**Western Power Distribution First Draft Business Plan for RIIO-ED2 - Published 27th January 2021**

**CONSULTATION RESPONSE FORM**

(closing date: Sunday 28th February)

For more details on WPD’s first draft Business Plan and the accompanying consultation document, please visit: **www.westernpower.co.uk/RIIO-ED2-Business-Plan-Jan2021**

You can submit your answers to the consultation online or via this consultation response form

**About you:**

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| **Name:** |  |
| **Position:** |  |
| **Organisation:** |  |
| **Email address:** |  |
| **Telephone number:** |  |

Questions 1-5: **Feedback on WPD’s 67 proposed core commitments**

*See WPD’s ‘Have your say’ consultation document pages 14-42*

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| ***Question 1:***  **In terms of what we have heard from stakeholders so far, do you disagree with any of the feedback or do you consider any key priorities to be missing?** |
| *[type answer here]* |

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| ***Question 2:***  **Has there been any change in priorities, or emerging issues, for example as a result of Covid-19?** |
| *[type answer here]* |

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| ***Question 3:***  **For each core commitment, is this an area of focus you want to be included in the draft Business Plan?** |
| *[type answer here]* |

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| ***Question 4:***  **What option level would you prefer for each core commitment?**  **Option 1:** Less than our current view (and at a lower cost). This may still offer an improvement on current performance however, as stakeholders have been clear they will not accept any deterioration in service levels.  **Option 2:** WPD’s current view  **Option 3:** Further ambition  **Option 4:** Considerably greater ambition |
| You can use our online tool to provide feedback on each of the specific core commitments. This can be found at:[**www.westernpower.co.uk/RIIO-ED2-Business-Plan-Jan2021**](http://www.westernpower.co.uk/RIIO-ED2-Business-Plan-Jan2021)  Alternatively, please indicate in the tables below your preferred option. There is also a free-text column under ‘option 5’ for you to suggest alternative commitments. For example:   |  |  |  |  | | --- | --- | --- | --- | | **Core commitment** | | **Preferred option**  **(1,2,3 or 4)** | **Alternative commitment you would suggest** | | **E.g.** | **Example commitment 1** | **2** | *[type answer here]* | |  | **Example commitment 2** | **2** | *[type answer here]* | |  | **Example commitment 3** | **4** | *[type answer here]* | |  | **Example commitment 4** | **1** | *[type answer here]* |   For commitments that are currently of a binary (do/don’t do) nature, you are invited to either express support (typing ‘yes’ or ‘no’) or suggest alternatives. For example:   |  |  |  |  | | --- | --- | --- | --- | | **Core commitment** | | **Preferred option** | **Alternative commitment you would suggest** | | **E.g.** | **Example commitment 5** | **Yes** | *[type answer here]* | |  | **Example commitment 6** | **No** | *[type answer here]* | |  | **Example commitment 7** | **Yes** | *[type answer here]* | |

**Meeting the need of consumers and network users**

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| **Core commitment** | | **Preferred option** | **Alternative commitment you would suggest** |
| ***Customer service*** | | | |
| **1** | **Maintain a high standard customer satisfaction score across all key services areas** | **[1, 2, 3 or 4]** | *[type answer here]* |
| **2** | **Achieve full compliance with the Customer Service Excellence Standard every year** | **[Yes/No]** |  |
| **3** | **Answer calls within an average of four seconds and maintain an abandoned call rate of less than 1%, within our UK-based in-region Contact Centres** | **[Yes/No]** |  |
| **4** | **Respond to social media enquiries and power cut reports quickly** | **[1, 2, 3 or 4]** |  |
| **5** | **Provide greater insight on the planned work activity and interruptions on the network by creating an online viewer for our customers and stakeholders** | **[Yes/No]** |  |
| **6** | **Achieve full compliance with the British Standard for Inclusive Service Provision every year** | **[Yes/No]** |  |
| **7** | **Resolve at least 90% of complaints within one day & resolve 99% of complaints within 31 days** | **[Yes/No]** |  |
| ***Customers in vulnerable situations*** | | | |
| **8** | **Proactively contact over 2 million Priority Service Register customers once every two years to remind them of the services we provide and update their records** | **[1, 2, 3 or 4]** |  |
| **9** | **Achieve a ‘one-stop-shop’ service for vulnerable customers joining the**  **Priority Services Register so that they only have to register with WPD once to be registered automatically with their energy supplier, water company and gas distributor** | **[Yes/No]** |  |
| **10** | **Identify and engage hard-to-reach vulnerable customers each year to**  **join the Priority Services Register within RIIO-ED2** | **[1, 2, 3 or 4]** |  |
| **11** | **Work with expert stakeholders, including our Customer Panel and**  **referral partners, to annually refresh our understanding of ‘vulnerability’ and co-create an ambitious annual action plan** | **[Yes/No]** |  |
| **12** | **Support fuel poor customers to make savings on energy bills over RIIO-ED2** | **[1, 2, 3 or 4]** |  |
| **13** | **Develop a model to identify the capabilities of vulnerable customers to**  **participate in a smart, low carbon future. Use this to maximise participation, remove barriers to entry and encourage collaboration**  **with the wider industry** | **[Yes/No]** |  |
| **14** | **Provide vulnerable and fuel poor customers with specific support and**  **education in relation to the smart energy transition** | **[1, 2, 3 or 4]** |  |
| **15** | **Take a leading role in initiating collaboration with a range of industry**  **participants to share best practice and co-deliver schemes to ensure vulnerable customers are not left behind by the smart energy transition** | **[Yes/No]** |  |
| ***Connections*** | | | |
| **16** | **We will develop our connections process and improve availability of information so that customers wishing to connect can easily comprehend the process and follow a simple set of rules to apply for**  **a connection** | **[Yes/No]** |  |
| **17** | **Maintain a high standard average customer satisfaction for connections** | **[1, 2, 3 or 4]** |  |
| **18** | **Improve our performance against Time To Quote (TTQ) and Time To Connect (TTC) for LCTs from RIIO-ED1 Level** | **[1, 2, 3 or 4]** |  |
| **19** | **Engage with 130 local authorities and local enterprise partnerships**  **to understand their requirements for strategic investment in terms of**  **changes in demand or network use** | **[1, 2, 3 or 4]** |  |
| **20** | **Improve cross border working practices between WPD, Independent**  **Distribution Network Operators, National Grid Transmission and the**  **Energy System Operator. Also promote competition in connections** | **[Yes/No]** |  |
| ***Social contract*** | | | |
| **21** | **Publish annual reports in a simple, easy to understand format, setting out WPD’s total expenditure, the impact on customer bills and actual**  **regulatory returns** | **[Yes/No]** |  |
| **22** | **We will, as a minimum, maintain our prime Environmental, Social and**  **Governance (ESG) rating from a recognised agency** | **[Yes/No]** |  |
| **23** | **Support local people in our communities via an annual ‘Community**  **Matters’ Fund** | **[1, 2, 3 or 4]** |  |
| **24** | **Provide staff with paid leave to volunteer to support local community**  **initiatives associated with vulnerability and environmental initiatives** | **[1, 2, 3 or 4]** |  |

**Maintaining a safe and resilient network**

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| **Core commitment** | | **Preferred option** | **Alternative commitment you would suggest** |
| ***Network resilience*** | | | |
| **25** | **On average fewer and shorter power cuts in RIIO-ED2 than**  **RIIO-ED1** | **[Yes/No]** | *[type answer here]* |
| **26** | **Reduction of tree related faults on HV and EHV overhead network due**  **to use of LIDAR in RIIO-ED2 thus reducing the impact on the customer** | **[Yes/No]** |  |
| **27** | **Continue to have focus on restoring HV supplies quickly (that are not automatically restored) within one hour** | **[1, 2, 3 or 4]** |  |
| **28** | **We will aim to restore customer supplies in RIIO-ED2 within 12 hours under normal weather conditions** | **[Yes/No]** |  |
| **29** | **Carry out work that improves network reliability for our worst served customers (those experiencing 12 or more higher voltage power cuts over a 3 year period)** | **[1, 2, 3 or 4]** |  |
| **30** | **Invest to improve the overall health of the network and develop a measure of overall asset health. Report annually to stakeholders the impact of our investments** | **[1, 2, 3 or 4]** |  |
| **31** | **We will continue to install further flood defences to reflect updated data from the Environment Agency** | **[1, 2, 3 or 4]** |  |
| ***Business IT Security and Cyber Resilience*** | | | |
| **32** | **Continually assess emerging threats to enhance cyber security systems to ensure no loss of data or network interruption from a cyber attack** | **[Yes/No]** |  |
| **33** | **Enhance the resilience of our IT network security by upgrading our disaster recovery capability to ensure continuity of our operations** | **[Yes/No]** |  |
| ***Safety*** | | | |
| **34** | **Undertake an additional Staff Safety Climate Survey during RIIO-ED2** | **[Yes/No]** |  |
| **35** | **Distribute safety advice information to stakeholders** | **[1, 2, 3 or 4]** |  |
| **36** | **Educate a minimum of children per year about avoiding danger**  **from electricity** | **[1, 2, 3 or 4]** |  |
| **37** | **Underground, insulate or divert overhead lines that cross school or other playing areas** | **[1, 2, 3 or 4]** |  |
| ***Workforce resilience*** | | | |
| **38** | **Demonstrate exceptional embedded employment practices by achieving**  **accreditation with Investors in People by the end of RIIO-ED2** | **[Yes/No]** |  |
| **39** | **Publish annually our updated Diversity & Inclusion Action Plan**  **& Performance** | **[Yes/No]** |  |

**Delivering an environmentally sustainable network**

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| **Core commitment** | | **Preferred option** | **Alternative commitment you would suggest** |
| ***Environment and sustainability*** | | | |
| **40** | **Reduce internal Business Carbon Footprint to be Net Zero by following a verified Science Base Target to limit the climate impact of our activities.** | **[1, 2, 3 or 4]** | *[type answer here]* |
| **41** | **Replace our transport fleet with non-carbon technology where practical** | **[1, 2, 3 or 4]** |  |
| **42** | **Install renewable local generation at all suitable offices and depots** | **[Yes/No]** |  |
| **43** | **Reduce leaks from fluid filled cables** | **[1, 2, 3 or 4]** |  |
| **44** | **Replace the poorest performing Extra High Voltage fluid filled cables (FFC) on our network** | **[1, 2, 3 or 4]** |  |
| **45** | **Reduce SF6 losses from that in RIIO-ED1** | **[1, 2, 3 or 4]** |  |
| **46** | **All PCB contaminated equipment will be removed from the WPD network by 2025.** | **[Yes/No]** |  |
| **47** | **Reduce tonnage of waste per £ total business expenditure** | **[1, 2, 3 or 4]** |  |
| **48** | **Reduce the volume of waste we send to landfill (excluding hazardous waste)** | **[1, 2, 3 or 4]** |  |
| **49** | **We will remove targeted overhead lines in Areas of Outstanding Natural Beauty** | **[1, 2, 3 or 4]** |  |
| **50** | **Where a low voltage mains cable is required it will be a minimum size of a 300mm2 cable and for the smallest pole mounted transformer size to be 50kVA single phase to reduce technical losses** | **[Yes/No]** |  |
| ***A smart, flexible network*** | | | |
| **51** | **Create and implement simple, fair and transparent rules and processes for procuring DSO flexibility services and introduce a customer satisfaction monitor to measure the effectiveness of our actions** | **[Yes/No]** |  |
| **52** | **Produce forecasts of potential flexibility requirements in order to undertake a flexibility tender every 6 months** | **[Yes/No]** |  |
| **53** | **Develop a standard to be measured against (using external scrutiny) to**  **demonstrate that we act as a neutral market facilitator to enable accessibility to multiple markets** | **[Yes/No]** |  |
| **54** | **100% load related reinforcement (primary) decisions include an assessment of flexibility alternatives** | **[Yes/No]** |  |
| **55** | **Ensure that connection offers with a reinforcement requirement are given option of a flexible alternative** | **[1, 2, 3 or 4]** |  |
| **56** | **Increase the range of options for flexible connections** | **[1, 2, 3 or 4]** |  |
| **57** | **Make it as easy as possible for our customers to connect LCTs, such that WPD connects more than the national average connecting in the UK**  **(prorated by our number of customers)** | **[1, 2, 3 or 4]** |  |
| **58** | **Improve the volume of data available via an interactive, API (Application**  **Programming Interface) relative to all data made available (e.g. via**  **spreadsheets and fixed format reports)** | **[1, 2, 3 or 4]** |  |
| **59** | **Introduce a customer satisfaction monitor to measure data availability,**  **ease of access and usefulness, improving from the baseline throughout RIIO-ED2** | **[Yes/No]** |  |
| **60** | **Using data from updated DFES and stakeholder insight to publish a**  **Long Term Development Statement and a Network Development Plan annually** | **[Yes/No]** |  |
| **61** | **Engage with stakeholders and the Electricity System Operator to update WPD’s Distribution Future Energy Scenarios for all four licence areas** | **[1, 2, 3 or 4]** |  |
| **62** | **Hold Local Energy Surgeries for local authorities, supporting them to develop their local energy plans** | **[1, 2, 3 or 4]** |  |
| **63** | **Undertake whole system collaboration schemes with other DNOs and the ESO** | **[1, 2, 3 or 4]** |  |
| ***Innovation*** | | | |
| **64** | **For each innovation project we will undertake a cost benefit assessment and implement into business practice to improve efficiency and effectiveness of assets, operations and customer service** | **[Yes/No]** |  |
| **65** | **Develop an interactive ‘innovation ideas portal’ aimed at stakeholders**  **submitting ideas for new innovation projects** | **[Yes/No]** |  |
| ***Community energy*** | | | |
| **66** | **Hold Community Energy Surgeries for local Community Energy groups** | **[1, 2, 3 or 4]** |  |
| **67** | **Establish dedicated innovation projects for Community Energy schemes** | **[Yes/No]** |  |

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| ***Question 5:***  **Are there alternative core commitments you would suggest?** |
| *[type answer here]* |

Questions 6-13: **Feedback on WPD’s full draft Business Plan**

**Presentation and accessibility of the Plan**

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| ***Question 6:***  **What are your views on the layout and structure of WPD’s draft Business Plan? How easy is it to understand and what would you change to make it clearer?** |
| *[type answer here]* |

**Overall acceptability of the Plan**

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| ***Question 7:***  **What are your views on the content of the draft Business Plan document? Is anything missing?** |
| *[type answer here]* |

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| ***Question 8:***  **What are your views on WPD’s overall package of proposals for RIIO-ED2 as currently set out?**  **‒ Are there aspects you: Strongly support? Would like to see change? Consider to be missing?** |
| *[type answer here]* |

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| ***Question 9:***  **Our aim is to keep bills as low as possible, but some of our commitments will incur additional costs that can’t be fully offset by our efficiency savings. What are your views on the current impact of WPD’s current view on customer bills?** |
| *[type answer here]* |

**Delivering a low carbon future**

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| ***Question 10:***  **What are your views on the process WPD has followed to determine the ‘WPD best view’?**  **e.g. Are there any other stakeholders we should be engaging with, or datasets we should be using, to improve our approach?** |
| *[type answer here]* |

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| ***Question 11:***  **Do you agree that WPD’s best view for Low Carbon Technology uptake represents a likely and credible outcome?** |
| *[type answer here]* |

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| ***Question 12:***  **In relation to ‘investing for a low carbon energy future’, what are your views on WPD’s current view proposals and the level of expenditure currently proposed?**  *See page 119 of WPD’s full Business Plan* |
| *[type answer here]* |

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| ***Question 13:***  **In relation to ‘building a smarter, secure, digitalised energy network’, what are your views on WPD’s current view proposal and the level of expenditure currently proposed?**  *See page 134 of WPD’s full Business Plan* |
| *[type answer here]* |

