Western Power Distribution
ED2 Workshops

West Midlands

November 2020

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1 | OVERVIEW

On 10 November 2020, Western Power Distribution (WPD) hosted the third in a series of four virtual stakeholder workshops. The workshops sought to elicit feedback from stakeholders on WPD's draft outputs for its Business Plan for the next price control period, RIIO-ED2, which runs from 2023–2028.

There were four virtual workshops, one for each of WPD's licence areas. This report covers the workshop that was held for stakeholders in the company's West Midlands licence area.

The event consisted of a series of presentations given by WPD representatives, with stakeholders giving their feedback during four breakout room discussions and online polls over the course of the day.

INTRODUCTION AND THE RIIO-ED2 BUSINESS PLANNING PROCESS

- The workshop began with an introductory presentation from Alison Sleightholm, Resources and External Affairs Director. Alison explained WPD's role distributing power to nearly 8 million homes and businesses across its network area. She then explained WPD's business planning process and timetable, and how stakeholder engagement feeds into the company's Business Plan. The initial breakout discussion allowed stakeholders to introduce themselves and discuss the impact of Covid-19 on their expectations of WPD.

SESSIONS ONE, TWO AND THREE: DRAFT BUSINESS PLAN OUTPUTS

The subsequent sessions worked through WPD's draft outputs under the heading of Ofgem's three themes and stakeholders' priority areas for each theme.

SESSION ONE: MEETING THE NEEDS OF THE CONSUMER

- This session was introduced by Alex Wilkes, External Affairs Manager. Alex explained how feedback from stakeholders had informed a total of 20 outputs under the priority areas of: Customer Service; Customer Vulnerability; and Social Contract.

SESSION TWO: MAINTAINING A SAFE AND RESILIENT NETWORK

- This session was introduced by Andrzej Michalowski, Planning and Regulation Special Projects Manager. Andrzej explained how feedback from stakeholders had informed a total of 13 outputs under the priority areas of: Network Reliability; and Business IT Security and Cyber Resilience.

SESSION THREE: DELIVERING AN ENVIRONMENTALLY SUSTAINABLE NETWORK

- This session was introduced by Andy Martyr-Icke, Environment Advisor, and Nigel Turvey, DSO and Future Networks Manager. They explained how feedback from stakeholders had informed a total of 27 outputs under the priority areas of: Environment and Sustainability; Distribution System Operator; Innovation; and Community Energy.

AFTERNOON SURGERY SESSIONS: DRAFT BUSINESS PLAN OUTPUTS

- In the afternoon, there were four optional surgery sessions on specific priority areas. They all followed a similar format to the morning workshops, focusing on gathering feedback on a series of draft outputs.

This meant that over the course of the workshop, all the priority areas under the three Ofgem themes had been discussed.

The session topics and presenters were as follows: Connections was hosted by Vanessa Buxton, Connection Policy Engineer; and Digitalisation was hosted by Jonathan Berry, DSO Digitalisation and Data Manager. The Workforce Resilience and Safety sessions did not take place as no stakeholders signed up.

The structure of the day has been summarised in the following table:

	SESSION ONE	SESSION TWO	SESSION THREE
OFGEM THEME	Meeting the Needs of the Consumer	Maintaining a Safe and Resilient Network	Delivering an Environmentally Sustainable Network
STAKEHOLDERS' PRIORITY AREAS	Customer Service Customer Vulnerability Social Contract	Network Reliability Business IT Security and Cyber Resilience	Environment and Sustainability Distribution System Operator Innovation Community Energy
SURGERY SESSIONS	Connections	Workforce Resilience *(*Did not take place at this event)* Safety *(*Did not take place at this event)*	Digitalisation

The full presentation can be found online at http://westernpower.co.uk/downloads/317284.

For the purposes of this report, we have recorded the feedback on the priority areas and associated draft outputs according to Ofgem's themes rather than the structure of the day itself.

WPD instructed EQ Communications, a specialist stakeholder engagement consultancy, to independently facilitate the workshops and take notes of the comments made by stakeholders.

Every effort has been made to faithfully record the feedback given. To encourage candour and open debate, comments have not been ascribed to individuals. Instead, notes have been made of the type of organisation that each stakeholder represents.

2 | METHODOLOGY

This section summarises the methodology adopted for gathering feedback from a wide range of stakeholders at these workshops.

Over 7,500 stakeholders are held on WPD's database, all of whom were invited to attend the workshops via email. 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.

Despite being held online rather than in person, WPD adopted their standard format for stakeholder engagement which was a series of presentations followed by discussions in smaller breakout groups. These breakout groups were facilitated by independent facilitators with feedback notes being taken by independent scribes. Every attempt was made to ensure that an equal number of stakeholders participated in each breakout room. However, due to varying attendance levels, this varied between 4 and 8 stakeholders. Each breakout room was attended by at least one WPD representative who was on hand to answer any technical questions.

The purpose of these stakeholder workshops was to round off WPD's stage of co-creation with stakeholders around their next Business Plan. They wanted to play back the feedback WPD had heard and interpreted to date, ensure it was correct and present to stakeholders the first draft outputs for the next Business Plan. Given that the previous feedback had been heard prior to the recent Covid-19 pandemic, WPD also wanted to ensure it was still correct.

To these ends, sessions one, two and three, as well as the surgery sessions, all centred around the facilitators asking the same three questions.

1. Covid-19: Has there been any change in priorities or emerging issues which will need to be addressed?
2. Have we interpreted stakeholder feedback correctly?
3. Is anything missing from the outputs proposed?

   What specific targets, measures and performance levels do you want to see for each output?

As the Social Contract – which is a separate document to the Business Plan – is at an earlier stage of development, a fourth question was also asked during the discussions on that priority area:

4. In relation to the 15 components stakeholders have identified, what specific commitments would you like WPD to make?

To support stakeholders to be able to answer these questions in the breakout rooms, in relation to questions 1 and 2 stakeholders were asked to refer back to the presentation they had just received, with a verbal recap of the key points provided by the facilitator. For question 3, due to the detailed nature of the draft Business Plan outputs, stakeholders were provided with on-screen prompts to work through, including a view on WPD's current baseline performance to provide important context.

Following each breakout session, including after the surgery sessions, stakeholders were asked to give their views using an online poll. After the sessions reviewing the draft outputs, stakeholders were asked to give their view on whether the outputs demonstrated the right level of ambition. For each, stakeholders were asked whether WPD had got the right level of ambition, answering on a scale of 1 to 5 whether they should 'do a lot less' (1) through to 'do a lot more' (5). As most outputs were ranked between 3 and 4, this report has displayed the online polling results both as an average out of 5, as well as in comparison to the baseline average for the outputs, which was 3.69 / 5, to give a better indication of which outputs stakeholders particularly prioritised. Please note that the surgery sessions were attended by fewer participants and the voting data is therefore based on a smaller sample size. Whilst polling data for the priority areas covered in these sessions is summarised in the relevant sections, it has not been compared against data for the priority areas covered in the main sessions.

The stakeholder feedback and polling results are set out in this report.

At the end of the morning session, stakeholders were asked to complete an online survey giving their feedback on the online workshop itself. The results of this have been summarised in Appendix 1 of this report.

3 | EXECUTIVE SUMMARY

The feedback summarised in this Executive Summary has been set out under Ofgem's three themes and the corresponding priority areas, rather than according to the structure of the workshop itself – except for the introductory session, which has been summarised first.

INTRODUCTION AND THE RIIO-ED2 BUSINESS PLANNING PROCESS

- A large proportion of stakeholders had attended the workshop to learn about WPD's plans, and many attendees were interested in furthering their collaboration with the company.

- Stakeholders were interested in discussing a wide range of topics, including grid capacity, connections for EV infrastructure, innovation and DSO, and consumer vulnerability.

- There was strong agreement that WPD should treat consumer vulnerability as a priority in light of the pandemic. It was also felt that lockdown had highlighted the importance of a resilient, reliable network.

BUSINESS PLAN DRAFT OUTPUTS

SUMMARY GRAPH: AVERAGE LEVEL OF AMBITION BY PRIORITY AREA

The graph below displays the average score for the outputs under each priority area. This provides an indication of whether stakeholders felt WPD had got the right level of ambition by priority area. The priority areas covered in the surgery sessions have not been included because the number of respondents was far lower and therefore comparing the data would be incorrect.

Priority Area	Score
Community Energy	3.91
Business IT Security and Cyber Resilience	3.90
Innovation	3.77
Environment and Sustainability	3.73
Customer Vulnerability	3.72
Distribution System Operator	3.66
Network Reliability	3.64
Customer Service	3.56
Social Contract	3.42
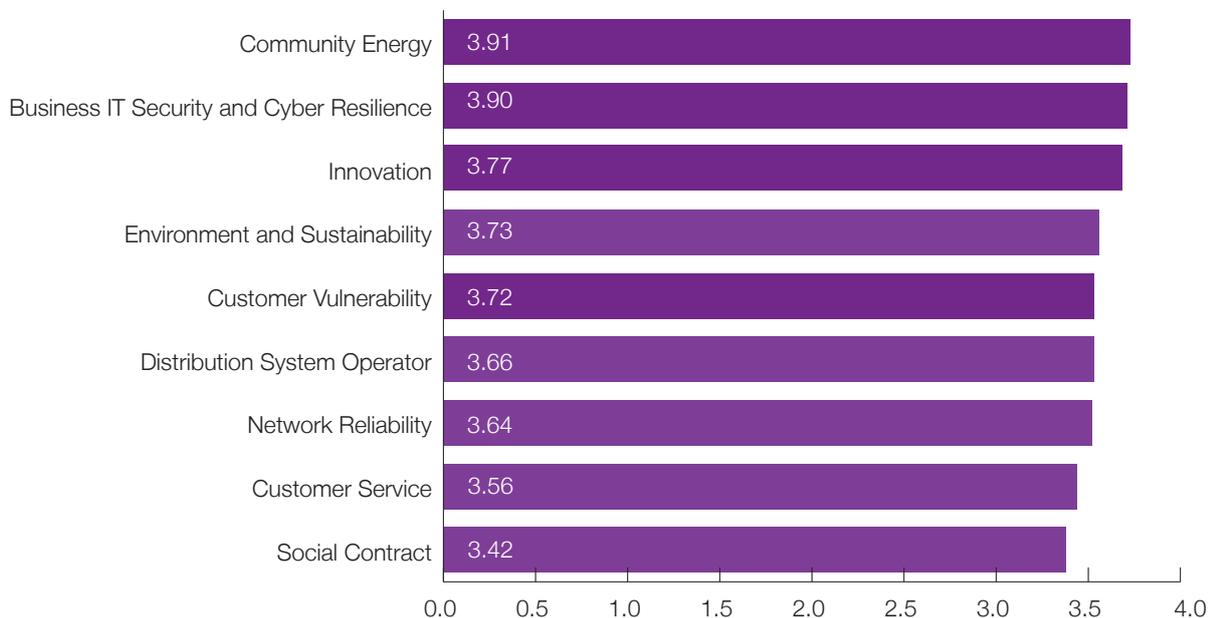
SESSION ONE: MEETING THE NEEDS OF THE CONSUMER

- **Customer Service:** Stakeholders broadly agreed that WPD should maintain its high levels of customer service, but some were of the view that the company should not necessarily strive to go further, particularly if this came at a significant cost to customers. It was noted that different types of customers have different expectation of customer service. For example, major energy users may have different expectations of WPD than domestic customers, and this should perhaps be accounted for. Stakeholders particularly wanted WPD to focus on improving its customer service around planned interruptions, requesting a greater level of ambition in the online polling in this area. This output scored on average 4 / 5 in the online poll, making it one of the highest ranked outputs in the workshop. Stakeholders were least concerned with the output relating to answering calls within an average of four seconds, which ranked relatively low in the online polling with 3.35 / 5. Customer Service was second lowest priority area voted on by stakeholders with an average score of 3.56 / 5.

- **Customer Vulnerability:** It was felt that outputs in the Consumer Vulnerability priority area had become more important in the light of Covid-19 as more people find themselves in vulnerable situations and, increasingly, in fuel poverty. It was felt that WPD has a responsibility to ensure that the most vulnerable are not left behind by the transition to a smarter future. As a result, the output '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' was the highest scoring in this priority area in the online poll, scoring on average 3.96 / 5.

- **Social Contract:** Stakeholders broadly agreed that WPD should have a social contract as people's expectations of large companies are changing. However, all of the individual outputs in this priority area scored below the 3.69 / 5 baseline in the online poll and this priority area was the lowest ranked of all in the workshop.

- **Connections:** Stakeholders were strongly of the view that WPD should go further than planned with regard to the output to provide new connections quotations and energisation in line with customer expectations. They also expressed strong support for increased availability of information on connections so that customers wishing to connect can easily comprehend the process and follow a simple set of rules during the application phase.

SESSION TWO: MAINTAINING A SAFE AND RESILIENT NETWORK

- **Network Reliability:** Stakeholders were of the view that reliability was particularly important in light of Covid-19, particularly for customers in vulnerable situations and for those dependent on a reliable service while working from home. It was commented that a number of the outputs in this priority area should have more measurable targets put against them. Network Reliability was the third lowest ranked priority area, scoring 3.64 / 5 in the online poll, against a baseline of 3.69. However, the output 'improve the health of the network using asset condition data to target investment where the need is greatest' was one area where a large proportion of stakeholders thought WPD should increase its level of ambition in ED2, scoring this 3.94 / 5.

- **Business IT Security and Cyber Resilience:** Stakeholders were very much of the view that cyber resilience should be one of WPD's top priorities. Although it was acknowledged that it was difficult to put measurable targets against these priorities, it was nevertheless felt that WPD should do all it can to make sure its systems and processes were 100% resilient. When asked to vote on this priority area in the online voting, this was the second highest ranked, with 3.9 / 5.

- **Workforce Resilience:** This priority area was not discussed as it was a surgery session to which no stakeholders signed up.

- **Safety:** This priority area was not discussed as it was a surgery session to which no stakeholders signed up.

SESSION THREE: DELIVERING AN ENVIRONMENTALLY SUSTAINABLE NETWORK

- **Environment and Sustainability:** Stakeholders were of the view that WPD should lead in this area, particularly in relation to replacing the poorest performing Extra High Voltage Fluid Filled cables on the network, reducing SF6 losses and reducing its Business Carbon Footprint. All of these outputs scored well above the 3.69 / 5 baseline in the online poll. In the case of the latter output it was commented that many of the local authorities in WPD's network areas had more exacting Net Zero targets than WPD and the company should seek to be more ambitious as a result.

- **Distribution System Operator:** Stakeholders felt that WPD should ensure that the network is able to facilitate LCT connections in order support Net Zero 2050. In the online poll, this output scored 3.95 / 5, indicating that stakeholders felt that WPD should go further in this area. It was felt that more could be done to educate customers on the benefits of flexibility services and that WPD has a role to play in this.

- **Innovation:** Stakeholders felt that the outputs in this area were somewhat vague and that they would benefit from having measurable targets put against them, for example, with regard to the number of projects facilitated or the amount of customers' money saved. All of the outputs in this area scored above the 3.69 / 5 baseline. As a result, this priority area scored 3.77 in the online poll, making it the third most important priority area in the eyes of stakeholders.

- **Community Energy:** Community Energy was the highest ranked priority area voted on in the online poll, scoring an average of 3.91 / 5. It was felt that WPD should go beyond facilitating community energy and should actually endeavour to sell the benefits of projects to communities.

- **Digitalisation:** Stakeholders agreed with the previous feedback that clear and accessible data is vital. It was commented that greater insight into financial data would be of benefit to some customers in order to demonstrate the viability of their projects.

WRITTEN FEEDBACK

After the workshop, stakeholders were asked to complete a short online feedback form. Some of the key findings are shown below:

- 88% of attendees who filled out a feedback form told us that they found the workshop either 'very interesting' or 'interesting'. Stakeholders also rated their satisfaction with the event as 8 / 10

- 100% 'agreed' or 'strongly agreed' that they had had an opportunity to make points and ask questions.

- 63% 'agreed' or 'strongly agreed' that the right topics were discussed on the day.

- 100% thought EQ Communications' facilitation was either 'very good' or 'good'.

- 100% felt the online format worked 'well' or 'very well'.

4 | ATTENDEES

62 stakeholders representing 57 different organisations attended the online workshop. The organisations represented were as follows:

- Ashfield District Council
- Auriga Services
- Babcock
- Birmingham City Council
- Cannock Chase Council
- Capula
- Centrica
- CoGen Ltd
- Colwich Parish Council
- Cotgrave Town Council
- Coventry Citizens Advice
- Coventry City Council
- Deerhurst Parish Council
- Dorstone Parish Council
- Eaton Electrical Products Ltd
- Energy Assets Utilities
- Energy Capital
- Energy Systems Catapult
- Epperstone Parish Council
- Forest of Dean District Council
- Geldards LLP
- GMP Contracting Services Ltd
- GTC
- Highways England
- Hitachi ABB Power Grids
- IBM
- Interesting Stuff Ltd
- Joint Radio Company
- Landmark Associates Ltd

- Leighton and Eaton Constantine Parish Council
- Local customer
- Lucy Electric UK Ltd
- Major Energy Users' Council
- Malvern Hills District Council
- National Grid ESO
- NIE Networks
- North Warwickshire Citizens Advice
- Sembcorp Energy UK
- Shropshire Council
- Solihull Council
- South Gloucestershire Council
- Southam Town Council
- SP Energy Networks
- St Modwen
- Stafford Borough Council
- Staffordshire Moorlands District Council
- Telford & Wrekin Council
- The Schumacher Institute
- Transport for West Midlands
- TUSC Ltd
- University of Birmingham
- University of Nottingham
- Warwickshire County Council
- Wattify Ltd
- West Midlands Combined Authority
- Wychavon District Council
- YES Energy Solutions CIC

During the online poll, attendees were asked what type of stakeholder they were. The results have been summarised in the pie chart below.

During the online poll, attendees were asked what type of stakeholder they were.
The results have been summarised in the bar chart below.

Stakeholder type	Percentage
Local authority	27%
Domestic customer	15%
Energy consultant	10%
Parish / community council	10%
Academic institution	6%
Charity	4%
Distributed generation customer	4%
Fuel poor / vulnerable customer	4%
IDNO	4%
Utility	4%
Connections provider	2%
Developer	2%
EV charge point manufacturer / installer	2%
Future customer	2%
Government	2%
Major energy user	2%
Vulnerable customer representative	2%

5 | INTRODUCTION AND THE RIIO-ED2 BUSINESS PLANNING PROCESS

A large number of stakeholders had attended the workshop with a view to learning about the company's upcoming plans. Stakeholders' primary areas of interest were usually related to their sphere of work. For example, those representing local and regional government were likely to be interested in the growth agenda and how WPD could support their Local Plans. They were also keen to learn how WPD could help them meet their targets to reduce carbon emissions. Those representing the charity sector, NGOs and consumer bodies wanted to learn about the company's work supporting customers in vulnerable circumstances, and representatives from a range of organisations, including businesses and academia, also expressed an interest in engaging closely with the company going forward.

Local authorities reported that grid constraints had affected their plans for growth, with a number of them expressing concern over how the grid would cope with increased demand following the transition to EVs. The need to connect low carbon technologies and the demand for sustainable community energy projects were linked to local emissions targets, with some councils aiming to reach Net Zero as soon as 2030. This green agenda also appeared to have fuelled interest in innovative technologies and the transition to DSO. Stakeholders from a range of backgrounds, particularly those from rural areas, indicated that network reliability and resilience were important issues, along with customer vulnerability.

Some indicated that their expectations of WPD remained unchanged, with one stakeholder stating that the company should provide its usual level of service in the event of an outage. However, some pointed out that the pandemic had affected different sectors and businesses in different ways, with some industries seeing increased demand or changes in consumption patterns, meaning that precise expectations of WPD may vary according to sector. Stakeholders from a range of backgrounds felt that the company should step up its work on customer vulnerability, with a particular focus on transient vulnerability caused by Covid-19.

Several stakeholders argued that the pandemic had changed people's priorities. For example, the challenges presented by the March lockdown highlighted the need for robust and resilient systems and digital solutions, and stakeholders called on WPD to ensure that it can quickly respond to changes in supply and demand. In addition, society's ability to adapt to these new circumstances had demonstrated the plausibility of implementing significant, systemic changes to combat climate change. It was also noted that EVs ownership may see an uptake following changes in travel patterns post-lockdown.

WHY HAVE YOU ATTENDED TODAY?

"I am interested to see what you're going to do in the next five-year price control period." **Local authority**

"We have a local neighbourhood plan where some of the policies are related to the environment and climate control, and we are interested in how WPD can support us in relation to setting this up." **Parish / community council**

"I want to see any large-scale plans you have in the pipeline. We've worked successfully with you in the past; we want to maintain that level of cooperation." **Business customer**

"We are a supplier to WPD in various areas. We are increasingly getting involved in the digitalised agenda, so advising WPD on the challenges coming ahead as things move towards the DSO model." **Business customer**

"I am here to hear WPD's long-term stance on resilience, future-proofing for homes, what the stance is regarding capacity requirements like EV charging, the reduction of gas within heating systems in houses and the knock-on effects of that." **Developer**

"I am interested to know how WPD plans to work with Birmingham's smart city developments. I want to get more information about WPD's plans and how we can support them as a university." **Academic institution**

"I'm here to make sure that my residents receive a reliable service at a good price and that your customer service helps them properly when they need it." **Local authority**

"I'm from Citizen's Advice in Coventry and work with WPD on the Power Up project for vulnerable customers. I am interested in WPD's plans going forward for these types of customers." **Consumer body**

"I'm a local councillor, so the social contract issues are quite important for me, but also reliability, pricing and the path towards carbon neutrality." **Local authority**

"I am interested in self generation of electricity. There's a problem in our local patch whereby there's a potential business park that could produce additional electricity but is unable to connect to the distribution network due to lack of suitable substations." **Local authority**

"I'm really interested in innovative technologies for shaping the next Business Plan as well as the transition to DSO." **Business customer**

"We're an embedded generator. We've got 19 separate operational sites within the WPD footprint, and we have the capability to produce over 300 megawatts of power when required. We see an increasing engagement opportunity with WPD on that front. We also have a couple of projects that are in construction at the moment, such as a large-scale battery. So, I'm interested in connections and the transition to DSO."
Distributed generation customer

"We've had a lot of growth in terms of development and I'm keen to understand just how the network will stand up to additional demand with new homes and EVs. We've got this guilty feeling that we've not been doing anything about community energy, so I want to learn something there." **Parish / community council**

"I'm here to see what the plans are in terms of expectations on developers for future supply needs. I'm also interested in community-owned projects and connection issues." **Local authority**

"From my council's point of view, we have made a commitment to be carbon zero by 2030 as a borough. The issue we have is grid constraints. We can't do as much as we would like to do just because the capacity is not there. We are also trying to make the transition to EVs. There are a lot of issues that need to be resolved to help us reach our target."
Local authority

"I'm the chair of a parish council, so I'm obviously interested in supply to our residents, maintaining it and ensuring that vulnerable people are well looked after. I have to say that we're in a fairly affluent area, but there are still vulnerable people that need looking after, particularly what with Covid at the moment."
Parish / community council

"We tend to send management to DNO workshops because we are a customer of the DNO. We also have customers that are connected to our network, so we're also interested in faults, network reliability and vulnerable customers." **IDNO**

"I sit on the Gloucester LEP and I'm on the Customer Collaboration Panel. I'm most interested in sustainability aspects, such as community energy, EVs and the low carbon system." **Local authority**

HAS COVID CHANGED YOUR PRIORITIES AND EXPECTATIONS OF WPD?

"Depending on which industry you were involved in, we saw vastly different situations emerging. The water industry used more electricity as they were pumping water around more to cope with demand, and so did the supermarkets, they were busy. On the other end, we have three pub chains; they saw no demand because they had to shut their pubs."
Trade association

"We largely use digital technology, transforming not only education but also our future power grid. Doing online teaching means the working load is increased. When you build up a model or system, 10 years later the efficiency will improve and working load will be reduced." **Academic institution**

"It does highlight areas that need more investment in terms of updating legacy systems. We need to get on with the digital agenda, so that if this kind of thing happens again in the future, we have a more robust and resilient system in place." **Business customer**

"This might sound counter-intuitive, but my expectations haven't changed in light of Covid. I've been impressed with how WPD responded to customer vulnerabilities, particularly during the initial lockdown. Their response was very good, comprehensive and collaborative, which made all the difference because they were more able to respond to the needs of the vulnerable." **Consumer body**

"We need to do things in a more dynamic way. Mass home working is an example. You need a dynamic understanding of supply and demand changes."
Energy aggregator

"It's brought the smart / fair equation into sharper focus, especially how we direct resources for growth." **Business customer**

"I think your engineers should have more awareness of those that are self-isolating, and those that are very anxious about contracting the virus. Especially those in the vulnerable category." **Utility**

"I expect the same levels of service if there's an outage, but obviously with remote working, you'll have to adapt and fine-tune your response to the wider trends in use of technology." **Local authority**

"There has been an attitude shift regarding how deep change can happen. With renewables, really deep changes need to be made and Covid shows people that changes can be made quite quickly when needed. So, this is an opportunity."
Business customer

"I think the EV charging is pertinent and Covid is encouraging people to travel less so maybe be more inclined to move to EV. Covid has certainly changed patterns for travel in general." **Developer**

"There's a general feeling around the post-Covid world that we need to rebuild the economy more sustainably and WPD absolutely has a role there. WPD should look to roll out the EV charging networks more quickly and support the implementation of battery storage networks in order to help establish renewable energy systems more strongly."
Academic institution

"It's clear that the needs of customers have increased. Financial vulnerability has increased, and it will get worse before it gets better, so that needs support. However, WPD really needs to focus on transient vulnerability in these present times and get people in these situations on the PSR. When looking at these types of vulnerability, it also needs to streamline how people can be contacted so that they can get the help that they need as quickly as possible." **Vulnerable customer representative**
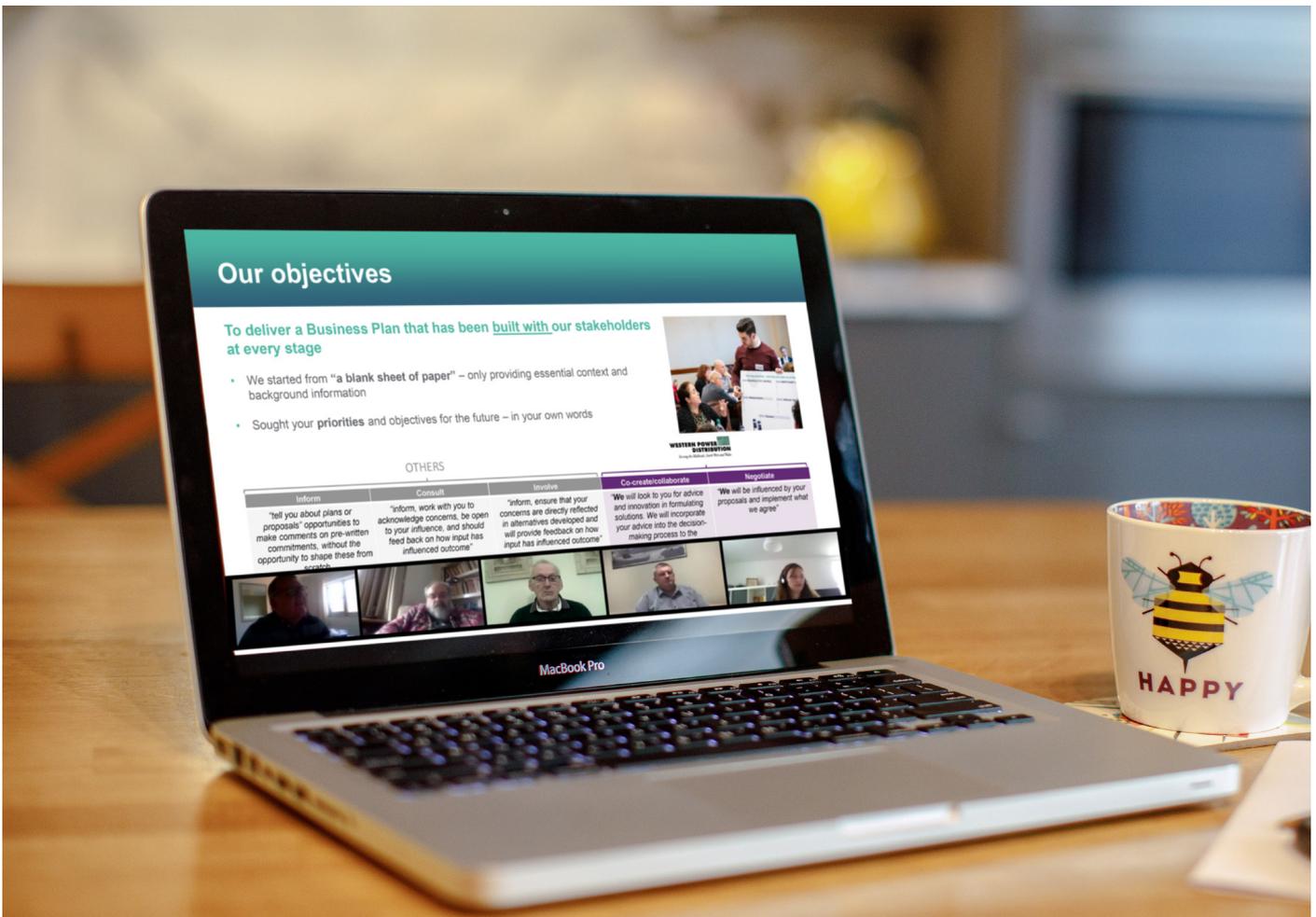
6 | SESSION ONE: MEETING THE NEEDS OF THE CONSUMER

CUSTOMER SERVICE

IMPACT OF COVID-19

There was acknowledgment that Covid-19 would make the most vulnerable of WPD's customers even more vulnerable, especially those who are shielding or isolated. This means that it is more important than ever that the company continues to deliver high standards of customer service, particularly when dealing with incoming calls from people who need support.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

There was broad agreement that WPD does perform highly in this area and that this high level of service should be maintained, although there was not consensus on whether the company should strive to improve on its performance in ED2, especially if this comes at a significant cost to customers. Stakeholders were of the view that it is important to maintain high levels of customer service during power cuts, particularly for those in vulnerable circumstances. There was acknowledgement that Covid-19 has made this even more important.

There was also agreement that WPD should continue to use a range of communication methods, tailored to customer types. The point was made a number of times that the company should not seek to engage primarily on social media as this is not the preferred method of communication for many, particularly the most vulnerable. It was added that research should be carried out to learn more about customers' preferred communications channels.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

There was broad agreement that WPD was focusing on the right outputs and that most of them were appropriate. Whilst it should be noted that the Customer Service priority area outputs were ranked second lowest of all in the online poll, they did all score above 3 / 5. It should also be noted that only one output engendered more than one vote for WPD to reduce its proposed level of ambition in ED2. This was the output to answer calls within an average of four seconds. Of note was the output to provide greater insight on planned work activity and interruptions. This scored an average of 4 / 5, making it one of the highest scoring outputs voted on in the workshop. It was acknowledged that customers are far more understanding if they are communicated with effectively in advance.

In terms of what might be missing, it was suggested that consideration should be given to those in rural areas who may not receive the same level of service as those in urban areas. It was also commented that customer service requirements for major users as opposed to domestic customers should be considered as many of the former would expect a higher level of service, including dedicated account managers. The point was made that cost should, perhaps, be factored in when discussing many of these outputs so stakeholders are given more context regarding the implications of increased investment. Stakeholders raised a range of individual comments relating to each of the outputs, which have been summarised under the outputs below.

Customer Service Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = 3.69

Output	Average Score
Provide greater insight on the planned work activity and interruptions on the network by creating an online viewer for our customers and stakeholders	4.00
Maintain an average customer satisfaction of 9/10 (90%) or higher across all key services areas	3.60
Resolve at least 90% of complaints within one day and resolve 99% of complaints within 31 days	3.56
Achieving full compliance with the British Standard for Inclusive Service Provision every year	3.53
Respond to social media enquiries and power cut reports in less than 5 minutes	3.49
Achieve full compliance with the Customer Service Excellence Standard every year (Provide a wide range of inclusive customer contact channels and accessibility tools)	3.42
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	3.35

AVERAGE SCORE

"In terms of post-Covid, there needs to be more focus on vulnerable customers and their requirements, as they'll be even more vulnerable at this time." **Business customer**

OUTPUTS: CUSTOMER SATISFACTION

MAINTAIN AN AVERAGE CUSTOMER SATISFACTION OF 9 / 10 (90%) OR HIGHER ACROSS ALL KEY SERVICES AREAS

Stakeholders broadly agreed with this output. In the online polling, it was the second most high scoring output in this area, scoring 3.6 / 5. Over half of stakeholders (53%) voted 3, meaning that they thought this represented for right level of ambition for ED2, with the remainder voting either 4 or 5 / 5 ('do more' or 'do a lot more'). One stakeholder also commented that this should be the most important output given how WPD is funded, as customers clearly can't 'vote with their feet'. Notably, no one voted that WPD should 'do less' against this output. In the discussions, it was commented that Ofgem values customer satisfaction highly, so this should always be a focus for WPD. Moreover, the point was made that customer satisfaction scores should be split for domestic customers and major users as different stakeholder types have very different expectations of a DNO. For example, a major user may rely on a single point of contact at WPD or even a key account manager with knowledge of their business.

"Large users find it difficult to contact WPD and all DNOs because you're focused on domestic customers. There isn't a separate line for industrial or commercial, so it's quite a long process to make contact. It's a different set of rules. For domestic, I'd say that 90% ought to be a standard and the effort ought to be to improve on that. There ought to be a separate means of communication for large users. It's right that your website is directed at domestic customers, but industrial and commercial are affected just as much. Key account managers would be ideal, as there are some in some cases. You need a laid-out procedure if you want to report a fault that takes you through the steps, so that you end up talking to an engineer rather than an operator aimed at domestic consumers." **Trade association**

"I'm based in the Midlands, and I'm a domestic customer. I'm very happy with the service I get. I've lived in my house for over 20 years, my first power cut was during Covid, but it came on a lot quicker than we were told. I'm happy; I'd give you 9 out of 10. The issue is that in urban areas, your satisfaction levels are probably higher, but you need to concentrate on areas with more outages."
Vulnerable customer representative

"For as long as Ofgem's focus is on customers being the test of whether a regulated business such as WPD is performing, as opposed to it being up to the shareholders to decide, then it's clearly going to have to be the highest rated output." **Business customer**

"We are faced over the next 10-15 years with about 2000 new houses which brings in issues around power cuts and supplying of power. I don't know if customer satisfaction would reach 90% in our area because of our specific issues but I believe that it is a good idea. We were looking at similar targets when we were working on RIIO-ED2, but I think that 90% is probably a bit safe. You could try to do more there." **Local authority**

"From Ofgem's perspective then, it's clear that this is one of the most important areas. There is a financial angle to all this which doesn't seem to be covered at all. These are all lovely targets, but there's nothing about the cost to achieve this or the efficiency in delivering it. You can do what you like, but how much does it cost? There's got to be a balance between how good we want it to be and how much we are willing to pay." **Business customer**

RESOLVE AT LEAST 90% OF COMPLAINTS WITHIN ONE DAY AND RESOLVE 99% OF COMPLAINTS WITHIN 31 DAYS

The general view amongst stakeholders was that WPD's performance in this area is good at present, and the aspiration to resolve 90% within 31 days was an appropriate target. It was, however, felt by some that it might not necessarily be the best use of customers' money to try to go further than this target in ED2. In the online polling the average score for this output was 3.56 / 5, making it the third highest scoring Customer Service output. However, almost half of stakeholders (47%) voted that this output represented the right level of ambition for ED2 and that WPD should not necessarily go further than the target stated in this area.

"The only point I would make there is to consider that maybe this target should be 28 days; it's easier to measure this than 31 days." **Parish / community council**

"Are they 31 working or calendar days? Within 24 hours is good, that's key." **Trade association**

"The 90% within one day would be brilliant. I know it's a challenge with any service, so I think if you could do that, it would be brilliant." **Utility**

"The levels you've got there are really good, but I'm not quite sure if that's a good use of consumer bills. However, I would say that, as I haven't had any customer complaints against WPD. I might have a different view if I was a WPD customer who didn't receive a response to my complaint quickly enough." **Utility**

WE WILL AIM TO MEET ALL GUARANTEED STANDARDS OF PERFORMANCES

It was commented that, whilst many of the outputs in this priority area have hard targets against them, this output is merely an aspiration. This output was not included in the online poll as it is a regulatory requirement.

"Most of the issues we have with Western Power are not customer service but the capabilities of their network. As a consequence, I think those standards are fine but what's more relevant is that the network needs to be upgraded." **Parish / community council**

"The first two targets are hard targets, whilst this one is just an aspiration, so I'm not sure how it fits with the other two." **Distributed generation customer**

"It might also be good to understand what the standards of performance are." **Utility**

OUTPUTS: COMMUNICATION

ACHIEVE FULL COMPLIANCE WITH THE CUSTOMER SERVICE EXCELLENCE STANDARD EVERY YEAR (PROVIDE A WIDE RANGE OF INCLUSIVE CUSTOMER CONTACT CHANNELS AND ACCESSIBILITY TOOLS)

Stakeholders felt that, again, more context should be given against this output to highlight what it means for consumers. It was felt that digital channels are important for disseminating messages in real time, but it was acknowledged that this should not be at the expense of more traditional communications as many stakeholders still rely on these. This was the second lowest scoring Customer Service output when stakeholders were asked to vote in the online poll with 62% of stakeholders voting it 3 / 5, meaning that it was seen as being the right level of ambition, although it should be noted that only one stakeholder thought that WPD should 'do a little less' in this area.

"As an end consumer, I'm not really sure what that would mean for me. Does it mean it's going to be available in different languages or different formats?" **Utility**

"One important thing to consider is that there has been a move away from the traditional contact points, as everything is going digital. There needs to be thought about how the message can be pushed out there using both analogue and digital channels." **Vulnerable customer representative**

"Digital channels, such as messenger and text boxes, are good, as they give a sense of immediacy, but not everyone is a digital native." **Consumer body**

ACHIEVING FULL COMPLIANCE WITH THE BRITISH STANDARD FOR INCLUSIVE SERVICE PROVISION EVERY YEAR

Stakeholders felt that this output needed more explanation as it was not clear what this means. In the online poll, it scored much lower than the average baseline with 3.53 / 5, perhaps reflecting this uncertainty.

> "I wouldn't know exactly what this would mean for me." **Utility**

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

Some stakeholders were complimentary about how reactive WPD is and, whilst it was commented that it is good that the company has an online presence, this should not be at the expense of using the telephone, which is the primary method of contact for many people, especially the most vulnerable.

This was, however, the lowest scoring of all the Customer Service outputs in the online poll, scoring 3.35 / 5. 63% of stakeholders felt this output represented the right level of ambition for ED2, scoring it 3 / 5.

> "I've had personal experience with regard to communication with the local WPD office and have been surprised with how reactive they are on all levels and how quickly they've got back to me with regard to my concerns. The problem is the infrastructure they have to deal with, and they often can't give a positive answer due to that." **Local authority**

> "I like that you have the online presence, but I agree that you have a lot of customers that can't or won't do that. Telephone should be key; it's a catch-all. Online is a back-up presence. I would always try online first of all, whereas my neighbour would call you." **Vulnerable customer representative**

RESPOND TO SOCIAL MEDIA ENQUIRIES AND POWER CUT REPORTS IN LESS THAN 5 MINUTES

There was some praise for WPD's current performance in this area. However, the point was made that improvements in this area shouldn't be at the expense of other methods of communication as social media is not used by everyone. 60% of stakeholders, when voting in the online poll, were of the view that WPD's target for this output is appropriate, although 37% thought that the company should go further against this target.

> "We had a power cut just a few weeks ago at 8 a.m. on a Sunday morning. I tweeted this and had a response that they had no record of this, then people came out forthwith and dealt with it. The communication was excellent throughout this and all the workers arrived in masks and very safely. They then got back in touch with me to ask about my experience with them. I would give them 10 / 10 for this – not for the infrastructure but for the way they responded to me." **Parish / community council**

> "The problem with dealing with people using social media is that it doesn't really reach into the far corners of our community. Many of our community are not on social media and don't understand it so we need to use snail mail to pass on their comments to WPD." **Local authority**

PROVIDE GREATER INSIGHT ON THE PLANNED WORK ACTIVITY AND INTERRUPTIONS ON THE NETWORK BY CREATING AN ONLINE VIEWER FOR OUR CUSTOMERS AND STAKEHOLDERS

There were examples of WPD's good performance in this area and it was commented that, for major users, there are good channels of communication. However, it was felt that more could be done to engage with domestic customers, particularly the most vulnerable who are least likely to use social media channels to get their information.

When asked to vote in the online poll, this output was the one in the Customer Service priority area where stakeholders really felt that the company should go much further than stated, scoring this on average 4 / 5. In fact, this was the joint highest scoring of all the outputs voted on in the workshop. Only about a quarter of stakeholders voted 3 / 5, meaning that they thought WPD had got the right level of ambition for this output, with almost three quarters (74%) of the view that the company should go further. Notably, no one voted that the company should do less in this area.

"That would be useful. I know that a lot of companies are activating online portals where people can sign up for updates." **Utility**

"If there are major issues, WPD would make direct contact with large users. There is that interaction almost on a daily basis anyway. For domestic customers, nobody should be left behind. This type of thing can leave a lot of your customers behind who don't have the facilities that we're talking about." **Trade association**

"From the impact of Covid and having to move to a more digital environment, some customers won't sit within that bracket. So, I would ask: how are you ensuring that they get the updates they need? Maybe you need more customer research to find out how they would like to be engaged with. It's been difficult to do research lately because of the lack of face-to-face interaction, so you need to identify their preferences." **Utility**

"A lot of people would be very interested in this area. I follow WPD on Google Alerts, and it's surprising how many traffic delays are caused by WPD. More insight on those kinds of activities would be good, like planned works and what interruptions they will cause." **Business customer**

"You need to provide reassurance, especially to elderly customers, when there is an interruption. Social media probably doesn't reach all your stakeholders. Anything you can tell the outside world about what you are doing is good, even if it's just giving a warning that there may be a short interruption." **Distributed generation customer**

"If it's during the outage, you wouldn't have the power to actually go online to check the online viewer. So, I agree with providing greater insight, but I would like more information about how you're going to do that." **Distributed generation customer**

"I think I would argue, anecdotally perhaps, that WPD has always done a good job of keeping in touch with regards to planned works. The issue may be that the customers have to go out of their way to find that information. I think the communication is there, but how it's transmitted to customers might be a point of debate, possibly." **Storage and renewables provider / installer**

"Those customers who would fall into the vulnerable bracket are those that would be more concerned about power cuts, planned or unplanned. Those groups of consumers would also be the least likely to use social media. How do you go about tackling those vulnerable, hard-to-reach customers when there is a planned or unplanned outage?" **Utility**

CUSTOMER VULNERABILITY

IMPACT OF COVID-19

It was clear in the discussions that Covid-19 has made some of the outputs in this priority area increasingly important. The point was made that efforts to contact eligible customers to promote the PSR and ensure that they are signed up should remain a priority as this is hugely important for those who are shielding and isolated. It was commented that, as a result, the output to identify and reach over 30,000 hard-to-reach vulnerable customers may need to be revised.

In addition, it was felt that the economic impact of the pandemic will mean that more people will be pushed into fuel poverty, so initiatives to support these people will also become increasingly important in the coming months and years.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

Stakeholders agreed with the requirement to ensure that the PSR is kept up to date. The comment was made that, for some, vulnerability is transient and that the causes of vulnerability are complex and changing. It was also noted that many customers do not know about the PSR so may not seek out support when they need it. Stakeholders also broadly supported initiatives to make signing up to the PSR easier and to avoid situations where customers are being asked to register multiple times. Some stakeholders, including those working in the charity sector, felt the system where multiple organisations held data which could not be shared resulted in some customers missing out on the support they need, something that is exacerbated as customers increasingly move suppliers.

There was acknowledgement that there is a need to treat the causes rather than the symptoms of fuel poverty. To do this, it was felt that WPD should continue to educate customers on fuel efficiency and, in due course, on initiatives such as flexibility services which had the potential to save them money.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

Overall, Customer Vulnerability ranked middle out of all the priority areas on average. However, the individual outputs received varying levels of support. Stakeholders strongly supported WPD taking a leading role in ensuring that vulnerable customers are not left behind by the smart energy transition, with the relevant output scoring 3.96 / 5. Equally, they voiced strong support for facilitating the participation of vulnerable customers in the low carbon future (3.84 / 5).

Other outputs ranked lower than the average baseline. The output to 'support over 75,000 fuel poor customers to directly save on average £40m over RIIO-ED2' ranked lowest in this priority area, perhaps reflecting the sentiment that while energy suppliers have a responsibility to save customers money, the role of distributors such as WPD should be more educational and informative. Equally, the output to contact over 2 million PSR customers biannually to update records scored 0.06 below the average baseline, with one stakeholder feeling that the output presented a monumental, perhaps overly ambitious, task and another wanting more detail on whether WPD would merely attempt to contact 2 million of its customers or firmly establish contact with those customers.

In terms of things that were seen as missing from these outputs, stakeholders tended to focus on the channels of communication WPD uses as a way to reach out to customers in vulnerable circumstances, those in fuel poverty and those who may potentially be left behind in the transition to a smart network. Suggestions included working with grassroots organisations, local authorities and parish councils, and using channels such as parish council magazines or even 'local champions'. It was also suggested that WPD makes use of the data that is held by local authorities. However, it was noted that GDPR presented a barrier, the implication being that anything that could be done to overcome barriers such as this would be positive.

Customer Vulnerability Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = 3.69

Output	Score
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	3.96
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	3.84
Identify and engage over 30,000 hard-to-reach vulnerable customers each year to join the Priority Services Register	3.73
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	3.71
Work with expert stakeholders, including our Customer Collaboration Panel and referral partners, to annually refresh our understanding of 'vulnerability' and co-create an ambitious annual action plan	3.67
Provide vulnerable and fuel poor customers with specific support and education in relation to the smart energy transition	3.64
Proactively contact our over 2 million Priority Services Register customers once every two years to remind them of the services we provide and update their records	3.63
Support over 75,000 fuel poor customers to directly save on average £40m over RIIO-ED2	3.61

AVERAGE SCORE

"We recognise that WPD is the leader in its field and as such we would expect it to be leading on vulnerability. It's good to see that you are considering these things and that you're going to deal with it. I suppose I'm being a bit facetious here but if you don't have many power cuts, surely you don't need to deal with vulnerability! Perhaps you need to reassure vulnerable customers that you have a plan for supporting them." **Parish / community council**

"The best part about the available numbers is that they give accurate information. What was previously on the PSR was out-of-date. These numbers have been produced taking an informed view. As large as they sound, the numbers are an accurate reflection." **Academic institution**

"The normal business routine is that customers contact the supplier. There's no mention in the stats of suppliers. It seems you're shouldering the total burden. You would think suppliers had obligations too." **Parish / community council**

"Vulnerable customers need a simple route for identifying their needs. The customer's touch point should be a one-time thing and the industry should tie everything together. The supplier route should capture and share the information." **Business customer**

"I wonder if WPD is doing too much because of their own excellence and whether suppliers should be taking this on." **Parish / community council**

"How well is the PSR segregated for different vulnerabilities? Some people will be living with long-term vulnerabilities, while it will be more transient for others. I think that the outputs need to reflect a smarter and more targeted approach to assisting different types of people." **Academic**

"Is there a way of getting more data on vulnerable people from organisations in order to streamline the process of identifying and assisting them?" **Vulnerable customer representative**

"What is your definition of fuel poor customers? Has that changed with Covid and is it likely to change in the future? Also, you're effectively a third party. You're almost remote as the energy provider, not the supplier, so what scope do you have to change things?" **Parish / community council**

"For the country to achieve Net Zero, the transition has to be across the board. It's not just about the DNO, it's about highlighting areas where there otherwise wouldn't be any progress." **Academic institution**

OUTPUTS: POWER CUT VULNERABILITY

PROACTIVELY CONTACT OUR OVER 2 MILLION PRIORITY SERVICES REGISTER CUSTOMERS ONCE EVERY TWO YEARS TO REMIND THEM OF THE SERVICES WE PROVIDE AND UPDATE THEIR RECORDS

Whilst stakeholders asked for clarification as to whether this output referred to actual contact being made or an attempted contact, it was nevertheless felt that contacting 2 million customers represented a huge undertaking. Around half of stakeholders polled (48%) were of the view that this represented the right level of ambition, although 50% were of the view that WPD should go even further.

"The 2 million PSR customers contacted every year: is that the limit or bare minimum?" **Parish / community council**

"Either the GP service or somebody had actually put people onto the register. When they were onto the register, they were communicated with every couple of years. Some people came to end of life and then there was closure off of the register. I thought it worked quite well. There wasn't a lot of input I was required to put into it, it seemed to flow quite well." **Local authority**

"Does this output relate to attempted contacts or occasions when you have actually spoken to someone? I think that the aspiration to contact people is great, as you want to ensure that people's vulnerabilities are recorded and any changes to their situation don't slip through the net. If it's only attempted contacts, that's a different idea and will probably not be enough." **Vulnerable customer representative**

"I don't think we should underestimate the scale of the task." **Utility**

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

There was a good deal of support for this output. Stakeholders cited their experience of dealing with a previously confusing system and it was commented that utilities and other services had a responsibility to simplify this for customers. It was added that Ofgem should endeavour to drive improvements in this area and make data sharing easier. When asked to vote on this target in the online poll, over half (53%) were of the view that WPD should go further against this output in ED2, with 20% voting 5 / 5.

"I would say that the one-stop-shop is a really good thing to have to ensure some kind of joining up between key utilities and other services." **Parish / community council**

"Regarding the lovely idea of a one-stop shop: how does one know if one can register on the PSR? Lots of people don't even know what it is." **Parish / community council**

"I think it's an industry-wide problem, and one that should be led by government. There should be some policy decisions made around the PSR, and whether there's a better way of doing it altogether." **Business customer**

"I have some previous experience with the PSR. I don't know if it has changed much in recent years, but my impression was that it's a right old mess. There are all different kinds of people trying to use it and information coming from 106 different agencies. There's now a lot of complexity around GDPR. Is anyone looking at how the PSR can be run better, fundamentally? This seems to assume we are just dealing with the system as it exists." **Business customer**

"One thought is that surely Ofgem needs to be seen to be driving this a bit harder rather than a grassroots initiative from the companies concerned? Could Ofgem not put some kind of benchmark in place? This would be put more pressure on the companies." **Local authority**

"They're all good targets to have. With the target to have a one-stop shop for PSR, I'm not sure if WPD are at this stage yet, but have they thought about the when and the how? Is there a plan following on from the Business Plan? Have they thought about specifics? Having said that, I appreciate that it's difficult to predict the future." **Vulnerable customer representative**

"It is the responsibility of utilities companies to get on the same page and make it as easy as possible to join the PSR. The sooner that it can be put in place, the better. I agree that this is an important priority." **Vulnerable customer representative**

IDENTIFY AND ENGAGE OVER 30,000 HARD-TO-REACH VULNERABLE CUSTOMERS EACH YEAR TO JOIN THE PRIORITY SERVICES REGISTER

Stakeholders were of the view that this output had risen in importance in light of the Covid-19 pandemic and it was commented that WPD should work with relevant community groups to further engage with hard-to-reach customers. When asked to vote on whether they thought this output was appropriate, the average score from stakeholders was 3.73 / 4, with 62% voting that WPD should endeavour to go further in this area.

"Reach out to councils through parish council magazines quarterly or every 6 months. Those magazines are then pushed through everybody's door." **Local authority**

"On identify and engage over 30,000 hard-to-reach customers, have WPD accounted for Covid-19 and the pandemic or are these numbers not included in this? We've certainly seen a huge increase." **Vulnerable customer representative**

"I think that this figure will need to increase once you start talking to community groups, as you will discover so many more people." **Local authority**

"I think that Covid has made this area even more of a priority than before. You need to leverage bodies such as the Association of Carers and Age UK and use them as information points, as they are in touch on the ground with so many people. They will relay information to vulnerable people." **Local authority**

"As another point of reference as a way to get into these groups, there's the association of local councils as well. Each area will have its own set-up. They are often quite a good way to find out how to get to the local parish councils so you get a regional look at the parish councils and how they can help." **Local authority**

WORK WITH EXPERT STAKEHOLDERS, INCLUDING OUR CUSTOMER COLLABORATION PANEL AND REFERRAL PARTNERS, TO ANNUALLY REFRESH OUR UNDERSTANDING OF 'VULNERABILITY' AND CO-CREATE AN AMBITIOUS ANNUAL ACTION PLAN

There was support for WPD to work with a range of expert stakeholders to refresh their understanding of vulnerability. It was suggested that these should include local authority representatives who will have knowledge of the needs of their constituents. It was added that the company could perhaps work with 'local champions' at a grassroots level. 44% of stakeholders voted in the online poll that this output was appropriate, scoring it 3 / 5, although 56% voted that the company should 'do more' or 'do a lot more' in ED2. Notably, no stakeholders thought that the level of ambition proposed against this output should be reduced.

"I think that there's a constant need to keep up to date with stakeholder needs at the moment, so there is merit in this output. Things have changed so much, and you need to talk to as many people as possible as often as possible."
Vulnerable customer representative

"Lots of councils have lots of digital information outlets, which can disseminate huge amounts of information to huge numbers of people. You should engage with councils more to get that information out there." **Local authority**

"Also, you should engage with district councillors as I'm aware of people in my ward who are disadvantaged. I don't know whether they're listed on your list or not, but I could name a number of people who could well be." **Local authority**

"Councillors can identify not only the vulnerable people, but also those who can or can't access the things that WPD can offer. Can you not get champions within local parishes or district councils to help those vulnerable people? Rather than directly address them, target the ones capable of accessing this information for WPD to support them so they can then provide the local support to people in that community." **Business customer**

OUTPUTS: FUEL POVERTY

SUPPORT OVER 75,000 FUEL POOR CUSTOMERS A YEAR TO DIRECTLY SAVE ON AVERAGE £40M OVER RIIO-ED2

There was acknowledgement that WPD as a distribution company did not have the ability to reduce bills significantly for those struggling to pay, in the same way that a supplier could. Therefore, it was suggested that outputs such as this, which place an emphasis on helping to educate and inform customers, should be supported. Notwithstanding this, stakeholders broadly thought that this output represented the right level of ambition for ED2 with almost half (48%) voting that the company had got this about right, in the online poll. As a result, this was the lowest ranked of all the Customer Vulnerability outputs.

"I used to run a team looking at vulnerable customers and how to help them – we had a specific tariff for vulnerable customers, and this is something that I think should be continued in that area. As a distribution company I'm not sure you can help other than giving them a discount on their distribution charge which would be passed on to the supplier anyway. The supplier has a relationship with the customer which the distribution company does not. WPD could fulfil more of an educational role in this respect rather than anything else. For me, the biggest impact you can have with vulnerable customers is reducing their energy bills. At the end of the day the cheapest way they can pay for their energy, the better." **Local authority**

"I worry about the word average in front of the £40 million. I'm not sure that should be there. What does it really mean? If WPD can help customers to be more energy efficient then that should be over the lifetime of the customer and not just a limited number of times. There needs to be a plan in place for everyone, including Mrs Miggins who lives on her own and doesn't have a smartphone, not just those who are technically literate."
Parish / community council

"WPD should be increasingly engaged in this area. The current situation is only going to get worse in the short term in terms of affordability. How is that saving being calculated? I'm curious about how that figure has been arrived at." **Business customer**

"I think as far as stretching the target, this output broadly works. The question there for me is: what are you going to do differently to ensure that this happens? All the outputs are great, and I don't disbelieve it, but the devil is in the detail a bit." **Consumer body**

"I wonder whether this should be your job." **Parish / community council**

"It sounds like you have an indirect relationship with the customer to help them save money. Perhaps in a more direct way, you should explain the benefits of flexibility to people in ED2." **Business customer**

"Supporting fuel poor customers is made more challenging because of GDPR." **Parish / community council**

"It's a huge increase on the previous efforts, but it's difficult to tell whether it's an effective effort without putting it into context for a local area." **Vulnerable customer representative**

"Would maybe presenting the effort as a percentage figure better?" **Vulnerable customer representative**

"There needs to be a balanced approach to ensure that efforts are best targeted but do not result in huge bills for everyone else." **Vulnerable customer representative**

"There needs to be more collaboration between WPD and the emergency services, as they see people on the ground as part of their work and they can identify signs of fuel poverty. That may mean that the 75,000 target may need to be revised." **Local authority**

"Covid-19 has driven up fuel poverty and councils have large amounts of data on people in this area, particularly in the large housing estates that they oversee, so tap into it." **Local authority**

OUTPUTS: SMART FUTURE

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

It was felt by some that a model to identify the capabilities to participate in a smart, low carbon future would help WPD to identify areas to target. There was a strong feeling from stakeholders that customers, particularly the least affluent, should not be left behind by the transition to a smart future, especially those who do not use the internet. This output was widely supported by stakeholders, scoring above the 3.69 / 5 baseline in the online poll, with 64% voting that the company should go further than planned.

"I'm not sure whether there is a comprehensive vulnerability map to help. Could you work more closely with industries that work most directly with vulnerable people? That could make the process more efficient."
Vulnerable customer representative

"I think that this output could be focused by putting effort into looking for hot spots and cold spots in areas on the PSR. If there are certain areas where the numbers are lower, more work and efforts could be required to investigate and promote it more heavily, and therefore increase registration."
Vulnerable customer representative

"Some of the issues I have in terms of that are about the specific actions WPD have outlined and how the company plans to reach those vulnerable people, be it through partnerships with local authorities or community groups." **Local authority**

"I like the aspiration, but you have to remember that 40% of the population haven't got the capability of going online and you need to find a way for everyone to benefit from the smart future." **Local authority**

"I think that this is important. Everyone should have the same chance in life and therefore should be able to enjoy a green future." **Local authority**

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

This was the highest scoring output when stakeholders were asked to vote in the online poll, with an average of 3.96 / 5. Stakeholders supported WPD's aspiration to take a leading role in this area and it was added that the company should look beyond the industry for companies and community groups to collaborate with.

"I think that this idea is great, but it could be expanded to more than just DNOs and involve other industries, as there are many reasons why people are in vulnerable situations. This collaboration could create an effective solution." **Business customer**

"I agree. I would focus this idea on engaging with community groups already doing things within their communities." **Parish / community council**

"This is a really great idea, and I would expand it to involve other industries. That way, wider support can be provided." **Utility**

PROVIDE VULNERABLE AND FUEL POOR CUSTOMERS WITH SPECIFIC SUPPORT AND EDUCATION IN RELATION TO THE SMART ENERGY TRANSITION

Opinion was split on whether this output necessarily fell within the remit of WPD. As a result, it polled slightly below the 3.69 baseline for all outputs, scoring 3.64 / 5. However, some felt that this is exactly the sort of initiative WPD should be involved with as an energy network, as opposed to a supplier of electricity. Again, the point was made that WPD should work in collaboration with local groups to provide support for those people most in need.

"In addition to the electrical network problems we also have problems with broadband, and we have a local initiative which is getting the message out to the more isolated parts of the local area. In order to do this, they are reaching out to the parish councils and community groups in order to get the message out, because they know the individuals in the community and why they might not be responding to you." **Parish / community council**

"It would seem wrong if WPD didn't take on this role." **Utility**

"In terms of increasing knowledge and awareness for people in vulnerable circumstances, what does that mean in practice? Is it someone coming round to look at the meter? Perhaps it's about having that link to community groups as a communication channel which can demystify all the changes." **Vulnerable customer representative**

"Is it a specific license obligation? Does anybody expect the DNOs to be active in this area? It seems slightly outside of their core remit to me." **Business customer**

SOCIAL CONTRACT

IMPACT OF COVID-19

Stakeholders did not make any specific comments on whether Covid-19 had impacted priorities in this area. However, many of the stakeholder groups discussed this priority area after making points on the Consumer Vulnerability outputs, having discussed the impact of the pandemic on customers in vulnerable circumstances and those in fuel poverty.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

Stakeholders broadly agreed with concept of WPD producing a Social Contract. It was commented that large companies have a responsibility to go beyond what is considered CSR to an approach based on ESG. It was noted that many of the outputs discussed at the workshops are based on efficiencies, saving time and money, whereas many customers increasingly expect companies to justify why they are doing things rather than just detailing what they intend to do.

COMMITMENTS FOR THE SOCIAL CONTRACT

This session also included a question on what commitments should be included in the upcoming draft Social Contract. It was commented that the Social Contract should be concise and clear, distilled into a brief statement rather than something overly complex.

Stakeholders were of the view that commitments relating to transparency are important and it was suggested that these could be supplemented with external accreditation, for example on fair tax.

There was recognition that, although WPD is a large company, it does operate at a local level with depots and infrastructure located in communities. The comment was made that WPD should strive to be a 'good neighbour' and that this should be included in the Social Contract. There was also recognition that WPD employs a lot of people who have good technical know-how and that this could be put to use in local schemes, for example with operational staff helping communities with certain projects, including those relating to helping them achieve Net Zero carbon.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

The conversations then turned to the proposed outputs for the next Business Plan. Stakeholders did not necessarily suggest outputs that were missing but said that a number of those proposed were to be expected of a large company and the company should therefore go further. With regard to the publication of annual reports, it was felt that these should be accessible to customers. In the case of the output to support 300,000 people in local communities via a £250k 'Community Matters' Fund, it was felt that this could go further, presumably in light of the Covid-19 pandemic. Whilst the proposed initiative to allow staff to volunteer was the lowest ranked output in this priority area, it was suggested that WPD staff with certain skills, such as those from an engineering background, could make use of these skills to support local communities.

All outputs scored lower than the average baseline in the online polling, demonstrating that relative to other areas stakeholders were comfortable with the level of ambition in this area. In fact, this was the lowest ranked priority area overall in the online poll.

Social Contract Outputs: Average Score Compared to Overall Baseline
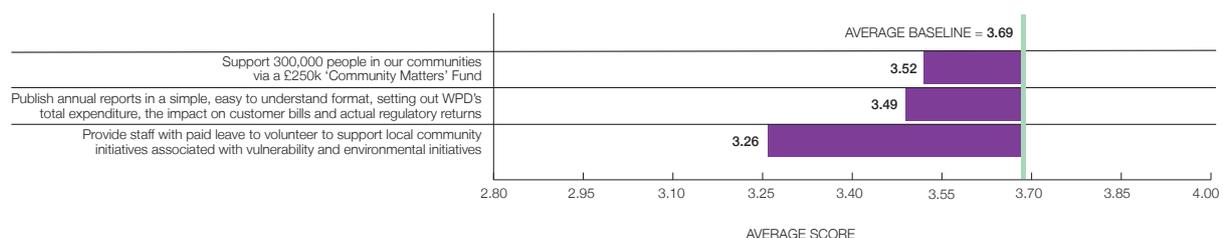
AVERAGE BASELINE = **3.69**

	Score
Support 300,000 people in our communities via a £250k 'Community Matters' Fund	3.52
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	3.49
Provide staff with paid leave to volunteer to support local community initiatives associated with vulnerability and environmental initiatives	3.26

AVERAGE SCORE

COMMITMENTS FOR THE SOCIAL CONTRACT

Out of the 15 components, only those that received stakeholder comments have been included below. There was no online polling on the components.

"All of the benchmarks seem reasonable even though they are minimalistic. That's not a criticism. You're doing well, but you can go further." **Local authority**

"I trust that WPD is very responsible, but I thought this sort of matrix requirement looks to be a good plan. From an academic point of view, if you split these things into so many elements, the delivery will be very complicated. My opinion is that there doesn't need to be so many targets. I trust that WPD will do these things well, but the requirements and objectives are too detailed, and you will end up having to fill out a lot of forms. Simplify the whole process to something more like 5 elements rather than 15." **Academic institution**

"The priorities are broadly good, but there are lots that are about saving seconds or pennies. I would like to see less priority on KPIs that are marginal but mass, and the money you save on them could be used to focus much more on more targeted issues. The transition to a DSO is huge, so you might have to accept that you will do worse on some of those KPIs that involve seconds on power cuts, but I think that's okay. The transition to a DSO should be the focus at the moment, and the other KPIs can take a hit." **Business customer**

TRANSPARENT REPORTING

One stakeholder raised the importance of having an advisory board within WPD to ensure accountability against performance metrics.

"It's important to know who is auditing and measuring your performance to see if you meet the benchmarks. And I don't mean a Big Four auditor doing it. Do you have an advisory board making sure that the managers and the board are held accountable for delivering them? It needs to be ongoing, and a part of the DNA of your company." **Local authority**

CLARITY ON TAX AFFAIRS AND DIVIDENDS

One stakeholder questioned whether WPD had looked into securing a fair tax certification, as another DNO had done.

"Have you looked at fair tax mark stuff, and are you fair tax certified yet? I think SSE is fair tax marked." **Local authority**

POSITIVE OUTCOMES FOR CUSTOMERS IN VULNERABLE SITUATIONS

One stakeholder underlined that WPD should avoid rolling out extensive yet superficial campaigns and instead aim to effect meaningful change, be it on a smaller scale. Another stakeholder urged WPD to be more proactive in its support of vulnerable customers as opposed to simply adhering to an outdated CSR model.

"In terms of fuel poverty there are a lot of people in my town who are very poor, and it would be better for you to do a little bit really well rather than something that's wide scale but shallow, or a photo op. Time banking has been done really well sometimes." **Local authority**

"It reminds me of the old corporate social responsibility model rather than the more activist approach we are moving towards now in terms of ESG. It's minimalistic. Volunteering is great for CSR and employee benefits, but for the social contract and social value I'm looking more at what WPD can do in terms of coming to us, procurement, and supporting local communities as an anchor institution to support a more sustainable and affordable carbon neutral economy." **Local authority**

A FRAMEWORK FOR ENGAGING LOCAL COMMUNITIES

It was noted that WPD could put its local expertise to use within communities, for example by providing simplified information to parish councils or domestic customers. Similarly, it was felt that WPD could adopt the role of a 'good neighbour' within communities.

"I would add working with local partners. Our local authority is putting together a working group of experts on the ground to work on a retrofitting scheme. You need to work with those who have been on the ground, have local expertise, and have a holistic approach rather than target-driven approach." **Business customer**

"People end up living near your infrastructure, so there should be something about being good neighbours if you need to do maintenance. In a lot of new housing estates, developers are deliberately putting the affordable houses near the sewage processing plant or substation, so there's a social equality aspect." **Local authority**

"There's probably something about understanding what is possible. A lot of the information you get from WPD, because of the nature of the work, is fairly technical, and actually boiling it down to what it means for parishes or individuals is quite an important piece of work. So, maybe something within the Social Contract is that. Maybe there is something about the language used, maybe there is still that element of understanding what is meant by various capacity jargonistic terms." **Local authority**

TRANSPARENT MECHANISMS SO STAKEHOLDERS CAN INFLUENCE DECISIONS

A lack of technical transparency, particularly between WPD and local authorities, was raised as a barrier to planning and infrastructure.

"I recognise that there has been a range of engagement with local authorities, but I think there is still a missing link in terms of technical translation to fully align WPD's plans with local authority plans. We need to start talking about planning and infrastructure. So, you need to carry on the way you are going but go further." **Business customer**

COMMUNITY AND ENVIRONMENTAL INVESTMENT / BENEFITS

It was felt that WPD needs to go further in educating local bodies about constraints and managing their expectations of projects.

"People are very keen to be part of being carbon neutral, but then they come up against a buffer. Local bodies understanding the constraints of what is possible needs to be a commitment underneath one of them." **Local authority**

PLAYING AN ACTIVE ROLE REGIONALLY

One stakeholder called for WPD to have a less superficial regional approach, urging it to immerse itself in local systems and projects, which would in turn enable it to tackle wide-ranging issues such as vulnerability.

"You need to have a regional view but more focussed and in depth, not just a light touch stakeholder consultation that's flat. There are systems and projects emerging at a local level and that should be a really strong focus because that's how you tackle vulnerability." **Business customer**

OUTPUTS FOR THE BUSINESS PLAN

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

Stakeholders were broadly in favour of this output as long as the information is accessible and appropriate for the audience. 55% of those polled thought this output was appropriate for ED2, scoring it 3 / 5, although 43% were of the view that WPD should go further in this area.

"As long as it is clear and easily understandable then that sounds good." **Local authority**

"Who is the target audience? Is it homeowners, business, stakeholders in general or councils? It is difficult to make a comment without knowing who it is targeted at." **Developer**

SUPPORT 300,000 PEOPLE IN OUR COMMUNITIES VIA A £250K 'COMMUNITY MATTERS' FUND

This was the most endorsed of the three Social Contract commitments voted on in the online poll with almost half (48%) of those polled voting for WPD to go even further with this output than the stated target.

WE WILL AS A MINIMUM MAINTAIN OUR PRIME ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) RATING FROM A RECOGNISED AGENCY

This was not included in the online poll because there was not scope for varying levels of ambition for this output.

"Shouldn't this be expected anyway rather than be an additional thing on the contract?" **Developer**

PROVIDE STAFF WITH PAID LEAVE TO VOLUNTEER TO SUPPORT LOCAL COMMUNITY INITIATIVES ASSOCIATED WITH VULNERABILITY AND ENVIRONMENTAL INITIATIVES

Stakeholders supported this output, recognising that among WPD's staff members, there is a huge amount of knowledge that could be put to good use on helping to deliver community initiatives. Examples included lending their expertise to community energy projects as well as those centred on delivering environmental and social benefits.

"For me there is a massive lack of engineers in the population. Electricity is just one challenge we have. If we are going to target education, we need to get people interested in the built environment and get younger people interested in engineering. WPD could have a big impact going into schools." **Developer**

"I think the answer is our council would benefit from community energy schemes. I am aware of one or two of these going on including environmental initiatives and vulnerability ones too. Does WPD do anything like this at the moment?" **Local authority**

"WPD must have people that can support and guide us. Before we get our consultant telling us multiple ways of doing things, with no standardisation, WPD could talk to us about the best solution and guide it." **Developer**

CONNECTIONS

IMPACT OF COVID-19

Stakeholders did not comment on whether Covid-19 would impact the priorities or emerging issues in this area.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

Stakeholders supported proposals to address the complexity of the connection application process. It was acknowledged that more companies and organisations would be looking to connect to the grid in the future, including those who are not necessarily as tech savvy as those currently looking to connect. Therefore, anything that could be done to help customers navigate the process would be welcomed.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

Whilst no specific additional outputs were put forward, it was suggested that WPD could make use of videos to help connections customers and that more could be done to make the connections process more intuitive and navigable. Stakeholders were very keen that connections were completed in a speedy fashion, but it was commented that it is more important that information is accurate at all times and that guarantees are given of when milestones will be met. Although engagement with relevant tiers of local and regional Government was seen as positive, it was commented that WPD needs to demonstrate how it has acted upon the feedback it receives. In terms of specific targets, measures and performance levels, it was felt that the output to improve cross-border working practices was currently too vague, with one stakeholder calling for more detail and measurable targets in this area. Broadly, stakeholders wanted to see WPD be more ambitious in this priority area in ED2.

A range of individual comments relating to some of the outputs were raised, which have been summarised below.

Connections Outputs: Average Score Compared to Overall Baseline

Output	Average Score
AVERAGE BASELINE = 3.69	
Provide new connections quotations and energisation in line with customer expectations	4.20
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	3.80
Engage with local authorities and local enterprise partnerships to understand their requirements for strategic investment in terms of changes in demand or network use	3.67
Improve DNO/IDNO/NGET/ESO cross border working practices and promote competition in connections (to ensure that the consumer is best served under the process)	3.50

AVERAGE SCORE: 2.80 — 2.95 — 3.10 — 3.25 — 3.40 — 3.55 — 3.70 — 3.85 — 4.00 — 4.15

Click here to view a larger version of this graph in Appendix 3

Please note that as Connections was held as an optional afternoon surgery session, and was therefore attended by fewer participants, the voting data for these outputs is less robust. While the Connections voting data has been summarised in this section, it has therefore not been compared against data from the other main sessions. However, for the purpose of this report, comparisons have been drawn between the Connections outputs themselves to give an indication of stakeholder views on this area.

OUTPUTS

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

This output was broadly supported by stakeholders. In the online poll, 40% felt this output represented the right level of ambition for ED2 and the remainder were of the view that WPD should go further, although it should be noted that there was a sample of only five stakeholders. In the discussions, it was suggested that videos could be used to share information and that better mapping would be useful to help connections customers to plan – something that would be even more helpful in the future as more low carbon technologies look to connect to the network.

"WPD should be expanding its online platform and provide more information about the connections process. Videos about different kinds of connections could be a great route. By doing things like this, people can find answers for themselves and go back to WPD more empowered for discussions." **Developer**

"I think that there needs to be more of an element of self-service at all levels here, as it would be great to get relevant information on where we are on the connections process as easily as possible." **Developer**

"People are going to be needing different types of connections down the line, such as three-phase and EV chargers, meaning that lots of new infrastructure is required. It would be great to see some mapping from WPD to show how it is planning to get the network ready for that to inspire some confidence." **Local authority**

PROVIDE NEW CONNECTIONS QUOTATIONS AND ENERGISATION IN LINE WITH CUSTOMER EXPECTATIONS

This was the most highly ranked Connections output, scoring an average of 4.2 / 5. The point was made that, whilst it is important for the process to be facilitated in a timely fashion, it was more important that information is accurate and that their time frames are guaranteed as this means that the process can be completed more quickly.

"I would want some kind of guarantee of timescales about when a connection quote would be provided. The standards in place have been hard won and I don't want WPD to be rushing things and be left with nothing." **Developer**

"It's more about the quality of information not the speed. If everything is present and correct when it hits our inbox, we'll be able to get through our work quickly and can get the connection up and running." **Business customer**

"If people want to take longer, they need to have a guaranteed quotation date." **Developer**

"From the legals process perspective, the better the quality information available, the faster the legals can be completed." **Business customer**

ENGAGE WITH LOCAL AUTHORITIES AND LOCAL ENTERPRISE PARTNERSHIPS TO UNDERSTAND THEIR REQUIREMENTS FOR STRATEGIC INVESTMENT IN TERMS OF CHANGES IN DEMAND OR NETWORK USE

There was acknowledgement that engagement with the relevant tiers of local and regional government was appropriate as an output and that this engagement should inform WPD's future plans.

"I think that this should be built into the long-term development plans. You actually need to act once you have listened to stakeholders. Listening on its own will not cut it if you do nothing afterwards." **Developer**

IMPROVE DNO/IDNO/NGET/ESO CROSS BORDER WORKING PRACTICES AND PROMOTE COMPETITION IN CONNECTIONS (TO ENSURE THAT THE CONSUMER IS BEST SERVED UNDER THE PROCESS)

It was commented that WPD should be looking to achieve this output in ED2, but that it should be more measurable and should have more detail on the activities required. Out of all the Connections outputs voted on, this scored the lowest with 3.5 / 5.

"This is a very generalised statement and doesn't really say anything. WPD should be looking to do this, so it's laudable that it's there. However, the statement gives no evidence of how it intends to do so." **Business customer**

"How are you going to engage with new people? It still feels like a barrier is up for them."
Business customer

7 | SESSION TWO: MAINTAINING A SAFE AND RESILIENT NETWORK

NETWORK RELIABILITY

IMPACT OF COVID-19

In terms of the impact of Covid-19 it was commented a number of times that a reliable service is vitally important for customers, particularly those in vulnerable circumstances – including those shielding – as the impact of a power cut is hugely exacerbated. The point was also made that, with more people working from home, reliability is more important than ever.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

There was broad agreement with previous feedback regarding power cut frequency and duration. Clearly stakeholders would not like to see a reduction in levels of service in ED2, even though factors such as the increase in new connections will make it challenging to meet targets. It was also felt by some that targeting worst served customers should be a priority for WPD as customers should expect the same level of service irrespective of where they live.

Stakeholders agreed that tree management is a high priority and there was support for the usage of LIDAR to make this as efficient a process as possible.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

Stakeholders made the point that a number of these outputs should have more measurable targets put against them and it was commented that they would benefit from more context as they could be construed as being somewhat vague. In terms of any outputs missing, it was commented that WPD should do more to investigate battery storage to help reliability. It was also suggested that the company should research the impact of ash dieback on its tree management programme and consider including a commitment relating to the replacement of any trees cleared.

Moreover, it was noted that the scope of the output to 'underground, insulate or divert overhead lines that are adjacent to or cross school playing areas', which was the lowest ranked in this priority area with 3.33 / 5, should be extended to include other recreational areas beyond just school playing fields.

All the outputs ranked on average between 3 and 4 ('right level' and 'do more') in the online poll – although there was some variance. The highest ranked outputs related to improving the health of the network using asset data with 3.94 / 5, and having on average fewer and shorter power cuts in ED2 than ED1 with 3.85 / 5.

Stakeholders raised a range of individual comments relating to each of the outputs, which have been summarised under the outputs below.

Network Reliability Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = 3.69

Output	Score
Improve the health of the network using asset condition data to target investment where the need is greatest	3.94
On average fewer and shorter power cuts in ED2 than ED1	3.85
Continue to focus on restoring supplies quickly and target achieving more than 85% of customers (that are not automatically restored) within one hour	3.79
Reduction of tree related faults on HV and EHV overhead network due to use of LIDAR in ED2 thus reducing the impact on the customer	3.62
Undertake 50 schemes to improve the reliability of our worst served customers and prioritise these schemes based on numbers of vulnerable customers	3.57
We will aim to restore customer supplies in ED2 within 12 hours under normal weather conditions	3.54
We will continue to install further flood defences to reflect updated data from the Environment Agency	3.45
Underground, insulate or divert overhead lines that are adjacent to or cross school playing areas	3.33

AVERAGE SCORE

"A common theme for me in this will be how these points can be achieved with increased demand on the network." **Developer**

"Since Covid, the reliance of having electricity at home is getting more and more important." **Developer**

"At the moment there is language like 'fewer' and 'shortage' but there aren't specific targets in there, for example, the percentage figures for these targets." **Vulnerable customer representative**

OUTPUTS: NETWORK PERFORMANCE

ON AVERAGE FEWER AND SHORTER POWER CUTS IN ED2 THAN ED1

Stakeholders broadly supported this output. In the online poll it was the second highest ranked under the Network Reliability priority area with 63% voting that WPD should go even further than the stated level of ambition. Whilst it was commented that it may become more difficult to achieve this target as more renewables connect to the grid, it was noted that more and more customers, including major users, are dependent on a reliable service so it was important that WPD continues to make progress in this area. It was added by one stakeholder that WPD should look to target its worst served customers, rather than those who currently enjoy a good service.

"It's a given. Everyone is looking for fewer power cuts. Whatever measure you've put in, they'll want you to improve. As a domestic customer, I used to lose supply at least five times a year because I was at the end of the line. You learn to accept it. WPD ought to be bragging about their service."
Trade association

"I would refine this output and focus on the areas where the power cuts are at the highest levels. Target the worst-performing parts of the network and bring them up to scratch. That way, the average would come down." **Developer**

"It's not something that affects most people, but it does affect some of our big businesses. Especially in rural areas, we don't want to see them disappearing which they've threatened to do. And, with more distributed generation, we will see more heat pumps which will again cause fluctuations so we may see this as an increasing problem." **Local authority**

"I think that this output could be quite a tall order, as the level of service is already very good."
Parish / community council

"The other piece around the network is about quality faults, particularly when you get up to businesses who work on very fine tolerances of what their machines can actually deal with. We have a few out in some areas where the quality of the current is critical to them, and they have quite a lot of dropouts which then end up costing a lot of money, because expensive machines aren't able to cope with those fluctuations." **Local authority**

"That definitely makes sense. Customers and stakeholders don't need to know about the supplier until the lights go out. So as long as you're keeping the lights on, everyone is happy." **Utility**

"It's quite vague language. I was expecting something a bit meatier." **Business customer**

"I think as we go forward, we are going to be much more dependent on electricity as a society. I would have thought that we should be pushing harder on that. What with the transition to EVs, and the importance of electricity for heat going forward, it seems to be a relatively long time, in my opinion."
Business customer

CONTINUE TO FOCUS ON RESTORING SUPPLIES QUICKLY AND TARGET ACHIEVING MORE THAN 85% OF CUSTOMERS (THAT ARE NOT AUTOMATICALLY RESTORED) WITHIN ONE HOUR

There was broad support for this output. Around one third (32%) were of the view that the level of ambition is appropriate, with 64% voting in the online poll that WPD should go even further. It was added that this output represents a reduction in the level of service compared to the target in ED1, which was a cause for concern for one stakeholder. It was noted that a reduction in the level of service in this area may delay the transition to DSO, although it was commented that the level of service is currently very good, particularly for those living in rural areas.

"I think what you're doing is fine. I can only reiterate that, living in a city, a power cut is rare. You need to concentrate on areas like the highlands with higher volumes of power cuts."
Vulnerable customer representative

"You might need to think about the fact that people will start working from home, and maybe people weren't aware of power cuts during the day before when they used to be at work. That's how it impacted me." **Vulnerable customer representative**

"I don't agree with this. I think it's fine as it is and perhaps could even be worse during the transition to a DSO. Perhaps some customers need targeted improvement, but en masse it's not a priority."
Business customer

"I disagree. I think more power cuts will impede the transition. We should use batteries to make a more robust network during the transition to a DSO, because a flaky network won't encourage people to accept the changes." **Local authority**

"Why is WPD trying to achieve less than it did in ED1? That's concerning." **Local authority**

WE WILL AIM TO RESTORE CUSTOMER SUPPLIES IN ED2 WITHIN 12 HOURS UNDER NORMAL WEATHER CONDITIONS

Whilst it was broadly felt that this output represented the right level of ambition, it did score below the baseline of 3.69 / 5 in the online poll, with 13% of stakeholders voting that WPD should not go as far as planned in ED2. Notwithstanding this, it was noted that weather is becoming more extreme – something that should be taken into consideration in this output as it was felt that this was an important caveat.

"As for the phrasing 'under normal weather conditions', the loss of power isn't usually under those conditions, and engineers have to get out there. I think that phrase is misleading, as it could be days before a storm clears. You've got to be attempting that in not normal weather conditions."
Trade association

"It's not actually a target at all. Maybe the language needs firming up on that." **Business customer**

"I'm intrigued by this figure of it taking over 12 hours to restore 70-odd customers. Is that individuals or residential homes? Also, is this over a year? What timescale are we talking about here?"
Parish / community council

"If we're moving towards renewables then battery storage becomes an issue, to ensure reliability of supply." **Local authority**

"People should look to become more self-resilient too. There are different levels of resilience and it shouldn't be WPD's sole responsibility."
Business customer

"Normal weather conditions are an interesting caveat here. My instinct is that there should be more focus on parts of the region where there will be more extreme weather. If you look after extreme weather, that will take care of everything else."
Local authority

OUTPUTS: TREE MANAGEMENT

"I think that there will be a lot of tree deaths due to ash dieback. There needs to be more focus on ash management." **Parish / community council**

"I hope that there is a programme for alerting customers about trees that are at risk in an adverse weather event. Have you got a maintenance programme for trees near lines?" **Local authority**

"Could tree management be linked to flood management? Tree trunks could be used as 'leaky weirs' during extreme weather. This could be a double win for WPD." **Local authority**

REDUCTION OF TREE RELATED FAULTS ON HV AND EHV OVERHEAD NETWORK DUE TO USE OF LIDAR* IN ED2 REDUCING THE IMPACT ON THE CUSTOMER (*LIGHT DETECTION AND RANGING)

Although stakeholders were impressed with LIDAR and the efficiencies this technology can bring to the company, it was felt by some that this output should be more measurable and have a target attributed to it, for example by including a target related to a reduction in tree related faults. When stakeholders were asked to vote on this output in the online poll, 43% were of the view that this output represented the right level of ambition, although over half (53%) voted for WPD to go even further in ED2.

"Obviously living in a rural environment, we do have a tree issue and I would emphasise that regular inspections are crucial. The only significant power cuts we've had in recent years have been due to trees coming down in a storm, and when you're on a fairly tenuous network the process of switching networks won't really help much. We get WPD coming over and saying things like 'ooh that tree is looking dodgy', well my feedback is that they should deal with that straight away and not wait until it causes damage to the network." **Parish / community council**

"Completing the tree resilience clearance programme is laudable but too general. You need a date there." **Business customer**

"Is the LIDAR equipment accurate enough to capture the information needed for tree management? With the collaboration point we spoke about earlier, we have a lot of data across the country, and this information could be shared. If you have surveyed areas and that is available, it could have wider uses. In terms of flood resilience and liaising with the AA, it could well be that WPD has more accurate information than they have." **Developer**

"I think it would be interesting to know how many outages you have due to trees. I didn't know how much of an issue it is. That will show how much it is reduced by the new technology. From my legal perspective, we include obligations in the documents we draft, but in the legal context. It's interesting to know how much of an issue it is."
Business customer

"I think there should be a specific target in terms of tree management and resilience. I am not an expert but what has been achieved in the past should be improved upon." **Local authority**

"It is important to consider the species that they are replacing the trees with too." **Local authority**

"LIDAR is extremely fast, and it covers large areas in a short space of time." **Business customer**

"I don't understand why you pick out LIDAR specifically. There are other considerations for tree management. Your target should be a reduction of tree-related faults in ED2. What's the target? Is it 100%? I have no idea what the current performance is." **Business customer**

WE WILL COMPLETE OUR TREE RESILIENCE CLEARANCE PROGRAMME ON THE EHV NETWORK

Stakeholders did not vote on this output in the online polling, as the output is as ambitious as it can be already. In the discussions, it was suggested that WPD should consider including a commitment relating to the replacement of any trees cleared.

"I would like to see WPD using the data they are getting regarding the trees to be cleverer about which trees they are cutting." **Energy consultant**

"In terms of cutting the trees, should there be a commitment to planting trees where there are no wires?" **Local authority**

"Could there be more specific planting commitments to maintaining forests that could be part of the environmental commitments?" **Parish / community council**

OUTPUTS: TARGETING INVESTMENT

"I know that this needs attention, and I understand there are faults and current limits to some transformers being able to take on renewable energy. Therefore, the very general statement of where the need is greatest should be addressed. Is this need for a large number of customers or is it for an industrial reason? We need to think about how to address this. It might be more useful to have a percentage improvement target rather than a cash one." **Local authority**

"My interest here is to assess fault current limiters. There is a problem in getting it implemented in distribution networks. I don't quite know how to put a target on this as there are solutions not yet won. I don't think you need to put a monetary target on reinforcing substations because the network doesn't have enough head room. I would be interested to hear about indirect customer views. In this case the council is a direct customer of the DNO as they can be the direct in line of communication." **Energy consultant**

"In terms of industrial size developments, officers can be very involved. I see it as coming to planning committees where we see officers working with developers. We have at least one case where a developer was more than happy to fund a roof full of EV panels but was unable to get a connection because of the substation. WPD asked for a million-pound contribution to put this right." **Local authority**

"This is the problem we see from our angle too. We often hear a would-be connector being awarded a 1-million-pound bill for solving an asset problem, which is actually the DNO's problem. No one seems to have broken that loop." **Energy consultant**

"At the moment water authorities have to be proactive and there don't seem to be such regulations for power at the moment." **Developer**

"An obvious target would be for the DNO to have a certain fault current headroom on all of their substations to facilitate DG connections. We have this discussion so often, but it's a case of being able to implement a solution. Where the cost falls is in the speculative current improvement. At the moment the process is completely passive. There has to be an approved piece of equipment, but this approval process is the problem. We can't share knowledge between councils because of this." **Energy consultant**

"A target could be that it is incumbent to keep a 20% fault current headroom on each of the primary substations." **Local authority**

IMPROVE THE HEALTH OF THE NETWORK USING ASSET CONDITION DATA TO TARGET INVESTMENT WHERE THE NEED IS GREATEST

In the online vote, this was ranked the highest of all Network Reliability outputs. It scored 3.94 / 5, with over one third (34%) voting this 5 / 5. In the discussions, it was noted that the current situation with Covid-19 has resulted in more people working from home rather than travelling to the office to work, which would present an even greater challenge for WPD in the coming winter, making people even more reliant on their home broadband network.

"You have the challenge of seeing how energy consumption has moved to homes rather than offices, especially over winter with heating and lighting." **Local authority**

"It is important for the electricity supply to the mobile phone and mobile broadband networks to be resilient too." **Local authority**

UNDERTAKE 50 SCHEMES TO IMPROVE THE RELIABILITY OF OUR WORST SERVED CUSTOMERS AND PRIORITISE THESE SCHEMES BASED ON NUMBERS OF VULNERABLE CUSTOMERS

It was felt that more context should be given to this output as stakeholders were not necessarily sure whether 50 schemes was a lot or a little. It was added, in the discussions, that WPD should continue to map its most vulnerable customers to ensure that they are targeted. When asked to vote on this output in the online poll, 39% were of the view that this output represented the right level of ambition, although over half (52%) voted that WPD should go even further.

"You've got some data to show where the worst-served customers are. Presumably, you're doing research with the customers as well, to see what they need? If there's a power outage, it's the impact it has on them. How are you identifying the 50 schemes?" **Vulnerable customer representative**

"Improving the health of the network: what does this look like now and what's the ambition based on different voltage categories?" **Business customer**

"Is 50 schemes over 5 years particularly ambitious? That's less than one a month." **Business customer**

"Is there a mapping or a link between customers on the PSR and tree management or areas with a high risk of faults? Is there a way you can map the two?" **Vulnerable customer representative**

"Some clarification is needed in the wording here: is a vulnerable customer someone with a heath issue or someone at risk of having a power cut?" **Parish / community council**

"It's never good to go off-supply. Covid is a transitory thing, and electricity demand has moved from industry to domestic." **Parish / community council**

"It's difficult to comment without the context and the bigger picture. How long will the schemes take? How many schemes are there in the pipeline?" **Vulnerable customer representative**

OUTPUTS: FLOOD DEFENCES

WE WILL CONTINUE TO INSTALL FURTHER FLOOD DEFENCES TO REFLECT UPDATED DATA FROM THE ENVIRONMENT AGENCY

It was felt by some that this output should be more measurable as there are no targets attributed to it. It was added that, alongside the increase in extreme weather, this output is becoming more important as new homes are often being built on flood plains, putting pressure on substations which needs to be looked at, and may require more engagement with other relevant bodies such as local authorities and water companies, as well as the Environment Agency. In the online vote, almost half (49%) were of the view that this output represented the right level of ambition, although 43% voted that WPD should go further.

"Any number at all might be good, because it does look a bit woolly as it stands. In an area that is affected by flooding it is a major concern. Some sort of numerical measure would be good, such as an increase of a certain percent, but without the numbers there then the target looks a little bit naked." **Parish / community council**

"You don't want flood defences installed in areas that don't flood. Investment needs to be targeted. How many substations are susceptible to flooding?" **Business customer**

"My drive is that I would like to see more targets. I don't like open-ended targets. They could have a target of 50 in ED2." **Local authority**

"There are a lot of new developments in the fields next to substations. Work on flood defences is often split among lots of agencies and local authorities, so there are arguments over which protections to use so it doesn't put your substations at even more risk of flooding." **Local authority**

"You should liaise more with relevant bodies, such as Severn Trent Water, local councils and the Environment Agency, to make sure that your lines are not at risk. They all have responsibilities to look after their infrastructure in order to make sure that there are as few issues as possible. This should be a new output." **Local authority**

"Integration with local flood management planning is hugely important, rather than simply looking after your own assets. You need to look to collaborate more with local bodies in order to work out best practices and work more effectively." **Business customer**

"Only a few weeks ago, a flood appeared in my village due to some new housing that has been built. The flood got within 20 yards of the village substation so I think you've got your work cut out trying to figure out where the next flood might occur. In Tamworth they built on a flood plain and built a wall around the estate to keep the floods out." **Parish / community council**
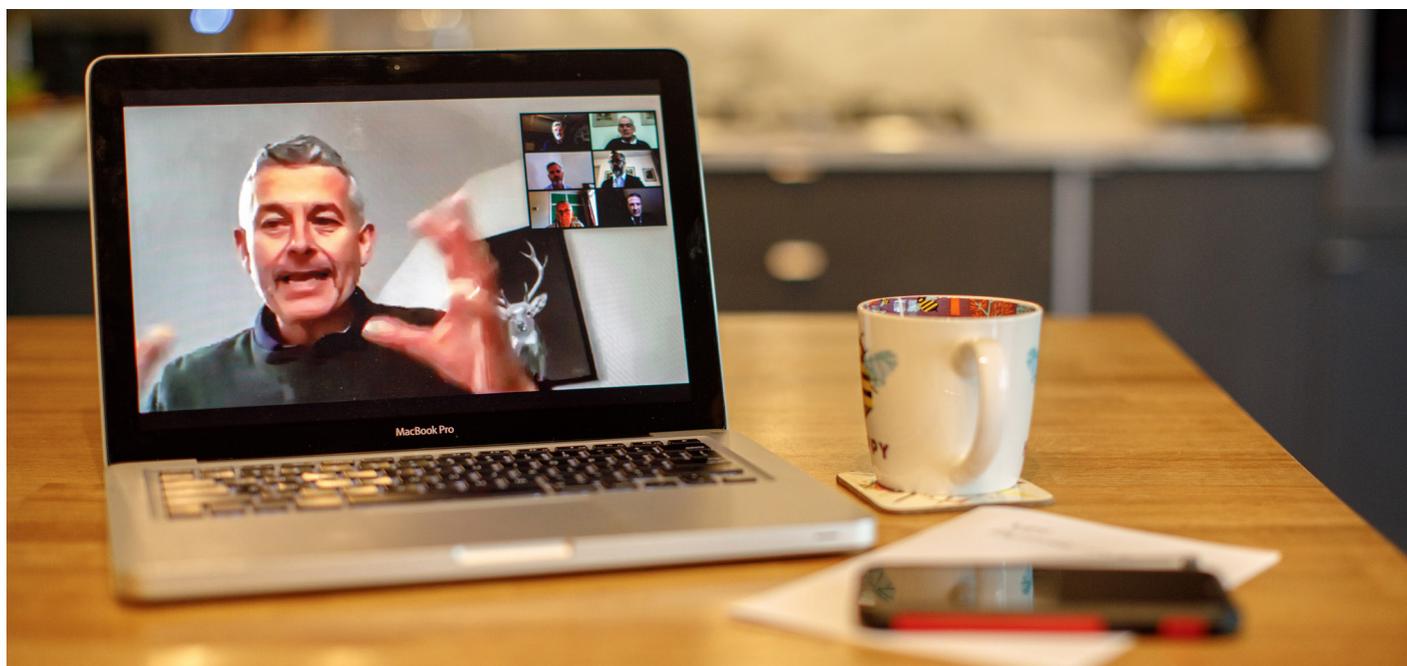
OUTPUTS: SAFE NETWORKS

UNDERGROUND, INSULATE OR DIVERT OVERHEAD LINES THAT ARE ADJACENT TO OR CROSS SCHOOL PLAYING AREAS

This output was ranked the lowest of all the Network Reliability outputs, with an average of 3.33 / 5. It was felt by a number of stakeholders that school playing areas might not necessarily be the most appropriate places to underground in order to deliver the greatest safety benefits and that other recreation areas should be included. It was also commented that this output may be costly and may not deliver real benefits for customers, so more detail on the number of accidents this would prevent should be provided.

"I did wonder why school playing fields were put top of the list above other areas that may be affected. I mean it would be lovely to have everything underground but that's not going to happen. We should look at protecting the aesthetics of areas of outstanding natural beauty."
Parish / community council

"I like the idea of looking at power lines near school playing areas. I would question whether it's cost effective, though. How many accidents do you get nowadays?" **Parish / community council**

"This is not the only area where this could be a problem, such as football fields. It's important to identify other risk areas and assets with the greatest public risk." **Parish / community council**

"It's hard to know if this KPI is good without knowing the cost implication." **Business customer**

"I think there should be an ambition to move things from overhead to underground cabling. It is probably more resilient to have something underground than it is overground and is less prone to lightning strikes and trees. The other is the unsightliness of overhead cabling, in among houses. I would like to see that removed in the environment and being held up with a little higher value. I would think an ambition to move as much as possible to underground cabling, and to look at the cost/benefits of that to see what the cost/benefit would be, would be good." **Local authority**

"I feel that this output needs to be extended to include any civic playing area or recreational ground." **Parish / community council**

"I agree that the scope of this output needs to be increased." **Local authority**
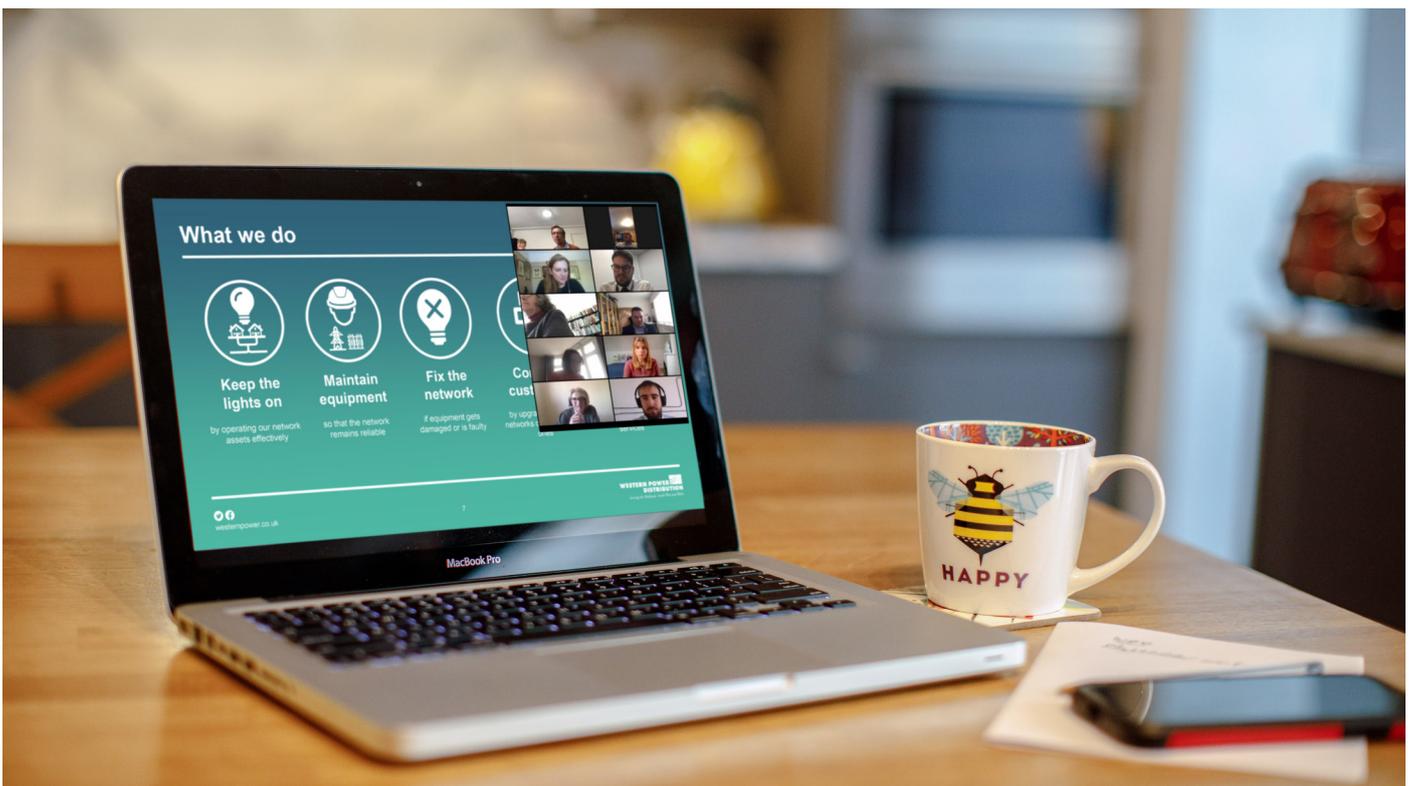
BUSINESS IT SECURITY AND CYBER RESILIENCE

IMPACT OF COVID-19

Stakeholders cited the fact that the Covid-19 pandemic had resulted in more people working from home and being dependent on a reliable electricity network as something that highlighted the need for increased cyber resilience.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

Stakeholders were very much of the view that network security and resilience are becoming more important and that cyber resilience should be an area of focus for WPD. It was acknowledged that this is an incredibly fast-moving area, so collaboration between companies should be encouraged, as should learning from other sectors. There was recognition that electricity networks are critical for society and increasingly so in light of the fact that more people are currently working from home. It was felt that WPD should be 100% resilient to cyber-attacks, even though it was noted that this is increasingly difficult given that these may come from incredibly sophisticated state actors.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

In terms of missing outputs, it was commented that there should be a focus on staff training as breaches are often down to individuals rather than systems. One stakeholder called for more forward investment, though acknowledged that the regulatory context tended to be more 'backward-looking'. As for specific targets and performance measures, it was noted that some of these outputs are somewhat vague, with one stakeholder stressing that 'where the specifics lie is where the issue presents itself' when it comes to cyber security. However, it was also noted that the outputs under this area are hard to quantify.

All of the outputs in this priority area were seen by stakeholders as being important, as shown by the fact that they all scored above the 3.69 baseline in the online poll. Indeed, the priority area of Business IT Security and Cyber Resilience was ranked the second highest of all the priority areas with an average score of 3.9 / 5.

Stakeholders raised some comments relating to each of the outputs, which have been summarised below.

Business IT Security and Cyber Resilience Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Score
Enhance our cyber security systems to protect critical systems from unauthorised access leading to data or network disruption	3.96
Development and implementation of new systems, technologies and applications that are capable of supporting the future network	3.93
Continually assess emerging threats and install next generation anti-virus and security systems to mitigate against these risks in line with National Cyber Security Centre guidelines	3.87
Enhance the resilience of our IT network by upgrading our disaster recovery capability	3.83

Click here to view a larger version of this graph in Appendix 3 ✕

OUTPUTS: ENHANCING CYBER SECURITY

ENHANCE OUR CYBER SECURITY SYSTEMS TO PROTECT CRITICAL SYSTEMS FROM UNAUTHORISED ACCESS LEADING TO DATA OR NETWORK DISRUPTION

Clearly cyber security is one area which causes stakeholders a good deal of concern. It was felt that the implications of a cyber-attack make some of the other priority areas pale into insignificance. As a result, all of the cyber security outputs scored well above the 3.69 baseline, with the above output scoring the highest with 3.96 / 5.

It was commented that WPD should look to other industries such as the financial sector for examples of best practice to replicate and should also seek external accreditation such as ISO27001. The point was made that, given the seriousness of this area and the fast pace of innovation, WPD should be more forward-looking and less 'conservative'. It was also commented that, often, breaches occur because of personnel rather than systems and that this is something the company should be mindful of. WPD was therefore encouraged to provide training and initiate appropriate protocols in this area.

"I do feel there is one thing we need to put out on the high horizon and that is resilience. Our current resilience is based on the fact that we are a top-down system, and as a consequence it is uniquely vulnerable to someone cutting the chain, but that is changing and becoming more based on people generating their own energy. I see the generation side becoming something that can protect our network. On my driveway I have 150 kW of battery storage and that could power the village for an hour in times of crisis, so a bigger network in that regard would make us more future-proofed. The resilience factor would be increased if users of the network could isolate themselves in times of crisis without being part of the contagion that could affect the greater network." **Parish / community council**

"This topic makes flooding of a substation pale into insignificance, and what's missing here seems to be the process of testing vulnerability. What ways can you test the way that you are resilient is my question." **Parish / community council**

"WPD has taken a very specific and highly conservative approach to cyber security in the past. It's basically the principle of locking down everything. Their big challenge is in this area of IT-OT conversions, this interface between the traditional IT system and the operational technology. As the network becomes more digital, the exposure becomes a lot greater. If someone breaks into WPD's IT systems today, the worst that's likely to happen is that they can take down the email system, but they can't access the network itself. As we move into a more distributed world, it's possible that people can break into the IT system and then find a back door into the network and start to take out substations. The level of complexity of this challenge and the potential threat to our critical national infrastructure is increasing significantly. It's about working together with stakeholders in our industry, like IBM. These are big challenges on a global basis, so we need to work together as an industry." **Business customer**

"I don't think this scratches the surface of the issue, in many ways. Clearly, it's a good attempt without getting into the specifics, but where the specifics lie is where the issue presents itself. You say you are embracing Active Network Management and are seeing benefits from that investment. WPD is very progressive in their outlook in this approach and are leading the way. It's easy to dismiss it as too general but there could be a lot going on behind the scenes to move the dial." **Business customer**

"Everyone in the IT industry has to conform to IT security standards. Apparently, energy networks don't have to. It would be a good start for you to say to Ofgem that you need to be ISO27001-compliant." **Business customer**

"Before I went into the world of consumer vulnerability I did work in cyber security for a bit. Without the detail here, I have to assume that a gap analysis has been done. The only comment I have is to do with outsourcing critical infrastructure. I suppose it'd be interesting to know if a business impact assessment has been done. Is there an information management system in place where all those information assets have been identified? You also need to determine whether the confidentiality level has been identified so you can have a risk-based approach. As part of this top-down approach, you need to list all of the controls you're going to implement. It depends how many controls you think are applicable with a view to having a management system in place. It's a continuous thing, so you need to be looking at it daily, weekly, and annually. Without some of the detail, those are my initial thoughts. As for all these industrial control systems, are there outsourced data systems? Do you audit them? In an audit you would go out and provide an assurance report of the high-risk things and the supplier would either need to fix that issue or look at whether it's safe to continue using it." **Vulnerable customer representative**

"In many senses, the regulatory context is backwards-looking. It's setting policy on the basis of a rear-view mirror perspective. Cyber security is something where you definitely need a forward-looking perspective. More forward investment needs to be made. There needs to be some funding going in to facilitate these new ways of operating and new working practices." **Business customer**

"One of the obvious challenges around cyber security, at any level, is that typically the weakest link is the individuals rather than the system itself. It's down to the implementation of the cyber security protocols, alongside appropriate training of individuals in the process. It can be made robust."
Business customer

"You can take learnings from other industries. There's the financial services industry, where security is fundamental to the whole industry. They've worked together very effectively as an industry to make that happen. I think maybe Ofgem is a bit behind the curve on some of this stuff. They don't focus on the IT side of things as much." **Business customer**

CONTINUALLY ASSESS EMERGING THREATS AND INSTALL NEXT GENERATION ANTI-VIRUS AND SECURITY SYSTEMS TO MITIGATE AGAINST THESE RISKS IN LINE WITH NATIONAL CYBER SECURITY CENTRE GUIDELINES

It was commented that, whilst anti-virus and security systems are important, WPD should not lose sight of the human element and should provide training to its staff to ensure that the company is adequately protected. Although this was the lowest ranked output in this priority area, it still scored 3.83 / 5 against an average baseline 3.69 / 5 in the online poll, indicating how important this is viewed by stakeholders.

"For me it's about the NCSC and other state actors that work to keep the UK safe, and we should be looking to trust in those people who are experts in keeping us safe but make this process completely transparent to the users of WPD. It's not really WPD's job but they need to be across it."
Energy consultant

"It's great that you've got anti-virus software, but the main weakness in all systems is the human element, so it is important for WPD to give training and guidance on cyber awareness to all its staff and partners that connect to its network, because that is the weak point that attackers could exploit."
Local authority

"I think you've pretty much got cyber security covered there. As long as you're aware of it which you are, you're not going to let your own business get swamped by threats. The local authorities have got to play a role in this as well so it's important to work together." **Local authority**

"I agree with this output. This is a sensible thing to do." **Local authority**

OUTPUTS: DISASTER RECOVERY AND FUTURE-PROOFING

ENHANCE THE RESILIENCE OF OUR IT NETWORK BY UPGRADING OUR DISASTER RECOVERY CAPABILITY

This output was scored highly by stakeholders in the online poll, particularly when compared with those voted on in other priority areas. Almost two thirds (64%) felt that WPD should go further than planned in this area and the comment was made by one stakeholder that this should have a number of more specific activities against it, including the production of a disaster recovery plan. The point was made that threats to the electricity network could come from national actors who clearly have huge resources at their disposal, so disaster recovery is absolutely vital should a cyber-attack occur.

"The headline is wrong. It's about operational technology (OT) as much as IT." **Business customer**

"Changes in the last 6 months saw a global pandemic and mass home working. Systems are very secure, and it means some people found it impossible to work properly from home. You need to balance the new way of working going forward and the cyber threat." **Energy aggregator**

"You should include something there about wider uses of data. During ED2, the wider uses of DNO/DSO data by local projects will be much more extensive. I expected to see something focusing on enabling this and avoiding data misuses becoming a barrier. We need to unlock and apply much more network and real-time operations data to many more actors and parties to enable us to solve Net Zero challenges together." **Business customer**

"You haven't explained what sort of metrics you've used to measure disruption. If there was an incident, what timescales are you thinking of for putting the network back on its feet?" **Parish / community council**

"Your response will probably need to be different depending on whether the risk is coming from big geopolitical actors in a context of cyber warfare, or home-grown teenaged hackers." **Local authority**

"I would say these aspirations do not go far enough. There should be more, and they should be more specific. I would expect to see a longer list of items in this area. Disaster recovery is great. Any IT network should have a disaster recovery plan, but it doesn't seem to say a lot." **Business customer**

DEVELOPMENT AND IMPLEMENTATION OF NEW SYSTEMS, TECHNOLOGIES AND APPLICATIONS THAT ARE CAPABLE OF SUPPORTING THE FUTURE NETWORK

When asked to vote on this output in the online poll, stakeholders ranked this as the second most important output in this area, and one of the highest overall, with 3.93 / 5. Almost two thirds (65%) of stakeholders were of the view that WPD should go further than planned in ED2. The point was made that the transition to DSO will require a more dynamic system with lots of data being generated. As a result, water-tight IT and OT systems will become more important than ever.

"It's probably more important than ever given that we're going to have a much more dynamic system with the transition to a DSO, and there's going to be a lot of data going back and forth, so security will be critical to whether the new network works." **Business customer**

WORKFORCE RESILIENCE

This priority area was not discussed as it was a surgery and no stakeholders signed up to the session.

SAFETY

This priority area was not discussed as it was a surgery and no stakeholders signed up to the session.

WORKFORCE RESILIENCE

8 | SESSION THREE: DELIVERING AN ENVIRONMENTALLY SUSTAINABLE NETWORK

ENVIRONMENT AND SUSTAINABILITY

IMPACT OF COVID-19

Stakeholders did not feel that the Covid-19 pandemic had led to any change in priorities or emerging issues in this area.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

It was broadly agreed that WPD should lead by example when it comes to delivering an environmentally sustainable network, especially in terms of its Business Carbon Footprint. The point was made that many of the local authorities in WPD's licence areas have more exacting Net Zero carbon targets so WPD should aim to have a more ambitious target than 2050. It was felt that WPD should aim to reduce emissions in its fleet through the adoption of EVs as this sends out a positive message to customers, demonstrating that the company practices what it preaches.

It was felt by stakeholders that WPD should aim to reduce harmful leaks from its equipment in order to minimise its operational impact. Whilst there was acknowledgment from some that it may be hard to find an alternative to SF6, for example, it was noted that this is an extremely potent greenhouse gas so improvements should be made in this area against current standards.

It is clear that waste reduction, particularly of single use plastics, is one area that has risen in importance for stakeholders in recent years. There was agreement that WPD should reduce the amount of waste that is sent to landfill in ED2, although some stakeholders were of the view that the target of zero waste to landfill will be very challenging to meet.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

In terms of WPD's outputs with regard to its Busines Carbon Footprint, it was felt that the company should go further than planned. When asked to vote on the output to reduce internal Business Carbon Footprint to be Net Zero by 2043, over one third (36%) voted 5 / 5 in the online poll, indicating that a significant proportion of stakeholders want WPD to be a lot more ambitious. It was also commented that the 2043 target date is not within the ED2 price control period, so a target within this date range should be included.

With regard to WPD's operational impact, those who had knowledge of this topic felt that the company had a responsibility to be more ambitious in ED2. As a result, in the online poll, the output to replace over 60km of the poorest performing Extra High Voltage Fluid Filled cables on the network was the highest ranked of all in this priority area, scoring 4 / 5, with 71% of stakeholders voting 4 or 5 / 5, while the output to reduce SF6 losses was joint second with 3.91 / 5.

It should be noted that whilst the output to achieve zero waste to landfill was the lowest ranked of all of the outputs in this priority area, it was seen as being an ambitious aspiration and one that would be very challenging to achieve.

Stakeholders suggested specific topics they thought were missing for some of the outputs, which are summarised under the relevant outputs below. However, as an overarching point, one stakeholder noted that there was nothing relating to WPD's stewardship of the land it owns or leases, particularly in terms of biodiversity.

The outputs relating to the operational impact of the network also all scored highly – higher than the average baseline. Of note was the output relating to the undergrounding of overhead lines, which received a score of 3.46 / 5 – lower than the average baseline – reflecting the concern of stakeholders during the discussion sessions that this would have a negative environmental impact.

Environment and Sustainability Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Average Score
Replace over 60km of the poorest performing Extra High Voltage Fluid Filled cables on our network	4.00
Reduce SF6 Losses from that in ED1	3.91
Reduce internal Business Carbon Footprint to be Net Zero by 2043	3.91
Adopt EV technology for 88% of our transport fleet by the end of 2028; resulting in 100% replacement of WPD's van fleet in RIIO-ED2, with the exception of larger specialist vehicles	3.85
Reduce network leaks by fluid filled cables from ED1	3.76
20% reduce tonnage of waste per £ annual turnover	3.72
Install renewable local generation at all offices and depots in order to power our depots and offices	3.72
Further increase the smallest size of low voltage mains to 300mm2, and increase our smallest pole mounted transformer size to 50kVA single phase to reduce technical losses	3.56
We will remove 34km of overhead lines in Areas of Outstanding Natural Beauty	3.46
Achieve zero waste to landfill	3.41

AVERAGE SCORE

2.80   2.95   3.10   3.25   3.40   3.55   3.70   3.85   4.00   4.15   4.30

"They look really good. I'd be intrigued to hear other people's thoughts, but they look stretching enough. All the figures are backed up by data, so it does flow through." **Vulnerable customer representative**

"What is the marginal cost in order to reduce your carbon? Maybe that's not such an easy thing to discuss in a business plan but it might be good to explore how carbon is saved and how money is spent to do so, as this will have an impact on bills in the end. Maybe some simplified information about how the decisions are made could be provided?" **Business customer**

OUTPUTS: OUR BUSINESS CARBON FOOTPRINT

REDUCE INTERNAL BUSINESS CARBON FOOTPRINT TO BE NET ZERO BY 2043

There was broad consensus in the discussions that 2043 is a long time away, so this output was not perceived as being stretching enough. It was pointed out that many local authorities in WPD's network area have far more exacting Net Zero targets. This sentiment was borne out in the electronic voting, where this output garnered an average score of 3.91 / 5, with almost two thirds (64%) of stakeholders voting that WPD should go further against this target.

However, it was commented that this should not come at a significant cost to customers as, clearly, there are a number of customers who already struggle to pay their bills. The comment was also made that WPD should research the impact of certain technologies which may be perceived as environmentally friendly, with the example given of batteries.

"I think that 2043 is certainly not ambitious enough. My thought is the government will move to 2040 themselves. In terms of the fleet development, the impact the contracts on vehicles have is big. I think we need to be a lot further ahead on that curve." **Storage and renewables provider / installer**

"It doesn't quite coincide with a lot of the local authorities. A huge number of local authorities and parish councils all declared climate emergencies which have a 2030 Net Zero approach, and that's for the whole areas, not just the councils themselves. So, there's a bit of a contrast there. I appreciate 2030 is a very stretching target but that would be an observation really that it doesn't match with other local authorities' wishes." **Local authority**

"This is not ambitious enough. I understand that there are difficulties in getting to it so what date do you set in getting to a target, and my guess is that somewhere between 2035 and 2040 would be the more reasonable ambition to have. 2043 should be updated to something better than that." **Local authority**

"It does seem to me that 2043 is an awful long way out. In this situation where the crisis seems to be increasing to a point where it's beyond anything we had expected, we need to be more dynamic. 2043 seems to be a bit like 'well the next person can deal with that' and that's not really good enough." **Local authority**

"All we have is a date here and we need more context about where we're at. This will enable us to ascertain how much effort is required and how much WPD's operations would have to change." **Local authority**

"2043 feels a long way away, so I'm not sure whether this is hugely ambitious or quick enough. Achieving Net Zero is obviously something that has to happen though." **Vulnerable customer representative**

"I have seen shorter time frames. Leeds are setting 2030, and one of our members, Bristol City Council, have set 2025 for themselves as a local authority. You're asking today's customers to pay for something that people after 2050 will benefit from. I'm not sure whether that's fair. Dragging it back by seven years will take a bigger investment, particularly as the government haven't been clear about how they will achieve it by 2050. Things like converting the fleet are a given." **Trade association**

"I wonder how the figure of 2043 was reached." **Developer**

"I'm always a bit concerned by bringing targets forward as well. I like that people want to see things earlier, but the implication is the cost. I work with people on lower incomes; how will this benefit them? You can do some things, like replace your fleet, but it's more about how you will be meeting those targets, what you're doing to reduce it and what the impact is on other areas of the business." **Vulnerable customer representative**

"I think there are different environmental considerations. I think we need to consider the impact of batteries on the environment. How can we deal with battery waste and recycling? They are chemical materials that need to be considered in the development plan. Society needs to realise that this will be a serious issue. Battery technology itself is not entirely waste-free. About 3 or 4 years ago I mentioned this, and I was told that it hadn't been considered on a national framework yet. It is not just WPD's responsibility." **Academic institution**

ADOPT EV TECHNOLOGY FOR 88% OF OUR TRANSPORT FLEET BY THE END OF 2028; RESULTING IN 100% REPLACEMENT OF WPD'S VAN FLEET IN RIIO-ED2, WITH THE EXCEPTION OF LARGER SPECIALIST VEHICLES

There was a good deal of endorsement for this output, with 60% of stakeholders voting that the company should go further than planned, in the online poll. It was felt by some that WPD should also look at other technologies such as hydrogen or biomethane for its larger, specialist vehicles. The point was made that WPD should ensure that the EVs it procures are responsibly sourced so that this output doesn't come at an environmental cost, in terms of the carbon impact of their production and the need to replace them. It felt that WPD could lead the way in this area by sourcing the energy for EV charging from renewable sources and that the company should demonstrate that it is doing so by publicising the fact on the side of its fleet.

"It is incredibly important that businesses such as WPD set an example for smaller businesses that they can run their business on EVs. Leading by example is extremely important so that smaller businesses can see that it's possible and then may follow suit." **Parish / community council**

"I'm not sure whether such a heavy focus on EVs is a good idea. We have a really great opportunity to shift towards biodiesel for really large vehicles here." **Academic institution**

"I don't think that replacing just small vehicles with electric ones is enough. It should include larger specialist vehicles too." **Local authority**

"I think an 8-year period to replace your vehicles is good, but you need to replace them with quality vehicles that will have a long lifespan." **Local authority**

"I think yes, having the electric vehicles is one thing and having people recognise them as electric vehicles is another thing so I would encourage you to put a sticker on them so they can see that your car is not being plugged into a petrol pump." **Energy consultant**

"I'm very wary of simply switching to electric vehicles, because there is a massive environmental impact on producing them, so you need to do less mileage too; you need the whole package. If you are using all EVs but you are replacing them frequently then it's worse than just staying with petrol cars. It's not just about using EVs, but well-chosen EVs that will last 20 years. You also need to use your data and intelligence to see where your staff are, how far they are driving and reduce mileage by optimising the use of those vehicles." **Local authority**

"You should install vehicle charging points that only use renewable sources, because if you are charging them from fossil fuels then there is no difference in impact." **Local authority**

"There is no comment on hydrogen vehicle technology at all, and certainly for higher energy usage or bigger vehicles I would expect that they would be hydrogen source rather than electric source, so I think maybe there ought to be a review or a rethink in what role they have to play in the change in the vehicle technology you would be using." **Local authority**

"The potential for hydrogen or something similar is going to be quite useful. There are already authorities looking to see how they can use their energy from waste plants to generate that hydrogen. So, there is a lot of work being done on hydrogen across the UK, and something which should be reflected here." **Local authority**

"I think that there are good opportunities to bring more hydrogen and biodiesel vehicles into the mix. Maybe there could be some percentage-based targets there?" **Business customer**

INSTALL RENEWABLE LOCAL GENERATION AT ALL OFFICES AND DEPOTS IN ORDER TO POWER OUR DEPOTS AND OFFICES

Stakeholders were of the view that this was a positive output and that WPD should work to encourage other businesses to do the same. It was added that solar panels are relatively inexpensive. In the online poll, 43% thought this output represented the right level of ambition, with just over half (55%) voting that the company should go further than planned in ED2.

"You should use your knowledge and experience to help other partners move in the same direction, such as other organisations and local authorities. You've all got a stake in this." **Local authority**

"Putting solar panels on a roof is not that expensive. I would strongly encourage WPD to do this." **Local authority**

"I made a note that the company is installing solar and battery generation at the business premises. I believe that's an amazing thing that you're doing, and I think if you can roll that out into the business world, that would be a brilliant thing. Well done to WPD." **Parish / community council**

OUTPUTS: OPERATIONAL IMPACT

REDUCE NETWORK LEAKS BY FLUID FILLED CABLES FROM ED1

In the online poll, 39% of stakeholders voted that the output represented the right level of ambition, with the remainder voting that WPD should go even further in ED2. It was commented that leaks from fluid filled cables are hazardous, but it was felt that more context needs to be given to this output as stakeholders do not know the extent of the problem.

"We encounter fuel filled cables on the network which is really unfortunate. It creates a nightmare of a mess so anything to do with replacing these has got to be a good thing. What is considered a reasonable time frame is hard to say because I don't quite know how much is left on the network." **Developer**

"I would replace the word 'Reduce' with 'Stop'. If we are going to reach Net Zero by 2043, all of these issues will need to be eliminated. That needs to be the ultimate aim." **Local authority**

REDUCE SF6 LOSSES FROM THAT IN ED1

Almost two thirds (63%) of stakeholders who voted felt that this output did not go far enough and should go further in ED2. It was acknowledged that the gas SF6 is a highly potent greenhouses gas and it was commented by one stakeholder that it is not sufficient to just reduce it.

"From an engineering perspective, I'd like to see more information on the SF6 losses. It must be a near-impossible target to monitor losses. I'd like to see how that's going to happen. It's probably in there because it sounds good, but are you actually going to do it?" **IDNO**

"From a personal point of view, SF6 is still very dangerous to have lying around. This needs to be removed really quickly. 'Reduce' is not a strong enough word." **Energy consultant**

REPLACE OVER 60KM OF THE POOREST PERFORMING EXTRA HIGH VOLTAGE FLUID FILLED CABLES ON OUR NETWORK

Whilst there was not a good deal of qualitative feedback on this in the discussions, this output was the highest ranked output in the Environment and Sustainability priority area. Over 70% of stakeholders were of the view that this output does not go far enough in ED2 and called on WPD to 'do more' or 'do a lot more'.

ALL PCB CONTAMINATED EQUIPMENT WILL BE REMOVED FROM THE WPD NETWORK BY 2025

Stakeholders did not comment on this output and it was not included in the online poll as it is a legislative requirement.

OUTPUTS: IMPACT OF OUR NETWORK

WE WILL REMOVE 34KM OF OVERHEAD LINES IN AREAS OF OUTSTANDING NATURAL BEAUTY

This was the second lowest ranked output in this priority area and the one where the largest proportion of stakeholders who voted in the online poll were actually of the view that WPD should do less than planned in ED2. It was commented that the electricity network has an impact in both urban and rural areas and that this output might have come about as a result of lobbying by certain groups such as the National Trust, as it has in the case of National Grid. Notwithstanding this, some did feel that WPD should aim to remove all overhead lines and almost half of stakeholders who voted (47%) were of the view that WPD should go further than planned.

"This came up in National Grid's Business Plan. The thing that emerges from it is that there's a lot said about natural beauty. The industry doesn't concentrate enough on the overall impact of the system. I have some knowledge of what National Grid have been doing. The group that advises them is made up of organisations like the National Trust, and there isn't a consumer representative, such as Citizens Advice. It needs to be broader. There are overhead cables in urban properties and there is argument as to whether it's good or bad for the people in the neighbourhood." **Trade association**

"Perhaps you should have some policies to restrict installation of overhead lines in AONBs and areas of conservation in the future." **Local authority**

"We've got conservation areas, such as the Malvern Hills. There's a whole multitude of factors of why you should keep that environment clean, and actually clean up those areas that need to be cleaned up." **Local authority**

"I'm sure that environmentalists would be happy to see that, but it would be a better ambition to remove all overhead lines by a certain date." **Local authority**

FURTHER INCREASE THE SMALLEST SIZE OF LOW VOLTAGE MAINS TO 300MM2, AND INCREASE OUR SMALLEST POLE MOUNTED TRANSFORMER SIZE TO 50KVA SINGLE PHASE TO REDUCE TECHNICAL LOSSES

56% of stakeholders were of the view that this output represented the right level of ambition. It was commented that this output is economically viable as it would reduce future operational costs. It was also noted that this increase in the size of low voltage mains would be needed in order to accommodate the projected increase in the take-up of EVs.

"I think this is a pretty unambitious target. You will need larger pole mount if everyone moves to electric vehicles." **Energy consultant**

"Economically it is viable if you increase the size of the conductor. You can reduce losses and reduce overall investment cost to the operation costs. Also, with increasing the size of the cross section of a conductor, you can increase the thermal limit and therefore increase security. This is also economically effective, so I think this would be a great direction in which to move forward." **Academic institution**

"If you took a medium size housing estate with its current transformers, and a reasonable fleet of electric vehicles, it only requires one electric shower as well and these running at the same time for lots of fuses to blow. We can't not talk about the huge impact EVs will have on the networks. We need a big upgrade to cope with everything in the next 10 years even." **Energy consultant**

ACHIEVE ZERO WASTE TO LANDFILL

Although this was the lowest ranked output in the electronic vote, it should be noted that as the target is already ambitious, it is difficult to see how WPD could go any further in terms of its level of ambition. Significantly, no stakeholders voted that WPD should do less than proposed in ED2. It was commented by one stakeholder that single-use plastic is not mentioned. However, this is arguably implied in the above output.

"Single-use-plastic reduction is not in any of these outputs. It might already be being worked on behind the scenes, but it would be good to have it expressed explicitly." **Local authority**

"Zero waste to landfill seems unrealistic. Even if you could achieve this, there is always going to be the lowest common denominator of waste. We all aspire to discarded products becoming new ones." **Local authority**

20% REDUCE TONNAGE OF WASTE PER £ ANNUAL TURNOVER

Half of all stakeholders who voted were of the view that this output represents the right level of ambition in ED2, with the remainder voting that WPD should go even further. It was commented, however, that this output does require some more context as it is difficult for stakeholders to fully understand the scope of this ambition. The comment was made that there is a waste hierarchy, so the company should work to move certain types of waste up the hierarchy and endeavour to design them out of processes, where possible, in order to meet this target.

"I think it depends on what you define as waste. There is no zero waste, things just go back around. But 20% doesn't sound that radical to me." **Local authority**

"It would be useful to have some more context. What are other companies doing? Is this business as usual?" **Business customer**

"What is the context behind this 20%? To the layman, this does not mean a lot." **Vulnerable customer representative**

"When it comes to landfill there is a waste hierarchy. Reusing and minimisation is very important, and at the high end of the waste hierarchy, designing them out is better than deciding whether to burn or bury them. So there needs to be an audit to see if anything needs to be moved up the waste hierarchy." **Local authority**

ENSURE COMPLIANCE WITH ENVIRONMENTAL LEGISLATION AND WORK IN PARTNERSHIP WITH THE ENVIRONMENT AGENCY AND NATURAL RESOURCES WALES

This output was not voted on in the online poll as there was not scope to have varying ambition levels for this output. The point was made that this should not necessarily be an output per se as WPD has an obligation to comply with environmental legislation.

"It's a bit of non-target, as WPD would have to do it anyway. Why is this even an output?" **Local authority**

DISTRIBUTION SYSTEM OPERATOR

IMPACT OF COVID-19

Stakeholders did not feel that Covid-19 had impacted on WPD's priorities in this area.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

The priority area of Distribution System Operator was divided into two areas: flexibility services; and scenario planning and whole systems. Stakeholders generally agreed with previous stakeholder feedback that information and educational resources available for domestic and commercial customers are limited, which could inhibit the uptake of flexible services if not addressed. There was also some endorsement for the aspiration to work with manufacturers to facilitate flexibility and to educate customers on the benefits that this can bring. It was also noted that rules and tariffs are currently complex and that more should be done to simplify them.

In the case of scenario planning and whole systems, it was agreed that WPD should work with stakeholders, especially local authorities, in order to understand their development proposals and that the outcomes of this engagement ought to inform the company's future plans. It was added that WPD should engage more with domestic customers and should investigate the possibility of incentivising them to further encourage the take-up of flexibility services.

It was also felt that the availability of Active Network Management information should be improved in order to support Net Zero ambitions and that ANM should be rolled out to domestic as well as business customers. Stakeholders also agreed with the feedback that WPD should do more to collaborate with other parties to provide the best possible outcomes for customers. It was noted that this would mean more engagement with the gas industry, as this may provide the most economical solution for certain customers.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

In terms of any outputs that may be missing, it was suggested that WPD could collaborate with TOs and the ESO to create an information hub to inform developers of the most appropriate places to locate renewables. It was also suggested that Active Network Management ambitions should evolve to include domestic customers as well as businesses. Stakeholders particularly recognised the importance of Active Network Management, ranking the related output second highest under this priority area. However, most feedback under Distribution System Operator was in relation to the importance of facilitating low carbon technology to support Net Zero. This was ranked highest in this priority area. However, it was felt that this should have a specific target put against it. This point was made with regard to a number of other outputs which were seen as laudable but somewhat intangible. For example, whilst stakeholders saw the need to engage with relevant stakeholders in order to update DFES, it was commented that perhaps this should have a target put against it.

Stakeholders raised a range of individual comments relating to some, although not all, of the outputs, which have been summarised below.

Distribution System Operator Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Average Score
Ensure that our network is able to facilitate LCT connections in order to support Net Zero 2050	3.95
Evolve the Active Network Management options for enabling connection of generation and demand without the need to reinforce the network	3.86
Consider Whole System solutions to identify the most economical solution for customers to connect or utilise their capacity	3.81
Act as a neutral market facilitator to enable accessibility to multiple markets	3.65
Engage with stakeholders and the ESO to update Distribution Future Energy Scenarios for all four licence areas each year	3.62
Create and implement a simple, fair and transparent rules and processes for procuring DSO flexibility services	3.57
Using data from updated DFES and stakeholder insight to publish a Long Term Development Strategy and a Network Development Plan annually	3.52
Produce signposting of potential flexibility requirements and undertake a flexibility tender every 6 months	3.50
Use the updated DFES to inform revised network requirements that will be captured in Distribution Network Options Assessments	3.44

AVERAGE SCORE

OUTPUTS: FLEXIBILITY SERVICES

CREATE AND IMPLEMENT SIMPLE, FAIR AND TRANSPARENT RULES AND PROCESSES FOR PROCURING DSO FLEXIBILITY SERVICES

In the online poll, almost half (48%) of stakeholders felt that this output represented the right level of ambition. While one stakeholder did vote for WPD to do a little less in this area, the remaining two fifths of stakeholders wanted the company to go further against this output and perhaps bring forward any time frames. It was felt by some that this output is somewhat vague and that it should have measurable targets against it.

It was noted that there is currently a lack of knowledge on the part of many of those who will be looking to procure DSO flexibility services, so simple, clear case studies should be included to encourage their take-up. There was acknowledgement that one of the impacts of the EV roll-out will mean that EV owners are likely to find themselves operating in this market in ED2. The comment was made that these people should be engaged, educated and, potentially, incentivised in the future so they can actively participate. It was also felt that this should be broadened to society and perhaps the word 'education' should be included in this output, as most people have very little knowledge of flexibility services. The point was made that the market is currently somewhat fragmented, so greater standardisation across all DNOs would be needed to ensure that rules and processes are simple for all, irrespective of where they live in the UK.

"It's certainly moved on from last time and you are actually talking about possible solutions here, which is great. I just wondered if there ought to be less vagueness about it, so is there any way it could be more targeted so that it happens?" **Local authority**

"How are they going to measure these? I'm not sure whether the word 'education' needs to be in one of these outputs as well. They're assuming that everyone knows what it is." **Utility**

"There is a consumer angle on this developing. There are some trials going on with offering flexibility contracts for people who have EVs. I think there's something to do here with engaging the consumer, saying you can have £200 a year if you participate in this market with your EV or your battery."
Business customer

"This needs to be brought forward in order to meet the overall target of 2050 for Net Zero, but in order to get there we need some targets for implementing more flexibility, which is much closer."
Local authority

"We are already seeing some of that, so we do see when some areas are coming onto the flexibility market. We do have a bit of understanding; we just need to know a little bit more, I think."
Local authority

"At the moment, each of the DNOs seem to be developing a rather fragmented approach to flexibility markets. There's no kind of national joined up way of doing this. I think someone needs to join this all up and see what each DNO is doing here."
Business customer

"How do we see this working in practice? As a developer, I need to know when the conversation with WPD will happen. In terms of the response we get back from WPD, will this just be telling us to try a bit harder, or will it be actual advice for how developers can do this? Will WPD be more open speaking about this application stage? I think, for me, we need examples of how things will change going forward. This way, developers and councils can say to consultants what they need to look out for and engage with. A lot of people working for big landowners don't have the delivery side of things. They will be asking things without really knowing what to ask for. We need some real-life examples rather than bad advice. We need to know how you see all of this going down to the IDNOs." **Developer**

"A lot of the DNOs are using online auction-type platforms to procure flexibility services. One of the strange conundrums is that firms like us have put assets in where we can, which tend to be areas where it is least needed. So, DNOs have struggled in some areas to meet the requirements of their flexibility needs because of constraints on their networks. The growth of EVs will also have an impact, though maybe less of an impact than people expect. Most EV buyers will want to drive it, not necessarily to provide a service to the network operator."
Distributed generation customer

"I think there's more of a need for a societal education process here. Look at what's happened with smart meters. It's taken years to get them sorted out. Behind the scenes it's been an unmitigated disaster in terms of cost and time. I have a smart meter but haven't changed my behaviour because I haven't seen any strong price signals yet. That's what will happen in terms of the increase in the capability of individuals at a local level to influence the demand on the network." **Distributed generation customer**

PROVIDE ACCURATE, USER-FRIENDLY AND COMPREHENSIVE MARKET INFORMATION

This output was not included in the online poll. However, it was supported by stakeholders, many of whom recognise how complex this subject is for most people. They therefore welcomed anything that WPD could do to make this more accessible. The point was, however, made that there is a limit to the amount of information that certain stakeholders would want to be in the public domain, given that developers, for example, are operating in a market and would not want their competitors to see commercially sensitive information.

"We're moving towards a very different world, but you need to work out how to sell it and make people aware there is business in flexibility." **Local authority**

"If we concentrate on this and get this bit right, we're going to enable community projects, a lot more local generation, and a lot more understanding as well. The big role with community energy is engaging with people to get them to understand energy and the needs and demands and generation, and you'll find a lot less resistance about engaging energy in their community and bringing it down to their level. This whole element is really important." **Local authority**

"At the moment it works really well for businesses who already contract energy and understand the energy market. If you come in as a homeowner, it makes very little sense at the moment as it is too technical. So, in order for people to buy into it, they have to understand it and at the moment it's far too complicated for them to understand."
Local authority

"How does that work with confidentiality? I don't necessarily want other people to know how I'm bidding in, and how I see my assets being used. There's a bit of a difficult balance there in that respect." **Distributed generation customer**

PRODUCE SIGNPOSTING OF POTENTIAL FLEXIBILITY REQUIREMENTS AND UNDERTAKE A FLEXIBILITY TENDER EVERY 6 MONTHS

In the online poll, this output scored below the 3.69 baseline with 3.5 / 5. Over half of stakeholders (52%) voted that this output represented the right level of ambition, with 43% voting that WPD should go further in ED2. It was, however, commented that this output does not have a hard target against it. It was added that this output would benefit by having some dates and locations included to allow customers to plan ahead.

"The thing that the DNOs are usually after is actually reduction in demand, rather than increasing generation. Then they can work within what they've got already. Getting people to moderate their demand in the past has been quite difficult, particularly at the domestic level. Domestic demand is a big part of the equation, but there's also a lot of industrial and commercial demand there as well."
Distributed generation customer

"There's not a hard target in there. Signposting is necessarily quite woolly in some senses."
Distributed generation customer

"You could start looking at giving dates as to when flexibility is rolled out across WPD's areas. Across the Marches there are a few areas where you can buy into flexibility contracts but it's not everywhere yet and we don't know when they will come on board. So, having a clearer understanding of when and where flexibility would be available is quite important, certainly for the local authorities and communities trying to get down to Net Zero." **Local authority**

ACT AS A NEUTRAL MARKET FACILITATOR TO ENABLE ACCESSIBILITY TO MULTIPLE MARKETS

Again, it was commented that this output would benefit from having some measurable targets put against it. It was also commented that a distinction should be made between the different types of flexibility and the different types of customers these are open to. There was also acknowledgement that access to flexibility services, for domestic customers, is likely to benefit the more affluent, early adopters of new technology so consideration should be given to those who do not have these technologies at their disposal. This output was endorsed in the online vote, with just over half of stakeholders polled (51%) stating that it represented the right level of ambition for ED2 and the remainder voting for WPD to go even further than planned.

"Some distinction between types of flexibility would be helpful. Domestic has the potential to be very large but is complex and uncertain. There are other user groups to consider." **Energy aggregator**

"Listing KW values would be helpful for indicating progression." **Business customer**

"To participate in flexible services, you need something like a heat pump, solar panels, EVs. How does that work with vulnerable customers if they cannot afford these things without assistance?" **Energy aggregator**

"There are no dates or volumes specified. If this were possible to make the targets firmer, that would be good." **Parish / community council**

OUTPUTS: SCENARIO PLANNING AND WHOLE SYSTEMS

ENSURE THAT OUR NETWORK IS ABLE TO FACILITATE LCT CONNECTIONS IN ORDER TO SUPPORT NET ZERO 2050

There was clearly a good deal of support for this output. In the online poll, almost two thirds (64%) voted for WPD to go further than planned in ED2. As a result, it was the highest ranked of all outputs in the DSO priority area, scoring 3.95 / 5.

It was commented that data transparency should be an area of focus for WPD under this output, with the suggestion made that WPD should help to facilitate a data hub involving all the DNOs as well as TOs and the ESO to help connections customers to plan where to roll out LCTs.

"If you're going to facilitate LCT connections, and the flexibility market, then data transparency is critical. We think there should be some sort of data hub across the DNOs and the ESO and everyone involved so that companies can find out where they can put their LCT assets in an easy way that is consistent across the whole system. There's a lot of work to be done in terms of how to make that data available in a way that's both safe and accessible by the right people only." **Business customer**

"For me, ensuring the network is able to facilitate LCT connections is great. What's that in terms of a hard number? We need to connect more LCTs to the network." **Business customer**

"One of the concerns that we have as an ICP is where the financing of this comes from. Will it be passed down to the end consumer? Where's the analysis of what the strategy will be and who bears the cost?" **Storage and renewables provider / installer**

USING DATA FROM UPDATED DFES AND STAKEHOLDER INSIGHT TO PUBLISH A LONG TERM DEVELOPMENT STRATEGY AND A NETWORK DEVELOPMENT PLAN ANNUALLY

Whilst this output didn't engender any meaningful feedback in the discussions, it was broadly endorsed by stakeholders in the online poll, with 52% thinking this output represented the right level of ambition and 43% voting for WPD to go further than planned in ED2.

ENGAGE WITH STAKEHOLDERS AND THE ESO TO UPDATE DISTRIBUTION FUTURE ENERGY SCENARIOS FOR ALL FOUR LICENCE AREAS EACH YEAR

There was broad support for this output. It was felt that engagement and collaboration with relevant actors is vitally important to help WPD to plan and produce their DFES. Suggestions of stakeholders to engage with included local authorities as well as community energy groups. 52% of those who voted were of the view that this represented the right level of ambition in ED2, with the remainder voting for WPD to go further than planned.

"It's really important in terms of how WPD interact with local energy area stakeholders to work with them, whether that's community groups or local authorities. We need to be able to interact collaboratively with the system, so you need to make it as easy as possible, within the regulations. There has been a lot of talk about how you could sandbox certain areas and derogate, although it's not actually necessary. There is lots that can be done to unlock opportunity in the local network if the DSO can provide the flexibility." **Business customer**

USE THE UPDATED DFES TO INFORM REVISED NETWORK REQUIREMENTS THAT WILL BE CAPTURED IN DISTRIBUTION NETWORK OPTIONS ASSESSMENTS

It was commented that regular reviews and updates of the DFES are required as technology is moving at a rapid pace resulting in more exacting time frames. In the online poll, 59% of stakeholders voted that this output represents the right level of ambition, with 39% voting for WPD to go even further.

"This approach needs to be a big priority for WPD, especially in its yearly statement, because timescales are accelerating so we need to review it regularly."
Business customer

EVOLVE THE ACTIVE NETWORK MANAGEMENT OPTIONS FOR ENABLING CONNECTION OF GENERATION AND DEMAND WITHOUT THE NEED TO REINFORCE THE NETWORK

This was the second highest ranked of all the DSO outputs in the online vote, scoring an average of 3.86 / 5. 69% of stakeholders voted for WPD to go further against this output in ED2. It was commented that ANM should be rolled out to include the whole network, including community energy groups, as this will help to free up capacity in the network, which will be needed to accommodate the anticipated uptake of EVs.

"ANM is relatively new for most DNOs. It is increasingly enabling them to do exactly what it says there. The question is, does ANM cover part of your network or all of it and at what level will it go down to in terms of whether it will affect people like myself, or community energy schemes, for instance? The target there should be to ensure that the network management capability covers the whole of the network within a particular defined time period and is able to free up capacity down to a particular level."
Distributed generation customer

"Evolving active network management options is key for EV uptake. You want to be able to do this without the high costs of digging up roads and putting in cables." **Business customer**

CONSIDER WHOLE SYSTEM SOLUTIONS TO IDENTIFY THE MOST ECONOMICAL SOLUTION FOR CUSTOMERS TO CONNECT OR UTILISE THEIR CAPACITY

There was acknowledgement that a whole systems approach is needed to accommodate future energy demand, including heat, as it may be the case that the complete electrification of heat is not necessarily the right solution. It was felt that the regulator had an important role in facilitating this approach, ensuring that DFES take into consideration all energy vectors including green gas. This was the third highest ranked output in this priority area in the online vote, scoring an average of 3.81 / 5, with 68% of stakeholders voting for WPD to go further than planned in ED2.

"The struggle is you're dependent on Ofgem and legislation putting policy in place that you can then react to. The whole systems question is another dimension. You're talking about different shareholder groups. Without gas, you'd need 6-7 times the electricity capacity you have. There's a logic to using other existing utilities. These have different shareholder groups and investors so it's not straightforward to define that relationship."
Academic institution

"The missing piece is a shared responsibility for localised plans. What does it look like if we take the concerted approach? DFES assumptions are key for this. This is a missing piece that relates to our discussions and considerations with Ofgem."
Business customer

"There will be massive issues when we have heat pumps on all the houses in new housing developments. You need some way of making sure you don't have 400 heat pumps firing at same time and wrecking the grid." **Local authority**

"I like the whole system approach, but I feel that this output and approach is a little fuzzy. I would like to see something about integration between the gas and electricity systems expressed more explicitly as part of a process to push this idea forward."
Developer

"Biomethane is also a component part of the picture and that needs to be tied up too." **Developer**

INNOVATION

IMPACT OF COVID-19

Stakeholders did not feel that Covid-19 would change emerging issues or priorities in relation to the priority area of Innovation.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

There was support for WPD leading the way in terms of innovation and it was seen as a given that the company should collaborate with stakeholders to do this. However, it was felt that the company should not seek to innovate for the sake of it and that the benefits of innovation in terms of cost savings for customers should be demonstrated. There was also support for helping companies and individuals to develop innovative projects. One stakeholder representing an IDNO was currently involved in a number of innovative projects that would benefit from WPD's input.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

It was acknowledged that some these outputs are hard to quantify, although it was suggested that there could be some targets placed against them in terms of the size or scale of projects, or indeed the amount of money that has been saved as a result of their initiation. It was commented that innovative projects need to become part of WPD's business as usual activities, delivering benefits for customers, Therefore, measurables based on the value delivered for customers should be looked at.

All outputs in this priority area were ranked above the baseline average, scoring between 3.75 and 3.82 / 5 in the online poll. In fact, as a priority area, Innovation ranked third highest overall, demonstrating the level of ambition stakeholders wanted WPD to have in this area. Stakeholders raised some comments relating to each of the outputs, which have been summarised below.

Innovation Outputs: Average Score Compared to Overall Baseline

Output	Score
Implement learning from innovation projects into the business to improve efficiency and effectiveness of assets, operations and customer service	3.82
Develop an interactive innovation "ideas portal" aimed at stakeholders providing suggestions for innovation requirements	3.75
Develop new innovation projects with priorities informed by stakeholder engagement	3.75

AVERAGE BASELINE = **3.69**

(Scale: 2.80, 2.95, 3.10, 3.25, 3.40, 3.55, 3.70, 3.85, 4.00)
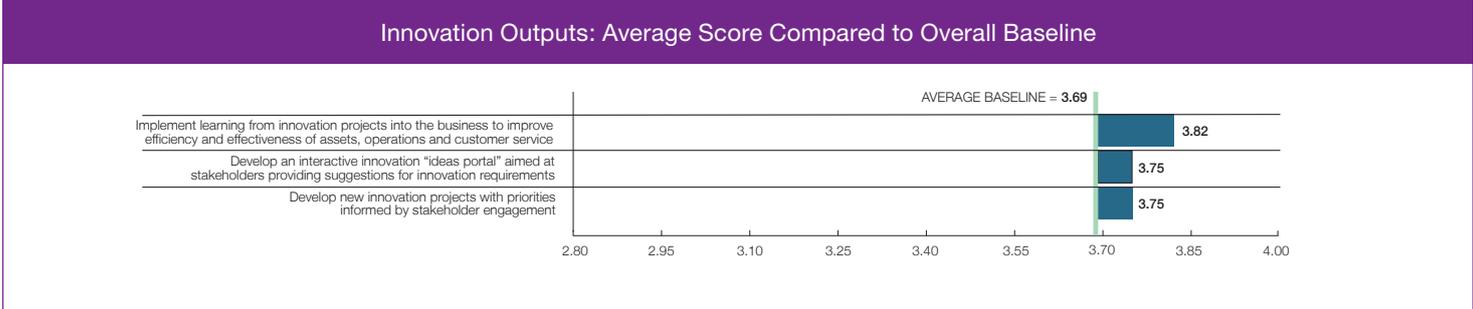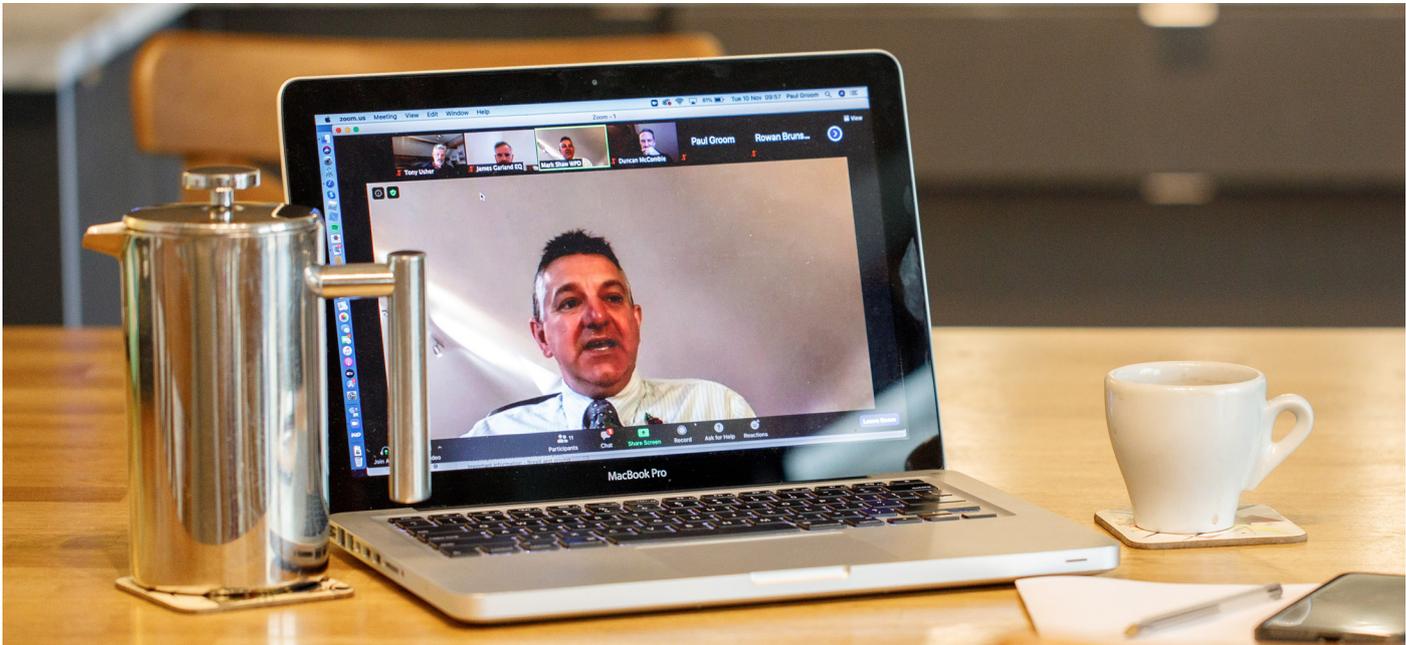
"There are lots of overlapping innovation projects. The number that ultimately go to market is hard to calculate. Going forward they should be more outcome-based." **Energy aggregator**

"That's a common theme running through these targets. I accept there's a lot of underlying detail. With innovation projects, you should show how much money you've put into this and show the outcomes." **Business customer**

"I struggle with innovation. What do you mean by it? Is it a different way of doing things, is it how you want to communicate – how do you class it? Some projects are already tried and tested but they want to bring it to a wider audience. So, I do struggle with this area, particularly with our target group we deal with. They like tried and tested ideas, rather than something new. The kind of groups I deal with are not early adopters. You need to think about how you engage with them and prove the innovation to them." **Vulnerable customer representative**

"Innovation: the word describes the whole process. Innovation is new ideas, but how can you know what new ideas are going to come up? That's why Ofgem tend to put it in a separate funding thing rather than the Business Plan. I would agree with these outputs, but it's how you're going to develop them. That's where the later things, such as developing a portal, will be useful. It's what you do with those ideas, how you monitor and improve and them, and how you get to do it. Do you have a separate department, or do you make it part of a line manager's responsibility? These are the things that WPD need to go through." **Trade association**

"In terms of the NIA or NIC, how much is expected for regional operators who are monopolies at the end of the day? How much of their profits should be put towards innovation?" **Business customer**

OUTPUTS

DEVELOP NEW INNOVATION PROJECTS WITH PRIORITIES INFORMED BY STAKEHOLDER ENGAGEMENT

It was commented that this output would benefit from having a measurable target put against, perhaps relating to the number or size of specific projects. It was also noted that this is something that certain stakeholders would be expecting WPD to do anyway. This sentiment that WPD should be more ambitious in this area was borne out in the online poll, with 54% of stakeholders voting that WPD should go further than planned in ED2. However, it was cautioned that innovation should not be done for its own sake or simply to attract funding from the regulator.

"It seems a bit finger-in-the-air. There's no measure there, again. Is that one project, two projects, ten projects a year? Is there any scale of the size of the projects? It's lacking detail." **Utility**

"That's something I would be expecting WPD to do anyway." **Utility**

"This is another area that maybe Ofgem needs to look at again. There's a specific requirement to do innovation and Ofgem funds a lot of that work. The risk is that it becomes an end in itself, a sort of self-perpetuating innovation project ecosystem where people just build innovation projects for the sake of it in order to get their required funding. All too often, these innovation projects never turn into a production project. They don't actually generate any value. I think that's partly down to the way the programme is constructed by Ofgem. They should provide some more incentives to make it real projects, not just things to muck around with." **Business customer**

IMPLEMENT LEARNING FROM INNOVATION PROJECTS INTO THE BUSINESS TO IMPROVE EFFICIENCY AND EFFECTIVENESS OF ASSETS, OPERATIONS AND CUSTOMER SERVICE

There was a good deal of endorsement for this output. It was the highest ranked of all the outputs in this priority area, with 66% of stakeholders voting 4 or 5 / 5 in the online poll. WPD's own Electric Nation project was cited as an example of one innovation project which would inform the company's approach to EV charging in the future, given the insight it derived into human behaviour. There was recognition that innovation did not necessarily just refer to technology or assets and that there are a number of ways that a new way of doing things can be rolled out, including ways to benefit customers in vulnerable situations.

"One scheme that probably does tick the box is Electric Nation. That has informed a lot of charging processes going forward." **Business customer**

"This is a really interesting take on it, and it has given me a pause for thought in terms of how WPD can innovate to serve the vulnerable population. One of your really big assets is the PSR because it gathers together a huge amount of information around the people who are vulnerable. What I would like to see – and this also links to the one sign-up for PSR – is whether you can analyse this information in innovative ways and use it to target other groups or make it available to third parties or charities working with vulnerable people. There's a thousand hurdles to that and perhaps I'm doing some blue-sky thinking, but those are my thoughts. The social indicator data is very useful but by combining that with what you've got, I wonder if it's possible to come up with something even more innovative." **Consumer body**

DEVELOP A NEW INTERACTIVE INNOVATION "IDEAS PORTAL" AIMED AT STAKEHOLDERS PROVIDING SUGGESTIONS FOR INNOVATION REQUIREMENTS

There was a good deal of support for this output with 62% of stakeholders who voted in the online poll stating that WPD should go further than planned in ED2. Stakeholders were of the view that this could foster collaboration between a range of relevant companies and organisations such as IDNOs and DNOs. It was commented that this output should have more detail put against it and the point was made that the portal could lead to the establishment of an ideas forum.

"It sounds like a good idea. We've got hubs for information. It sounds like a good way for stakeholders to network and share ideas, especially with the move to Net Zero and the innovation supporting that." **Utility**

"It sounds like a good idea to have an ideas portal. It's a way of getting new different ideas from stakeholders, but I understand the difficulties around quantifying innovation and where you go from there. These are positive things to be aiming for." **Business customer**

"All I can say is that because there's no information around it, it's hard to say. For example, what is the ideas portal? What are you looking to do? If the ideas are put into the portal, what's the input from WPD? These ideas will cost money and there needs to be a plan in place." **IDNO**

"From our IDNO perspective, we are doing some innovative projects with government funding around the control of networks, EV charging and heat pumps. What if that interacted with something you do? For example, we're installing substation monitoring. We probably do need to collaborate more. A forum on innovation between DNOs and IDNOs would be really useful." **IDNO**

"Maybe tie the ideas portal and innovation project back with what is in the larger strategy to try to drive things forward rather than having a separate ideas portal." **Vulnerable customer representative**

COMMUNITY ENERGY

IMPACT OF COVID-19

It was commented that the output to host surgeries in communities would be impacted by Covid-19 as the current restrictions would prevent WPD staff from holding these in person.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

In terms of whether WPD had correctly interpreted previous feedback, stakeholders strongly agreed that community energy should be a priority and that WPD should support the development of community energy projects. It is clear that there is a good deal of enthusiasm on the part of many communities to participate in community energy projects but there is often a lack of information – something which stakeholders would like to see addressed.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

It was felt that both of these outputs would benefit from having some measurable targets attributed to them. For example, there could be targets relating to the number of surgeries WPD should hold or the number of innovation projects facilitated. It was also suggested that WPD should have a role in promoting community energy projects to communities in order to encourage communities to participate and there were calls for some definable targets to be put against this, such as the number of roadshows held in the next six months. It was commented that these outputs are somewhat vague and would benefit from more detail on timing with milestones and deadlines included.

Both of the outputs in this priority area were supported by stakeholders, scoring well above the baseline in the online poll, with over 60% of stakeholders voting for WPD to go further than planned in terms of its level of ambition in ED2. This priority area scored highest across all the other priority areas, with an average of 3.91 / 5.

Stakeholders raised a whole range of individual comments relating to each of the outputs, which have been summarised below.

Community Energy Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = 3.69

Establish dedicated innovation projects for community energy projects — 3.93
Hold Community Energy Surgeries for local Community Energy groups — 3.89

2.80 2.95 3.10 3.25 3.40 3.55 3.70 3.85 4.00
AVERAGE SCORE
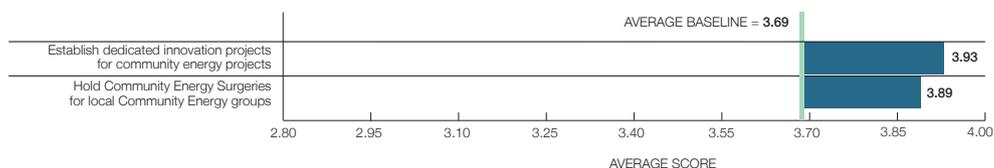
"This is very close to our heart; we actually have a project in progress at the moment. Our biggest issue is with the network and being able to put our community energy system onto the network. We're told that this isn't possible, and this is the case for other parishes in our area as well. The only thing holding us back is that we effectively have a 1-inch pipe and we're trying to throw a 12-inch supply down it, and people are getting frustrated which means that Western Power gets the blame when it's not really their fault. We see this as the most important thing in the next 10 years in our community."
Parish / community council

"As we move forward, and more people get EVs in our community, this is only going to become more of an issue. There is a local farmer here who wanted to put photovoltaics on the roof and was told they couldn't do it. If the network were updated next week then they would jump on it straight away. It's not exactly a fly-by-night thing. We're making everything more electrical, such as heating and EVs. More investment is needed so that local communities can do their bit and not just be left by the wayside."
Parish / community council

OUTPUTS

ESTABLISH DEDICATED INNOVATION PROJECTS FOR COMMUNITY ENERGY PROJECTS

There was a good deal of support for this output, with almost two thirds (64%) voting that the company should go further than planned in the online vote. Whilst WPD's role in encouraging the take-up of community energy projects was praised, it was, however, commented that this output needs to have more context, including a clear definition of what constitutes an innovation project. A number of stakeholders at the workshop had experience of community energy projects and cited specific examples of challenges they had faced, which could potentially be addressed by meeting this output. The discussion on this topic turned to some of the challenges facing community energy groups, including funding and a lack of knowledge of the work required to set up a community energy project. It was felt that groups should be incentivised and that WPD should aim to make facilitating projects a priority. In addition, it was felt that WPD should invest ahead of need if there is a given amount of certainty that the project will be delivered.

"To be fair to WPD you probably are the best DNO in this area so far. You've done a lot of work already so it's really pleasing to see that you're continuing this journey. You are actually trying to advance it, which is really good to see. It's just bringing people along with you which is the important thing, and you are planning to do that." **Local authority**

"There needs to be more detail around what WPD considers a community energy project to be. It's a bit broad, but I acknowledge that at this stage the strategy has to be broader."
Vulnerable customer representative

"I'm thinking about the future in terms of eligibility for community energy projects. If I were to look at this for the first time, I'd be asking: 'What is an innovation project?' 'What's the criteria?' I think potentially having clearer definitions would be useful."
Vulnerable customer representative

"WPD and other DNOs just need to take the risk with the infrastructure so that these communities can update their systems, even if sometimes it doesn't work." **Energy consultant**

"It would be good to understand that ambition for community energy projects. Community energy comes in very many different forms. I think that education piece is perhaps something which hasn't been put out there as much as it could be yet. The tools are all there, and there's a lot more information there, but getting people engaged in it is going to have to be key." **Local authority**

HOLD COMMUNITY ENERGY SURGERIES FOR LOCAL COMMUNITY ENERGY GROUPS

Stakeholders supported this output, scoring it on average 3.89 / 5 in the online poll. The idea of educating communities on the benefits of community energy was widely supported as there is a currently lack of knowledge of the subject despite the fact that there is a good deal of enthusiasm. It was felt that there could be a role for WPD in promoting community energy and 'selling' the benefits of it to the community. It was commented that this output would benefit from having some measurable targets included, such as the number of surgeries held or communities helped.

"I'm not involved at all in community energy projects and it doesn't feature in our area, perhaps because we're in a rural area and are fully integrated onto the grid. I would guess that some amateurs out there would benefit from WPD's input on this."
Parish / community council

"We need a lot more education on what's available and how to do it. I think it would be difficult at the current time to whip up a lot of enthusiasm for it. The area is surrounded by solar power farms and there was a lot of resistance to that at the time."
Parish / community council

"I think there's an item to sell community energy to people who are just mulling it over and the potential pros and cons and incentivise this."
Parish / community council

"I think the idea of surgeries is a good idea. From my experience of community groups, there's a lot of enthusiasm but perhaps not an awful lot of expertise. If that's one way that WPD can support those kinds of groups to get things off the ground, then I think that's a great way to support it. I think that a like-minded group comes together with broad and potentially naïve ideas but any input on the practicalities and the engineering side would be good, to give them information in the first instance and then to guide them along the process in the second instance insofar as there is scope to do so." **Consumer body**

"There are a lot of initiatives out there that would like to come forward, but they need to know you are on their side, so to speak. These are going in the right direction; we just need to see something happening."
Local authority

"There needs to be a set of definable targets and signposting of milestones. That will encourage members of the public to know that something is happening and will make them want to be part of it, but they need to know it's possible for it to happen."
Local authority

"Well, have we got numbers and dates to add to it to make it not quite so vague? Surgeries within the next 6 months, that sort of thing?" **Local authority**

"It's difficult during Covid-19, but assuming we get out of it, then do you foresee having roadshows? Going around different areas, educating communities, or what? I just wonder, in 10 / 20 years' time, what is the vision?"
Parish / community council

DIGITALISATION

IMPACT OF COVID-19

Stakeholders did not feel that Covid-19 would impact the priorities or emerging issues in this area.

PLAYBACK OF PREVIOUS STAKEHOLDER FEEDBACK

It was broadly agreed that access to clear, accessible data is vital to help customers plan. The example was given of another utility which had published financial data that had helped to unlock a project by demonstrating its viability to a client. There was also a feeling that sharing data can encourage collaboration to deliver benefits to customers.

WPD'S PROPOSED BUSINESS PLAN OUTPUTS

No specific targets or performance levels were suggested by stakeholders, although clarity on time frames was sought. In addition, it was commented that the more granular the data, the better. It was also commented that time is critical for some projects – the implication being that WPD should aim to provide real time information where possible. Both outputs in this priority area were endorsed by stakeholders, although it should be noted that there was a small sample size of just five stakeholders. Stakeholders raised some comments relating to each of the outputs, which have been summarised below.

Digitalisation Outputs: Average Score Compared to Overall Baseline

	AVERAGE BASELINE = 3.69	
Developing the API interface and data availability under API		3.80
Demonstrate leadership in publishing network data, with relevant data presumed open, and promote its availability to customers		3.60

2.80   2.95   3.10   3.25   3.40   3.55   3.70   3.85   4.00
AVERAGE SCORE
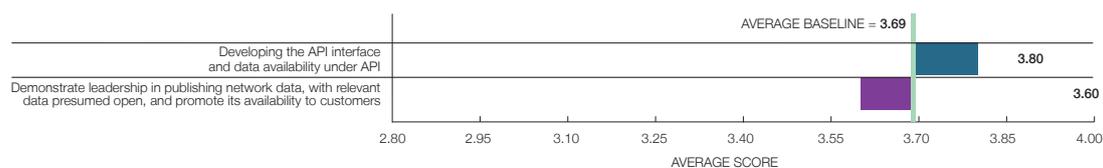
Please note that as Digitalisation was held as an optional afternoon surgery session, and was therefore attended by fewer participants, the voting data for these outputs is less robust. While the Digitalisation voting data has been summarised in this section, it has therefore not been compared against data from the other main sessions. However, for the purpose of this report, comparisons have been drawn between the Digitalisation outputs themselves to give an indication of stakeholder views on this area.

"We do a lot of back-up systems; you'd be surprised how much energy is stored. They're not flexible, though. We are seeing that a lot of it could be becoming demand flexible by switching to another battery type. The cost of storage and flexibility becomes lower because you're not making a dedicated system. It's a question of whether it should be made flexible, and then you need to know cost-benefits."
Storage and renewables provider / installer

"Could the data go to local switchgear or substation level?" **Storage and renewables provider / installer**

"If you made it clearer as to what is important for you to operate the system, that would be helpful. Is there value for us to allow our customers to interact with the grid in a way that's beneficial to both of you? It needs to be two-way. If the power supply is going to be more two-way, the information needs to be too."
Storage and renewables provider / installer

"We want as much visibility as possible, which is why I'm interested in how far ahead you make decisions and whether there's any guidance on that, maybe on the data request portal and the view ahead. That would be useful. Do you have any forward guidance on supply and demand?"
Storage and renewables provider / installer

OUTPUTS

DEMONSTRATE LEADERSHIP IN PUBLISHING NETWORK DATA, WITH RELEVANT DATA PRESUMED OPEN, AND PROMOTE ITS AVAILABILITY TO CUSTOMERS

Three of the five stakeholders who voted were of the view that WPD was aiming for the right level of ambition in ED2 for this output. The example was given of publicly available financial data on the National Grid website which had helped one stakeholder facilitate a battery storage project. It was also commented that data on constraints is helpful, as is historic data on demand and generation which can inform stakeholders' future plans. In the online poll, this output scored an average of 3.6 / 5.

"The National Grid site is useful; I've been looking at that and their new dynamic container service. It's a good example of the type of data, even down to the point that they publish the financial data of bids. It's allowed us to convince a large potential customer that they ought to be using a battery."
Storage and renewables provider / installer

"Definitely. If there were constraints in areas on voltage, if you could reproduce that in some way that allowed interaction with generation, demand management, etc. It's useful to have the data to know what the key things for you are. Is it a lot of power, reactive power, things like that? If you can show what's happened in the last couple of years, it builds a picture and allows business cases to be built with more precision."
Storage and renewables provider / installer

DEVELOPING THE API INTERFACE AND DATA AVAILABILITY UNDER API

The development of an API interface and data availability of API was supported by stakeholders, 60% of whom voted for WPD to go further than planned in ED2. It was commented that rolling this out would result in more timely information, which would be particularly useful for one stakeholder who was looking to develop a battery storage project. In the online poll, this output scored the highest of the two for this priority area with an average of 3.8 / 5.

"Especially on the battery storage side, time is really critical. It's not just a question of how much generation or load; it's very time-responsive."
Storage and renewables provider / installer

"What sort of timescales are you talking about in terms of designing the system? Are you looking for instant data?"
Storage and renewables provider / installer

9 | APPENDIX 1: 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 the workshop?

average:

8.00

/10

Overall, did you find this workshop to be:

Neutral (13%)

Very interesting (13%)

Interesting (75%)

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

Strongly agree (38%)

Agree (62%)
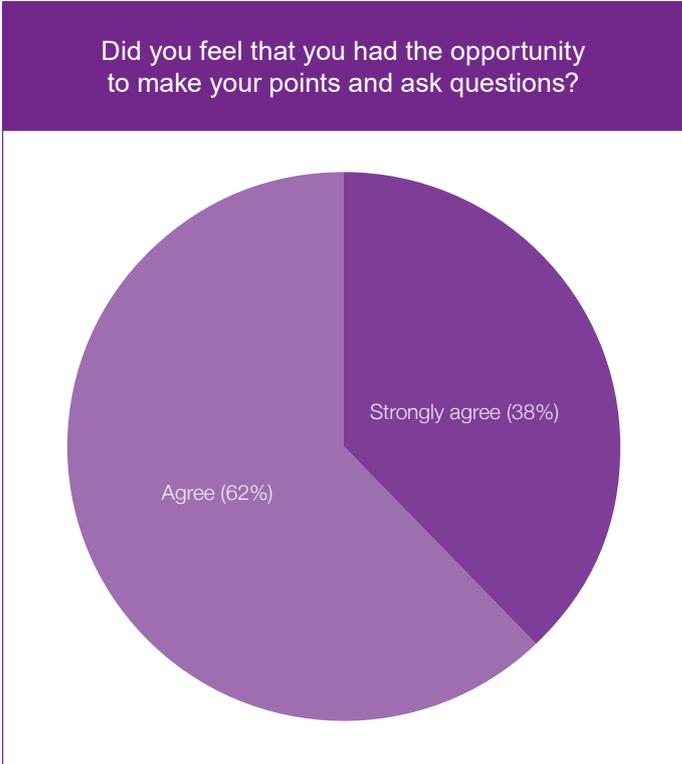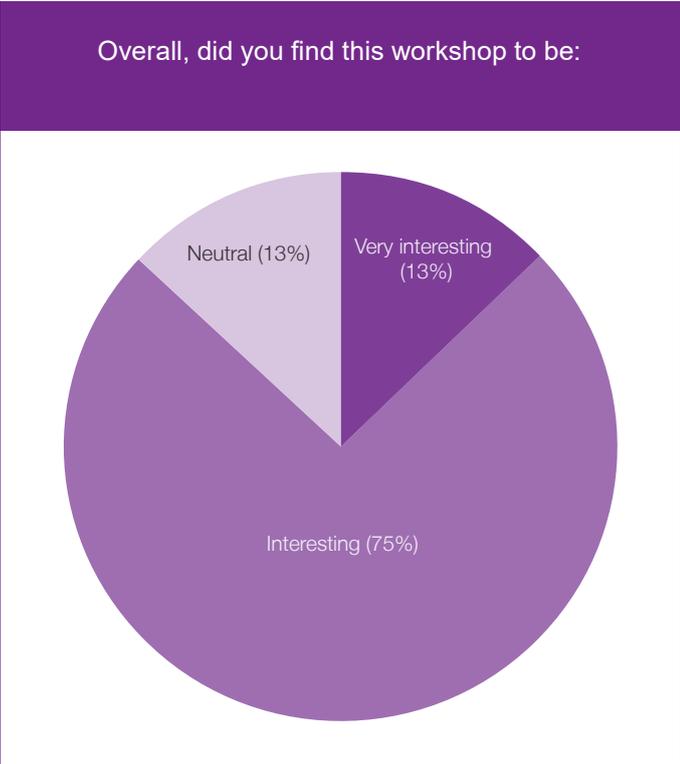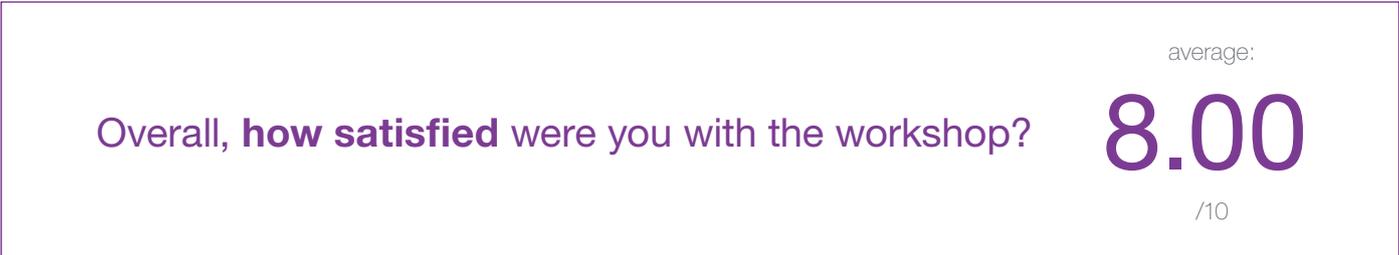
"There's always opportunity for more engagement!"

"Well moderated."

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

Disagree (13%)

Strongly agree (25%)

Neutral (25%)

Agree (38%)
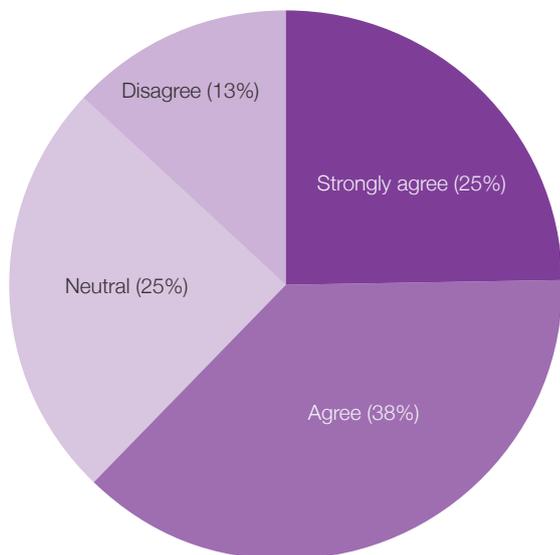
What did you think of the way the workshop was chaired by your facilitator?

Very good (25%)

Good (75%)
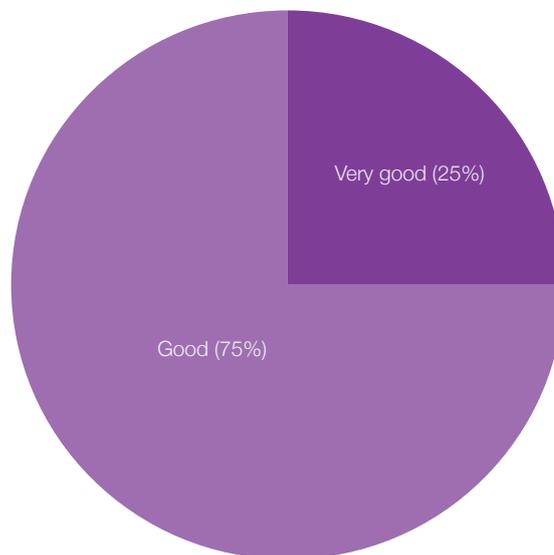
"The level of interaction and the efforts made by the co-ordinator to involve all present was good."

"Kept to time, and largely discussions were kept to the relevant question."

"People in breakouts had space to speak."

"Nice chunks for the sessions, broken up with interaction."

How well do you think the online format worked?

Very well (25%)

Well (75%)

"Easy to join and the breakout rooms worked really well."

Any other comments?

"Really informative, interesting and engaging workshop. Well done to all involved."
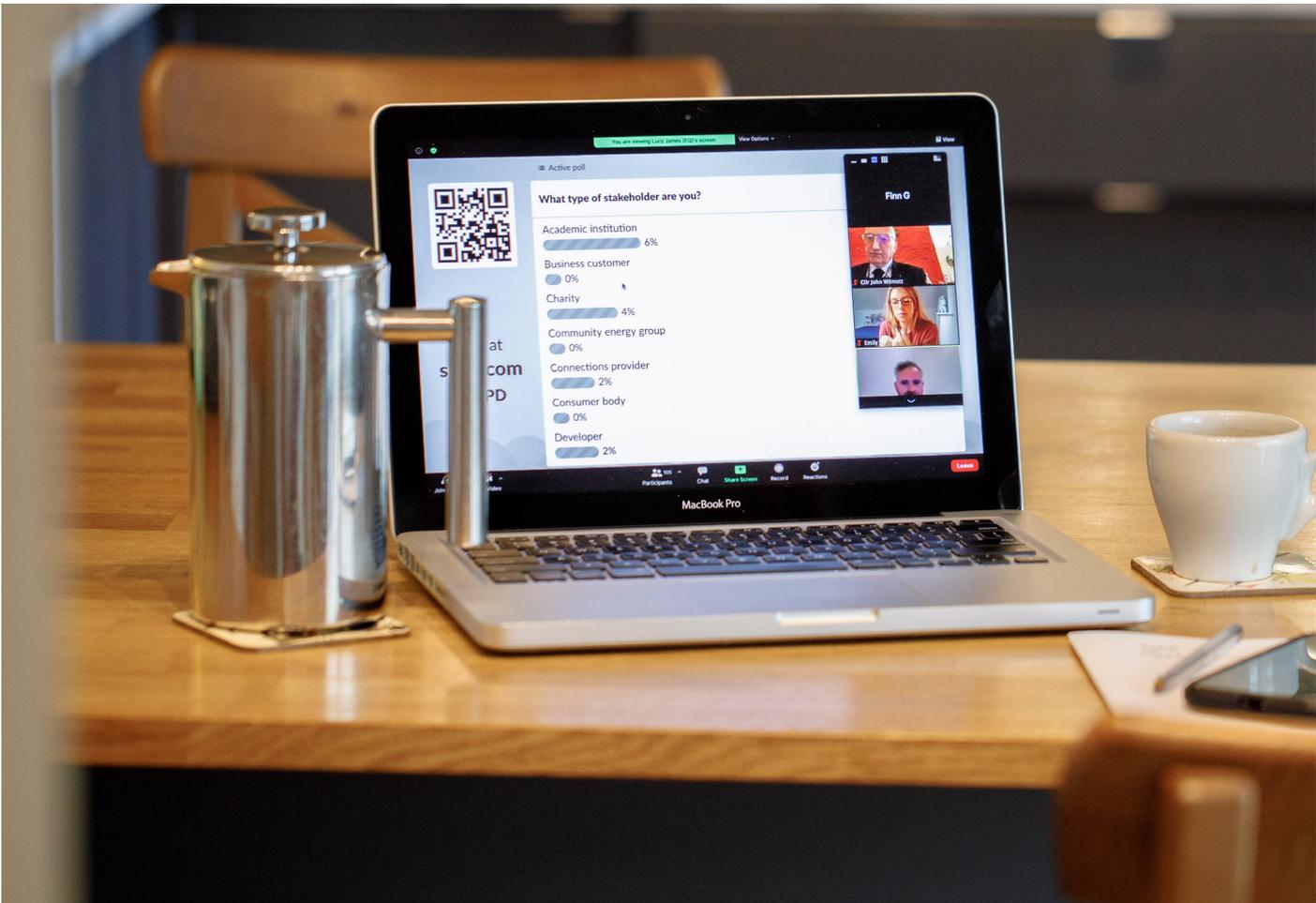
10 | APPENDIX 2: BREAKDOWN OF VOTING RESULTS

The tables below provide a breakdown of the raw voting data obtained for each priority area. Please note that for Connections and Digitalisation, data was provided by a lower total of respondents following the surgery sessions, which were attended by fewer stakeholders. Therefore, while the data for these priority areas gives an indication of stakeholder views, it is less robust.

CUSTOMER SERVICE

Statement	1	2	3	4	5	Average
Provide greater insight on the planned work activity and interruptions on the network by creating an online viewer for our customers and stakeholders			26%	48%	26%	4.00
Maintain an average customer satisfaction of 9/10 (90%) or higher across all key services areas			53%	34%	13%	3.60
Resolve at least 90% of complaints within one day and resolve 99% of complaints within 31 days		2%	47%	44%	7%	3.56
Achieving full compliance with the British Standard for Inclusive Service Provision every year		2%	56%	28%	14%	3.53
Respond to social media enquiries and power cut reports in less than 5 minutes		2%	60%	24%	13%	3.49
Achieve full compliance with the Customer Service Excellence Standard every year. Provide a wide range of inclusive customer contact channels and accessibility tools		2%	62%	27%	9%	3.42
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	2%	4%	63%	17%	13%	3.35

CUSTOMER VULNERABILITY

1 – do a lot less =   2 – do less =   3 – right level of ambition =   4 – do more =   5 – do a lot more =

Statement		Average
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	2% / 31% / 36% / 31%	**3.96**
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	2% / 31% / 36% / 22%	**3.84**
Identify and engage over 30,000 hard-to-reach vulnerable customers each year to join the Priority Services Register	38% / 51% / 11%	**3.73**
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	2% / 33% / 42% / 22%	**3.71**
Work with expert stakeholders, including our Customer Collaboration Panel and referral partners, to annually refresh our understanding of 'vulnerability' and co-create an ambitious annual action plan	38% / 51% / 11%	**3.67**
Provide vulnerable and fuel poor customers with specific support and education in relation to the smart energy transition	6% / 40% / 36% / 17%	**3.64**
Proactively contact our over 2 million Priority Services Register customers once every two years to remind them of the services we provide and update their records	2% / 48% / 35% / 15%	**3.63**
Support over 75,000 fuel poor customers a year to directly save on average £40m over RIIO-ED2	2% / 48% / 37% / 13%	**3.61**

% OF STAKEHOLDER VOTE

SOCIAL CONTRACT

1 – do a lot less =   2 – do less =   3 – right level of ambition =   4 – do more =   5 – do a lot more =

Statement		Average
Support 300,000 people in our communities via a £250k 'Community Matters' Fund	2% / 7% / 43% / 33% / 15%	**3.52**
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	2% / 55% / 34% / 9%	**3.49**
Provide staff with paid leave to volunteer to support local community initiatives associated with vulnerability and environmental initiatives	2% / 11% / 52% / 28% / 7%	**3.26**

% OF STAKEHOLDER VOTE

CONNECTIONS (SURGERY)

1 – do a lot less =   2 – do less =   3 – right level of ambition =   4 – do more =   5 – do a lot more =

Statement	3	4	5	Average
Provide new connections quotations and energisation in line with customer expectations	20%	40%	40%	4.20
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	40%	40%	20%	3.80
Engage with local authorities and local enterprise partnerships to understand their requirements for strategic investment in terms of changes in demand or network use.	50%	33%	17%	3.67
Improve DNO/IDNO/NGET/ESO cross border working practices and promote competition in connections (to ensure that the consumer is best served under the process)	50%	50%		3.50

% OF STAKEHOLDER VOTE

NETWORK RELIABILITY

1 – do a lot less =   2 – do less =   3 – right level of ambition =   4 – do more =   5 – do a lot more =

Statement	2	3	4	5	Average
Improve the health of the network using asset condition data to target investment where the need is greatest	2%	36%	28%	34%	3.94
On average fewer and shorter power cuts in ED2 than ED1	2%	34%	40%	23%	3.85
Continue to focus on restoring supplies quickly and target achieving more than 85% of customers (that are not automatically restored) within one hour	4%	32%	45%	19%	3.79
Reduction of tree related faults on HV and EHV overhead network due to use of LIDAR in ED2 thus reducing the impact on the customer	4%	43%	40%	13%	3.62
Undertake 50 schemes to improve the reliability of our worst served customers and prioritise these schemes based on numbers of vulnerable customers	2% 7%	39%	37%	15%	3.57
We will aim to restore customer supplies in ED2 within 12 hours under normal weather conditions	4% 9%	33%	37%	17%	3.54
We will continue to install further flood defences to reflect updated data from the Environment Agency	9%	49%	32%	11%	3.45
Underground, insulate or divert overhead lines that are adjacent to or cross school playing areas	9% 4%	47%	24%	16%	3.33

% OF STAKEHOLDER VOTE

BUSINESS IT SECURITY AND CYBER RESILIENCE

1 – do a lot less =   2 – do less =   3 – right level of ambition =   4 – do more =   5 – do a lot more =

Statement	Chart	Average
Enhance our cyber security systems to protect critical systems from unauthorised access leading to data or network disruption	2% / 26% / 46% / 26%	3.96
Development and implementation of new systems, technologies and applications that are capable of supporting the future network	2% / 33% / 35% / 30%	3.93
Enhance the resilience of our IT network by upgrading our disaster recovery capability	2% / 34% / 38% / 26%	3.87
Continually assess emerging threats and install next generation anti-virus and security systems to mitigate against these risks in line with National Cyber Security Centre guidelines	4% / 32% / 40% / 23%	3.83

% OF STAKEHOLDER VOTE

ENVIRONMENT AND SUSTAINABILITY

1 – do a lot less =   2 – do less =   3 – right level of ambition =   4 – do more =   5 – do a lot more =

Statement	Chart	Average
Replace over 60km of the poorest performing Extra High Voltage Fluid Filled cables on our network	28% / 43% / 28%	4.00
Reduce internal Business Carbon Footprint to be Net Zero by 2043	9% / 28% / 28% / 36%	3.91
Reduce SF6 losses from that in ED1	37% / 35% / 28%	3.91
Adopt EV technology for 88% of our transport fleet by the end of 2028; resulting in 100% replacement of WPD's van fleet in RIIO-ED2, with the exception of larger specialist vehicles	40% / 34% / 26%	3.85
Reduce network leaks by fluid filled cables from ED1	39% / 46% / 15%	3.76
Install renewable local generation at all and depots in order to power our depots and offices	2% / 43% / 35% / 21%	3.72
20% reduce tonnage of waste per £ annual turnover	50% / 28% / 22%	3.72
Further increase the smallest size of low voltage mains to 300mm2, and increase our smallest pole mounted transformer size to 50kVA single phase to reduce technical losses	3% / 56% / 22% / 19%	3.56
We will remove 34km of overhead lines in areas of Outstanding Natural Beauty	4% / 11% / 37% / 30% / 17%	3.46
Achieve zero waste to landfill	2% / 63% / 26% / 5%	3.41

% OF STAKEHOLDER VOTE

DISTRIBUTION SYSTEM OPERATOR

1 – do a lot less = ▨   2 – do less = ▨   3 – right level of ambition = ▨   4 – do more = ▨   5 – do a lot more = ▨

Statement	Votes	Average
Ensure that our network is able to facilitate LCT connections in order support Net Zero 2050	36% / 33% / 31%	3.95
Evolve the Active Network Management options for enabling connection of generation and demand without the need to reinforce the network	2% / 29% / 50% / 19%	3.86
Consider Whole System solutions to identify the most economical solution for customers to connect or utilise their capacity	2% / 2% / 28% / 47% / 21%	3.81
Act as a neutral market facilitator to enable accessibility to multiple markets	51% / 33% / 16%	3.65
Engage with stakeholders and the ESO to update Distribution Future Energy Scenarios for all four licence areas each year	52% / 33% / 14%	3.62
Create and implement simple, fair and transparent rules and processes for procuring DSO flexibility services	48% / 40% / 10%	3.51
Using data from updated DFES and stakeholder insight to publish a Long Term Development Strategy and a Network Development Plan annually	5% / 52% / 29% / 14%	3.52
Produce signposting of potential flexibility requirements and undertake a flexibility tender every 6 months	2% / 2% / 53% / 29% / 14%	3.50
Use the updated DFES to inform revised network requirements that will be captured in Distribution Network Options Assessments	2% / 59% / 32% / 7%	3.44

% OF STAKEHOLDER VOTE

INNOVATION

1 – do a lot less = ▨   2 – do less = ▨   3 – right level of ambition = ▨   4 – do more = ▨   5 – do a lot more = ▨

Statement	Votes	Average
Implement learning from innovation projects into the business to improve efficiency and effectiveness of assets, operations and customer service	34% / 46% / 16%	3.82
Develop new innovation projects with priorities informed by stakeholder engagement	45% / 34% / 20%	3.75
Develop a new interactive innovation "ideas portal" aimed at stakeholders providing suggestions for innovation requirements	39% / 48% / 14%	3.75

% OF STAKEHOLDER VOTE

COMMUNITY ENERGY

1 – do a lot less = ▨   2 – do less = ▨   3 – right level of ambition = ▨   4 – do more = ▨   5 – do a lot more = ▨

Statement	Votes	Average
Establish dedicated innovation projects for community energy projects	2% / 33% / 31% / 33%	3.93
Hold Community Energy Surgeries for local Community Energy groups	2% / 33% / 36% / 29%	3.89

% OF STAKEHOLDER VOTE

DIGITALISATION (SURGERY)

1 – do a lot less = ▉ 2 – do less = ▉ 3 – right level of ambition = ▉ 4 – do more = ▉ 5 – do a lot more = ▉

Demonstrate leadership in publishing network data, with relevant data presumed open, and promote its availability to customers	40%	40%	20%	**Average 3.86**
Developing the API interface and data availability under API	60%	20%	20%	**Average 3.33**

0%   20%   40%   60%   80%   100%

% OF STAKEHOLDER VOTE

11 | APPENDIX 3: OUTPUTS AVERAGE SCORES COMPARED TO BASELINE

Customer Service Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Average Score
Provide greater insight on the planned work activity and interruptions on the network by creating an online viewer for our customers and stakeholders	**4.00**
Maintain an average customer satisfaction of 9/10 (90%) or higher across all key services areas	**3.60**
Resolve at least 90% of complaints within one day and resolve 99% of complaints within 31 days	**3.56**
Achieving full compliance with the British Standard for Inclusive Service Provision every year	**3.53**
Respond to social media enquiries and power cut reports in less than 5 minutes	**3.49**
Achieve full compliance with the Customer Service Excellence Standard every year (Provide a wide range of inclusive customer contact channels and accessibility tools)	**3.42**
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	**3.35**

AVERAGE SCORE
(scale: 2.80, 2.95, 3.10, 3.25, 3.40, 3.55, 3.70, 3.85, 4.00)

Customer Vulnerability Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Average Score
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	**3.96**
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	**3.84**
Identify and engage over 30,000 hard-to-reach vulnerable customers each year to join the Priority Services Register	**3.73**
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	**3.71**
Work with expert stakeholders, including our Customer Collaboration Panel and referral partners, to annually refresh our understanding of 'vulnerability' and co-create an ambitious annual action plan	**3.67**
Provide vulnerable and fuel poor customers with specific support and education in relation to the smart energy transition	**3.64**
Proactively contact our over 2 million Priority Services Register customers once every two years to remind them of the services we provide and update their records	**3.63**
Support over 75,000 fuel poor customers to directly save on average £40m over RIIO-ED2	**3.61**

AVERAGE SCORE
(scale: 2.80, 2.95, 3.10, 3.25, 3.40, 3.55, 3.70, 3.85, 4.00)

Social Contract Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Average Score
Support 300,000 people in our communities via a £250k 'Community Matters' Fund	3.52
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	3.49
Provide staff with paid leave to volunteer to support local community initiatives associated with vulnerability and environmental initiatives	3.26

AVERAGE SCORE

(x-axis: 2.80, 2.95, 3.10, 3.25, 3.40, 3.55, 3.70, 3.85, 4.00)

Connections Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Average Score
Provide new connections quotations and energisation in line with customer expectations	4.20
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	3.80
Engage with local authorities and local enterprise partnerships to understand their requirements for strategic investment in terms of changes in demand or network use	3.67
Improve DNO/IDNO/NGET/ESO cross border working practices and promote competition in connections (to ensure that the consumer is best served under the process)	3.50

AVERAGE SCORE

(x-axis: 2.80, 2.95, 3.10, 3.25, 3.40, 3.55, 3.70, 3.85, 4.00, 4.15)

Network Reliability Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Score
Improve the health of the network using asset condition data to target investment where the need is greatest	3.94
On average fewer and shorter power cuts in ED2 than ED1	3.85
Continue to focus on restoring supplies quickly and target achieving more than 85% of customers (that are not automatically restored) within one hour	3.79
Reduction of tree related faults on HV and EHV overhead network due to use of LIDAR in ED2 thus reducing the impact on the customer	3.62
Undertake 50 schemes to improve the reliability of our worst served customers and prioritise these schemes based on numbers of vulnerable customers	3.57
We will aim to restore customer supplies in ED2 within 12 hours under normal weather conditions	3.54
We will continue to install further flood defences to reflect updated data from the Environment Agency	3.45
Underground, insulate or divert overhead lines that are adjacent to or cross school playing areas	3.33

AVERAGE SCORE: 2.80 2.95 3.10 3.25 3.40 3.55 3.70 3.85 4.00

Business IT Security and Cyber Resilience Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Score
Enhance our cyber security systems to protect critical systems from unauthorised access leading to data or network disruption	3.96
Development and implementation of new systems, technologies and applications that are capable of supporting the future network	3.93
Continually assess emerging threats and install next generation anti-virus and security systems to mitigate against these risks in line with National Cyber Security Centre guidelines	3.87
Enhance the resilience of our IT network by upgrading our disaster recovery capability	3.83

2.80 2.95 3.10 3.25 3.40 3.55 3.70 3.85 4.00

Environment and Sustainability Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Average Score
Replace over 60km of the poorest performing Extra High Voltage Fluid Filled cables on our network	4.00
Reduce SF6 Losses from that in ED1	3.91
Reduce internal Business Carbon Footprint to be Net Zero by 2043	3.91
Adopt EV technology for 88% of our transport fleet by the end of 2028; resulting in 100% replacement of WPD's van fleet in RIIO-ED2, with the exception of larger specialist vehicles	3.85
Reduce network leaks by fluid filled cables from ED1	3.76
20% reduce tonnage of waste per £ annual turnover	3.72
Install renewable local generation at all offices and depots in order to power our depots and offices	3.72
Further increase the smallest size of low voltage mains to 300mm2, and increase our smallest pole mounted transformer size to 50kVA single phase to reduce technical losses	3.56
We will remove 34km of overhead lines in Areas of Outstanding Natural Beauty	3.46
Achieve zero waste to landfill	3.41

AVERAGE SCORE

2.80 2.95 3.10 3.25 3.40 3.55 3.70 3.85 4.00 4.15 4.30

Click here to return to the Environment and Sustainability section of the report

Distribution System Operator Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Average Score
Ensure that our network is able to facilitate LCT connections in order to support Net Zero 2050	3.95
Evolve the Active Network Management options for enabling connection of generation and demand without the need to reinforce the network	3.86
Consider Whole System solutions to identify the most economical solution for customers to connect or utilise their capacity	3.81
Act as a neutral market facilitator to enable accessibility to multiple markets	3.65
Engage with stakeholders and the ESO to update Distribution Future Energy Scenarios for all four licence areas each year	3.62
Create and implement a simple, fair and transparent rules and processes for procuring DSO flexibility services	3.57
Using data from updated DFES and stakeholder insight to publish a Long Term Development Strategy and a Network Development Plan annually	3.52
Produce signposting of potential flexibility requirements and undertake a flexibility tender every 6 months	3.50
Use the updated DFES to inform revised network requirements that will be captured in Distribution Network Options Assessments	3.44

AVERAGE SCORE

(x-axis: 2.80, 2.95, 3.10, 3.25, 3.40, 3.55, 3.70, 3.85, 4.00)

Innovation Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Output	Average Score
Implement learning from innovation projects into the business to improve efficiency and effectiveness of assets, operations and customer service	3.82
Develop an interactive innovation "ideas portal" aimed at stakeholders providing suggestions for innovation requirements	3.75
Develop new innovation projects with priorities informed by stakeholder engagement	3.75

(x-axis: 2.80, 2.95, 3.10, 3.25, 3.40, 3.55, 3.70, 3.85, 4.00)

Community Energy Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Establish dedicated innovation projects for community energy projects	**3.93**
Hold Community Energy Surgeries for local Community Energy groups	**3.89**

2.80   2.95   3.10   3.25   3.40   3.55   3.70   3.85   4.00

AVERAGE SCORE

Click here to return to the Community Energy section of the report

Digitalisation Outputs: Average Score Compared to Overall Baseline

AVERAGE BASELINE = **3.69**

Developing the API interface and data availability under API	**3.80**
Demonstrate leadership in publishing network data, with relevant data presumed open, and promote its availability to customers	**3.60**

2.80   2.95   3.10   3.25   3.40   3.55   3.70   3.85   4.00

AVERAGE SCORE
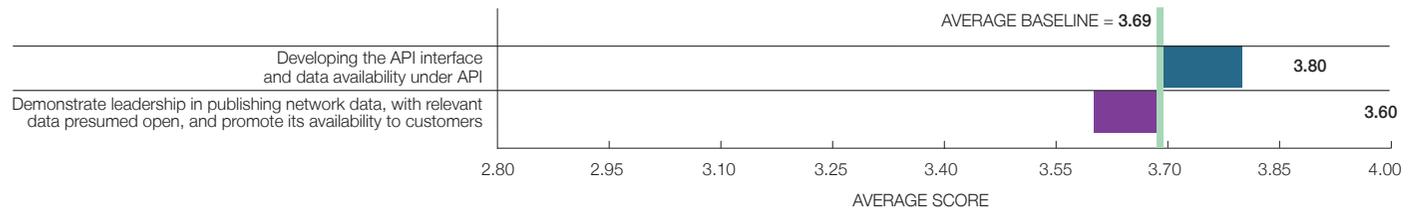
Click here to return to the Digitalisation section of the report