

## RIIO-ED2 Consumer Vulnerability Guidance Document v0.2

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## **Related Documents**

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

## Contents

<b>RIIO-ED2 Consumer Vulnerability Guidance Document v0.1 .....</b>	<b>1</b>
<b>Related Documents .....</b>	<b>2</b>
<b>1. Introduction .....</b>	<b>5</b>
Compliance .....	6
Review .....	6
<b>2. Consumer Vulnerability Incentive (ODI-F) .....</b>	<b>7</b>
Reporting process and scope .....	7
Consumer Vulnerability Incentive performance metrics .....	7
PSR Reach .....	8
The social value of Fuel Poverty Services Delivered and the social value of Low Carbon Transition Services Delivered.....	9
Fuel Poverty Customer Satisfaction Survey and Low Carbon Transition Customer Satisfaction Survey .....	10
<b>3. Minimum requirements .....</b>	<b>17</b>
<b>4. Annual Vulnerability Report (ODI-R).....</b>	<b>22</b>
AVR General instructions and requirements.....	22
Report type and availability .....	22
Scope of the AVR .....	23
Annual Vulnerability Report structure .....	23
Introduction .....	24
CV ODI-F targets progress .....	24
Regularly Reported Evidence .....	25
Social Value Framework utilisation .....	27
Progress in delivering vulnerability strategy commitments .....	28
Plans for effectively supporting Domestic Customers in Vulnerable Situations during winter periods .....	29
<b>Appendix 1 – Vulnerability principles and baseline expectations .....</b>	<b>31</b>
<b>Appendix 2 – Fuel Poverty Customer Satisfaction Survey script.....</b>	<b>34</b>
<b>Appendix 3 – Low Carbon Transition Customer Satisfaction Survey script ..</b>	<b>35</b>

## 1. Introduction

1.1. To ensure that Distribution Network Operators ('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 (CV ODI-F) and the Annual Vulnerability Report (ODI-R) within RIIO-ED2.<sup>1</sup>

1.2. The purpose of the RIIO-ED Consumer Vulnerability Guidance Document (the "Guidance") 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).

1.3. The CV ODI-F and the AVR ensure that licensees are held accountable for delivering their vulnerability strategies and vulnerability principles and baseline expectations within the RIIO-ED2 price control period ('RIIO-ED2') and to incentivise the development of efficient, ambitious and best practice initiatives. Appendix 1 outlines the consumer vulnerability principles and baseline expectations.

1.4. This Guidance is intended to help the licensee comply with its licence obligations under Special Condition 4.6, by providing further information to assist the licensee in reporting its performance under the CV ODI-F 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 a Vulnerable Situation, is relevant, easy to understand, accurate and, where possible, is comparable across licensees.

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

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<sup>1</sup> References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work.

1.6. Where the Guidance refers to the 'licensee', this also includes any Representative acting on behalf of the licensee.

1.7. This document is version 1.0 of the RIIO-ED2 Consumer Vulnerability Guidance Document referred to under Special Condition 4.6 of the Electricity Distribution Licence.<sup>2</sup>

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

## **Compliance**

1.9. Licensees are required by Special Condition 4.6 to comply with this document.

1.10. 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.

1.11. 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**

1.12. Ofgem may amend this Guidance by direction in accordance with paragraph 4.6.21 of Special Condition 4.6.

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<sup>2</sup> RIIO stands for Revenue = Incentives + Innovation + Outputs.

## 2. Consumer Vulnerability Incentive (ODI-F)

2.1. The CV ODI-F assesses licensees' performance against targets set under five common outturn performance metrics. It uses an automatic mechanism to determine whether a reward or penalty should be applied. Licensee's performance against the five metrics will be assessed at the end of the second and fifth Regulatory Years of RIIO-ED2.

### Reporting process and scope

2.2. Licensees are required to report their individual performance in relation to the Consumer Vulnerability Incentive (ODI-F) in accordance with the RIGs.

2.3. Licensees are required to make their submission through the RIGs 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.

2.4. As part of the incentive, we have introduced a minimum requirements assessment which uses an independent assurance process to provide Ofgem and wider stakeholders with 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

2.5. The CV ODI-F is based on a set of defined, relevant, quantitative performance metrics which have their own target. The metrics are used to evidence licensees performance and determine whether any rewards or a penalty should be applied.

2.6. This section sets out further detail on the metrics, including the methodology all licensees must apply when measuring and reporting performance against the metrics within RIIO-ED2, including through the RRP and within the AVR.

2.7. The five metrics which licensees must report their performance against as part of the CV ODI-F are:

- PSR Reach
- The social value of Fuel Poverty Services Delivered
- The social value of Low Carbon Transition Services Delivered
- the satisfaction of Domestic Customers in Vulnerable Situations with Fuel Poverty Services Delivered (the Fuel Poverty Customer Satisfaction Survey)

- the satisfaction of Domestic Customers in Vulnerable situations with Low Carbon Transition Services Delivered (the Low Carbon Transition Customer Satisfaction Survey).

## **PSR Reach**

2.8. PSR Reach means the total number of households registered on the licensee's Priority Services Register (PSR) out of the total number of households in the licensee's Distribution Services Area that are eligible to be registered in accordance with the criteria set out in this Guidance. This is to be represented as a ratio.

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

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

2.10. 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 for licensees using the PSR household methodology;
- 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;<sup>3</sup> and
- The result of the calculation of eligible households will be fixed for the RIIO-ED2 period and licensees are to inform Ofgem of the total number of households eligible for registration on the PSR in its Distribution Services Area as of 1 April 2023 in order to set the denominator of the fraction within the formula in paragraph 3.9.<sup>45</sup>

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<sup>3</sup> 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.

<sup>4</sup> This figure should be communicated to Ofgem once calculated by the licensee and reported within its AVR as discussed in Chapter 4.

<sup>5</sup> While the number of households eligible to be registered on a licensee's PSR is fixed within the calculation for the purpose of CV ODI-F, we expect licensees to continue to maintain practices and procedures to identify Domestic Customers who may be eligible for the PSR in line with its obligations under SLC 10 (Special Services).



2.11. PSR Reach must be calculated in accordance with 2.9 and 2.10 above as at 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.

2.12. The independent assurance process for this metric is set out in the minimum requirements chapter below.

### **The social value of Fuel Poverty Services Delivered and the social value of Low Carbon Transition Services Delivered**

2.13. There are two metrics within the CV ODI-F which assess the social value of the services licensees deliver to Domestic Customers in Vulnerable Situations over RIIO-ED2; one relating to Fuel Poverty Services Delivered and the other to Low Carbon Transition Services Delivered.<sup>67</sup>

2.14. The contact measured by these two metrics should be an individual interaction and must not include large scale messaging such as, but not restricted to, mass broadcasts, leaflet drops or awareness campaigns. The service should not fall into any other category within the Broad Measure of Customer Satisfaction ('BMCS'), Major Connections or Distribution Operation System output delivery incentives, unless the service delivered goes beyond what is measured and assessed through these incentives – for example, support provided to a customer in a Vulnerable Situation beyond the delivery of a connection.

2.15. Value is to be measured using the common Social Value Framework.<sup>8</sup> The framework makes assumptions in order to quantify the level of benefits achieved through licensee's delivery of services to support Domestic Customers in a Vulnerable Situation. The aim of the framework is to provide a fair and comparable measure of value across licensees. It is

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<sup>6</sup> Fuel Poverty Services Delivered has the meaning given to that term in the licence: means the 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.

<sup>7</sup> Low Carbon Transition Services Delivered has the meaning given to that term in the licence: 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 in enabling participation in a net zero energy system.

<sup>8</sup> The Social Value Framework utilises a commonly followed 'Rulebook' to ensure that each licensee calculates NPV in a comparable and consistent way.

recognised that the framework does not produce values which are completely accurate, nor is it expected to be completely accurate.

2.16. This framework 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 relation to how much of the benefit delivered can be attributed to the service delivered by the licensee (or its Representative).

2.17. Licensees are required to report the net present value ('NPV') measurement of value cumulatively. By 31 July 2025, licensees should report the value delivered over Regulatory Years 2023/24 and 2024/25 against its target for the end of the 2024/25 Regulatory Year. By 31 July 2028, licensees should report the value delivered over all five years Regulatory Years of RIIO-ED2 (from 1 April 2023 to 31 March 2028) against the target set for the end of the 2027/28 Regulatory Year.

2.18. The independent assurance process for the two value of services delivered metrics is set out in the minimum requirements chapter below.

### **Fuel Poverty Customer Satisfaction Survey and Low Carbon Transition Customer Satisfaction Survey**

2.19. There are two metrics within the CV ODI-F which assess customers' satisfaction with the services licensees deliver to Domestic Customers in Vulnerable Situations over RIIO-ED2. They are the Fuel Poverty Customer Satisfaction Survey and the other to Low Carbon Transition Customer Satisfaction Survey.<sup>910</sup>

2.20. The customer satisfaction measured by each of the surveys should be in relation to an individual interaction and must not include large scale messaging for example mass broadcasts, leaflet drops or awareness campaigns. The service should not fall into any other category within the Broad Measure of Customer Satisfaction ('BMCS'), Major Connections or Distribution Operation System output delivery incentives, unless the service delivered goes beyond what is measured and assessed through these incentives – for example, support

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<sup>9</sup> Fuel Poverty Customer Satisfaction Survey has the meaning given to that term in the licence: means the survey used to measure the satisfaction of Domestic Customers in Vulnerable Situations with the Fuel Poverty Service Delivered by the licensee.

<sup>10</sup> Low Carbon Customer Satisfaction Survey has the meaning given to that term in the licence: means the the survey used to measure the satisfaction of Domestic Customers in Vulnerable Situations with the Low Carbon Transition Services Delivered by the licensee.

provided to a Domestic Customer in a Vulnerable Situation beyond the delivery of a connection.

### *Calculating the results of the surveys*

2.21. The questionnaire for each survey has several screening questions and leads up to a question asking, 'Overall, using a scale of one to ten, where one is very dissatisfied and ten 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 CV ODI-F, Ofgem considers that this question, known as the "killer question", best captures customers' overall experience.

2.22. The scores to be reported for each survey will be based on the average customer satisfaction score, out of ten, from the customers who actually gave a score for the "killer" question. The licensee's performance against the killer questions for each survey, will be aggregated and averaged to produce the licensee's final score.

2.23. The annual scores will be based on the annual average customer satisfaction. The denominator should be the number of people who gave a score for the killer question.

2.24. For the purposes of calculating the results, all completed surveys must be included in the sample. If a respondent terminates the interview before completing the survey, the interview will be kept in the sample if the respondent has terminated after they answered the killer question. If a respondent terminates the interview before the killer question has been answered, the interview will not be kept in the sample.

2.25. Where the independent third party identifies cases submitted and interviewed under the wrong service type or cases that have been duplicated (different phone numbers so not de-deduped); then these surveys will be ineligible and must be removed from the calculation of the final score. Additionally, surveys must be removed from the calculation of the final score in the following call scenarios:

- If the interviewer misleads the customer.
- Where the customer is confused and unable to adequately complete the survey.
- Where there is a language barrier and the customer is unable to complete the survey.

- Where it is clear there is confusion between third party connection providers, suppliers, meter operators or installers.
- Where there is evidence of discrimination.

2.26. Where a survey is found to be eligible for removal under the scenarios described above, the independent third party will inform the affected licensee and contact Ofgem for final approval to remove the survey. If required, the independent third party may also provide the call recording for the case as further evidence.

2.27. Licensees are required to report the average of all “killer question” scores received during the 2023/24 and 2024/25 Regulatory Years in the RRP to be submitted by 31 July 2025. Those scores should be calculated in accordance with the following formulas:

$$\begin{aligned} &\text{Fuel poverty services delivered CSAT} \\ &= \frac{\text{sum of all killer question scores over 2023/24 and 2024/25}}{\text{number of killer question respondents over 2023/24 and 2024/25}} \end{aligned}$$

$$\begin{aligned} &\text{Low carbon transition services delivered CSAT} \\ &= \frac{\text{sum of all killer question scores over 2023/24 and 2024/25}}{\text{number of killer question respondents over 2023/24 and 2024/25}} \end{aligned}$$

2.28. Licensees are required to report the average of all “killer question” scores received during the 2025/26, 2026/27 and 2027/28 Regulatory Years in the RRP to be submitted by 31 July 2028. Those scores should be calculated in accordance with the following formulas:

$$\begin{aligned} &\text{Fuel poverty services delivered CSAT} \\ &= \frac{\text{sum of all killer question scores over 2025/26, 2026/27 and 2027/28}}{\text{number of killer question respondents over 2025/26, 2026/27 and 2027/28}} \end{aligned}$$

$$\begin{aligned} &\text{Low carbon transition services delivered CSAT} \\ &= \frac{\text{sum of all killer question scores over 2025/26, 2026/27 and 2027/28}}{\text{number of killer question respondents over 2025/26, 2026/27 and 2027/28}} \end{aligned}$$

2.29. As licensees’ performance data should be independently collected using the same method across all licensees, there is no minimum requirement check required as part of the assessment of performance within the CV ODI-F for the two survey metrics.

*Form of the customer satisfaction surveys*

2.30. Licensees are required to appoint an independent third party service provider, such as a market research company, to conduct the two customer satisfaction surveys on their behalf. The same independent third party must be appointed by all licensees. The independent third party service provider must be appointed by 1 April 2023 for a period lasting until at least 31 July 2028.

2.31. However, licensees can decide to replace an appointed independent service provider during RIIO-ED2 to conduct the customer satisfaction surveys, if all licensees collectively agree to do so. Licensees should make Ofgem aware of any changes to the independent third party and the reasons for the change.

2.32. The service provider must use the full survey scripts set out in Appendix 2 and 3 of this Guidance. Any proposed changes to the survey scripts must be agreed with Ofgem and all licensees. Amendments to the survey script in Appendix 2 and 3 do not constitute a modification to the Guidance.

2.33. Each licensee must satisfy itself that it is undertaking the customer satisfaction surveys in compliance with relevant data protection and other information legislation.

#### *Procedures to mitigate the risk of bias*

2.34. Licensees must maintain systems, processes and procedures as are reasonably necessary to mitigate the risk of bias in the results of the two customer satisfaction surveys. These systems, processes and procedures must include, but not be limited to, systems, processes and procedures that meet the requirements specified below:

- The licensee must not gather or process customer data in a manner that could reasonably be expected to bias the results of the survey.
- If a licensee wishes to contact customers to confirm whether or not they would like to participate in the Fuel Poverty Customer Satisfaction Survey or the Low Carbon Transition Customer Satisfaction Survey, the licensee must attempt to contact the entirety of the population for the relevant service type in that respect prior to providing the required data to the independent third party. Licensees must not use such contacts selectively for certain service types (but not others) in a way that the licensee could reasonably judge might affect the results of either surveys within the CV ODI-F.

- The licensee (and the independent third party) must not use any financial or non-financial incentives to encourage customers to take part in the customer satisfaction survey.

#### *Data administration*

2.35. For each customer included in the sample, the licensee must provide the independent third party with:

- the licensee's name that the customer will recognise
- the type of service delivered; a Fuel Poverty Service Delivered or a Low Carbon Transition Service Delivered
- the date the service provided was completed
- a contact telephone number (where known)
- any additional telephone numbers (where known) and
- the customer's name (where known).

2.36. Other information such as customer name, customer address and additional contact telephone number are optional.

2.37. Each licensee must submit the specified data to the independent third party on a weekly basis. For this purpose, the 'week' begins on a Monday and the data should be submitted to the independent third party by 4pm on the second working day following the week concerned.

2.38. The specified data for any customer who has had a Fuel Poverty Service Delivered or a Low Carbon Transition Service Delivered must be sent to the independent third party the week after completion of the relevant work or delivery of the relevant quotation.

2.39. The independent third party must undertake its interviews within ten working days of the service being delivered to the Domestic Customer.

2.40. Once the ten day timeframe for contact has expired, the sample data will be returned to the licensee highlighting the details of those customers who have been contacted and

surveyed, and those who have been contacted and have asked not to be contacted in the future for licensee customer surveying activities.

*Sample selection and frequency of the surveys*

2.41. From the data provided by the licensee, the appointed independent third party is required to remove those customers that have previously been surveyed as part of either survey within one month. This will be applied on a licenced area basis, for example, if the same customer has received a Fuel Poverty Service Delivered or Low Carbon Transition Service Delivered from two licensee areas within the same licensee group then they could be surveyed for both.

2.42. The determination of which customers should be removed will be based on the individual receiving the service. Where two individuals from the same company receive a service then both would be surveyed.

2.43. In instances where the same customer appears in more than one service type in any given week, the independent third party should ensure that the customer is surveyed no more than once in total and that the customer is only surveyed in relation to the service category with the smallest number of records if selected to be surveyed.

2.44. The independent third party should then select the customers to interview at random. The independent third party should complete enough interviews to deliver a statistically robust sample of responses.

2.45. Results should be calculated based on the number of interviews completed.

*Statistical robustness process*

2.46. There will be a statistical robustness check of the licensee's surveyed population, to ensure that any penalties incurred through the CV ODI-F are based on a statistically robust sample.

2.47. The statistical robustness check will apply to the full years in which licensee's performance is assessed, taking account to the number of surveys undertaken and the size of the eligible population. The margin of error and confidence level used to determine statistical robustness check will be set at 5% and 95% respectively.

2.48. Table 1 provides indicative numbers of surveys that need to be undertaken each year, for different population sizes, to determine the appropriate sample size at error rates of 5% at a 95% confidence level.

**Table 1: Indicative survey numbers based on 95% confidence level**

Size of population	Margin of error at 5%
100	81
500	201
1000	278
2000	322
3000	341
4000	351
5000	357
6000	361
7000	364
8000	367
9000	368
10000	370

2.49. Where the margin of error is less than or equal to 5%, and the score is less than the target, the penalty will be triggered for the relevant licensee in accordance with Special Condition 4.6.

2.50. If the margin of error is higher than 5%, no financial penalty will be applied irrespective of the survey score.

2.51. See Table 2 below, which demonstrates the thresholds against which the penalty will be determined.

**Table 2: Penalty determination**

Margin of error	<5%	>5%
If licensee performance is less than target	Penalty	No penalty
If licensee performance is greater than target	No penalty	No penalty



### 3. Minimum requirements

3.1. As part of the CV ODI-F and AVR, we have implemented a minimum requirements process which underpins the incentives. This is to provide assurance to Ofgem and wider stakeholders that licensees' scores are robust and comparable.

3.2. All 14 licensees are required to collectively appoint a common independent assurance provider to undertake the minimum requirements checks on their behalf. Licensees must appoint the independent assurance provider by 31 December 2023 and inform Ofgem as soon as reasonably practicable after confirmation of appointment. Licensees may decide to collectively appoint different independent assurance providers for different metrics.

3.3. The independent assurance provider should provide each licensed network operator with a report for each of its Distribution Services Areas detailing the outcome of their assurance check against the criteria set out in relation to the relevant metric. The criteria for each of the five metrics is set out in Table 3 below. Where a licensee has not met the criteria the independent assurance provider should supplement the information shown in Table 3 below with a document which sets out the reasons why the licensee has not met the criteria in question.

3.4. Table 3 below sets out the reporting template for the independent assurance provider, including the criteria against which licensees will be assessed through the independent assurance process.

3.5. The process the independent assurance provider follows when assessing performance annually under the AVR assurance, the assurance for the CV ODI-F assessment for year two and the CV ODI-F assessment for year 5 of RIIO-ED2 is set out below in Tables 5, 6 and 7 respectively.

#### **Minimum requirements for the CV ODI-F**

3.6. For the CV ODI-F, each licensee must provide Ofgem with their independent assurance providers' report 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 when assessing licensee's performance under the incentive.

3.7. Licensees are required to meet all relevant criteria for a particular metric in order to obtain any reward in relation to performance associated with that metric. Table 4 below

outlines the possible outcomes which would result in a licensee passing or failing the minimum requirement for a particular metric.

3.8. Failure to meet the minimum requirement for a particular metric will result in an adjustment to licensees reward under the incentive in accordance with Special Condition 4.6. The possible outcomes for licensees where minimum requirements are either met or not met are noted in Table 4 below.

## Minimum requirements for the AVR

3.9. As part of the AVR, licensees are required to provide assurance to Ofgem and wider stakeholders that performance reported annually in relation to the CV ODI-F ongoing performance in Table 8 is robust and comparable.

3.10. As part of a licensee's submission of its AVR, it should include the independent assurance provider's report as detailed in paragraph 3.3.

**Table 3 – Minimum requirements**

Metric	Minimum requirement category	Minimum requirement criteria	Has the criteria been met? (Y/N)
PSR Reach minimum requirement (SpC 4.6.7)	PSR Reach has been reported in line with the common methodology	The PSR Reach actual performance is calculated in line with the agreed methodology and data provided by Centre for Sustainable Energy (CSE)	
	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 contact 100% of its registered PSR customers to verify their data every 24 months	
Value of Fuel Poverty Services Delivered minimum requirement (SpC 4.6.9)	Assurance that performance against the targets has been calculated and reported in line with the common Social Value Framework methodology	The £NPV value calculated is in line with the common Social Value Framework Rule Book	

Metric	Minimum requirement category	Minimum requirement criteria	Has the criteria been met? (Y/N)
		The £NPV value calculated is attributed to the value of Fuel Poverty Services Delivered and the scope of the metric set out within Chapter 3 of the RIIO-ED2 Consumer Vulnerability Guidance Document.	
		The values reported are accurate from the calculations in the relevant SROI model.	
Value of Low carbon transition Services Delivered minimum requirement (SpC 4.6.11)	Assurance that performance against the targets has been calculated and reported in line with the common methodology	The £NPV value calculated is in line with the common Social Value Framework Rule Book.	
		The £NPV value calculated is attributed to the value of Low Carbon Transition Services Delivered and the scope of the metric set out within Chapter 3 of the RIIO-ED2 Consumer Vulnerability Guidance Document.	
		The values reported are accurate from the calculations in the relevant SROI model.	

**Table 4: Possible outcomes as a result of passing or failing the minimum requirements**

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

**Table 5 – AVR assurance**

Assurance process activity	Date to be completed
Year End	31st March every year from 2024
DNO Submits Data Template to Assurance Partner	31st May every year from 2024
Assurance Assessment Complete	30 <sup>th</sup> June every year from 2024
Annual Report Issued	31st July every year from 2024

**Table 6 – CV ODI-F Year 2 assurance**

Assurance process activity	Date to be completed
Year End	31 <sup>st</sup> March 2025
DNO Submits Data Template to Assurance Partner	31 <sup>st</sup> May 2025
Assurance Assessment Complete	30 <sup>th</sup> June 2025
Annual Report Issued	31 <sup>st</sup> July 2025

**Table 7 – CV ODI-F Year 5 assurance**

Assurance process activity	Date to be completed
Year End	31 <sup>st</sup> March 2028
DNO Submits Data Template to Assurance Partner	31 <sup>st</sup> May 2028
Assurance Assessment Complete	30 <sup>th</sup> June 2028
Annual Report Issued	31 <sup>st</sup> July 2028

## **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 preceeding 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. Licensees are required to provide the following information in the AVR using the format provided in the structure and tables set out in this section:

- annual progress against Consumer Vulnerability Incentive performance metric targets set out in Table 8;
- regularly reported evidence (RRE) – additional quantitative information relating to licensee’s support for Domestic Customers in a Vulnerable Situation set out in Table 9
- detail on 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 and;
- the measures in place to support support Domestic Customers in Vulnerable Situations over the winter period in the event of a loss of supply (“winter preparedness measures”).

## **AVR General instructions and requirements**

### **Report type and availability**

4.4. The AVR submission should be easy to read for all stakeholders and published on the licensee's Websites. Interested parties should be able to easily understand the licensee's performance in the past Regulatory Year.

4.5. A group of licensees must publish a single AVR, which applies to all the licensees within the group. Sufficient information about each individual licensee is to be included in the AVR to provide an overview of individual licensees performance, and the AVR must clearly distinguish between licensees where relevant.

4.6. There is no restriction on the font sizes used for the AVR (however the submission must be legible).

4.7. There is no limit on the length of any submission. However, consideration should be given to the purpose and audience of the submission. For this reason we expect that submissions should be no longer than 20 pages, including for a group of licensees.

4.8. Where material amendments are made to any information reported, these amendments should be clearly communicated to stakeholders and Ofgem are clearly identified.

4.9. Where a DNO identifies that inaccurate information has been reported, we must be notified, and corrections made as soon as practically possible.

## **Scope of the AVR**

4.10. 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 in implementing the licensee's vulnerability strategy commitments, and vulnerability targets, where applicable.

4.11. The licensee must follow the broad scope and specifications in structure, content and performance measures, as set out in this Guidance Document for the AVR. However, the licensee may provide additional information where it considers it appropriate to do so.

## **Annual Vulnerability Report structure**

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

## Introduction

4.13. 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 highlight the key vulnerability issues prevalent in the licensee's Distribution Services Area.

## CV ODI-F targets progress

4.14. Each licensee must include a section covering its performance against the metric targets as part of the CV ODI-F. The licensee should include information in relation to all metrics listed below in a table with the same column and row headings set out below.

**Table 8: CV ODI-F – ongoing performance**

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>
Social value of Fuel Poverty Services Delivered (NPV)			<i>Bespoke target</i>				<i>Bespoke target</i>
Social value of Low Carbon Transition Services Delivered (NPV)			<i>Bespoke target</i>				<i>Bespoke target</i>
Average Fuel Poverty Customer Satisfaction Survey score			<i>9/10</i>				<i>9/10</i>



Metric	Year 1	Year 2	Year 2 target	Year 3	Year 4	Year 5	Year 5 target
Average Low Carbon Transition Customer Satisfaction Survey score			9/10				9/10

4.15. Each licensee should input its bespoke PSR Reach targets in the 'Year 2 target' and 'Year 5 target' columns.<sup>11</sup>

4.16. Each licensee should input its bespoke targets associated with the social value of Fuel Poverty Services Delivered and Low Carbon Transition Services Delivered.<sup>12</sup>

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

4.18. Licensees can provide additional narrative to accompany Table 8 to expand on the progress made and performance against the Year 2 and Year 5 targets within the Table. This information will provide stakeholders with important reasoning as to why licensee's performance may differ from the targets.

4.19. In accordance with Table 5, licensees are required to supplement the submission of its AVR with the outcome of the independent assurance providers check in relation to the performance reported within Table 8.

### Regularly Reported Evidence

4.20. 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.

<sup>11</sup> The PSR Reach bespoke targets should reflect the targets included in each RIIO-ED2 Final Determinations Company Annex <https://www.ofgem.gov.uk/publications/riio-ed2-final-determinations>

<sup>12</sup> The targets for these two metrics should be inputted using the information set out within Special Condition 4.6 and the targets within our RIIO-ED2 Final Determinations Company Annexes.

**Table 9: Regularly Reported Evidence table**

RRE	Expectation	Year 1	Year 2	Year 3	Year 4	Year 5
Frequency of PSR Customer data cleanse	Licensee has attempted to contact all PSR Customers to verify their data	% of registered PSR Customers the licensee has attempted to contact to verify their data during the 2023-24 Regulatory Year				
CSS score for PSR Customers who have experienced a power cut	9.01 target					
The volume of Fuel Poverty Services Delivered	[Licensees forecast volume of Fuel Poverty Services Delivered for RIIO-ED2]					
The volume of Low Carbon Transition Services Delivered	[Licensees forecast volume of Low Carbon Transition Services Delivered for RIIO-ED2]					

4.21. In line with Principle 1 of the vulnerability baseline expectations,<sup>13</sup> licensees should demonstrate the maintenance of their PSR databases through reporting in the table the

<sup>13</sup> [RIIO-ED2 Sector Specific Methodology Decision](#), Annex 1 – Appendix 3

percentage of registered PSR Customers the it has attempted to contact to verify their data during the 2023-24 Regulatory Year.

4.22. A core part of a licensee's role in protecting and supporting Domestic 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 the AVR, we require licensees to report the average satisfaction survey results of PSR customers who have experienced a power interruption. This should be the average calculated from all satisfaction scores of PSR respondents to the supply interruptions survey as part of the BMCS. This information must be reported in the table as an annual score.

4.23. Each licensee should report the volume of Fuel Poverty Services Delivered and Low Carbon Transition Services Delivered through the RRE report element of the AVR. These volumes should be the same as those used to calculate the £NPV associates with services delivered. Licensees should report this on a cumulative basis year on year, showing the total volumes of services delivered over the course of the RIIO-ED2, building up to a total figure for RIIO-ED2 at the time of reporting for the Regulatory Year beginning on 1 April 2027.

4.24. Licensees can provide additional narrative to accompany Table 9 to expand on the RRE and performance against the expectations set out in the second column of the table.

### **Social Value Framework utilisation**

4.25. A key element of the Consumer Vulnerability Incentive are the performance metrics which measure the value of the services delivered by the licensee to Domestic Customers in Vulnerable Situations.

4.26. 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.

4.27. The outputs of using this tool can provide insights into the programmes of work which are working well, those that can be improved to deliver more value to Domestic Customers in Vulnerable Situations and those services that possibly are not delivering the expected value and should be discontinued from being delivered.

4.28. In this section of the AVR, licensees should set out how the Social Value Framework has been used within the licensee business in the Regulatory Year preceding the AVR submission, including but not limited to:

- 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**

4.29. The licensee must include a table listing all its bespoke RIIO-ED2 vulnerability strategy commitments.

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

- A short description of the commitment;
- A short description of the expected benefit or outcome.
- the activities involved in implementing the commitment over RIIO-ED2.
- 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.
- An explanation for why the commitment has received its red, amber or green rating.

4.31. Licensees can provide additional narrative to accompany Table 10 to expand on the progress made in delivering the strategy commitments.

4.32. See Table 10 below for the template that must be followed when reporting against strategy commitments in the AVR.

**Table 10: Table template for AVR reporting**

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

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

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

4.34. In our review into the licensees response to Storm Arwen, we recommended that there should be an enduring role for licensees to report information on winter preparedness measures within the RIIO-ED2 framework. We confirmed what the scope of this reporting in our RIIO-ED2 Final Determinations by setting out that licensee's plans for supporting Domestic Customers in Vulnerable Situations over winter periods would be reported within the AVR.<sup>14</sup>

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

- A review of how successful its winter preparedness measures were in supporting Domestic Customers in a Vulnerable Situations over the winter during the previous Regulatory Year. This information must include:

<sup>14</sup> RIIO-ED2 Final Determinations, Core Methodology Document paragraph 5.207  
<https://www.ofgem.gov.uk/publications/riio-ed2-final-determinations>

- The plans the licensee had in place to prepare Domestic Customers in a Vulnerable Situation prior to the winter period
  - The plans the licensee had in place to protect the interests of Domestic Customers in a Vulnerable Situation during the winter period
  - A review of how effective the plans in (a) and (b) proved to be, including what worked well and what did not work so well.
  - The lessons learned that the licensee plans to take onboard from its review of the most recent winter in relation to preparing and protecting Domestic Customers in a Vulnerable Situation.
- 
- The forward view of how the licensee will improve its winter preparedness measures to better support and prepare Domestic Customers in a Vulnerable Situation over future winter periods, including:
    - The plans the licensee has to embed the lessons learned identified in (d) above in its plans to prepare and protect Domestic Customers in a Vulnerable Situation over the upcoming winter period (post the submission of the AVR).
    - Any other information the licensee can share on its plans for support prior to and during the upcoming winter, acknowledging that at the time of the AVR submission these plans are not likely to be finalised.

## **Appendix 1 – Vulnerability principles and baseline expectations**

4.36. The following are the principles and baseline expectations licensees should deliver for Domestic Customers in Vulnerable Situations. The vulnerability strategies produced by licensees at DNO group level are aligned to these principles and baseline expectations.

Principle 1: Effectively support consumers in vulnerable situations, particularly those most vulnerable to a loss of supply, through a sophisticated approach to the management, promotion and maintenance of a Priority Services Register (PSR).

4.37. As a baseline expectation, licensees should:

- Undertake proactive and targeted advertising of the PSR and the services offered to vulnerable consumer groups. By targeted, we mean towards specific areas of highest need or where data analysis suggests there are gaps in PSR Reach.
- Have a data and information strategy in place specific to meet the needs of vulnerable consumers. This should demonstrate how DNOs will maintain their PSR database, with customer data checks at least every 24 months. Data analysis should be used to inform the development and delivery of service offerings. As part of their data and information strategy, DNOs should consider how to best facilitate the sharing of vulnerable customer data with suppliers and other utilities to get customers onto the PSR in line with Data Best Practice.
- Communicate with and provide information to PSR customers in formats suited to a range of additional communication needs, including hearing or sight loss. For accessibility services, companies should meet a minimum standard of Accessibility AA. Translation services should be available for at least the top 10 languages in a DNO area.
- Have dedicated lines, or prioritisation processes, available for customers registered on the PSR when they need to contact the DNO, regardless of the time of day.
- Deliver a wide range of support during, or in relation to, a supply interruption that reflects different customer needs and is, at a minimum, in line with the company's existing RIIO-ED1 provision. There should be a clear link between the information held about PSR customers and how this is used to target, or prioritise, support. We consider a wide range of support could include, but is not limited to, crisis packs, hot meals and drinks, mobile generation, alternative accommodation or on-site welfare units. We would expect there to be multi-channel information provision during supply interruptions. Companies can deliver this support directly or through/in conjunction with partner agencies. This support should be available 24/7.

Principle 2: Maximise opportunities to identify, and deliver support to, consumers in vulnerable situations through smart use of data.

4.38. As a baseline expectation, licensees should:

- Utilise social indicator, or vulnerability, mapping to inform their service development and approach to partnerships. This approach may form part of the DNO's PSR management, but the identification of vulnerability should not be limited to PSR registrations and should recognise that vulnerability can be transient and may evolve in the transition to Net Zero.
- Maintain a good understanding of the social and well-being issues associated with the scope of the DNOs' role, the prevalence of these within their consumer base and how they are evolving.

Principle 3: Understand new forms of vulnerability, in particular by identifying blockers to participating in a smart flexible energy system.

4.39. As a baseline expectation, licensees should:

Have an extensive network of partnerships with a range of organisation types, from multiple sectors including other utilities.

- Make use of referral channels and signpost support to customers. This will primarily be done through customer service teams, but we expect DNOs to seek opportunities to maximise consumer touchpoints.
- Be involved in two-way flow partnerships supporting vulnerable customers, in line with the companies understanding of social issues in their region. This should include the DNO having direct involvement in the end to end process of delivering support, providing expertise and cocreating schemes. Where appropriate, we would expect to see example schemes where the DNO is taking a leading role.
- Have a clear process for identifying which partnerships are likely to be most effective at delivering benefits through co-operative working. This should be clearly linked to the priority areas of focus of the strategy, in particular addressing fuel poverty and supporting those at risk of being left by the energy system transition.

Principle 4: Embed the approach to protecting the interests of consumers in vulnerable situations throughout a company's operations to maximise the opportunities to deliver support.



4.40. As a baseline expectation, licensees should:

- Have processes in place for embedding a commitment to protecting the interests of vulnerable customers within the company's culture. This should include a well justified approach to ensuring all staff have received an appropriate form of vulnerability training to maximise the potential from all customer touchpoints. Companies should make use of external advice and support to set strategic direction, such as a vulnerability advisory or research panel. DNOs should appoint a vulnerability champion at senior management or board level.
- Seek opportunities to protect vulnerable customers throughout their capabilities.

## Appendix 2 – Fuel Poverty Customer Satisfaction Survey script

1.1. Firstly, can I just confirm that you have recently received [INSERT SERVICE NAME] from [INSERT DNO]?

1.2. Now thinking back to your initial contact with [INSERT DNO], using a scale of 1 to 10, where 1 is very dissatisfied and 10 is very satisfied; can you please tell me how satisfied you were with how easy it was to deal with [INSERT DNO] when you first contacted them?

1.3. On a scale of 1 to 10, how beneficial has the service been to you, where 10 is very beneficial and 1 is not beneficial?

1.4. Have you noticed any energy savings as a result of [INSERT SERVICE NAME] to date?

**[If the customer says “no, too early to tell” or “unsure”, ask if the customer understands the savings they can expect over time.]**

1.5. **Killer question:** 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 [INSERT DNO] into account, how satisfied were you with the service provided?

1.6. Please can you tell us why you gave a score of [INSERT SCORE FROM PREVIOUS QUESTION]?

1.7. Again, taking all aspects of the service provided by [INSERT DNO] on this occasion into consideration, what could they have done better?

## Appendix 3 – Low Carbon Transition Customer Satisfaction Survey script

1.1. Firstly, can I just confirm that you have recently received [INSERT SERVICE NAME] from [INSERT DNO]?

1.2. Now thinking back to your initial contact with [INSERT DNO], using a scale of 1 to 10, where 1 is very dissatisfied and 10 is very satisfied; can you please tell me how satisfied you were with how easy it was to deal with [INSERT DNO] when you first contacted them?

1.3. On a scale of 1 to 10, how beneficial has this service been to you, where 10 is very beneficial and 1 is not beneficial?

1.4. Have you adopted the technology required as a result of your interaction with [INSERT DNO]?

**[If the customer says “no”, ask if it is their intention to adopt the technology in the future.]**

1.5. **Killer question:** 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 (DNO) into account, how satisfied were you with the service provided?

1.6. Please can you tell us why you gave a score of [INSERT SCORE FROM PREVIOUS QUESTION]?

1.7. Again, taking all aspects of the service provided by [INSERT DNO] on this occasion into consideration, what could they have done better?