



Part One Submission:

# Stakeholder & consumer vulnerability strategies

Ofgem Stakeholder Engagement &  
Consumer Vulnerability Incentive 2016/17

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## Session 2: WPD's long-term priorities – measuring the value for money of our actions

CATEGORY	AS NOW	OPTION 1 1 vote	OPTION 2 2 votes	OPTION 3 3 votes
Overall customer satisfaction	Rated 8.9/10	9.1/10	9.3/10	9.5/10
Connections satisfaction	Rated 8.7/10	8.9/10	9.1/10	9.3/10
Smart networks	Active Network Management zones rolled out by 2023	By 2022	By 2021	By 2020
Business carbon footprint	4.5% by 2023	4.5% by 2021	4.7.5% by 2023	4.10% by 2023
Undergrounding schemes	55km by 2023	55km by 2021	75km by 2023	90km by 2023
Emergency resilience 20% communities and businesses supported to improve resilience	30%	30%	40%	50%
	55%	60%	65%	
	65k & expanded scope	70k & existing scope	70k & existing scope	70k & existing scope
	150k	175k	200k	225k
		12.5k	15k	

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Grace Richardson-Banks  
Worcester

Matthew Hardy  
Cardinal Church Parish Council



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This document is Western Power Distribution's **Part One submission** to Ofgem's Stakeholder Engagement & Consumer Vulnerability (SECV) Incentive for the regulatory year 2016/17.

Western Power Distribution (WPD) is the Distribution Network Operator (DNO) responsible for delivering electricity to 7.8 million customers across the East and West Midlands, South West England and South Wales.

Ofgem's SECV Incentive is an annual scheme that encourages network companies to engage proactively with stakeholders in order to anticipate their needs and deliver a consumer focused, socially responsible and sustainable energy service. WPD's submission to this incentive is divided into three parts:

- Part 1: WPD's stakeholder engagement & consumer vulnerability strategies and key evidence (demonstrating that we meet Ofgem's minimum requirements).
- Part 2: Key outcomes resulting from WPD's stakeholder engagement activities.
- Part 3: Key outcomes resulting from WPD's consumer vulnerability activities.

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## Welcome

At WPD we don't just have a standalone stakeholder engagement strategy – engagement is an essential part of the way we do business, and underpins all of our decision-making processes. My message to the 7.8m customers who depend upon us every day, and the 6,500 staff who deliver our services, is a simple one: I want WPD to be the best. We must therefore never presume to know what our customers want.

The role of networks faces a rapid and unprecedented change. A 'smart' energy future brings exciting challenges and WPD is already evolving to ensure we play a key role in the UK's low carbon future. Stakeholders must be at the heart of this shift.

WPD is working to facilitate significant growth in low carbon technologies and to reduce the cost of providing enough capacity on the network by developing a number of 'smart' solutions. All this will change the relationship we have with customers. While focusing on the future, we must concentrate on what matters to customers today – like ensuring excellent network performance and customer service.

As this Part One submission outlines, it is essential to have a clear stakeholder engagement strategy that strikes a balance between driving improvements to our services in the short term; and focusing on long-term strategic priorities that may fundamentally change the way we operate in the future. For this reason, we aim to earn the trust of our

stakeholders and build long-term relationships by demonstrating that we listen to feedback, act on it and ultimately deliver positive outcomes for customers.

**In 2016/17 we have delivered 149 key outputs, as detailed on pages 5-7.**

To test the validity of our approach we undergo rigorous external assessments each year (see page 8). This benchmarks our strategies with other leading industries and reviews their effectiveness to address the challenges we face.

In such a changing environment it has never been more important to safeguard our most vulnerable customers. We have an extensive consumer vulnerability programme, delivering against a clear but ambitious strategy. Our Priority Service Register (PSR) is the bedrock of this, as it ensures we identify those in greatest need of support. Our first priority will always be the welfare of vulnerable customers during power cuts, but a developing understanding of the broad nature

of vulnerability is enabling us to provide a wide range of services our stakeholders value highly. **Our fuel poverty schemes helped 11,776 customers to save £3m in the last year alone.** At the same time, we are testing new initiatives such as those relating to smart meters, to ensure vulnerable customers are not left behind in a smart future.

I am proud of these achievements and with the continued support of our stakeholders I believe we are well placed to rise to the challenges we face. While there remains much to do, our ethos of quickly translating stakeholder feedback into action – evidenced by the 149 outputs in this submission – can only stand us in good stead.

Robert Symons, WPD Chief Executive

## In the words of our stakeholders

*“ I've had dealings with thousands of companies during my career. I've met very, very few that are, what I would call, 'world class'. The stakeholder engagement event run by WPD was profoundly well conceived and delivered.*

*There were no frills or gimmicks. There weren't any celebrities or attempt to charm the audience, nor fancy give-aways. There was just a genuine and transparent desire to share with the audience some of the inner thinking of the company and a sincere and engaging process towards assessing the attending stakeholders' views on the issues.*

*There was pace throughout the event; no languishing in past success or arrogance about being top of the league tables. The culture of the organisation, driven by a focus on customers and the desire to 'keep the lights on', was evident through every interface with every WPD member of staff. I'm sure those staff and indeed the company as a whole might be mildly embarrassed to be described as 'world class', but in my humble opinion, it would be a fair assessment.*

*Can I congratulate you and your colleagues for your approach. It was inspiring to be a part of the event.*”



Group CEO, EA Technology Ltd

## Key outputs we've delivered:

**149**  
IMPROVEMENT ACTIONS TAKEN

Improved overall customer satisfaction to **8.91/10**  
.....  
HIGHEST IN INDUSTRY 6TH YEAR IN A ROW

**4<sup>TH</sup> YEAR**  
BSI STANDARD FULL COMPLIANCE

**1<sup>ST</sup>**  
CUSTOMER SERVICE EXCELLENCE STANDARD  
Best performer in the UK

**1.4m**  
PSR CUSTOMERS PROACTIVELY CONTACTED OVER A TWO YEAR CYCLE

## An established, embedded strategy

WPD's stakeholder engagement strategy has been in place since 2007. The **core strategy** is enduring and comprehensive and therefore remains consistent each year. This ensures a clear focus and continuity of objectives that we are working to achieve. Feedback from our stakeholders, in particular WPD's expert Customer Panel, indicates that this is working. A stable strategic direction enables us to avoid short-termism by delivering enduring projects that expand on previous successes. It also helps to embed improvements in our 'business as usual' services for customers.

That said, consistency should never be mistaken for complacency. Our **delivery strategy** is therefore updated and reviewed annually by WPD's Chief Executive and Directors. They approve an action

plan that specifies owners, costs and intended outcomes, to enable them to monitor performance via regular reports submitted by WPD's Stakeholder and Social Obligations Manager.

Our stakeholder engagement and consumer vulnerability strategies also undergo rigorous external assessment each year, to identify if any changes are needed and to ensure they are fit for purpose, delivering positive outcomes for customers and benchmark well against other leading industries.

In 2016/17, following a two day assessment against the Customer Service Excellence Standard, the assessor concluded:

“ Overall rating: **COMPLIANCE PLUS**

WPD's Stakeholder Engagement Strategy continues to provide a robust framework for managing an impressive programme of consultation and engagement with customers. WPD has an in-depth understanding of its customers that has enabled it to design and provide services that meet the needs of the full range of customer groups.

Stakeholder engagement is carefully managed and well resourced. WPD methods of consultation are appropriate to the needs of the identified customer group. The range of engagement practices is impressive, from satisfaction surveys to Customer Panel meetings chaired by the CEO, to focus groups and workshops.

## Core strategy: Stakeholder engagement

### Our approach

#### How we engage

We are committed to be:

- **Inclusive:** of all stakeholders, including the hard-to-reach.
- **Tailored:** using methods to best suit each group.
- **Focused on action:** so engagement leads to measurable output.

#### Why we engage:

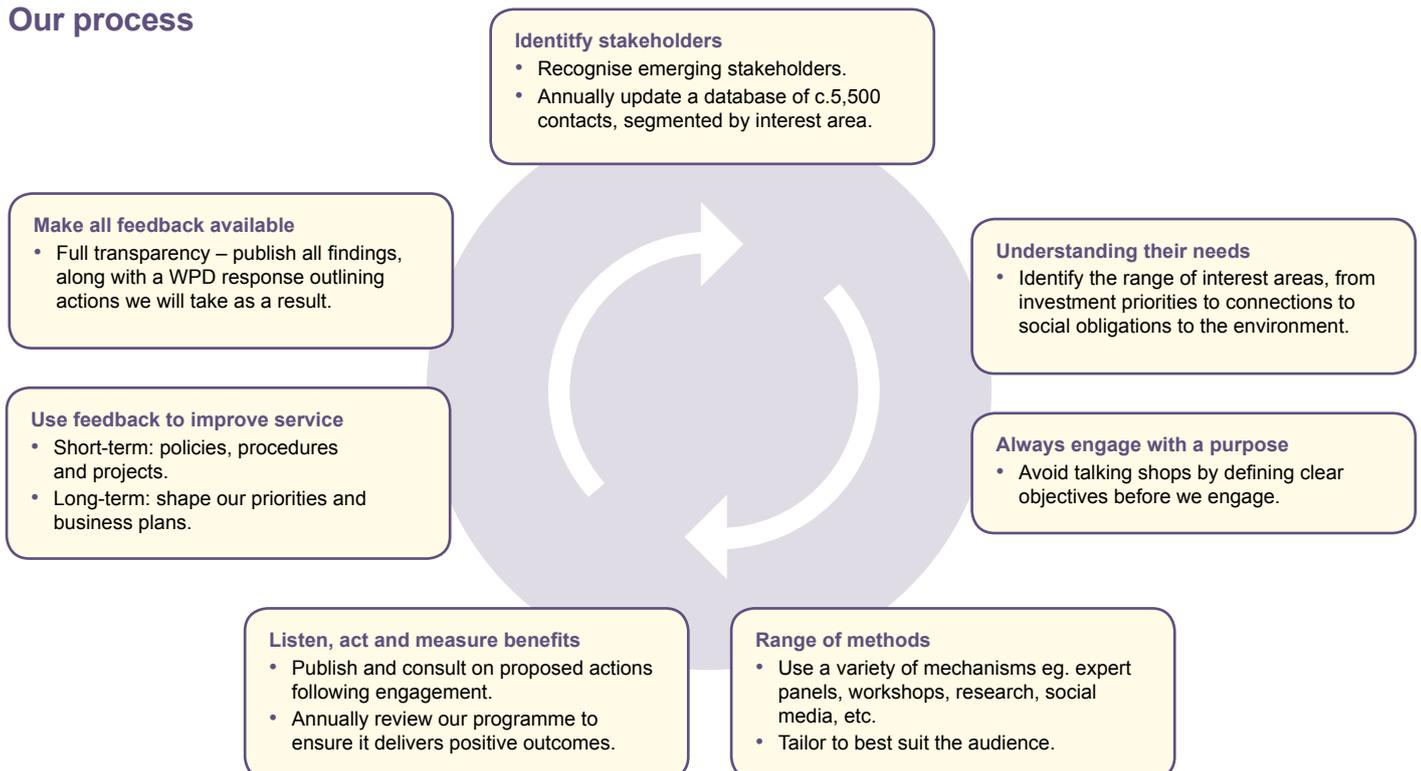
Customers pay for everything we do. Our decisions must be well justified, reflecting their views and addressing their priorities. We will:

- Engage on current service standards, **identify improvements, and measure the value** stakeholders place on these.
- Involve stakeholders in the ongoing monitoring

and reporting of **business plan delivery performance**.

- Seek early input to develop our **plans for the longer term** and identify our strategic priorities.

### Our process



## Our delivery

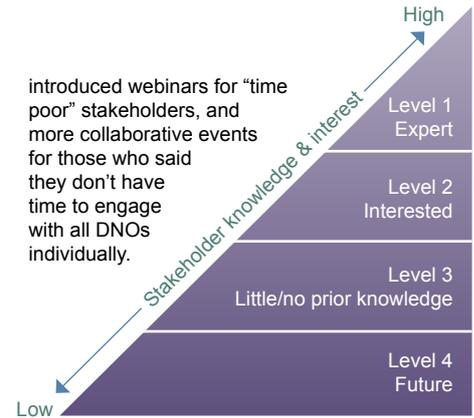
**Engagement is part of everyone's job**  
WPD follows a 'centrally-coordinated, locally delivered model'. WPD's Stakeholder & Social Obligations Manager coordinates WPD's programme and flagship projects, but delivery falls to managers throughout the business. For example, WPD's annual workshops are facilitated by Operational Managers who look after all aspects of the local networks as it is essential that they hear direct from the stakeholders they serve.

**Engagement leads to action**  
We never host "talking shops". We always engage with a purpose, ensure we take actions

as a result of feedback and communicate these to stakeholders. Demonstrating we take their feedback seriously helps to earn stakeholders' trust and build enduring relationships. 54% of attendees at our 2017 workshops had previously attended a WPD event.

**We use the most appropriate mechanisms**  
We tailor our methods to suit the different knowledge, interest and willingness to engage of our stakeholders. Our core programme is enduring, with examples shown below, but within this we continue to introduce innovative methods to ensure we engage in the most appropriate way. For example in 2016/17 we

introduced webinars for "time poor" stakeholders, and more collaborative events for those who said they don't have time to engage with all DNOs individually.

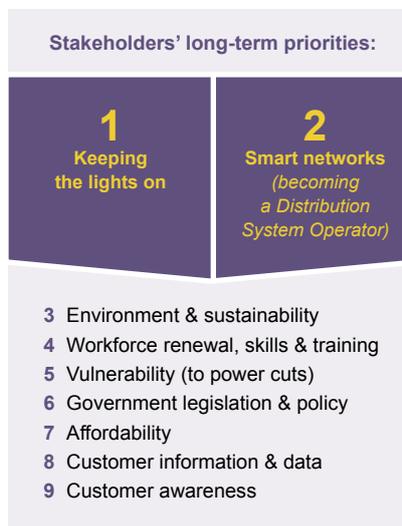


	Example of the audience	Tailored approach	Total reach	Times a year	Example outcomes (detailed in Parts 2 & 3)
<p><b>Level 1 - Expert</b> <b>Eg. Customer Panel</b></p> 	<p><b>Stakeholders from all key segments. Eg.:</b> Vulnerable/fuel poor - <i>Citizens Advice, Energy Saving Trust, Sustain Wales (new)</i> Connections - <i>Major Energy Users Council</i> Domestic - <i>Customers</i> Business - <i>B&amp;Q, Devon &amp; Cornwall Bus. Council</i> Emergency resilience - <i>Police, British Red Cross</i> Health - <i>University hospitals</i> Government - <i>Welsh Assembly, Parish Councils</i> Innovation/Education - <i>Nottingham University, IET</i> Industry/Utilities - <i>National Grid, British Gas, South West Water (new), Severn Trent Water</i></p>	<ul style="list-style-type: none"> <li>Detailed presentations</li> <li>CEO Question &amp; Answer</li> <li>In-depth workshops/debate and critical challenge</li> <li>Policy and action plan drafting</li> <li>Topic-specific surgeries</li> <li>Member only pre-meetings</li> <li>Budget for independent research</li> <li>Inclusion of Board Director</li> </ul>	34	4	<ul style="list-style-type: none"> <li>Reviewed PSR policy and removal of out-of-date records</li> <li>Reviewed social obligations strategy &amp; created £90k Innovation Fund</li> <li>New policy of Key Account Managers for connections customers</li> <li>Creation of storm bulletins for stakeholders</li> </ul>
<p><b>Level 2 - Interested</b> <b>Eg. Stakeholder workshops &amp; topic specific events</b></p> 	<p><b>Stakeholders from all key segments. Eg.:</b> <i>Parish councils, local authorities, consumer interest bodies, charities, connections providers, community energy groups, developers, trade associations, DNOs, gas &amp; water networks, suppliers, small businesses, major energy users, universities, environmental groups, battery storage providers (new), energy aggregators (new)</i></p> <p><b>Eg. Distribution System Operator events (new)</b> <i>Local authorities, Local Enterprise Partnerships, BEIS, Ofgem, MPs, NGT, community energy groups</i></p>	<ul style="list-style-type: none"> <li>Short WPD presentations to introduce topics</li> <li>Facilitated roundtable discussions including WPD Operational Managers (mixed tables to encourage balanced debate)</li> <li>Electronic voting</li> <li>Review WPD's strategy and action plans</li> <li>Q&amp;A with WPD Senior Managers</li> </ul>	270	6	<ul style="list-style-type: none"> <li>Consulted on data privacy plan for smart meters</li> <li>Expanded fuel poverty referral schemes</li> <li>Capacity loan scheme developed &amp; interactive online capacity map launched</li> <li>Average connection cost calculation tool launched</li> <li>£10k fund to support Local Resilience Forums created</li> <li>50,000 emergency planning guides sent to businesses</li> </ul>
<p><b>Level 3&amp;4 - Little knowledge</b> <b>Eg. Research, awareness campaigns and bulletins</b></p>	<p><b>All customers. eg.:</b> <i>contact following planned interruptions, unplanned interruptions &amp; general enquiries, vulnerable customers, major connections customers, distributed generation, smart meter roll out (new)</i></p>	<ul style="list-style-type: none"> <li>Satisfaction surveys</li> <li>Research re: priorities and 'willingness to pay'</li> <li>Annual 'Power for Life' newsletter</li> <li>Storm bulletins</li> </ul>	28,871	Monthly	<ul style="list-style-type: none"> <li>Multiple improvements. Top satisfaction in industry (8.91/10)</li> <li>Awareness of WPD increased to 64%</li> <li>Storm bulletins sent to 3,559 stakeholders</li> </ul>

## Updated for 2016/17

As outlined in detail in Part Two, page 2, our focus for 2016/17 has been to ensure that our engagement strategy is fit for the long-term. Networks face an unprecedented time of change as we respond to capacity challenges, build smart networks and facilitate the move to a low carbon future brought by high volumes of distributed generation. Engagement must be at the heart of this change.

Working with stakeholders we have identified nine long term strategic priorities. In 2017 stakeholders made it clear that two priorities take primary significance - "keeping the lights on" and "smart networks". The others are influenced by, or contribute towards, these. For instance, WPD's approach to vulnerability is shaped by our number one priority to "keep the lights on", whilst the workforce and skills required in future will be shaped by the requirements of building "smart networks". We have therefore structured our ongoing engagement delivery strategy around these two overriding priorities.



To deliver enhanced engagement, focused on the future, we've updated our approach.

**Updated strategy to 2023**

We will:

- Engage on service standards, improvement options and willingness to pay, to drive continuous improvement and measure value for money.
- Involve stakeholders in the ongoing reporting of Business Plan performance to demonstrate we deliver our promises.
- Seek early input to develop plans for the long-term, rather than "consult" on them.

# Strategy: Consumer vulnerability

## An established, embedded strategy

WPD's consumer vulnerability strategy has been in place since 2013 and has four key objectives. It is externally assessed annually, and has been judged to be highly effective and built for the long-term. It is therefore enduring and consistent, which enables us to deliver more sustainable and ambitious projects. The biggest measure of success is that it leads to positive, measurable outcomes that stakeholders value.

In 2016/17, following a two day assessment against their vulnerable customer standard for Inclusive Service Provision, the British Standard Institute's assessor concluded:

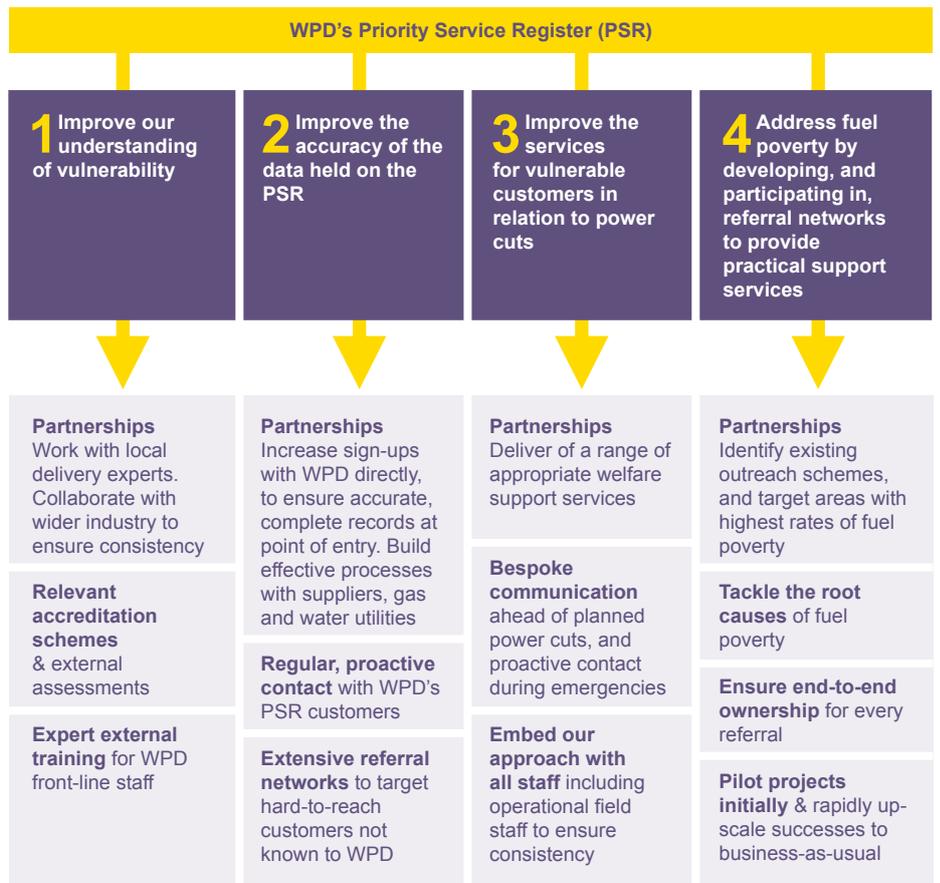
**Overall rating: FULL COMPLIANCE**

*Discussions were held with the CEO and Regulation Manager relating WPD's business strategy to the strategy and plan for vulnerable customers. There is a clear alignment between the two with a clear focus on the needs of vulnerable customers in all decision making. WPD's vulnerable customer strategy, processes and protocols remain compliant with the requirements of BSI Standard 18477 and it was observed that continual improvements have been identified and introduced.*

## Core strategy: Consumer vulnerability

Stakeholders are clear that WPD's primary focus must always be on the Priority Service Register (PSR); safeguarding our most vulnerable customers during power cuts, by providing support bespoke to their needs.

In recent years, our traditional remit has broadened as our understanding of the multi-dimensional nature of vulnerability has developed. Stakeholders support this, but insist we retain links to our core responsibilities as a network operator. Our strategy therefore has four pillars:



## Updated for 2016/17

While our primary objectives are unchanged, our strategy for how best to deliver them continues to evolve with the help of our stakeholders.

WPD's CEO reviews this strategy annually, along with an action plan containing timescales, outcomes, costs and owners. WPD's annual consumer vulnerability budget increased to £2.2m in 2016/17 as a result.

Partnerships are vital to delivering effective solutions for vulnerable consumers. Learning from the various initiatives we have delivered in the last three years, in 2016/17 we formalised our delivery strategy (shown right).

## A customer-perspective approach

For the last three years, 2014-2016 our approach has been from a process perspective, establishing key, new projects and procedures to address priority areas identified by stakeholders:

To embed these activities in our systems and the way we manage customer interactions as standard, in 2016/17 we introduced an intentional shift to now view our programme from our customers' perspective:

- 2014-2016**
- Develop PSR data cleanse processes and embed them in day-to-day operations.
  - Define our approach to fuel poverty.
  - Expand successful pilot fuel poverty schemes towards 'business-as-usual'.
  - Build PSR referral networks, engaging front-line agencies to identify and directly sign-up hard-to-reach vulnerable customers.

- 2016/17**
- **Vulnerable customers known to WPD**
    - Maintain effective and regular contact with customers to offer advice, support and check the accuracy of our data.
    - Ensure a range of holistic support services are in place to provide tailored support during power cuts and in relation to fuel poverty.
    - Embed our programme with all WPD frontline staff to ensure consistency at every customer touch-point.
  - **Vulnerable customers not known to WPD**
    - Extensive schemes in place to identify hard-to-reach customers, including new innovative approaches.
    - Explore the benefits of closer co-ordination with the health sector.
  - **Measure the value to customers of the outcomes we deliver**



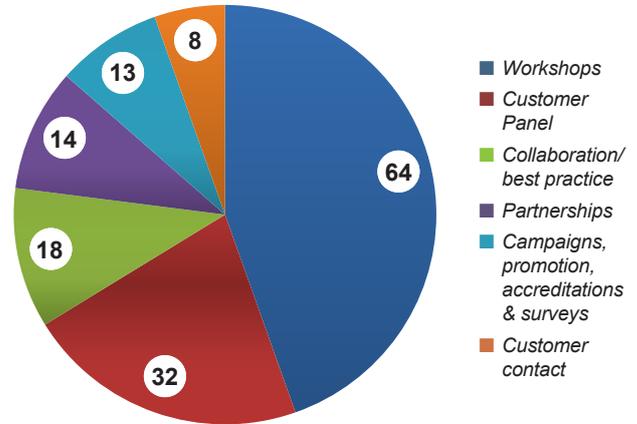
Over the last year we have engaged with over 14,000 stakeholders at around 130 events ranging from workshops to bilateral meetings. In addition, and as detailed on page 10, we have surveyed 28,871 customers to gauge their satisfaction and identify improvements to our services.

All these activities are only meaningful if they lead to action.

## Crucially, in 2016/17 our engagement has led to over 149 positive outcomes for customers.

In total we have invested over £3.9m delivering these outcomes. Our research (explained in Part Two, page 3 and Part Three, page 3) shows that customers value the improvements delivered, significantly higher than the cost to deliver them. When considering our programme as a whole, we can see that we have delivered a cost benefit per customer of £14.05.

Outcomes split by the engagement method to achieve them:



With	Source	Cost	Action as a result	Benefit
Domestic, Business, Utilities/Industry & Parish Councils	Campaign/promotion	£837k	1. <b>Customer awareness campaign:</b> TV, radio & newsletter sent to 7.8m customers promoting national 105 number, PSR, etc	Overall customer awareness increased to 64% (from 54%)
	Workshops	£243k	2-40. <b>Six stakeholder workshops</b> - 270 stakeholders attended, 39 actions taken	Eg: - <b>NEW: Active Network Management roll out published</b> (enabling more flexible network control) and accelerated to 2021 - <b>NEW: Published Distribution System Operator enabling strategy</b> and first stage transition plan
	Customer Panel	-	41-68. <b>Quarterly Customer Panel meetings</b> - new members added including Devon & Cornwall Business Council, Sustain Wales and South West Water. 28 actions	Eg: - <b>NEW: PSR policy to remove 352,046 out-of-date records</b> - <b>NEW: Storm bulletins</b> launched. 3,559 stakeholders registered - <b>Review of WPD's consumer vulnerability strategy</b>
	Accreditation	£2k	69. <b>Customer Service Excellence Standard reaccréditation</b>	Improved customer service - WPD is top rated UK company. 38/57 elements rated "Compliance Plus"
	Collaboration/best practice	£33k	70. <b>NEW: Joint Willingness to Pay research</b> with National Grid Gas & UK Power Networks	Identified the financial value customers attribute to potential service improvements. Used to inform cost benefit analysis for projects
	Customer contact	£54k	71. <b>1.03 million proactive contacts to customers</b> (658,107 texts & 374,953 calls - 115,747 to PSR customers)	49% of all contact is now proactive (from 40%), leading to increased satisfaction. Increased number of mobile phone records from 47% to 60%
	Customer contact	-	72. <b>NEW: Introduced two-way text messaging service</b>	Enable customers to not just receive updates but report faults and conduct conversations with us during incidents. Now able to send personalised (rather than blanket) messages at all voltage levels
	Customer contact	£3k	73. <b>Live 24/7 webchat now on every page</b>	Improved access to information. 24,537 webchats, 95% satisfaction
	Customer Panel	-	74. <b>NEW: Policy to open eight ramp-up call centres for longer in storms</b> utilising non operational staff	Enable main Contact Centre to make proactive outbound calls only - eg. Storm Doris: 5,747 proactive calls while taking 37,447 inbound calls
	Accreditation	-	75. <b>NEW: Introduced Next Generation Text (NGT) Lite App</b> after engagement with Action on Hearing Loss	Allows deaf/hard of hearing customers to communicate directly with us via a range of methods, using a phone, tablet or computer
	Customer contact	£53k	76. <b>NEW: Smartphone app launched</b> enabling power cut updates for multiple properties and easier PSR registration	New proactive information access channel for customers. 4,220 downloads in first month and used extensively during storms
	Customer contact	-	77. <b>Expanded social media presence</b> - 50k tweets (up 47%), 18k followers (up 37%), 5k Facebook likes (up 64%)	Quicker access to power cut updates for greater number of customers
	Customer contact	-	78. <b>NEW: WPD LinkedIn page launched</b>	Engagement with a broad range of stakeholders on an additional social media platform. 900 followers in the first month
	Customer contact	-	79. <b>Improved website design</b> to meet 'World Wide Web Consortium (W3C)' and Royal National Institute for Blind accessibility standards	Easier navigation and access to key information eg. 918,083 hits on the live power cut map, leading to a reduction in inbound calls
	Customer Panel	-	80. <b>NEW: Fortnightly website update newsletters</b>	Provide useful information, updates and new initiatives to be promptly shared with stakeholders - eg. launch of new connections capacity map and innovation updates
Collaboration/best practice	-	81. <b>NEW: Power cut advice film by Royal Association for Deaf people now online</b> - developed via industry working group and including signing and subtitles	Access to power cut advice in an accessible format for deaf and hard of hearing customers	
Campaign/promotion	£5k	82. <b>13,000 power cut advice &amp; PSR joining leaflets</b> sent including freepost registration form	Improved customer resilience and PSR records	

# Key outcomes delivered

With	Source	Cost	Action as a result	Benefit
Vulnerable, PSR, Hard-to-reach & Fuel Poverty	Accreditation	£3k	83. <b>BSI vulnerability accreditation (BS18477)</b> - 4th year	Ensure services accessible for all customers & identify improvements
	Workshops	£32k	84. <b>NEW: Who's on the wires social indicator mapping</b> to identify vulnerable customer hotspots	Targetted WPD's PSR referral networks to high vulnerability areas with low current PSR rates. Target fuel poverty schemes to high deprivation areas
	Workshops	-	85. <b>NEW: 4,700 field staff trained about vulnerability</b>	Equipped field staff to identify PSR customers, call out welfare support and distribute crisis packs. 23 Red Cross callouts since
	Workshops	£814k	86. <b>Proactively contacted 691,499 PSR customers</b> (575,752 WPD's data cleanse team, 115,747 during power cuts)	50.3% of records updated overall, enabling more proactive and targeted support to PSR customers in power cuts
	Partnerships	-	87. <b>NEW: 11 PSR referral networks set up</b> - now 34 total	Range of agencies now identify hard-to-reach customers, via relevant frontline services, in 44 locations. Contributed to 18,646 direct sign ups in 12 months
	Collaboration/ best practice	-	88. <b>NEW: Pilot scheme to refer off-gas PSR customers</b> to National Grid Gas, identified via data cleanse calls	Enable customers to discuss heating alternatives and eligibility for the gas extension scheme. 33 referrals in first 3 months
	Workshops	-	89. <b>NEW: Led industry change proposal for two-way data flows/common needs codes</b> and drafted initial standard Privacy Impact Assessment used by the industry	Increased sharing about customers with priority needs, ensuring consistency between all industry parties
	Customer contact	-	90. <b>NEW: Field staff PSR mapping tool</b> on handheld devices	Made it easy to identify and prioritise vulnerable customers for targeted support
	Workshops	-	91. <b>Online PSR form promoted</b> via website, social media, newsletter to 7.8m customers and PSR referral partners	Easy way to register and enable partners to directly sign-up customers who give their informed consent. 46% increase in direct registrations
	Partnerships	£460k	92. <b>Four Power Up fuel poverty referral schemes renewed</b>	7,205 customers supported. Annual savings of over £1.4million
	Partnerships	-	93. <b>NEW: Best practice workshop</b> with Power Up partners	Ensure consistent service for customers - share lessons and align processes
	Partnerships	£247k	94. <b>NEW: Three Affordable Warmth fuel poverty collaboration schemes created</b> - now four in total	3,528 supported. Annual savings of £1million. 1,863 (53%) added to PSR
	Workshops	£90k	95. <b>NEW: £90k fuel poverty local action fund launched</b> , funding 5 projects as follows:  <b>Northamptonshire Citizens Advice</b> working with McMillan Cancer and Anglian Water to identify customers suffering ill health and fuel poverty  <b>Working with carers to support rurally isolated customers</b> on Isles of Scilly  <b>99. Derbyshire Council Healthy Homes</b> targeting private tenants with health issues impacted by the cold  <b>Birmingham Disability Centre</b> reducing energy bills for disabled people with long term illnesses  <b>Wellington Healthy Homes project</b> create model for GP Practices to provide preventative healthcare support for patients suffering health impacts of cold homes	219 customers supported saving £400k a year  81 customers supported saving £46k a year  140 customers supported saving £47k a year  508 customers supported saving £75k a year  95 customers supported saving £13k a year
	Workshops	£5k	100. <b>NEW: Stronger Together Workshop</b> - first joint-utilities fuel poverty event in South Wales (150 stakeholders)	Co-ordinated approaches between WPD, gas and water utilities to tackle fuel poverty. Promoted PSR referral and identified new partners
	Partnerships	£14k	101. <b>NEW: Renewed British Red Cross welfare support.</b> New agreement to extend this to GTC (UK's largest Independent Network Operator)	23 WPD call outs in 2016/17 assisted 126 vulnerable customers Enable GTC customers to receive welfare support
	Collaboration/ best practice	£7k	102- <b>NEW: Bespoke training sessions for Contact Centre staff</b> via MIND, Dementia UK and Hijinx Theatre Group	156 staff trained to help identify vulnerability and tailor our advice/support, leading to 9.13/10 overall customer satisfaction. 9.13/10 satisfaction with PSR calls
	Accreditation	£1k	105. <b>Action on Hearing Loss deaf awareness charter mark</b>	Ensure services are accessible and improvements identified
Collaboration/ best practice	-	106. <b>16 industry working group meetings</b> on vulnerability	Collaborated on common needs codes, data sharing and share best practice	
Survey	£20k	107. <b>971 vulnerable customers surveyed</b>	Identified service improvements & track satisfaction. PSR data cleanse: 9.13/10 (highest ever). Fuel poverty referral schemes: 9.00/10 (highest ever)	
Collaboration/ best practice	£2k	108. <b>NEW: Sign language pop up feature</b> added to the six most commonly viewed WPD videos online	Ensure key advice is accessible for deaf and hard of hearing customers	
Campaign/ promotion	£11k	109. <b>NEW: 250k pharmacy bags promoting our PSR</b> and the 105 number distributed across the region	Post-campaign survey with pharmacies found 97% will recommend PSR to their customers. 100% recognised the 105 emergency number (3% before)	
Smart Networks, Connections...	Workshops	£300k	110. <b>NEW: Future energy scenarios completed for South West &amp; South Wales.</b> East & West Mid's due late 2017	Allow us to assess network constraints, impacts on new connections and most cost-effective options for reinforcement/investment
	Collaboration/ best practice	-	111. <b>NEW: Regional Development Plan for the South West published</b> working with National Grid Electricity Transmission (NGET)	Closer coordination with the transmission system operator to enable a quicker and smoother transition to a Distribution System Operator (DSO) and enable quicker and easier customer connections. 2GW of capacity released via 571 smart connections
	Collaboration/ best practice	-	112. <b>NEW: Developed DSO operability framework</b> for interactions with NGET	
	Workshops	-	113- <b>114. Consulted on future networks strategy</b> eg. Smart Energy Marketplace & Plymouth Manufacturing Group events	Presented on the transition to Distribution System Operator, refining our plans via feedback from over 4,000 stakeholders
	Collaboration/ best practice	-	115. <b>NEW: TSO (Transmission System Operator)-DSO project launched</b> with engagement via the Energy Networks Association	Ensure that the industry is discussing and resolving issues to enable better TSO/DSO interaction. Fulfil expectations of stakeholders who expect WPD to play a leading role in these discussions
	Workshops	£40k	116. <b>NEW: Interactive online capacity map</b> launched	Improved access to key information for potential connections customers to more easily assess feasibility of proposed schemes, including reviewing Statement of Works offers from NGET. 3,261 hits in first three months
Workshops	-	117. <b>NEW: Average connection cost calculator online tool</b>	Provides early indication of timescales and costs without a full quotation	

With	Source	Cost	Action as a result	Benefit
...Distributed Generation, Innovation, Community Energy & Major Energy Users	Customer Panel	-	<b>118. NEW: Introduced Key Account Managers for major connections customers</b>	Improved connections customer journey, ensuring efficient service, easy access to WPD and prompt resolution of issues
	Customer Panel	-	<b>119. Connections surgeries</b> held at WPD depots for 19 local customers	Provided opportunities for developers to meet with local WPD Network Planners one-on-one to discuss specific schemes
	Workshops	£30k	<b>120. NEW: Hosted nine Community Energy events</b> throughout the UK (603 stakeholders)	Improved customer understanding of the connections process. Share best practice and findings from existing community energy projects
	Collaboration/best practice	-	<b>121. NEW: Community Energy guides</b> on innovation and storage published	Practical guides in non-technical language, for Community Energy groups considering potential schemes
	Collaboration/best practice	£40k	<b>122. NEW: Developing a Community Energy resource pack</b> with Centre for Sustainable Energy	Designed to complement the ENA guides and support groups with little prior knowledge of networks and connections. Includes case studies of completed schemes, timelines and common dos and don'ts
	Collaboration/best practice	£12k	<b>123. NEW: Three Community Energy videos</b> published on smart connections, demand side response & local supply	10,375 hits in the first 3 months helping Community Energy groups to better understand the connections process
	Collaboration/best practice	-	<b>124. NEW: Export Limiting Schemes</b> launched	Facilitates connection of 'behind the meter' generation
	Workshops	-	<b>125. NEW: Capacity Loan trial</b> launched	Allow customers to borrow capacity from other schemes not ready to connect
	Workshops	£21k	<b>126. WPD Distributed Generation Forum</b> (58 stakeholders)	Expert-led sessions to support and inform customers interested in investing in and connecting low carbon technologies, which enables stakeholders to understand and feedback on our improvement plans
	Survey	£15k	<b>127. Distributed Generation survey:</b> 400 surveyed	Identify improvements & measure satisfaction - 8.74/10 (up from 2015/16)
	Survey	£40k	<b>128. Monthly 'major connections' survey:</b> 2,072 surveyed	Identify improvements & measure satisfaction - 8.51/10
	Collaboration/best practice	-	<b>129. NEW: New web tool for coordinating rebooking of smart meter installs</b> launched	Close working with suppliers to ensure a consistent, smoother installation process for customers
	Workshops	-	<b>130. Annual Balancing Act conference</b> (155 stakeholders)	Share learning from our portfolio of innovation projects
	Emergency response & Network security	Collaboration/best practice	-	<b>131. NEW: WPD Electric Vehicle policy</b> shared with industry
Workshops		£10k	<b>132. NEW: 10k Business Continuity Fund</b> launched	Help businesses to plan for power cuts via Local Resilience Forums
Workshops		£45k	<b>133. Small business (SME) resilience booklet</b> rolled-out	Support 50,000 SME's to develop power cut emergency resilience plans
Partnerships		-	<b>134. Seven formal agreements in place with Local Resilience Forums (LRF)</b> and attendance at all meetings	Meetings with various LRFs have helped to improve emergency response preparedness and processes in place to support customers
Partnerships		-	<b>135. NEW: 'Potential incident impact reports' rolled out</b> company-wide to assist GDNs during a gas outages	Quicker identification of locations of vulnerable customers on non-electricity area-wide incidents, so GDNs can prioritise them for first response
Partnerships		£30k	<b>136. National Caterers Association agreement</b> renewed	24/7 availability of hot food/drinks for customers off supply during storms
Partnerships		£33k	<b>137. 2,500 crisis packs</b> distributed	Practical support for vulnerable customers. Now distributed via WPD field staff
Partnerships		-	<b>138. South Wales and Mid &amp; West Wales Fire Service partnerships</b> to promote PSR & resilience advice	1,097 customers referred by WPD to receive a home fire safety check
Workshops		£58k	<b>139. NEW: Installing 250 in-home plug in devices</b> to notify WPD of a power cut affecting vulnerable customers	Trial 'last gasp' feature of smart meters (ahead of full roll-out) to aid PSR customers. Identify best method for contacting & supporting customers
Other eg. Education, Future customers, Government, Environment & staff		Partnerships	-	<b>140. Over 250 charitable and non-charitable organisations</b> helped including improved environments, wildlife projects, donations, children's education and the PSR
	Partnerships	£260k	<b>141. Expanded School education programme</b> to include energy efficiency, smart networks and PSR	Broadened the range of information provided to over 70,000 children
	Partnerships	-	<b>142. NEW: Community engagement roadshows</b>	Raised awareness to 6,000 customers. Promote the PSR
	Partnerships	-	<b>143. Community Chest</b> initiative ran for the fifth year running offering grants for community buildings	Grants totalling £29k given to 32 eligible applicants for energy saving measures such as roof insulation, LED lighting and double glazing
	Campaign/promotion	£8k	<b>144. NEW: Topic-specific safety awareness campaigns</b>	Warnings and articles aimed at users of fishing and farming equipment, hot air balloons and Pokemon Go, for example. Reached 518,724 via social media
	Collaboration/best practice	-	<b>145. NEW: Smart meters installed</b> across WPD's entire property portfolio	Energy savings of £138.5k achieved since 2015
	Workshops	£20k	<b>146. MP Parliamentary Reception</b> for 70 MPs & stakeholders	56,731 additions to PSR in the 2 months following - 27% increase
	Workshops	£10k	<b>147. Wrote to every MP &amp; MEP in our region</b> (204)	Shared details about WPD's innovation programme and DSO strategy and invite them to engage with us locally
	Survey	-	<b>148. All 6,500 staff attended CEO Roadshow</b> and 2,500 participated in the annual staff survey	Engaged staff about WPD's business plan commitments, stakeholder engagement, vulnerable customers & how their roles contribute to performance
	Campaign/promotion	£6k	<b>149. Apprentice scheme recruitment campaign</b>	Innovative Twitter Q&As with existing staff. 66% increase in applications
<b>TOTAL</b>		<b>£3.9m</b>		

## Areas of compromise

Whilst it is very important that we take action as a result of feedback, this does not mean automatic acceptance of every suggestion. To ensure that our programme has legitimacy and value, we sensibly consider the various options, including the potential benefits and viability/practicality of delivery before we act. Where it isn't possible to take action specifically in the terms requested by stakeholders, we are clear about the reasons why and suggest alternatives to ensure we still act on the feedback, but in a more effective way. For example:

Stakeholder request	Compromise action
1. WPD should not share smart meter data with any third party	WPD will never sell data and will never share it for any purpose other than to aid network operations. However, in order to do so, it will be necessary to share some data with Independent Connections Providers and WPD's contractors. However, data will always be anonymised and aggregated so individuals can't be identified
2. WPD should fully roll out Active Network Management zones (enabling flexible network control) by 2020	Due to the extensive work involved in developing ANM zones, including installation of complex and extensive telemetry on the network, we have committed to accelerate our rollout to 2021 (to 2023) on all networks where needed - ie. in all those with high volumes of local generation connections and resulting network constraints
3. WPD should deliver our 5% Business Carbon Footprint reduction target by 2021 (down from 2023)	The original 2023 target is already very stretching and was agreed after extensive engagement. We will endeavour to achieve this earlier, but will review this commitment after first taking the seven improvement actions stakeholders endorsed at our workshops in January 2017, and report back on the impact in 2018

## Customer Service Excellence (CSE) Standard

The Standard benchmarks WPD across multiple industries. It focuses strongly on the quality and breadth of WPD's stakeholder engagement and the outcomes this leads to for customers. WPD is judged against 57 elements.

WPD is assessed via a two-day audit. Over 100 pieces of evidence are reviewed and services observed first hand. In 2017 this included:

- Contact Centre operations.
- Proactive PSR cleansing.
- Webchat and website updates.
- Interviews with five Customer Panel members.
- Interview with a partner agency from WPD's 'Power Up' fuel poverty schemes.
- Field staff vulnerability training.

As well as interviewing staff from across the organisation, the assessor reviews WPD's stakeholder and consumer vulnerability strategies, and all associated policies, improvement plans and stakeholder engagement findings reports.

The Standard is very challenging and drives year-on-year improvement. While WPD has full compliance in every area, in 2017 we gained two additional 'compliance plus' ratings - for our stakeholder engagement process (the assessor said our events were exceptional and stakeholders genuinely feel their voices are heard) and the quality of our telephony performance (in light of our PSR cleansing and expert empathy training delivered to staff as a result of engagement with organisations like Dementia UK).

This means that for the 2nd consecutive year WPD has maintained its status as the highest scoring organisation in the UK, out of the 237 organisations assessed.

“WPD is notable for having been continuously accredited to the Standard since its inception in 1992. This is a remarkable achievement, reflected in the impressive total of 38 Compliance Plus elements. There are no partially compliant elements.

The quality and extent of the stakeholder workshops, feeding into service development, merit Compliance Plus. Your partnership arrangements are outstanding and merit Compliance Plus also. For example, you work closely with other utility companies to co-ordinate sign ups to the PSR and you fund a number of partners to provide Affordable Warmth fuel poverty advice. It was confirmed strongly on the visit that customers benefit from this joint working.

CSE Assessor, March 2017



Category:	1. Engagement process	2. Culture	3. Information & access	4. Delivery	5. Quality of service
Example element:	1.1.1 In-depth understanding of current and potential customer groups	2.1.1 Corporate commitment to engagement	3.1.1 Availability of information to stakeholders about our full range of services	4.1.1 Challenging standards set for our main services	5.2.5 Promptness with which we act on feedback and resolve issues
Result:	<b>Compliance Plus</b> “WPD has an in-depth understanding of its customers that has enabled it to design and provide services that meet the needs of the full range of customer groups.”	<b>Compliance Plus</b> “WPD’s culture continues to be highly customer-focused with a strong emphasis on team working and the use of customer insight to improve service delivery.”	<b>Compliance Plus</b> “You provide information using a variety of appropriate channels. Your partnership arrangements are outstanding.”	<b>Compliance Plus</b> “WPD has challenging standards, with sound monitoring procedures, that are used to effect continuous improvement.”	<b>Compliance Plus</b> “The ‘First Time Every Time’ commitment continues to reflect the high priority you place on delivering an excellent quality of service.”

## British Standards Institute (BSI): Inclusive Service Provision (BS18477)

The Standard assesses WPD's ability to recognise, respond to and provide inclusive services for customers who may be vulnerable and at a disadvantage when accessing services, as a result of circumstances such as illness, disability or personal trauma. It sets guidelines to help provide a fair, flexible service for all customers equally.

It is an essential annual evaluation for WPD. It deepens our understanding of the dynamic and multi-dimensional nature of consumer vulnerability and helps to identify service improvements. We put forward all key, new projects developed in the last 12 months, for the BSI to objectively scrutinise their effectiveness and inclusivity. A list of the actions we have taken as a result of the Standard are detailed in Part Three, page 4.

A two day audit assessed WPD against 36 elements, reviewing 42 evidence items, including strategies, processes and customer literature. The assessor also interviewed WPD's CEO and senior staff, visited our Contact Centre to see live processes in action and attended a WPD fuel poverty stakeholder consultation event. WPD has held full compliance for four consecutive years.



“The most recent stakeholder engagement and consumer vulnerability strategy planning started in September 2016 by WPD's executive team at the Strategy Conference, followed by a Strategic Planning Review in October. The Business Plan contains 76 objectives of which 17 are related to vulnerable customers. Out of this the Stakeholder Engagement and Social Obligations document was produced which covers: strategy, context, approach, key objectives, measuring success and an action plan. The Customer Panel is held four times per year and acts as the top level “sense check”.

During WPD's 'Working Together' fuel poverty conference a discussion was held with WPD's Chief Executive, during which the commitment and business rationale for vulnerable customer initiatives was demonstrated and reinforced with a clear focus on outcomes for the customer; and the value of the standard and having an independent check reiterated.

BSI Assessor, December 2016

An essential principle of WPD's stakeholder engagement strategy is that engagement is the responsibility of everyone working at WPD. Whilst our programme is centrally co-ordinated by WPD's Stakeholder & Social Obligations Manager, it is delivered locally by staff throughout the business. This is essential to ensuring that stakeholder feedback is heard throughout the business and directly influences every aspect of our operations and decision-making. Our culture all starts with clear leadership and personal involvement from WPD's Chief Executive and Directors:

## Senior management buy-in

As outlined on page 2, WPD's CEO, Robert Symons, personally reviews WPD's strategy and action plan annually. He also leads by example, attending WPD's Customer Panel, Connections Steering Group, DG forum, MP parliamentary reception and WPD's fuel poverty joint-utilities conference. Recognising the vital role our staff play in delivering engagement and acting on feedback, Robert carries out face-to-face roadshows with all 6,500 staff, presenting on stakeholder engagement and our actions to address consumer vulnerability.

A WPD Director now attends every WPD Customer Panel and Connections Steering Group. In 2016/17, they also led bilateral engagement with stakeholders on topics including pensions and safety, and with MPs and the Department of Business, Energy & Industrial Strategy, specifically on WPD's future networks plans and steps we are taking to build a smart network.



WPD's CEO with James Heapey, MP for Wells, at WPD's parliamentary reception, where we engaged 70 stakeholders.



WPD's Operations Director presents to 58 stakeholders at WPD's Distributed Generation forum. A Panel Q&A included WPD's Network Strategy Manager and Networks Services Manager for the S.West.

Engaging stakeholders regularly using their feedback to drive changes in our day-to-day business then falls to everyone working at WPD. For example:

## Local delivery



**Patrick Bates**  
Distribution Manager,  
Chesterfield Mansfield

*I look after all aspects of a network serving 372,267 customers. It's essential I engage*

*with stakeholders regularly to help ensure my team provides the best service possible. In addition to regular, local meetings with councils and developers for example, I facilitate discussions with a wide range of stakeholders at our workshops (see Part Two, page 4), about long-term priorities such as smart networks, as well as local issues. After hearing first-hand the importance placed on vulnerable customers, my staff were the first to pilot vulnerability training (Part Three, page 7), which has since been rolled out to all 4,700 WPD field staff. We've also made changes to the way PSR customers are displayed on our mapping systems to make it easier for my technicians to prioritise customers during power cuts (Part Three, page 7). My number one stakeholders are my 372,267 customers, so every month I analyse customer survey results and comments given for my region, to identify training and process changes needed to improve our local delivery.*



**Rebecca Betty**  
Team Manager, Contact  
Centre South Wales

*Engagement is a key part of my role as it helps me to design the services our*

*customers want. Stakeholders highly value proactive information during power cuts, in a range of easy access formats. This led us to expand our two-way text messaging (see Part Three, page 8), and I've since held discussions with the emergency services and government agencies to enable them to use this during emergencies. Engagement with Action On Hearing Loss led to the introduction of the Next Generation Text service app, for deaf and hard of hearing customers (Part Three, page 8). Contact with Dementia UK led to specialist empathy training for my proactive PSR data cleanse team, leading to our highest satisfaction ever of 9.13/10 (Part three, page 5). I hold discussions regularly with the agencies leading WPD's Power Up fuel poverty schemes, to improve the information we provide to customers and to ensure a smooth referral process (Part Three, page 9). Engagement with local fire and rescue services has also led to new PSR referral agreements.*



**Carl Henshaw** Emergency  
Planning Officer

*I engage with every Local Resilience Forum (LRF) in our area and chair a regional forum for emergency responders.*

*Acting on feedback that we could do more to help businesses during power cuts, I made this a key focus of the six emergency planning surgeries I led in 2017. This led to a number of refinements to WPD's power cut emergency planning guide for 50,000 small businesses (see Part Two, page 9). It also led me to launch a new £10k fund for LRFs to promote power cut continuity planning to their members and the new national 105 emergency number. We've also launched bespoke storm bulletins that we send ahead of anticipated severe weather (Part Two, page 9). Engagement during these emergencies is also essential. In January 2017, I coordinated discussions between WPD's local teams and National Grid Gas to help identify and share data on vulnerable customers, when a major gas fault impacted 2,700 properties in Northamptonshire. I've since overseen the roll-out of a new facility enabling every WPD local network manager to run 'potential PSR impact reports' for any area (Part Three, page 8).*

## Externally reviewed

“ Across WPD, from leaders, managers and front line staff, the commitment to the delivery of customer focused services was clear. Staff, customers and partners all confirmed the importance of customer service is emphasised by leaders at all times, particularly the CEO, who gives a presentation to all 6,500 staff every year and chairs the Customer Panel meetings. Discussions with staff confirmed the universal 'customer first' culture of WPD. **Customer Service Excellence, March 2017** ”

“ Commitment by senior management can be gauged by the readiness to invest in the plan and objectives related to vulnerable customers, with the budget for each action in the plan stated. Extra funding has been provided. The culture has been further embedded as business as usual across the organisation with the topic of vulnerable customers occurring naturally during the interviews on this assessment. New training initiatives continue to be introduced to broaden the understanding of staff members. **BSI, December 2016** ”

# Measuring the impact of engagement

For stakeholder engagement to work effectively you have to embed learning into the process of engagement. At WPD we believe the only way to judge the impact of our engagement is by the quality of outputs it leads to – driving improvements to our service. The way in which we measure that outputs are effective and beneficial, is to seek honest, objective feedback from customers. **28,871 WPD customers were surveyed this year.**

In addition to industry customer satisfaction surveys, which saw 22,399 WPD customers surveyed, we voluntarily commissioned research for all our key customer groups in order to assess the impact of our engagement with them. In 2016/17 this saw us survey a further 6,472 customers, to assess performance and trends, measure the impact of actions taken following engagement and identify areas for further improvement.

As part of this, it is also imperative to test the

effectiveness of our engagement mechanisms themselves. This helps us to ensure we are achieving our strategic objectives to deliver engagement that is inclusive and tailored to the knowledge and interest levels of our stakeholders. We use feedback to understand what stakeholders felt were the most effective methods and techniques to engage them, and use this to inform our ongoing approach.

For instance, by seeking feedback at our annual stakeholder workshops in February 2017,

we identified a clear message from demand connection customers (eg. developers looking to connect new homes and businesses) that from their perspective, our connections engagement had become too focused on the capacity challenges brought by generation connections. Listening to this, in March 2017 we re-ran our East Midlands strategic investment workshop to provide a greater focus on the impact for demand customers.

Below is a summary of every WPD satisfaction survey undertaken in 2016/17, and how they measure the impact of some of the key outputs in our Part Two and Three submissions:

## 1 Overall customer satisfaction

The ultimate objective of our stakeholder engagement programme is to improve the services we provide to our 7.8m customers. In the last year 22,399 WPD customers were surveyed as part of Ofgem's Broad Measure of Customer Satisfaction. This includes surveys specifically relating to:

### 2 Power cuts    3 Connections    4 General enquiries

WPD was the top rated DNO for the 6th consecutive year, while continuing to improve our score year-on-year. Breakdown questions cover every key aspect of the service received, from staff politeness, to the quality of information provided. In addition, in 2016/17 we interrogated 2,780 results including every score below 7/10, in order to identify improvements.

## 5 Stakeholder workshops

270 stakeholders surveyed following our annual events. As well as overall satisfaction, we ask questions such as: whether they had enough opportunity to give feedback (9.9/10), if we covered the right topics (9.8/10), and the standard of facilitation and workshop method (9.7/10).

## 6 Vulnerable customers

971 Priority Service Register customers surveyed following proactive contact from WPD to update their details and to offer advice.

7 WPD fuel poverty referral schemes (surveys of customers who were subsequently referred to a partner agency for fuel poverty support as part of our four Power Up schemes).

8 Small businesses (115 surveyed after receiving WPD's emergency planning help guide).

## 9 Major connections customers

2,072 large connections customers who had a quotation or completed works, but are not covered by the Ofgem Broad Measure of Customer Satisfaction.

## 10 Distributed Generation (DG) customers

400 customers who had a quotation or completed works. Plus attendees at WPD's:

11 DG engagement workshops (58 stakeholders).

## 12 Community energy customers

191 stakeholders surveyed following our six workshop events.

## 13 Webchat satisfaction

2,394 customers surveyed following a webchat interaction with WPD.

Example actions it measures the impact of	More detail
All outputs	Part 1, pg 5
New text message system providing personalised power cut updates	Part 2, pg 9
Increased proactive contact updating customers during incidents	Part 2, pg 9 & Part 3, pg 8
Customer Awareness campaign reaching 7.8m customers	Part 2, pg 9
39 actions including for example: – First company to submit stakeholder-approved data privacy plan for smart metering to Ofgem	Part 2, pg 4-5
Empathy training for contact centre staff from MIND and Dementia UK	Part 3, pg 4
11,776 customers supported via all WPD's fuel poverty schemes. Saving £3m a year	Part 3, pg 9
Resilience advice and support for 50,000 SMEs	Part 2, pg 9
New Key Account Managers introduced for major connections customers	Part 2, pg 5
Active Network Management zone roll-out plan published and accelerated (enabling smart/flexible management of the network)	Part 2, pg 7
Future Energy Scenarios for the growth of DG developed	Part 2, pg 8
Community Energy resource pack developed and online capacity heat maps launched	Part 2, pg 10
Webchat now available 24/7 on every web page	Part 3, pg 4

