

RIIO-ED2 Consumer Vulnerability Guidance Document v1.1

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Related Documents

- RIIO-ED2 Draft Determinations, Core Methodology Document, Chapter 5
- Special Condition 4.6 (Consumer Vulnerability output delivery incentive) of the Electricity Distribution Licence

1. Context

1.1. To ensure that licensees deliver the key vulnerability priorities to protect those whose wellbeing is most at risk during a loss of supply, to help those in, or at risk of, fuel poverty and in supporting those at risk of being left behind by the energy system transition to net zero, we have introduced the Consumer Vulnerability Incentive (ODI-F) and the Annual Vulnerability Report (ODI-R) within RIIO-ED2.

1.2. The purpose of this document is to assist licensees regarding the operation of the Consumer Vulnerability Incentive and to comply the requirement to produce an Annual Vulnerability Report under Special Condition 4.6 of the Electricity Distribution Licence.

1.3. Capitalised terms have the same meaning as stated in Special Condition 1.2 of the Electricity Distribution Licence unless otherwise stated.

1.4. It is the responsibility of each licensee to understand the provisions of this Guidance Document and how those provisions apply to it. This Guidance Document comes into effect on 1 April 2023.

1.5. This document is version 1.1 of the RIIO-ED2 Consumer Vulnerability Guidance Document referred to under Special Condition 4.6 of the Electricity Distribution Licence.

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2. Introduction

2.1. The purpose of this RIIO-ED2 Consumer Vulnerability Guidance Document (the Guidance Document) is to set out guidance in relation to Special Condition 4.6 of the Electricity Distribution Licence, including the reporting requirements and methodologies for:

- the Consumer Vulnerability output delivery incentive (ODI-F); and
- the Annual Vulnerability Report (AVR) reputational output delivery incentive (ODI-R).

2.2. The Consumer Vulnerability output delivery incentive and the AVR ensure that licensees are held accountable for delivering their vulnerability strategies and vulnerability baseline expectations within the RIIO-ED2 price control period (RIIO-ED2) and to incentivise the development of ambitious and best practice initiatives.

2.3. This Guidance Document is intended to help the licensee comply with their licence obligations under Special Condition 4.6, by providing further information to assist the licensee in reporting its performance under the Consumer Vulnerability Incentive alongside the RIIO-ED2 Regulatory Instructions and Guidance (RIGs) and the RIIO-ED2 Regulatory Reporting Pack (RRP). It also provides a template for the structure and content of the AVR to ensure that the licensee's AVR focuses on material matters in relation to support for Domestic Customers in vulnerable situations, is relevant, easy to understand, accurate and, where possible, is comparable across licensees.

Compliance

2.4. licensees are required by Special Condition 4.6 to comply with this document.

2.5. For the avoidance of doubt, this document is subordinate to the licence. This document does not change any definition or obligations contained within the licence and in the event of any ambiguity over the Guidance Document, the licence will take precedence.

2.6. This document in no way relieves affected parties, including licensees, from their responsibility to ensure ongoing compliance with legislation including competition, data protection, environment and consumer protection laws.

Review

2.7. Ofgem may amend this Guidance Document by direction in accordance with Special Condition 4.6.

3. Consumer Vulnerability Incentive

3.1. The Consumer Vulnerability output delivery incentive assesses licensees' performance against targets set against five common outturn performance metrics through an automatic mechanism to determine whether a reward or penalty should be applied. This assessment will assess the performance at the end of the second and fifth regulatory years of RIIO-ED2.

Reporting process and scope

3.2. Licensees are required to report their individual performance in relation to the Consumer Vulnerability Incentive (ODI-F) in accordance with the RIGs. This includes in the format prescribed by the RIIO-ED2 Regulatory Reporting Pack.

3.3. Licensees are required to make their submission through the RRP to be submitted by 31 July in 2025 and 31 July 2028. The sections below include further detail on what is to be reported for each metric within the incentive.

3.4. As part of the incentive, we have introduced a minimum requirements assessment composed of an independent assurance process to provide Ofgem and wider stakeholders with the assurance that licensees' performance scores are comparable and reliable. We set out further detail in relation to this process below.

Consumer Vulnerability Incentive performance metrics

3.5. The Consumer Vulnerability Incentive is based on a set of defined, relevant, quantitative performance metrics with associated targets. The metrics are used to evidence company performance and determine whether any rewards or a penalty should be applied.

3.6. This section sets out further detail on these metrics, including the methodology all licensees must apply when measuring and reporting performance against the metrics within period, including through the RRP and within the AVR.

3.7. There are five metrics against which licensees must report their performance as part of the Consumer Vulnerability output delivery incentive, these are grouped into three sections based on how they are measured, as follows:

- PSR Reach – measured by the proportion of households registered on the license's Priority Services Register (PSR) out of the total eligible in its Distribution Service Area (Metric 1)

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- the value of the services delivered to Domestic Customers in Vulnerable Situations measured through:
 - a) licensees' support of those in, or at risk of, fuel poverty (Metric 2); and
 - b) licensees' support of those at risk of being left behind by the energy system transition to net zero (through low carbon transition services) (Metric 3); and
- the satisfaction of Domestic Customers in Vulnerable Situations with services delivered by their licensee, measured through separate surveys, in relation to licensee's support for them:
 - a) with fuel poverty services (Metric 4); and
 - b) in the energy transition to net zero (through low carbon transition services) (Metric 5).

PSR Reach (Metric 1)

3.8. PSR Reach means the total number of households registered on the licensee's PSR out of the total number of households eligible to be registered in a licensee's Distribution Service Area. This is to be represented as a percentage shown as a decimal (eg 50% is represented as 0.5).

3.9. The PSR Reach must be calculated in accordance with the following formula:

$$\text{PSR Reach} = \frac{\text{Total number of households registered on the PSR}}{\text{Total number of households eligible for registration on the PSR}}$$

3.10. All licensees are required to apply the following principles in the determination of eligible households for the PSR:

- Eligibility is to be based on common, national datasets including data from the Office for National Statistics and Census data, as calculated by the Centre for Sustainable Energy;
- A household which has multiple residents who would independently qualify for registration on the PSR are to be counted once for the purpose of the calculation;¹ and

¹ While this incentive records PSR registrations on a household basis, we expect DNOs to capture the needs of their customers on an individual customer basis in order to provide the most appropriate support.

- The calculation of eligible households will be adaptable to include the best available data, we therefore expect the number of eligible households to change over the course of RIIO-ED2.

3.11. PSR Reach must be calculated in accordance with 3.9 and 3.10 for the final day of the regulatory reporting years for this incentive, 31 March 2025 and 31 March 2028. The total PSR Reach recorded on these dates is to be submitted by each licensee in accordance with the format prescribed in the RIIO-ED2 Regulatory Reporting Pack.

3.12. The independent assurance process for this metric is set out from paragraph 3.30 below.

The value of services delivered to Domestic Customers in Vulnerable Situations (Metrics 2 and 3)

3.13. Services delivered means the contact an individual Domestic Customer in a Vulnerable Situation has had with their licensee or the licensee's partner or contractor where a service has been provided or a job has been completed which is of benefit to the Domestic Customer in a Vulnerable Situation. This should be an individual interaction and should not include mass broadcasts, leaflet drops or awareness campaigns. The service should not fall into any other category within the Broad Measure of Customer Satisfaction or Major Connections incentives, with these two incentives taking precedence over the Consumer Vulnerability output delivery incentive.

3.14. Two metrics measure the value of these services delivered to Domestic Customers in a Vulnerable Situation within the incentive:

- The licensees' support of those in, or at risk of, fuel poverty; and
- The licensees' support those at risk of being left behind by the energy system transition to net zero (through low carbon transition services).

3.15. Value is to be measured using the common Social Value Framework². This tool inputs the number of Domestic Customers in a Vulnerable Situation to whom the licensee has delivered a service and the cost of those services, and takes into account assumptions in

² [Social Value Framework – option to explain further in an appendix or publish the framework files].
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relation to how much of the benefit delivered can be attributed to the service delivered by the licensee (or its representative).

3.16. Licensees are required to report the net present value (NPV) measurement of value cumulatively. In their RRP to be submitted by 31 July 2025, licensees should report the value delivered over Regulatory Years 2023/24 and 2024/25 against their target for the end of the 2024/25 regulatory year. In RRP to be submitted by 31 July 2028, licensees should report the value delivered over all five years Regulatory Years of RIIO-ED2 against the target set for the end of the 2027/28 Regulatory Year.

3.17. The independent assurance process for the two value of services delivered metrics is set out in the paragraphs from 3.30.

Customer Satisfaction Surveys (Metrics 4 and 5)

3.18. The two customer satisfaction surveys within the Consumer Vulnerability output delivery incentive are intended to the experience of Domestic Customers in a Vulnerable Situation of either the fuel poverty or low carbon transition services delivered to them by licensees (or their representatives).

3.19. The scope of the customer satisfaction surveys should cover all contacts of Domestic Customers in a Vulnerable Situation with the licensee or with their partners/contractors, relating to fuel poverty services or low carbon transition services where a service has been provided or a job has been completed.

3.20. The service provided should not fall into any other category within BMCS or Major Connections. Service Delivered should be defined as a service provided directly by a DNO or by one of their contractors or partners which is of direct benefit to the customer. This should be an individual interaction and should not include mass broadcasts, leaflet drops or awareness campaigns.

3.21. Licensees are required to collectively appoint an independent third party service provider, such as a market research company, to undertake the two customer satisfaction surveys on their behalf. The service provider must be appointed by 31 March 2023. An appointment of a service provider should end no sooner than 31 July 2028.

3.22. Licensees can appoint a different service provider within period to undertake the customer satisfaction survey administration. Licensees should make Ofgem aware of any changes to the independent third party and the reasons for the change.

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3.23. The service provider must use the survey script in the RIGs. Any proposed changes to the survey script used by the service provider can be raised by one or all licensees for consideration by Ofgem.

3.24. Licensees must maintain systems, processes and procedures as are reasonably necessary to mitigate the risk of bias in the results of these two customer satisfaction surveys. These systems, processes and procedures must meet the requirements set out in the RIGs.

3.25. The survey must be completed by the customer within 10 days of the service being delivered or job completed.

3.26. Within the relevant customer satisfaction surveys, there are several screening questions and a series of detailed questions asking customers to score their experience on a scale of one to ten. A score of one indicates that a customer is very dissatisfied and a score of ten indicates that the customer is very satisfied.

3.27. The questionnaire for each survey leads up to a question asking, 'Overall, using a scale of 1 to 10, where 1 is very dissatisfied and 10 is very satisfied, taking all aspects of the service from [name of licensee] into account, how satisfied were you with the service provided?'. Whilst all the questions are relevant to customers' quality of service, for the purposes of the Consumer Vulnerability Incentive, Ofgem considers that this question, known as the "killer question", best captures customers' overall experience.

3.28. The scores reported for both surveys for the purpose of the Consumer Vulnerability Incentive will be based on the average customer satisfaction score out of 10 of the customers who actually gave a score for the "killer" question.

3.29. Licensees are required to report the overall "killer question" scores over the 2023/24 and 2024/25 Regulatory Years in the RRP, based on when the service was delivered to the customer, to be submitted by 31 July 2025 in accordance with the following formulas:

Fuel poverty services delivered CSAT

$$= \frac{\text{all killer question scores over 2023/24 and 2024/25}}{\text{number of killer question respondents over 2023/24 and 2024/25}}$$

Low carbon transition services delivered CSAT

$$= \frac{\text{all killer question scores over 2023/24 and 2024/25}}{\text{number of killer question respondents over 2023/24 and 2024/25}}$$

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3.30. Licensees are required to report the average of all “killer question” scores over the 2025/26, 2026/27 and 2027/28 Regulatory Years in the RRP, based on when the service was delivered to the customer, to be submitted by 31 July 2028 accordance with the following formulas:

Fuel poverty services delivered CSAT

$$= \frac{\text{all killer question scores over 2025/26, 2026/27 and 2027/28}}{\text{number of killer question respondents over 2025/26, 2026/27 and 2027/28}}$$

Low carbon transition services delivered CSAT

$$= \frac{\text{all killer question scores over 2025/26, 2026/27 and 2027/28}}{\text{number of killer question respondents over 2025/26, 2026/27 and 2027/28}}$$

3.31. As licensees’ performance data is independently collected using the same method across all licensees, there is no minimum requirement check required.

Minimum requirements

3.32. As part of the Consumer Vulnerability Incentive, we have implemented a minimum requirements process which underpins the incentive. This is to provide assurance to Ofgem and wider stakeholders that licensees’ scores are robust and comparable.

3.33. Licensees are required to collectively appoint a common independent assurance provider(s) to undertake the minimum requirements checks on their behalf by 31 December 2023 and inform Ofgem of the identity of the independent assurance provider(s) as soon as reasonably practicable after confirmation of appointment.

3.34. The independent assurance provider should provide a report to the relevant licensee detailing the outcome of the assurance checks against the criteria set out in relation to each metric in the table below. Where a licensee has not met the criteria set out, the independent assurance provider(s) should supplement the below table with a document which sets out the reasons why the licensee has not met the criteria in question.

3.35. The independent assurance provider(s)’ report is to be provided to Ofgem by each licensee by 31 July 2025 and 31 July 2028 as part of the RRP submission. The assurance report and the licensees’ performance submission through the RRP will be considered by Ofgem together when assessment takes place under the incentive.

3.36. Table 1 below outlines the possible outcomes which would result in passing or failing on the minimum requirement for a particular metric.

Table 1: Possible outcomes as a result of passing or failing the minimum requirements

Overall outcome for metric	Reported performance	Minimum requirement outcome
Licensee eligible for reward in line with reported performance	Reported performance would be eligible for reward	Pass
Licensee receives no reward or penalty	Reported performance would be eligible for reward	Fail
Licensee receives no reward or penalty	Reported performance would be within the deadband	Pass
Licensee receives no reward or penalty	Reported performance would be within the deadband	Fail
Licensee receives penalty in line with reported performance	Reported performance would result in penalty	Pass
Licensee receives penalty in line with reported performance	Reported performance would result in penalty	Fail

3.37. Table 2 below sets out the reporting template for independent assurance provider, including the criteria against which licensees will be assessed through the independent assurance process.

Table 2: Consumer Vulnerability output delivery incentive minimum requirements

Metric	Minimum requirement category	Minimum requirement	Has the criteria been met? (Y/N)
PSR Reach	PSR Reach has been reported in line with the common methodology	Is the PSR Reach actual performance calculated in line with the agreed methodology and data provided by Centre for Sustainable Energy (CSE)?	

		Is the actual performance stated in the reporting template correct and in line with the CSE output?	
	Confirmation that the licensee has attempted to contact 100% of its registered PSR customers to verify their data every 24 months	Has the licensee attempted to cleanse 100% of its PSR records every 24 months?	
Value of services delivered (Fuel Poverty)	Assurance that performance against the targets have been calculated and reported in line with the common methodology	Is the £NPV value calculated in line with the SROI Rule Book and in line with the In Scope Definition?	
		Has the £NPV been fully assured?	
Value of services delivered (Low carbon transition)	1.1. Assurance that performance against the targets has been calculated and reported in line with the common methodology	Is the £NPV value calculated in line with the SROI Rule Book and in line with the In Scope Definition?	
		Has the £NPV been fully assured?	

4. Annual Vulnerability Report (ODI-R)

4.1. Special Condition 4.6 of the electricity distribution licence requires each licensee to prepare an AVR in accordance with this Guidance Document and make the AVR readily accessible to the public from its website. The report should set out what has been achieved during the preceding Regulatory Year.

4.2. The AVR will ensure each licensee is accountable on a yearly basis for implementing its RIIO-ED2 vulnerability strategy commitments and meeting the vulnerability baseline expectations.

4.3. In the AVR, licensees are required include the following information in the format included in the template set out in this section.

- Annual progress against Consumer Vulnerability Incentive performance metric targets;
- Regularly reported evidence (RRE) – additional quantitative information considered important inputs;
- Detail of how the licensee has used the Social Value Framework within its business, including in its decision making and prioritisation of vulnerability support services;
- An update on the progress made on the licensee's specific RIIO-ED2 vulnerability strategy commitments as submitted in its RIIO-ED2 Business Plan, and any additional activities it has undertaken in addition; and
- The plans licensees have in place for supporting customers in vulnerable situations over the winter period in the event of a loss of supply.

AVR General instructions and requirements

Report type and availability

4.4. The licensees are required to produce the AVR as a single document that should be no longer than [X] pages [to be confirmed once AVR section on winter preparedness is decided].

4.5. Where a corporate group covers multiple licensees, a single AVR should be published for the group.

Scope of the AVR

4.6. The AVR should provide stakeholders with an overview of the licensee's support services delivered for Domestic Customers in Vulnerable Situations. This should include reporting on progress implementing the licensee's vulnerability strategy commitments, and vulnerability targets, where applicable.

4.7. The structure, content and performance measures described in this Guidance should be the basis for the licensee's AVR. This Guidance sets out the broad scope of the AVR. There may be instances where the licensee may make enhancements to its AVR where it considers that it is appropriate to do so.

4.8. Where a licensee makes an enhancement for an aspect of their AVR that relates solely to their activities, we expect the licensee to explain the change in reporting, figures and/or parameters used. If the development or change is applicable to other licensees, then we expect the licensees to work together at a sector level to determine the appropriate consistent reporting practice so that this Guidance Document can be amended.

Annual Vulnerability Report structure

4.9. This section sets out a template for the structure that should form the basis of the licensees' AVR.

Introduction

4.10. In this section, licensees should provide a short introduction to the AVR which summarises the licensee's role in protecting and supporting Domestic Customers in Vulnerable Situations, provide an overview of its consumer vulnerability strategy and highlights the key vulnerability issues prevalent in the licensee's Distribution Services Area. This section should be no more than two pages.

Consumer Vulnerability targets progress

4.11. Each licensee must include a section covering its performance against the metric targets as part of the Consumer Vulnerability Incentive. The licensee should include information in relation to all metrics listed below in a table with the same column and row headings to that which is set out below.

Table 3: Consumer Vulnerability Incentive – ongoing performance

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Metric	Year 1	Year 2	Year 2 target	Year 3	Year 4	Year 5	Year 5 target
PSR Reach			<i>Bespoke target</i>				<i>Bespoke target</i>
Value of services delivered (Fuel Poverty) (NPV)			<i>Bespoke target</i>				<i>Bespoke target</i>
Value of services delivered (Low carbon transition) (NPV)			<i>Bespoke target</i>				<i>Bespoke target</i>
Customer satisfaction - fuel poverty services delivered			<i>[9/10]</i>				<i>[9/10]</i>
Customer satisfaction – low carbon transition services delivered			<i>[9/10]</i>				<i>[9/10]</i>

4.12. Each licensee should input its bespoke PSR Reach targets in the 'Year 2 target' and 'Year 5 target' columns.

4.13. Each licensee should input its bespoke targets associated with the value of services delivered in relation to fuel poverty and supporting customers in the low carbon transition. These should reflect the targets set out in Special Condition 4.6.

4.14. Each licensee should include the common baseline target for the customer satisfaction metrics, in accordance with the targets set out in Special Condition 4.6

Regularly Reported Evidence

4.15. Each licensee must include a section covering its performance in relation to the Regularly Reported Evidence (RRE) set out in the table below. The licensee should include this information in a table with the same column and row headings to that which is set out below.

Table 4: Regularly Reported Evidence table

RRE	Expectation	Year 1	Year 2	Year 3	Year 4	Year 5
Frequency of PSR Customer data cleanse	All customers' data cleansed every 24 months					
CSS score for PSR Customers who have experienced a power cut	[CSS baseline]					
The volume of fuel poverty services delivered	n/a					
The volume of low carbon transition services delivered	n/a					

4.16. In line with Principle 1 of the vulnerability baseline expectations,³ licensees should demonstrate the maintenance of their PSR databases through evidencing in the table the frequency of PSR customer data cleanse process.

4.17. A core part of a licensees' role in protecting and supporting customers in vulnerable situations is in ensuring those who may be vulnerable during a loss of supply are protected and receive the appropriate support. As part of this report, we require licensees to report the satisfaction survey results of PSR customers who have experienced a power interruption. This should be reported in the table as an annual score.

4.18. Each licensee should report the volume of services delivered through the RRE report element of the AVR. The volume of services should be derived in accordance with 2.14 and 2.15 of this document. licensees should report this on a cumulative basis year on year, showing the total volumes of services delivered over the course of the price control, building up to a total figure for RII0-ED2 at the time of reporting for Year 5.

Social Value Framework utilisation

4.19. A key element of the Consumer Vulnerability Incentive is the performance metrics which measure the value of the services delivered by the licensee to Domestic Customers in Vulnerable Situations who may be in, or at risk of, fuel poverty and those who receive services to support those at risk of being left behind by the energy system transition to net zero.

4.20. To calculate value delivered, represented by Net Present Value (NPV), licensees are required to use the common Social Value Framework. The licensees have used this framework to forecast how they expect to deliver value to Domestic Customers in Vulnerable Situations through the activities outlined in their vulnerability strategies.

4.21. The outputs of using this tool can provide insights into the programmes of work which are working well, those that can be improved and those that possibly are not delivering enough value to continue being delivered.

³ [RIIO-ED2 Sector Specific Methodology Decision](#), Annex 1 – Appendix 3
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4.22. In this section of the AVR, licensees should set out, over no more than three pages, how the Social Value Framework has been used within the licensee Group in the Regulatory Year preceding the AVR submission, highlighting:

- How it has been used in senior-level decision making; and
- How it has been used to prioritise vulnerability support services.

Progress in delivering vulnerability strategy commitments

4.23. The licensee must include a table listing all its bespoke RIIO-ED2 vulnerability strategy commitments ie the key programmes of activity included in its strategy.

4.24. The table should set out for each vulnerability strategy commitment:

- A short description of the commitment eg deliver target support to X,000 fuel poor customers over RIIO-ED2;
- A one sentence summary of the expected benefit or outcome;
- The activities involved in implementing the commitment over RIIO-ED2 eg deliver income maximisation advice to [number of customers] with trusted partner X;
- A red/amber/green status indicator on progress against the implementation milestones of activities against the licensee's end of RIIO-ED2 target as set out in its RIIO-ED2 Business Plan, where:
 - Red indicates progress against a milestone that is at significant risk and highly likely to be missed;
 - Amber indicates progress is delayed but is likely to be achievable before the end of the RIIO-ED2; and
 - Green indicates progress against the milestone is on track; and
- A brief explanation for any amber or red indicators.

4.25. The length of this section should be no longer than 3 pages.

Vulnerability strategy commitment	Description	Expected outcome/benefit	Key milestones for implementing commitment	RAG status	Status update
Strategy commitment	Two to four sentence description		Milestone		
			Milestone		
			Milestone		

Plans for effectively supporting Domestic Customers in Vulnerable Situations during winter periods

4.26. We consider that having robust plans in place to ensure all Customers, particularly Domestic Customers in Vulnerable Situations, are supported in the event that they are affected by a power cut is an important part of the licensees' role.

4.27. In our review into the network's response to Storm Arwen, we found that most licensees rolled out their planned winter preparedness plans, including campaigns to their PSR customers. We consider that there is an enduring role for licensees to submit elements of their plans on winter preparedness to us each year.

4.28. In this section of the AVR, licensees are required to submit the following information:

4.29. [to be confirmed at Final Determinations].