whether the company was best placed to deliver on the suggested actions directly or whether it would be more effective for WPD to fund

groups with stronger community links to carry out the work. For example, a stakeholder questioned whether customers, particularly vulnerable individuals, really need to be educated on smart networks, suggesting that educating partner organisations to enable them to offer support to vulnerable customers would be more useful.

In the same vein, attendees discussed the role of data-sharing with organisations and other utilities, with many suggesting that more data-sharing would increase efficiency and enable all organisations to serve vulnerable customers better.

OFGEM'S PRINCIPLE ONE: Support vulnerable customers through sophisticated management, promotion and maintenance of the PSR

Ofgem has set out five baseline expectations under this first principle, which focuses on managing, promoting and maintaining the PSR. When attendees were asked whether they agree that WPD's proposals for each baseline expectation are ambitious enough (1 = strongly disagree, 5 = strongly agree), the averages for each baseline expectation fell between 3.22 and 3.89 out of 5, indicating that stakeholders felt neutral or leaned toward agreement. The highest-scoring baseline expectation related to communicating in a range of formats and meeting a minimum standard of Accessibility AA, while the lowest-scoring expectation related to proactive and targeted advertising of the PSR, suggesting that stakeholders felt that WPD could go further in this area.

Many stakeholders agreed that a range of channels of communication were needed, including telephone, post, local resilience forums and customers on the network who could disseminate messages via social media channels. There was support for WPD's proposal to use community champions to improve communication with customers, although some stakeholders wondered whether WPD was expecting too much in



the way of volunteer input without offering enough in return. Some stakeholders argued that WPD needed to be more vocal in terms of providing information to people in fuel poverty, informing government of the consequences of all the changes entailed by the transition to a smart network, and generally informing people of what WPD is and what it does.

With regard to WPD's proposed activities around the baseline expectation for a wide range of support in relation to supply interruption, it was commented that a priority in rural areas should be ensuring that the electrical system is sufficiently robust to help people move with the smart network. Concerns were raised about resilience, in particular, how to ensure a constant supply for people who rely on medical equipment in their home. One stakeholder felt that customers would not want to be contacted regarding every outage and suggested that WPD should only contact customers about outages lasting 15 minutes or half an hour. Another suggested that WPD was not doing enough to improve infrastructure and was instead simply dealing with power cuts as they arose, suggesting that this should be addressed in the Business Plan.

With regard to the baseline expectation for a data and information strategy, there was some discussion of WPD's proposal to contact customers on the PSR every two years, with one stakeholder stating that more regular contact was needed given the pace at which infrastructure was evolving. A representative from a community energy group said that it had been very difficult to make contact with the public without face-to-face interaction during the pandemic and suggested that WPD consider advertising through channels such as radio and the press.

Some stakeholders wondered whether WPD was stretching itself sufficiently with its proposed actions to meet the baseline

expectation for a range of communication formats and meeting a minimum standard of accessibility. One had the impression that WPD seemed to be expecting a lot of volunteer input and queried whether the company was giving enough back. Another felt that WPD should be more vocal in informing government of the impact changes in the energy sector will have on vulnerable customers.

Several stakeholders indicated that they found it difficult to make an informed judgment on the level of ambition demonstrated in WPD's proposals to meet the baseline expectation for proactive and targeted advertising of the PSR without more detailed data on WPD's customer base. One stakeholder was unsure whether the target of identifying and engaging 30,000 hard-to-reach vulnerable customers was meaningful in terms of the size of WPD's customer base. It was also asked how a hard-to-reach customer was defined and how the success of coverage would be gauged.

OFGEM'S PRINCIPLE TWO: Maximise opportunities to deliver support through smart use of data

With regard to WPD's proposed activities under this principle, food banks were suggested as a useful source of data on vulnerable customers. Another suggested that as the country emerges from the disruption of Covid-19, levels of debt should be included in social indicator mapping. Although WPD's level of ambition was ranked in a similar way under the two baseline expectations for this principle, a slightly higher proportion of stakeholders disagreed that WPD's proposals are ambitious enough for the baseline expectation to maintain a good understanding of relevant social issues (11%) compared with the expectation to inform its approach with social indicator mapping (8%).



Stakeholder Feedback

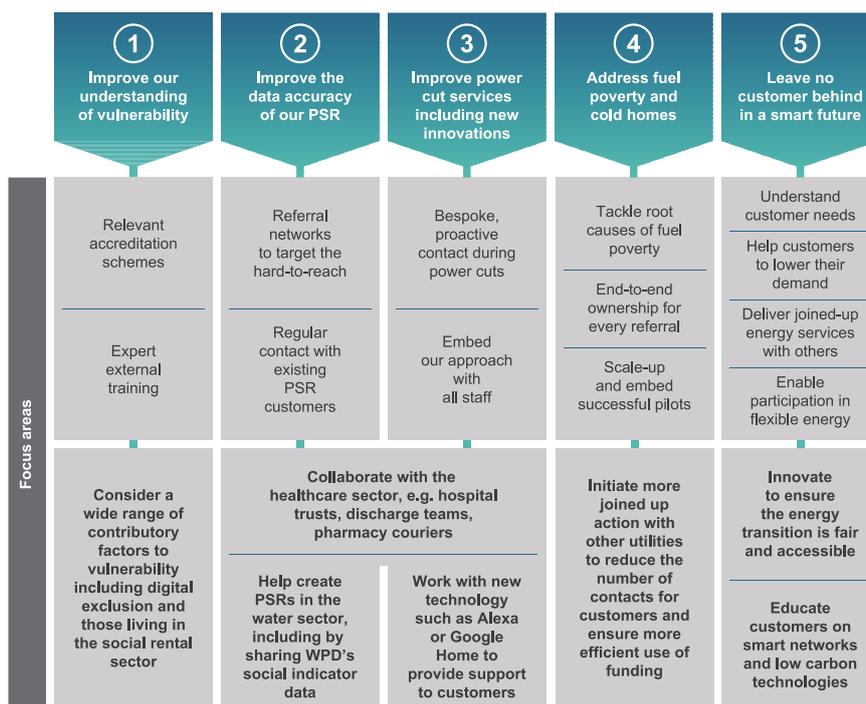
Introductions

- “I’m now a member of the WPD Customer Engagement Group. This is set up to challenge WPD on their Business Plan for stakeholders and customers. I am looking at how to help customers further.” **Consumer body**
- “We are the gas network for Wales and the South West. There is a lot of alignment with our work and this workshop for us to get some great feedback.” **Utility**
- “I’m a customer, I have done work with the water industry on similar areas and want to see whether there are cross purposes we can benefit from.” **Business customer**
- “We are looking out for vulnerable people who rely on oxygen supply. This means they are heavily affected by loss of power. We want to see how you want to keep improving and helping with this in the future.” **Vulnerable customer representative**
- “We provide debt and money advice for vulnerable people within the community. We are quite interested in this workshop today as we find a lot of people find it hard to access and contact utility companies.” **Vulnerable customer representative**
- “My own role is around horizon scanning and looking at how WPD is looking at changing approaches in response to changing vulnerabilities and how that fits in with our approach, both during and after the pandemic.” **Vulnerable customer representative**
- “My interest has been trying to find vulnerable people who are fairly well hidden in an affluent area. We’ve got people at the end of grids or on weak grids and subject to power outages or cuts.” **Local authority**
- “I’m the health champion, I have an interest in our vulnerable people, particularly those who suffer from dementia and mental illness. I’m interested in how WPD reach out to those people who might not be on an identifiable list and how you might identify them.” **Local authority**
- “I’m a respiratory nurse, we provide home oxygen services operating in the south west and London. Even though they get the money back, there is anxiety for families at the end of life and how they manage that. It’s an ongoing concern, and whether they’re on the right tariff. People may not be known to electricity companies because they come on to the spectrum later on and may not have had fuel poverty before but find themselves there. At the moment, I can only signpost them.” **Healthcare body**



- “I’m head of climate change and sustainability at a university and a lot of our research is around vulnerable customers, so very interested in what you are doing here.” **Local authority**
- “We are based in Hereford and are a higher education institute. We aim to be a community university. We want to get our students out working with the community but with local employers.” **Academic institution**
- “One of our projects is fuel poverty, we have energy advisors and have been a partner with WPD for a while. We work in five districts in Devon. We have people in rural areas, so power cuts is something we take seriously.” **Community energy group**
- “I’m a project manager, I help WPD administer grant schemes and across the water industry. I’m also interested in the PSR, the idea of sharing data and more collaboration across water and gas.” **Vulnerable customer representative**
- “I’m a senior assistant at The Carbon Trust. We help people with their decarbonisation journey.” **Environmental group**
- “I’m a senior technician at Shropshire Council. We focus on getting schemes in place to help as many people as we can.” **Local authority**

Detailed below is WPD’s current vulnerability strategy





1. Are these the right focus areas? Is anything missing?

- “The objectives look fine. I was interested in how they’re going to be delivered. Obviously, you’re talking about people who are often hard to reach. Whether you get to those people and how you reach those people, I’m not quite sure how that works?”
Local authority
- “What are you actually doing with the customers, what will this look like at the end of the day? Is it advice and support or is it actual initiatives? Are WPD actually best placed to do this, as we are working with a number of groups who are struggling for resources and they have stronger links to the local community. How are WPD going to really help in this area?” **Local authority**
- “So you are funding other organisations to work with those people. Is one of those Citizens Advice, for example?” **Local authority**
- “You don’t mention the energy supply companies, and they’re the people that have direct contact with customers. Do you work with the energy supply companies to get your message across? How do you collaborate with people like us?”
Community energy group
- “It’s the partnerships that are the most important part. WPD acts as a coordinator, they have coordination at their centre. What they do is they establish a contract with a provider, because they can’t give advice on a whole range of vulnerability issues, and they contact the organisations that can help and form a contract to make sure that something concrete is being done.” **Business customer**
- “My only comment would be about educating customers on smart networks and low-carbon technologies and I think particularly around vulnerable customers. Do they really need to know? I don’t need to know about how my Sky box works. Educating partner organisations to make sure they can provide support to customers that need it would make more sense.” **Community energy group**
- “Under point 4 ‘address fuel poverty and cold homes’, the government produced its Energy White Paper in December 2020 and in the section under buildings, what they’re looking to do is to raise all properties of Band D to Band G to at least Band C standard by 2035. Is that something that falls within point 4 or is that additional to point 4?”
Parish / community council
- “Under points 2 and 3, where you’ve got ‘collaborate with the healthcare sector’, and



you've got some examples, I was wondering if that also includes adult social care teams with local authorities? They have direct contact with vulnerable customers and they provide leaflets and support information. Perhaps that's an avenue where you can provide information without being on the PSR?" **Local authority**

- "I just wanted more information about the point under pillar 5, 'delivering joined-up energy services with others'. How does that work?" **Parish / community council**
- "About KPIs, one of the downsides is that the company can be more risk averse with less ambition. I wouldn't like to see that happen with WPD; I think some of the things they're trying to do are very innovative. To put numbers on it might not force them to be so advanced." **Business customer**

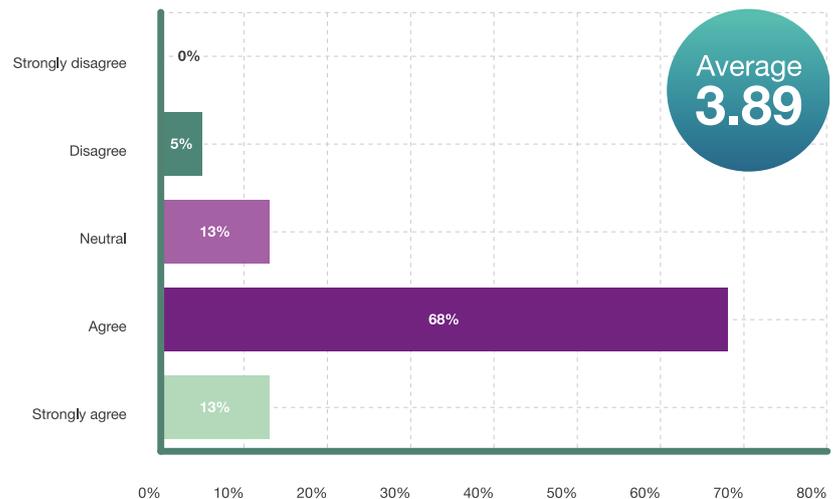
The workshop groups then discussed the first two of Ofgem's four principles for the new vulnerability strategy, under each of which sit a series of baseline expectations. Stakeholders were asked the following three questions for each of the baseline expectations, and also used Slido to indicate whether they thought each baseline expectation is ambitious enough:

2.
 - Do our proposed actions meet the baseline standards?
 - Are there areas we should go further, or make different commitments?
 - What specific targets, measures and performance levels do you want to see?

Principle One: Support vulnerable customers through sophisticated management, promotion and maintenance of the PSR



Range of communication formats and meet a minimum standard of accessibility AA



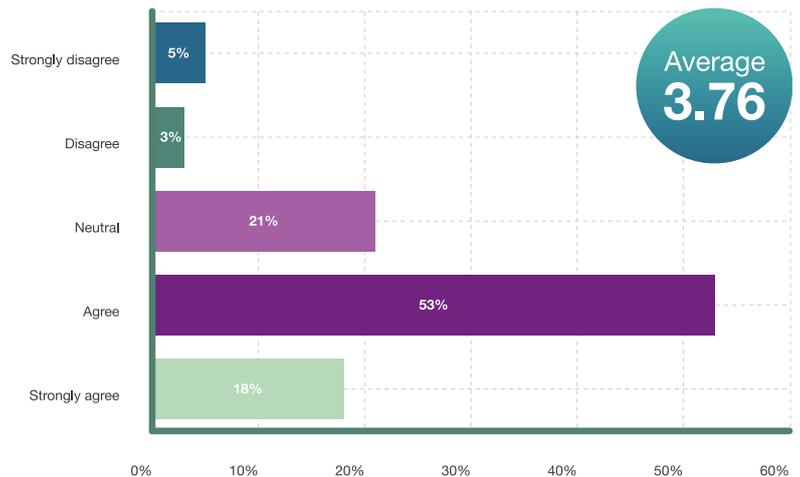
- “Sometimes you need to contact people in more than one way. Sometimes people will talk on the phone but not open the post. I think with vulnerable people you need to make sure you’re hitting different bases with them.”
Vulnerable customer representative
- “Don’t forget about customers on your network who can pass messages on, for example, we have 8,000 likes on our Facebook page and we’re always happy to pass messages on.” **Vulnerable customer representative**
- “There are local resilience fora that work with parishes, which would be a good way to coordinate with parishes. There are lots of parishes and they’re all different.”
Local authority
- “The network of community champions I think is a great idea. But it also offers the opportunity for a two-way communication, perhaps where those community champions might actually feed in live concerns and evolving concerns.”
Academic institution
- “Also looking to food banks for champions, they increased during Covid.”
Vulnerable customer representative
- “Are you expecting these community champions to be volunteers? Unpaid? I get a sense you’re expecting a lot of volunteer input into this strategy. I just wonder what you’re giving back. I just think you need to keep an eye on that.”
Community energy group
- “Are postcodes the right thing to identify? One of the problems with postcodes is that



they actually cut across at civil parish boundaries.” **Parish / community council**

- “Our parish council is working on an emergency plan, but I think this could be picked up on in the district. There could be a list of vulnerability groups that could feed back information from the utilities.” **Local authority**
- “Have you thought about cognitive health? So things like mental health?” **Vulnerable customer representative**
- “I find with a lot of our tenants, the biggest problem is that they don’t know who you are. They just think you’re another energy company that’s trying to sell to them. You should do a lot more to let people know who you are and what you do.” **Developer**
- “We can find vulnerable people being left behind in the changing of the network. There needs to be the electrical infrastructure in place to help people move with the smart network. There’s a massive gap in the information that we need to help people in fuel poverty. We make contact with thousands of vulnerable people, but what do we actually do for them?” **Local authority**
- “One of the problems that I see is that WPD should be standing on a big platform shouting out what is capable of being produced. I don’t hear people like WPD telling the government the consequences of all these changes.” **Business customer**

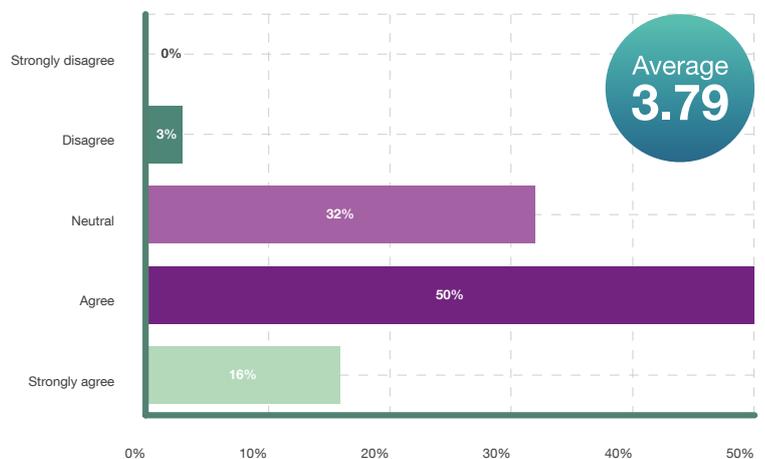
Dedicated lines for PSR customers





- “Thinking about patients that may rely on medical equipment, it’s absolutely essential they have a constant supply of electricity. Can they have a generator in their homes? How do you prioritise that? Who needs to be contacted? It’s about having a continuum of different carers.” **Vulnerable customer representative**
- “In the event of a power cut, how do they use the phone?”
Parish / community council

A wide range of support in relation to supply interruption



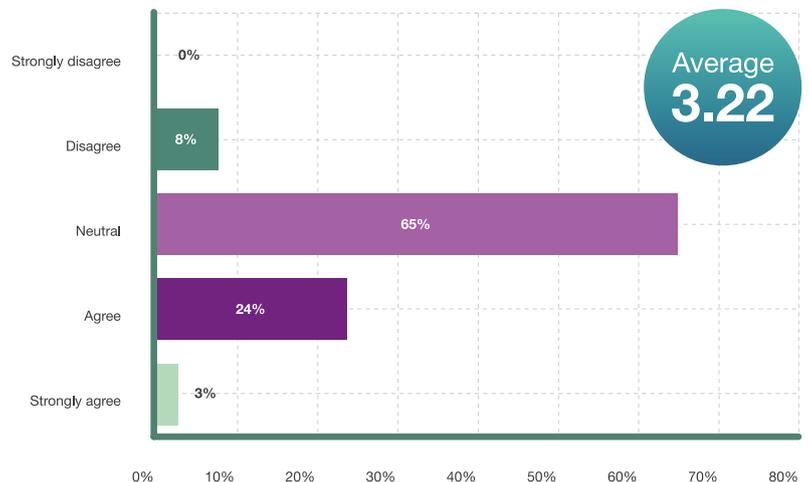
- “I think you do pretty well with it. I receive emails from you if there is a threat of a power cut or bad weather. The only question I have is whether fuel poverty actually qualifies someone being vulnerable.” **Parish / community council**
- “A lot of issues I have with people I work with is there is huge confusion over who is responsible for things within the home.” **Vulnerable customer representative**
- “Resilience is an interesting area, both in current circumstances and what’s happening in 5 to 10 years, specifically to do with care homes and uninterruptable power sources. The technology rolled out for general use could also be targeted for particularly vulnerable customers.” **Academic institution**
- “I’m just worried about ‘every outage’ as I know some are very short and are restored very quickly. You don’t want people being called to say you’re going to have an outage for five minutes. I just think we should put some parameters on that. Maybe half an hour. Maybe more than 15 minutes.” **Community energy group**
- “The economics of supporting a rural area are pretty weak for something like WPD.



An area like Herefordshire has very high indicators and poor infrastructure. It seems you're actually doing very little to improve that infrastructure rather than just dealing with power cuts as they arise. Is there anything in your Business Plan that deals with that?" **Local authority**

- “Is part of this package going to look at working with social care providers who are now using assisted care technologies in the home? Someone who needs a ventilator to keep them alive, will there be an option to set up a backup power supply for them? Are there minimum service standards for what you have to provide for medically vulnerable customers?” **Local authority**

Proactive and targeted advertising of the PSR



- “Have you considered general press, radio media type advertising? We’ve found it really quite difficult over the past year to make these contacts without the face-to-face stuff. It’s a hard graft to get the contacts out there.”

Community energy group

- “How do we know what the success of coverage is? Is there some external means of gauging how good the coverage is?” **Academic institution**

- “How are you defining a hard-to-reach customer?” **Community energy group**

- “Whether 30,000 is meaningful in terms of your customer base, I’m not sure. WPD’s area covers lots of rural areas where people are likely to be less accessible. As long as your strategy understands that diversity, I guess those numbers make sense. Without some more data it’s difficult to know if it should be stretched.”

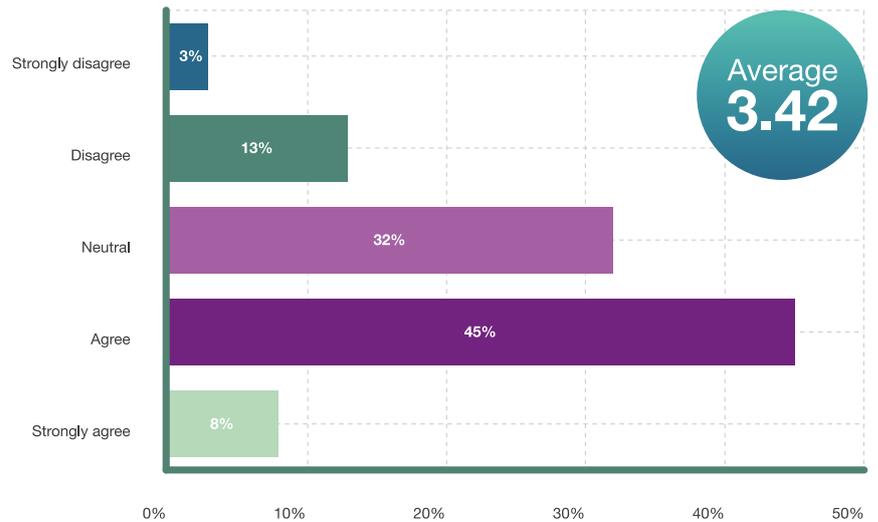
Community energy group



- “In December Bristol Water had an outage... we compared our lists of vulnerable people affected, and we had 160 people and they only had 7. If they’d come back to us we could have given them the list of postcodes and they could have followed it up. It’s probably for our carers and social workers to push the scheme as people move into council residences.” **Local authority**
- “I find WPD do such a good job of notifying me when there is a power cut that I’m still having doubts about how the consumer champions would help. Does this mean contacting the PSR every two years is no longer relevant, should they do it a lot more frequently?” **Business customer**
- “Community libraries as a network that isn’t necessarily national. Libraries need reinforcing for all sorts of reasons, they’re talking about hard-to-reach people and are an access point. It’s a low-tech access route that doesn’t rely on digital communication, which isn’t always solid with vulnerable people.”
Vulnerable customer representative
- “I was concerned with how big of a stretch is that target compared with where you were before?” **Vulnerable customer representative**
- “Am I right in saying that your register is registered with the gas industry? I imagine that would increase the footprint quite a bit, once all the data is in one pot. When you get a call from a customer, do you use that process to identify whether or not they’re vulnerable? If we know the criteria, we sign up 1,000 customers a year to a new home, then we can cover that at the time.”
Vulnerable customer representative



Data and information strategy, with customer data checks every 24 months and data sharing with suppliers and other utilities



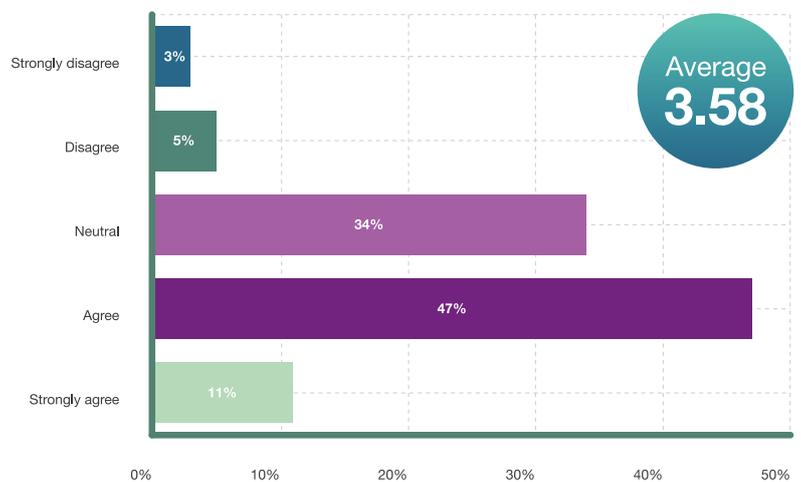
- “Every two years in infrastructure is not enough, so there needs to be that regular dialogue between these agencies who are trying to keep things up to date.”
Local authority
- “Yes, KPIs are important, particularly in the general sense with red, amber, green. I’m concerned about the PSR because you’ll contact 2 million people every two years, and 40% of them by phone, and that seems to be a conflict.” **Business customer**
- “When you’re talking about partner agencies, are you talking about other suppliers?”
Vulnerable customer representative
- “You are the clear influencer within an area. I am concerned there is little understanding of the PSR outside these groups. If you’re taking on some of these suggestions of things that aren’t necessarily in your remit, are you spreading yourself too thinly? I think it’s spot-on when you said about possibly doing a vulnerability check on everyone that doesn’t have to be in the PSR.” **Local authority**
- “The one group of entities that haven’t been mentioned at all thus far are the energy suppliers. I afford WPD great credit for addressing fuel poverty, but you’re not causing that problem. One of the biggest problems is the energy suppliers and how they’re charging bills. Not just the big well-known suppliers, but also some of these new start-ups.” **Community energy group**
- “Energy suppliers have these PSRs but I don’t think they actually do anything with them. Where people need somebody to speak on their behalf, the data protection rule really gets in the way of that, when they need help to access priority services.”
Developer



- “You talked about working with gas and water companies, but you didn’t talk about electricity companies, I wonder why.” **Business customer**
- “As DNOs, we share best practice.” **Utility**

Principle Two: Maximise opportunities to deliver support through smart use of data

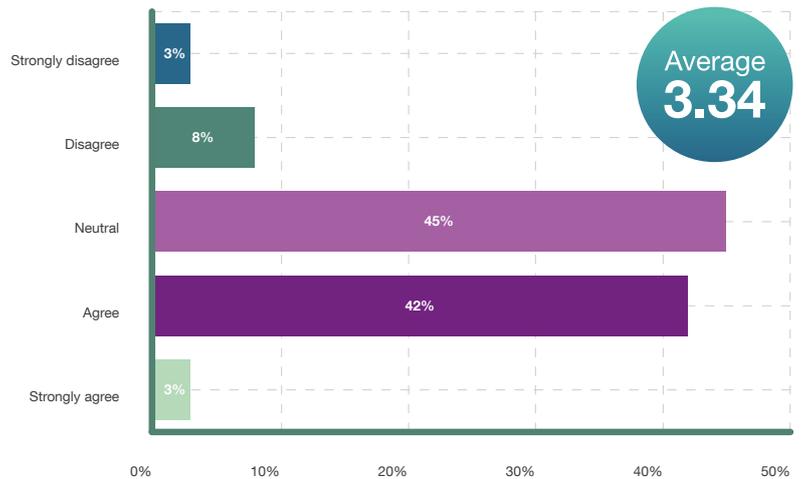
Use social indicator mapping to inform approach



- “Debt levels would be a good one to include, especially coming out of Covid.” **Community energy group**
- “You could also look at aligning it with various types of vulnerable customers, almost a mapping exercise, with the characteristics of people in different vulnerable situations, so it’s more customer-focused rather than regulator-led. It needs to be aligned to the changing needs of people.” **Vulnerable customer representative**
- “We just had all the customer characteristics in an Excel file, checking that we had partners for each of the categories and what we could do for those customers to make sure it was customer focused. I’m sure WPD have done similar.” **Utility**



Maintain a good understanding of the social issues associated with the scope of the DNO's role



- “I think food banks, they’re a useful group of people.” **Community energy group**
- “There’s a trend of food banks closing and variations such as social supermarkets popping up. They vary so much, so the issue is that their data-sharing is variable. But they are a good starting point for messaging.” **Vulnerable customer representative**



Workshop Two

WPD's Consumer Vulnerability Strategy (Part 2)

Summary

Alex Wilkes also introduced the second workshop, which explored Ofgem Principles Three (understand new forms of vulnerability) and Four (embed the approach to protecting the interests of vulnerable customers throughout company operations). Alex explained that WPD was looking at how the smart future and fuel poverty would impact vulnerable customers and outlined the company's proposals for addressing these issues in line with the baseline expectations laid out by Ofgem, with an emphasis on building a strong and effective network of partnerships and embedding the commitment to protecting customers' interests in WPD company culture.

According to the electronic voting, stakeholders felt that WPD's proposals on having an extensive network of partnerships and identifying which partnerships are likely to be most effective in terms of delivering benefits for fuel poverty were relatively ambitious, scoring an average of 3.63 and 3.54 out of 5, respectively. Conversely, it was felt that, of the expectations covered in this workshop session, WPD showed the least ambition in its actions under Ofgem Principle Four; the proposals for the baseline expectations to ensure that protecting customers' interests is embedded in the company's culture and to seek opportunities to protect vulnerable customers received 3.32 and 3.06 out of 5, respectively.

OFGEM'S PRINCIPLE THREE: Understand new forms of vulnerability

WPD's proposed actions under this principle provoked much debate, particularly in

terms of how to build partnerships and use a partnership approach to support the company's work to understand new forms of vulnerability. WPD was advised to be more transparent with regard to partnership working by publishing a list of the organisations it is partnering with. Several stakeholders were keen to discuss the relationship between WPD and energy suppliers, suggesting that work should be done to educate customers on the services that WPD and energy suppliers provide and the help that they can offer to vulnerable customers. Some suggested that WPD should do more to involve suppliers in its work to understand new forms of vulnerability.

With regard to WPD's proposals for the baseline expectation to identify effective partnerships to support the energy transition, there was some concern over how vulnerable customers would perceive the relevance to their lives of the transition to smart energy. Several stakeholders argued that the general population had a very low level of understanding of the net zero transition and issues around decarbonisation, and customers struggling to make ends meet were unlikely to see why educating themselves on new technologies such as electric vehicles should be a priority.

A number of stakeholders suggested that partnering with agencies that work with vulnerable customers would be key in enabling WPD to successfully engage with vulnerable customers on the energy transition. Working with private landlords was raised by several stakeholders as a tricky but important step, although it was noted that landlords with only



one or two properties should be addressed differently to larger rental businesses. It was also stated that while social landlords have a duty to improve energy efficiency, this might be difficult to achieve in some properties, and installing smart technology in social housing would be one way to address this. It was noted that there was little government funding available to help people understand how retrofitting could benefit them, and it was felt that WPD should look into commissioning and funding third-party organisations such as Eager and Act on Energy to carry out this work in local communities.

With regard to WPD’s proposals for the baseline expectation to identify partnerships for delivering fuel poverty benefits, there was a general consensus that fuel poverty should be addressed in the wider context of debt, food poverty and changes to Universal Credit, and that partnerships with other organisations are crucial to this work.

OFGEM’S PRINCIPLE FOUR: Seek opportunities to protect vulnerable

customers throughout our capabilities

During the discussion, there was widespread agreement that WPD was showing good ambition regarding embedding a commitment to protecting vulnerable customers’ interests in the company culture, and that this attitude would help drive work throughout the business that would have a beneficial social impact. Not all stakeholders felt this way, however, as around a quarter of voters disagreed or strongly disagreed that WPD’s proposals in this area are ambitious enough. Stakeholders suggested that to embed a commitment to protecting customers’ interests in company culture, WPD should ensure that all customer-facing staff receive training, not just those who work specifically on the PSR. The company was also advised that training should cover how to make a safeguarding referral to a local authority, and one stakeholder suggested introducing safeguarding champions.

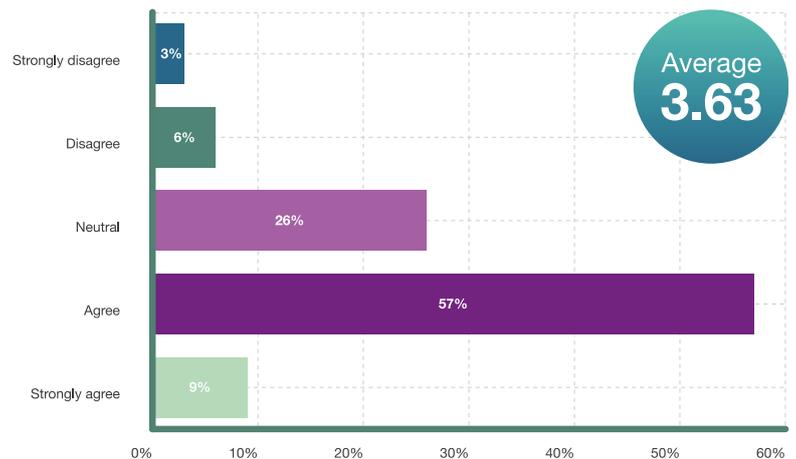
Stakeholder Feedback

- Do our proposed actions meet the baseline standards?
- Are there areas we should go further, or make different commitments?
- What specific targets, measures and performance levels do you want to see?

Principle Three: Understand new forms of vulnerability



Have an extensive network of partnerships



- “This is potentially a huge area. I’m not aware of anything in Shropshire that WPD do. If you are intending to get involved in this area, I can’t understand the scale. I’m assuming you’re looking for more partners for more scaled advice.” **Local authority**
- “Perhaps there needs to be some work with energy suppliers to help customers understand who provides what support. I’m thinking a vulnerable customer may be put off from signing up to the PSR because they’re not with WPD, so they can’t access help.” **Local authority**
- “I get concerned that WPD is not involving the supplier. It’s like the supplier just takes money out the system.” **Business customer**
- “I think when we start to talk about smart, we have to be very careful about mixing it with vulnerability. If you’re struggling to make ends meet, the whole smart conversation is virtually irrelevant.” **Community energy group**
- “Being able to join the smart future by having electric cars is not relevant for our customers at all.” **Vulnerable customer representative**
- “There is a shocking lack of knowledge of the smart agenda in the wider population. We need to have a conversation about what this weird term ‘low-carbon’ is. I’ve had conversations with the council where they’re still misusing the terminology. The challenges here are much vaster than has been captured.” **Community energy group**
- “There’s a bit of a vacuum around smart technology and whether it really helps. With stakeholders, the starting point should be around demystification. I think a lot of people are wary of the tech and what happens to the data. A clearing of the decks – in terms of ‘this is what it is and this is what it can do for you’ – would help people.” **Vulnerable customer representative**
- “We have to remember that if people who are not vulnerable are struggling to



understand, how much more difficult it is for the vulnerable.” **Local authority**

- “What’s the difference between smart energy future and the current energy efficiency schemes – what does it mean for the vulnerable customer?”

Vulnerable customer representative

- “That education would be useful for the agencies working with vulnerable customers, so that we can explain effectively to them.”

Vulnerable customer representative

- “There are lots of energy groups out there. For example, in Devon we’re blessed to have lots and are well placed to carry out some of that educational work with WPD. There’s a lot of base education to be done before we even get to the smart energy side of things. Vulnerable customers have no idea how WPD fits into their life.”

Community energy group

- “You mentioned the net zero transition. What does that mean for them, and what activities would they need to undertake, how would it affect their lives? That’s what you need to communicate with partner agencies.” **Vulnerable customer representative**

- “You should be pushing more towards cross-collaboration. If you’re struggling to put food on the table, you’re struggling with your water, your energy. The more collaboration, the better.” **Vulnerable customer representative**

- “I wonder if it was possible to pick up the customers on the PSR that go from prepaid meters to credit meters, as they will need additional support.”

Vulnerable customer representative

- “There are vulnerable customers, and then there’s ‘no customers left behind’ and I don’t think they’re the same thing. We’re talking about people that use the tiniest amounts of energy. Vulnerable customers need something quite different.”

Community energy group

- “One of the problems with the smart future is that it’s in the future. I know we’re putting in smart meters, but actually getting the benefit of those is some years away. Somehow we have to persuade people to invest now so that they will be ready to get lower bills through flexibility. Most energy suppliers are offering time of use tariffs and that kind of thing, so it’s a bit in the future.” **Community energy group**

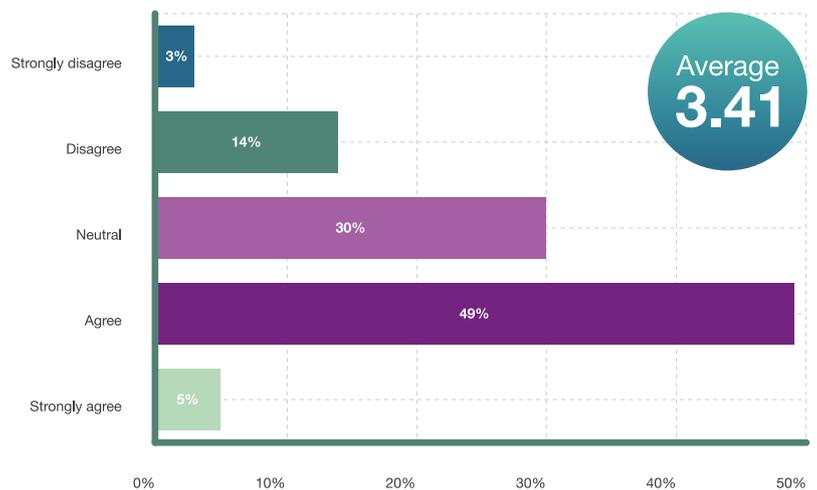
- “We are looking at the use of blockchain technology for purchasing energy in half-hour intervals. Vulnerable people will not have access to that. We’re looking at reducing the demand on the energy network, which makes sense from an environmental and economic perspective, but we need to help vulnerable customers to access that.”

Business customer



- “People won’t tend to engage with you on these things until it’s an urgent issue. People have strategies to manage their lives week to week and day to day, so be prepared to cope with a surge of interest as the deadline comes up.” **Vulnerable customer representative**
- “There are 4 million social homes in England, approaching 20% of all houses. Are there options for us to share our data? To my knowledge we haven’t registered the fact that we’ve got schemes with vulnerable people living in them and we should be recording that data.” **Vulnerable customer representative**

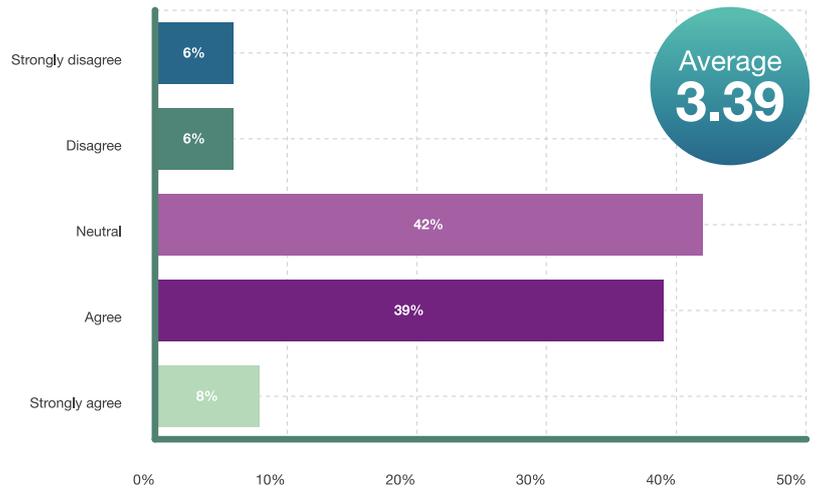
Make use of referral channels to signpost support



- “Part of your strategy needs to be that you are able to refer people to other things within the utility sector.” **Vulnerable customer representative**
- “I’m not sure actually because when I’ve tried to find out, it’s difficult to know who your partners are. We used to run a power project many years ago and when I was trying to work out what you were doing, I was referred to a partner in Nottingham which is far away from us. Be more transparent or publish partnerships in the area.” **Local authority**

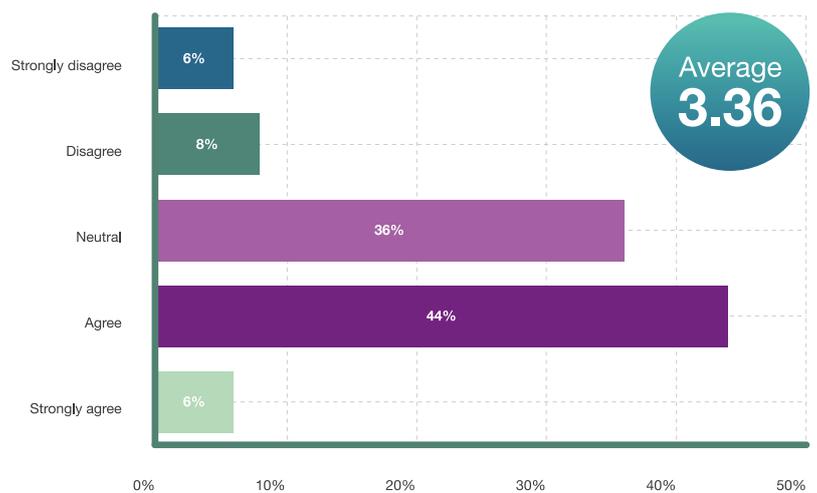


Be involved in two-way flow partnerships



- “Maybe some sort of longer-term support would be helpful where we can think about staff and training. It’s quite difficult at the moment the way we have to work. If there was a way we could work with WPD on a longer-term basis of delivery. I’m not sure if these words are saying that.” **Community energy group**
- “It’s interesting that you have five points on here of things you could do differently, when I was thinking this was a place where you did quite well. I’m wondering not if you’re being too ambitious, but you’re feeling that you’re needing to be more ambitious than you do need to be in this kind of section.” **Community energy group**

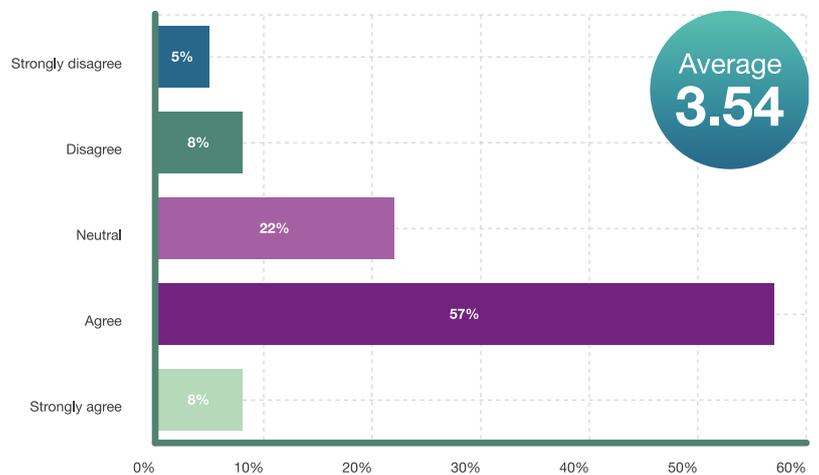
Identify which partnerships are likely to be most effective to deliver benefits (supporting the energy transition)





- “I think it’s critical that these people are engaged – those people who have the knowledge to pass through the system to help not only vulnerable customers but the whole population. You’ve got your vulnerable customers and they don’t know what they’re doing.” **Business customer**
- “It’s difficult as we’re still waiting to find out the standards for our own industry. We haven’t had the specifics spelt out to us. We’re worried about it as it feels like a bottomless pit and we might not have the resources to retrofit everything.” **Vulnerable customer representative**
- “You’ve got a call for improving infrastructure, and it would be useful if there was an extra dimension where if you’ve got a project, then there was a linkage so we could make sure vulnerable customers can get involved with it. As the government rolls out retrofits, they need to make sure the infrastructure is in place to allow us to do that, particularly properties of certain ages that use gas heating. Working with Registered Social Landlords and others who will have contact with that vulnerable group, there needs to be more coordination there.” **Local authority**

Identify which partnerships are likely to be most effective to deliver benefits (fuel poverty)



- “I don’t think there’s anything missing. I’m confused slightly at what the granularity of fuel poverty indicators is.” **Parish / community council**
- “I have a suggestion which relates more to the PSR. There are no doubt people in your area who are vulnerable because of who they are. I want to know whether they are taken care of as well in terms of how vulnerability affects fuel poverty.” **Parish / community council**



- “If I were to look at the whole market, people are slipping into vulnerability and fuel poverty because of your industry. Everything I’ve heard about WPD has been good. When you guys said about the dedicated number, I thought oh that’s good. It’s more the whole market, the amount of people getting into debt. People can’t efficiently look at their energy usage in line with their bills.” **Vulnerable customer representative**
- “If the 105 number was available to just register for the PSR, that would be great.” **Vulnerable customer representative**
- “What is the situation at the moment, if they have a different gas supplier to their electric, does it automatically transfer?” **Vulnerable customer representative**
- “I welcome the number of partners to be broadened. How are you going to get around working with private landlords? In my experience, the only thing that forces them to do something is their conscience. One-point communication, ease of contact, who is responsible for what. You can use tools as you want, but it’s the organisation you are partnered with that is critical.” **Vulnerable customer representative**
- “You said it was 27 million people you had reached in the past, but you said it’s hard to measure the impact and what the service is exactly bringing to the customer. How is this measured?” **Environmental group**
- “What is your measure of fuel poverty? Many people would not want to admit they’re in fuel poverty. So the energy efficiency of the home is not part of that?” **Parish / community council**
- “If we’re using the Reduced Data Standard Assessment Procedure energy bands, there are some fundamental problems with that. You could have taken out some energy efficiency measures years ago, but they deteriorate over time, but it never affects your SAP rating. People are living in houses of say, a SAP Band C, but they’re not in effect a SAP Band C, they’re far worse than that, but there’s no help for them.” **Parish / community council**
- “It’s understood, I think, that if you spend 10% or more on your bills, then you’re in fuel poverty, so it doesn’t just mean households, it’s companies as well.” **Academic institution**
- “It is an ongoing problem. The change to universal credit puts pressure on families’ finances and it takes them a long while to recover. When they’re struggling to pay their rent, energy and water suffer in terms of arrears.” **Community energy group**
- “There’s a lack of understanding of the link with food poverty.” **Vulnerable customer representative**



- “I don’t know where those figures have come from, but how you’re going to do it is the real challenge.” **Community energy group**
- “Around landlords, what exactly would WPD do to actually make the energy efficiency improvements? Would you work with partners to do it? One of the big problems at the moment is we haven’t got a decent grant scheme. The Green Homes Grant has failed fundamentally. We’re waiting for a comprehensive, well-founded, long-term grant scheme to refit or retrofit poorly insulated homes. It’s not your problem in a way, but it’s an environment we’re all working in at the moment.” **Community energy group**
- “The vast majority of the WPD area is level 4 wind-driven rain areas, and that has ramifications for cavity wall insulation.” **Parish / community council**
- “In Bristol I’ve started trying to layer map risks. Is that something you need support with?” **Local authority**
- “It is entirely dependent on factors out of your control. For example, tackling water debt is dependent on whether the water companies are putting people on to the right tariffs. I think the figures you’ve got there are achievable.” **Community energy group**
- “We had an additional 30,000 customers each year to join the PSR. I think we could probably be a bit more ambitious on that front, while acknowledging that savings are often dependent on these parties.” **Vulnerable customer representative**
- “I would like you to separate out very explicitly working with social housing, which gets a lot of support from central government, from where we need to focus, which is on the private rented sector. We’ve got big private rental landlords that should be doing a lot better, but the bulk of landlords are smaller, with one or two properties. There are some very specific issues with private renting that we need to address.” **Community energy group**
- “We only get to speak to landlords when they need our help! I wasn’t sure whether it’s something WPD should be doing, it depends on the energy efficiency improvements.” **Community energy group**
- “National landlord fora can be useful. With social landlords, they do have a duty to bring their energy efficiency up. But maybe they have some properties where that’s difficult. There’s a company that works with social landlords that put in smart communication and controls into social housing that allows the provider to contact the resident and contact about their heating, look at the boilers, etc.” **Local authority**
- “Estate agents would be a good place to contact. There are other landlord or letting agents too.” **Local authority**

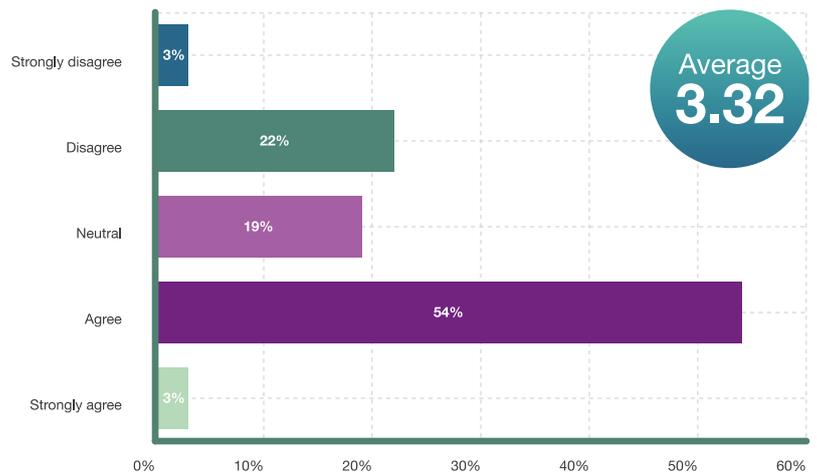


- “The main social housing providers have got further away from their partners because of the stress of rent arrears and their financial difficulties. We have a distant relationship now. One of the problems with dealing with vulnerable clients is they don’t have control of their own energy. Social housing providers have been in a difficult position since universal credit, it’s a flaw in the design. Claimants automatically have a debt problem. Landlords aren’t interested in your ability to pay for energy or afford energy-efficient appliances, they just want you to pay your rent on time.”
Vulnerable customer representative
- “You both go direct to the client and go through organisations like ours. We take a holistic approach. If you’re an energy advice organisation, that’s your thing. We try to put all the bits of the jigsaw together.” **Vulnerable customer representative**
- “Do you fund the stakeholders, so are you commissioning them? Is this your delivery or is someone else delivering it on your behalf? What you haven’t put in the document is the amount of investment in this, so what’s your stake in this?”
Vulnerable customer representative
- “For me there’s a trend that’s a real concern. There’s funding coming from the government to carry out the retrofitting, but there’s limited funding for the organisations that provide the service of helping people see the way that retrofitting advantages them. I want to know if you’re in the position to commission those organisations to support the retrofitting activities.? Third-party organisations like Eager, Act on Energy, that work in local communities.” **Local authority**

Principle Four: Embed the approach to protecting the interests of vulnerable customers throughout our company operations



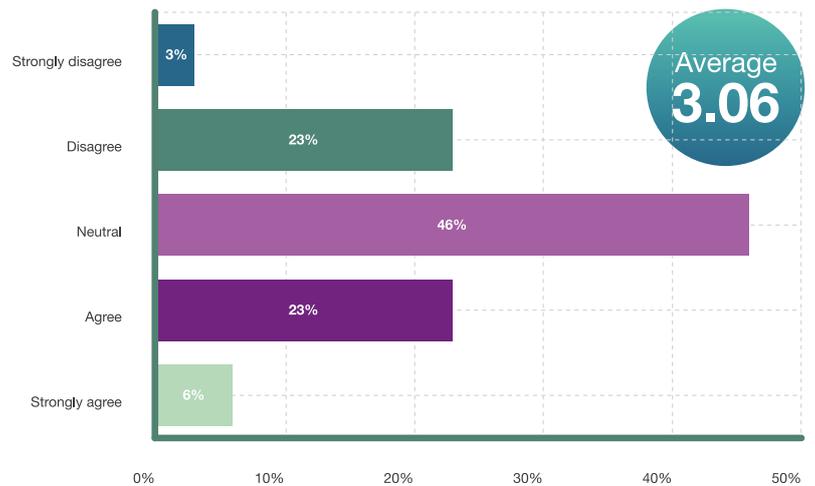
**Embed
commitment
to protecting
customers’
interests within the
company’s culture**



- “It’s the very tip of the spear to drive a lot of social impact work through the business, so I’m very pleased to see that there.” **Academic institution**
- “If we’re talking about is it ambitious enough, yes, it might come up in everyone’s personal development review or it might be something spot tested. I’m thinking particularly of people on the phone, obviously if you’re on the PSR dedicated phone, then it’s all covered, but if you’re not, have you had any interactions?” **Community energy group**
- “I think it’s sufficient, I don’t think you need to overstretch. I worked in the civil service and there was training all the time and you could have too much of a particular subject. I think it’s very important where you’re going and two years is the ideal period.” **Parish / community council**
- “Does your training include how to make a safeguarding referral to a local authority?” **Vulnerable customer representative**
- “Do you have safeguarding champions? Not everyone has to be trained, but there has to be someone to speak to in that eventuality.” **Developer**



Seek opportunities to protect vulnerable customers throughout our capabilities



- “Identifying the capability of customers to participate, do we also need to start thinking about data poverty, especially as Covid has shown us that families are struggling in that way. Maybe we need to have a wider view of fuel and service poverty.” **Local authority**
- “It looks really comprehensive. I’d be interested in the mapping, so with EPC data and quality data, is it sophisticated enough yet? What this isn’t telling me is how this turns into a thing or an activity.” **Vulnerable customer representative**
- “I think the field app is a great thing to have as you can just do it in the moment, that’s for sure. Your execs could play a role in role modelling this stuff. We would set individual targets for these sorts of things.” **Vulnerable customer representative**



Workshop Three

Social Contract

Summary

Eleanor Patey, Social Obligations Officer, introduced the third workshop, which focused on WPD’s Social Contract. She gave stakeholders some background information, explaining that the contract had been developed with input from stakeholders, and outlined the proposed structure. She listed 15 expectations that stakeholders had set out and explained that they now form the foundation of WPD’s Social Contract, defining the key focus areas and shaping the company’s approach to the enduring performance evaluation and improvements. She went on to explain how WPD had used these stakeholder expectations to develop 10 high-level focus areas under the three broader headings ‘Responsible Employer’, ‘Resilient Communities’ and ‘Protected Environment’. WPD was now asking stakeholders whether the company had interpreted stakeholder views correctly, whether any priorities had changed and whether anything was missing.

AMBITION AND SCOPE OF PROPOSALS

The broad outline of WPD’s proposed actions to meet the 15 stakeholder expectations was widely praised as comprehensive and imaginative, but some stakeholders felt that it remained to be seen how the measures would be implemented in practice. A business customer wanted to see KPIs and a vulnerable customer representative felt that it was difficult to assess the scale of WPD’s ambition without knowing how much investment would accompany the proposals. Several additional focus areas were suggested for the Social Contract, including an information portal for projects; climate change

adaptation and mitigation; a commitment to create a certain number of apprenticeships; and cross-referencing WPD’s proposals with the United Nations Sustainable Development Goals.

AREA ONE: RESPONSIBLE EMPLOYER

Under the commitment to be a responsible employer, WPD’s list of focus areas provoked much discussion. Many stakeholders agreed with the general areas of focus but felt the high-level outcomes were expressed in somewhat vague terms, calling for measurable data and more tangible targets. Stakeholders mooted a number of potential targets under the Diversity and Inclusion focus area, including setting a target number of people to employ from deprived areas, and a 50/50 gender balance for graduate engineers. The company was also advised to target apprenticeship opportunities to achieve a more diverse cohort. Several stakeholders felt that some of WPD’s high-level outcomes were what would be expected of any business, such as having an ‘excellent safety culture’. Some stakeholders wanted to see more commitments on training the workforce, and one felt that there should be a concerted effort to really engrain disability awareness within the company. It was suggested that benchmarking against other organisations could help WPD to gauge whether it was challenging itself enough. It was also observed that the Social Contract needed to be able to evolve and continue meeting goals as circumstances, the company and its customers change.



AREA TWO: RESILIENT COMMUNITIES

Under the commitment to promote resilient communities, the local focus was popular. There were questions about how the focus area ‘Just and Fair Net Zero Transition’ would be applied in practice. One stakeholder wanted to see a commitment about being able to react quickly to developments as they happen. Stakeholders identified several missing high-level outcomes, including a plan around three-phasing homes to boost community resilience; using colleges as a route to getting people into work; filling the gap created by the lack of information from the government on smart energy; providing more information on electrical safety; and doing more to inform people of WPD’s role to avoid confusion between the company and energy suppliers. One stakeholder felt that the outcome relating to community resilience was a long way removed from WPD’s core purpose of keeping people safe and supplied with electricity and it was a big ask for WPD to measure social cohesion in communities.

AREA THREE: PROTECTED ENVIRONMENT

On the commitment to protect the environment, there was a degree of scepticism from stakeholders, with one saying that WPD’s commitments looked a bit thin, another wanting to know whether WPD would be offsetting or reducing emissions, and a third saying that the results would depend on how the outcomes were delivered. It was suggested that partnering with local councils and social housing providers could help to achieve WPD’s objectives in this area. One stakeholder said that WPD should do more to publicise its work in this area as a way to engage with customers. A suggested missing high-level outcome was unlocking opportunities for sharing surplus electricity through the smart energy network and microgrids. A change in regulations would be needed for this to happen, it was observed, and some stakeholders expressed the hope that WPD could facilitate this change.

Detailed below are the 15 expectations that stakeholders had previously asked for as part of the Social Contract

Transparent reporting	Clarity on tax affairs and dividends	Positive outcomes for customers in vulnerable situations	Transparent mechanisms so stakeholders can influence decisions	Innovation to meet societal challenges (not just regulatory / technological ones)
Industry leading performance	Demonstrating WPD is a diverse, responsible employer	Methods for measuring the social impact of activities	Community and environmental investment/benefits	Excellent environmental performance
Fair and clear prices and returns/profits	Responsible and transparent Board governance	A framework for engaging local communities	Playing an active role regionally (e.g. local energy plans/aspirations)	Evidence the legitimacy of our operations for the future



1. Have we interpreted stakeholder views correctly?

- “I think those are the sorts of things that people are demanding these days.”
Local authority
- “I’m interested in the innovation one. I think we’re in this dynamic situation at the moment, and I’m wondering how quickly you can change to adapt to societal changes. Like with Covid, everyone working from home, etc.”
Vulnerable customer representative
- “I think it’s good to see such a broad outline of proposals. It’s very rare to see that in a private company and very difficult to see in a national company, so it’s great to see that such a range is going to be available to the public.” **Parish / community council**
- “It does look comprehensive; it doesn’t seem to include a lot of stuff and it’s good to see the company actually thinking about the social obligation.” **Local authority**
- “I’m interested in how you’re going to achieve it. You see it in a lot of organisations, there’s all kinds of wonderful aspirations, but how are you actually going to do it?”
Local authority
- “KPIs would be welcomed by the customers. The mention of future customers is welcome. It’s good to see that you’re not leaving customers out. Expert analysis is the only way you will achieve success.” **Business customer**
- “I think that there’s a whole bunch of lively things there, but I don’t know what you’re investing in them, so it’s hard to get an idea of a scale of all that.”
Vulnerable customer representative

2. Are there any additional areas the Social Contract should focus on?

- “I had a good look through and I don’t think there is anything missing.” **Utility**
- “The only thing I would flag is having seen the Power Up work in the past, it’s almost as if the problems of people are getting in the way of targets. Whether you guys have got room for this or not, but something like a go-to portal for projects when they do



raise certain problems. If you want a specific question about the industry, there is no one there to answer.” **Local authority**

- “On climate change mitigation, when I hear the word mitigation, I also think adaptation. It probably links very nicely into community resilience type activities. I think it’s worth putting in because mitigation and adaptation are always used in the same context.” **Academic institution**
- “Something the council has done is to incorporate a commitment to creating X number of apprenticeships into contracts. That has given some people an opportunity to acquire skills.” **Local authority**
- “The United Nations has produced Sustainable Development Goals, and it would be good for WPD to cross-reference what you’re aiming for with those goals. They’re all-encompassing, so they’re a good check base.” **Business customer**
- “The Social Contract cuts across pretty much everything that goes on, in the sense that we can say this is the job, this is the main project, now what else can we do to meet Social Contract objectives.” **Academic institution**

Responsible Employer

Responsible Employer

Power to Reconnect. Good. For our Time.

Focus Area	High-level Outcomes
Good Work & Inclusive Growth	Employees have the capacity and opportunity for satisfying and engaging careers
Diversity & Inclusion	The workforce is more diverse, inclusive and socially cohesive
Health & Wellbeing	Employee health and wellbeing (physical and mental) is improved
Social Mobility	More people have access to economic opportunities and fulfilling employment
Safety	Zero harm to staff & excellent safety culture

Example Action Plan Commitment:
Collect socio-economic data to ensure social mobility is considered in our recruitment and progression processes.

What specific commitments and performance levels would you like to see to help deliver these outcomes?

1. What specific commitments and performance levels would you like to see to help deliver these outcomes?



- “It’s a good list and it’s what I would expect to see. With these, it’s important to see the transition to see where you are now and the direction you are heading in. Take diversity and inclusion, for example; I can imagine it is a predominantly male company. It’s going down to that level of detail. Working with organisations like NMITE where we are pushing for a 50/50 gender balance for graduate engineers.” **Academic institution**
- “I think often it is about the language you use as well. Sometimes without realising, an organisation can become orientated around men because naturally you have more men in your company. But without being malicious, it seems rooted in the company. So it’s about getting rid of these.” **Vulnerable customer representative**
- “I assume you’re asking employees what they want. It’s really what the employees want and have you asked them and do they agree with this?” **Academic institution**
- “Does this extend to your contractors as well as your direct employees?” **Parish / community council**
- “I know you have an apprenticeship scheme. It might be worth thinking about diversity and inclusion and social mobility. It might be worth having some type of target of numbers of people in particularly deprived areas as something to look to.” **Community energy group**
- “About your opportunities for young people and apprenticeships, do you target them so you have a more diverse colleague cohort?” **Vulnerable customer representative**
- “Perhaps have some kind of internal training system so people can progress.” **Vulnerable customer representative**
- “I appreciate diverse and inclusive, but there’s something that separates being disability-friendly. That’s a particular issue all the way through the process as an employer, from the job description to the induction and training. There can be tokenism towards being disability-friendly rather than engrained disability awareness.” **Vulnerable customer representative**
- “Benchmarking outside WPD. It’s good to say that your safety is a certain percentage, but what’s happening with similar or diverse organisations, and are you challenging yourself enough?” **Business customer**
- “My only comment would be having the right data to justify your outcomes. You’ve got to find means of measuring. Take the first one for instance. I’d put that as a very wonderful aim, but without a good level of research it’s totally meaningless. If you’re not going to measure it, you’re not going to get the outcome. On the safety aspects, in the customer collaboration panel the aspects are broken down into fairly minute



areas, which makes it easier.” **Business customer**

- “I agree about the measures, and part of the challenge is knowing the extent of commitment that lies behind these measures. Like how you get to people that are currently outside of the industry on board.” **Vulnerable customer representative**
- “As a business in this area, should ensuring zero harm to staff and an excellent safety record not just be part of the daily work of a business and not really part of the Social Contract?” **Vulnerable customer representative**
- “On the health and wellbeing, that’s a bit of a fluffy statement to just say ‘improved’. By how much really? Is it things like that or is there an organisation your employees can approach separately from the company?” **Developer**
- “We’ve developed measures for loads of this stuff by using a company called Be Heard. It’s about getting that baseline of feelings and then making interventions based upon that.” **Vulnerable customer representative**

2. Do we have the right high-level outcomes against each focus area, is there anything missing?

- “This is being a responsible employer for every company. With a social contract, it needs to be able to change to meet the goals as the company and customers change. The circle is good, but it has to be able to be changed and improved to benefit the customer.” **Business customer**
- “About your employees and having open forums, there is engagement from the bottom up, so their voice is not lost. In my workplace, we’re developing empathy training. Rather than a top-down approach, it’s trying to get people engaged and to give examples within themselves and talk to colleagues. The aim is to make them feel valued.” **Healthcare body**
- “Are exit interviews conducted by an independent organisation? Most organisations have one with someone within the company, which isn’t the same.” **Vulnerable customer representative**



Resilient Communities

Resilient Communities

Focus Area	High-level Outcomes
Health & Wellbeing	Those in vulnerable situations due to health are supported
Social Mobility	More people have access to economic opportunities and fulfilling employment
Safety	Electricity-related accidents are reduced
Community Resilience	Communities' capabilities are strengthened to foster resilience and social cohesion
Vulnerability & Fuel Poverty	Our presence protects the most disadvantaged in our communities
Just & Fair Net Zero Transition	The benefits of a smart energy network and renewable energy are accessible to all

Example Action Plan Commitment:
Establish a workforce volunteering scheme, giving each employee two days to volunteer

What specific commitments and performance levels would you like to see to help deliver these outcomes?

1. What specific commitments and performance levels would you like to see to help deliver these outcomes?

- “I think it is a great move to have more of a local focus. I think volunteering and additional funding is a good way of doing this. WPD have skilled staff, so adding them to appropriate local projects would be good.” **Environmental group**
- “I was agreeing with the idea of working with local community energy groups. It would appeal to a lot of people, and I feel like it should be something that big companies should look into more.” **Local authority**
- “It is also really important in the way you are reporting these things. It’s good that you have them, but if no one knows about it, it’s pointless. Have definitive numbers and reporting of these.” **Local authority**
- “I think it’s good to have examples of things you’ve done in the past. Some people will read this and see it as words and not having an impact on the community. I think it’s down to impact reporting and having a baseline; in turn, this will generate ideas for future projects.” **Academic institution**
- “We’ve got yet another solar farm being built down here and it’ll be in another WPD area. Wouldn’t it be great if there were a couple of EV charging points at the same time? Is there something that says, be able to react quickly to changes as they happen



and making the most of the opportunities that are there?” **Community energy group**

- “The outcomes are all great, but a lot of that will depend on organisational-level decisions, around diversity. Do we go top-down or bottom-up? A lot of these I see as being linked quite well with the previous two sessions, and the point around weaving in the Social Contract into everything you do. One thing I’d do is try to map some of those targets we talked about in the previous two sessions against these, I think you’d see quite a lot of overlap.” **Vulnerable customer representative**
- “The Just and Fair Net Zero Transition, how would that take place? As customers, we would be paying for electricity, however it’s generated. We’d have no choice, it’s just something that comes into the house.” **Parish / community council**
- “For me, that would be through your PSR, in supporting them through a power cut. So saying this is what we promised and this is what we delivered.” **Developer**

2. Do we have the right high-level outcomes against each focus area, is there anything missing?

- “With the electrical revolution going on, is there a plan around three-phasing homes, particularly new homes but old homes as well, in terms of resilience?” **Community energy group**
- “WPD are in a position to see where individual needs for three-phasing start to arise and are therefore in a position to talk to the community and say can we do it as a job lot and not just piecemeal.” **Academic institution**
- “Some of the colleges would be useful in terms of getting people into work.” **Local authority**
- “You could build in something about the kinks with education there. You could bring into the personal and social education a lot of those topics and start quite young, so that people are more knowledgeable about their own personal circumstances.” **Business customer**
- “In the gas industry they’ve got a massive load of comms about carbon monoxide safety and electrical safety is also very important. How can you build on what you do



in terms of using your own channels for this?” **Vulnerable customer representative**

- “A lot of people don’t know who you are, and a lot of our tenants wouldn’t think to look on the WPD website for advice. When people have a lot of things going on in their lives, they don’t engage with things until they really need it. You should push yourselves out there more so people are more aware, as a lot of people think you’re just a utility company.” **Developer**
- “The one on community resilience is quite far from your core purpose to keep people safe and warm. I think that’s a big ask to measure. Also, what is it that you’re really trying to achieve around vulnerability and fuel poverty? You have to think about what it is that you’re really trying to achieve with that.” **Vulnerable customer representative**
- “You’ve got organisations that are paid by the government to put out information about smart energy and the like, and they’ve done it so badly that you really need someone to step in and sort the whole situation out. I’m not sure how far outside your remit that is, but someone needs to do it.” **Business customer**

Protected Environment

Protected Environment

WESTERN POWER DISTRIBUTION
Energy & Networks Asset Services Ltd

Focus Area	High-level Outcomes
Just & Fair Net Zero Transition	The benefits of a smart energy network and renewable energy are accessible to all
Protected Natural Environment	The natural environment is managed to safeguard communities and ecosystems
Climate Change Mitigation	We produce no harmful pollution

Example Action Plan Commitment:
 Harness the potential of changes to working patterns brought about by Covid-19 to reduce business emissions

What specific commitments and performance levels would you like to see to help deliver these outcomes?

1. What specific commitments and performance levels would you like to see to help deliver these outcomes?



- “This looks a bit thin to me. Are you talking about things you directly affect or are you talking about the wider environment?” **Community energy group**
- “One of the things that I’ve raised is the issue of tree management to do with things like ash dieback, and I think there are some interesting opportunities there for doing both the day job and also community and environmental protection activities through collaboration.” **Academic institution**
- “It’s about linking in with partners on this. Local councils now have climate change pledges and it’s a big focus and a hot topic, looking at not just reducing carbon in their own buildings but also for the communities and social housing providers, so that’s something that may be worth feeding into.” **Local authority**
- “I manage a lot of the protest activity, especially with a lot of the climate change groups. I think if you’re taking measures like this, you should shout about them a bit more; it’s probably a good way to engage with your customers.” **Local authority**
- “For me, this one is going to be all about the delivery, so what are you going to do and how are you going to get there?” **Vulnerable customer representative**
- “Also are you going to offset or are you going to reduce?” **Business customer**

2. Do we have the right high-level outcomes against each focus area, is there anything missing?

- “Picking up on the smart energy network and the microgrid. There’s got to be opportunities for sharing surplus electricity below a particular transformer within a community. So not necessarily having to lay in wires if the network is capable of shifting electricity around below that transformer. That must be technically possible, and that may be something for Ofgem to say, if you want to seriously encourage community energy schemes, this is maybe a required change in the current charging regulations.” **Academic institution**
- “It’s almost impossible for small community energy groups to get schemes up and running because of the regulations. We can’t deliver a wind turbine locally. People would want to have a wind turbine because it was their wind turbine, and they were going to get discounts on the price. At the moment the regulations don’t allow that, and if WPD could facilitate that change, that would be really helpful.” **Community energy group**



Appendix 1 Attendees

A total of 37 stakeholders attended the workshop, representing 31 organisations. The organisations represented on the day are shown below:

361 Community Energy	Exeter Community Energy
Accent	Granby cum Sutton Parish Council
Air Liquide	Harborough District Council
Auriga Services	Herefordshire Council
Caerphilly County Borough Council	Homes in Sedgemoor
Carbon Trust	Kirklington Parish Council
Central and East Northamptonshire Citizens Advice	Leicestershire County Council
Centre for Sustainable Energy	Lickey & Blackwell Parish Council
Citizens Advice Plymouth	Llannon Community Council
Citizens Advice Telford and the Wrekin	Navigate Charity
Community Energy Plus	Oxfordshire County Council
Coventry Citizens Advice	Scottish and Southern Electricity Networks
Coventry City Council	Shropshire Council
Curo	
Customer Engagement Group	
Derby Homes Ltd	
Derbyshire County Council	
Electricity North West	



Appendix 2 Workshop feedback

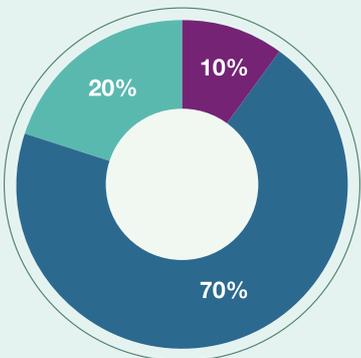
After the workshop, stakeholders were asked to complete a short feedback form. The feedback was as follows:

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



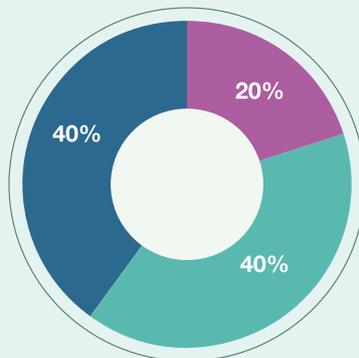
“ Good timekeeping and good explanations of each section.”

Overall, did you find this workshop to be:



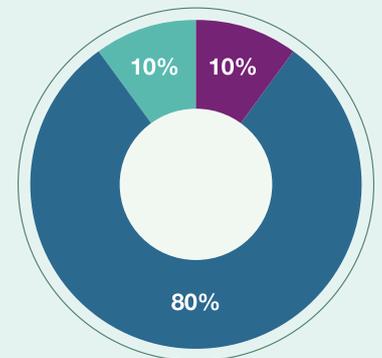
Very interesting
Interesting
Neutral
Not that interesting
Not interesting at all

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



Strongly agree
Agree
Neutral
Disagree
Strongly disagree

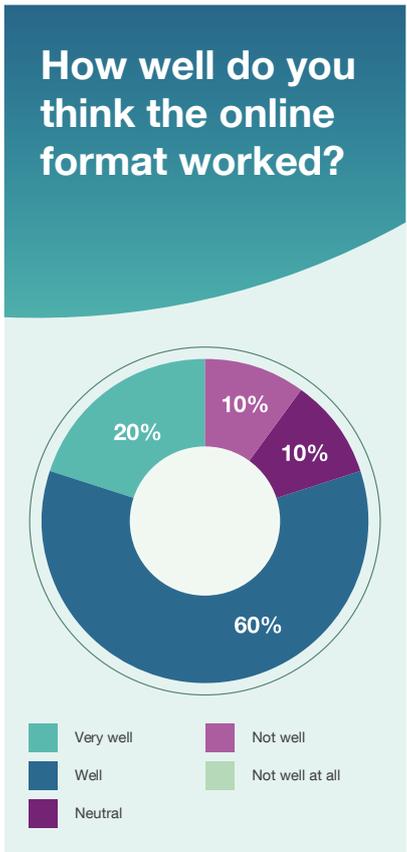
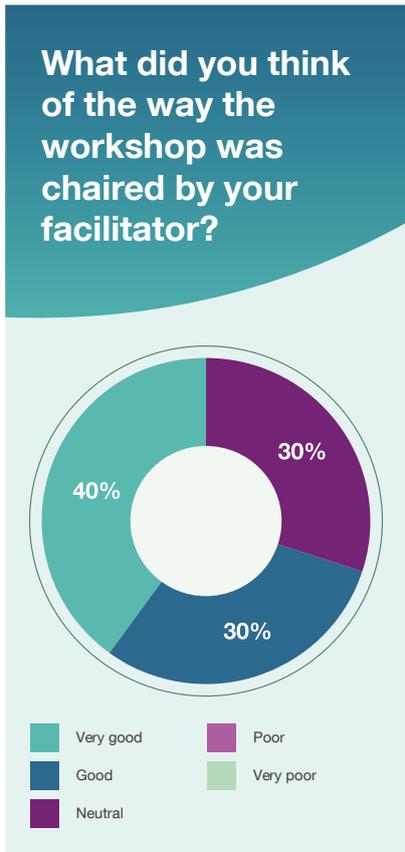
Did we cover the right topics for you on the day?



Strongly agree
Agree
Neutral
Disagree
Strongly disagree



“ It was a very good workshop with the right balance of talk, tell and engage.”



Comments

- “Everything went well, although the questions in the chat showed the range of knowledge amongst the participants.”
- “The timings and the combination of speakers and discussions was good.”
- “Good steering through topics and favoured those more extrovert or having a particular axe to grind compared to [a] face-to-face meeting.”
- “Breakout rooms worked well.”
- “Voting worked well.”



Any other comments?

- “As always the event was well organised, well delivered, gave me a chance to have my say and added to the sum total of my subject knowledge.”
- “A good effort, with all reports there has to be a finish point.”



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