

# 1. Customer Support Storm Strategy

## Type of proposal

Stretching commitment / New or enhanced service/Delivery accountability mechanism

## Proposal summary:

All DNOs should develop a **Customer Support Storm Strategy** tailored to local challenges and prioritising vulnerable customers—such as medically dependent, isolated, or those on less reliable networks. The strategy should include:

- **Common targets** for faster call response, fewer abandoned calls, quicker compensation.
- **Targeted initiatives**, funded by UIOLI and focused on resilience and practical support. DNOs could suggest their own range of services to suit their customer base, but based on a standardised SROI methodology.

We propose services such as backup batteries for medically dependent equipment, replacement hospital beds, smart UPS for digital phones (72-hour power), satellite phones in rural areas, and part-funded resilience hubs.

The services are shown in the benefits section of this document. These services are scalable and a selection of these could be chosen. We have suggested customer volumes based on certain criteria in the benefits table which we believe to be the gold standard.

We propose Ofgem assesses DNO storm strategies in Business Plan submissions and that DNOs report performance and spend via **RRP** and provide narrative in **SLC50 annual report**. This ensures transparency, accountability, and improved customer outcomes during storms.

The customer-focused members of SPEN and SP ENW's ISGs are supportive of this proposal.

## Which ED3 outcomes does the proposal support? (confirm all that apply)

Investing for the energy transition/ **Responsible and sustainable business**/ Smarter networks/  
Resilient networks

## Which Consumer Interest Pillars does the proposal support? (confirm all that apply)

Low cost transition/ Fair prices/ **Quality and standards**/ Resilience

## Summary of key reason(s)/driver(s) for the proposal

This proposal has two main drivers:

- 1. Restoration and communication in a power cut is a priority for customers.**
- 2. Climate change impacts the frequency and severity of events.**

Customer research, including Ofgem's Storm Arwen study and our own feedback, highlights clear priorities during and after storms: timely communication, support for vulnerable customers, and post-event assistance. Our consumer research confirms domestic consumers consistently prioritise speed of restoration, network resilience, communication during outages, and tailored support for vulnerable groups — especially medically dependent and hard-to-reach customers — as top

concerns. Government also wrote to the ENA in December 2025, reiterating the importance they place on resilient mobile communications during power outages, particularly in locations most vulnerable to power loss.

Storms are becoming more frequent and severe as the climate warms, significantly impacting our north/western-based networks and customers. While investments in resilience and automation have improved restoration times, increasing storm intensity, telecoms resilience challenges, and the digital switchover create ongoing risks, particularly for remote communities.

Ambitious targets are essential to drive innovation in response times and deliver tailored support when customers face heightened vulnerability. This proposal offers a real opportunity for a step change in how all DNOs support customers during severe weather events.

### Summary of supporting evidence (Examples could include references to sector specific intelligence, innovation projects, ISG engagement, wider consumer research, endorsement from third parties)

Our initiatives are shaped by Ofgem's Storm Arwen research, our own customer feedback, and insights from BMCS. These sources consistently highlight the need for improved communication, resilience, and tailored support for vulnerable customers during power outages.

Several proposed initiatives build on current or previous NIA innovation projects designed to address these needs. Details of these projects are available on the ENA Innovation Portal. In addition to direct customer feedback, we have engaged with wider stakeholders who strongly support enhanced measures for vulnerable communities.

**Consumer Scotland** states:

*"Consumer Scotland supports DNOs being able to invest in solutions that keep people connected during the digital switchover. Reliable communication—especially for vulnerable customers or those in areas with poor mobile coverage—is essential for safety and confidence."*

**Finlay Carson MSP** notes:

*"In Galloway and West Dumfries, severe storms are not just an inconvenience—they pose real risks to safety and wellbeing. When power and communications fail, rural communities can be left isolated and vulnerable. Investing in resilient infrastructure and community-based solutions is vital to ensure*

people remain connected, supported, and able to access help when they need it most.  
 Strengthening the role of Distribution Network Operators is a key to delivering those solutions.”

## Summary of potential benefits

The common ambitious commitments element of the strategy (faster speed of call answer, fewer abandoned calls, faster compensation payments for GSoPs). These commitments will have the following benefits:

- Avoided complaints or escalations
- Customers able to access information
- Improved reliability improves customer trust

For the bespoke support element of the strategy we have suggested a number of initiatives and modelled benefits using an SROI methodology.<sup>1</sup> The benefits of these initiatives include:

- Avoided cost of frontline worker training
- Essential item packs
- Job creation
- Food provision
- Cost savings to consumers for devices and installation.
- Avoided cost of A&E attendance
- Avoided cost to the NHS of an ambulance call out
- Avoided cost to the NHS of hospital inpatients attendance
- Avoided economic cost of fatality (built in the model but not included in the benefit calculation)
- Annual wellbeing benefit of reduced isolation

Using the SROI methodology, we estimate that these bespoke support initiatives can deliver up to **£1.2m** in net benefits (over and above the costs) across ED3 based on customer numbers we believe could benefit from these initiatives.

Indicator	Net benefits per customer	Total benefits per customer	Cost per customer	Potential number of customers supported
Enhanced Welfare Support	£1,200	£1,200	£1,200	1,000
Communications Interventions (installation of Uninterrupted Power Supply) for medically dependent customers	£1,200	£1,200	£1,200	1,000
Purchase and deploy backup batteries for electrical medical equipment for medically dependent customers	£1,200	£1,200	£1,200	1,000
Temporary provide hospital beds for customers whose beds at home are damaged during an outage	£1,200	£1,200	£1,200	1,000
Warm communication hubs and satellite phones for vulnerable and hard-to-reach customers, customers in frequently impacted areas	£1,200	£1,200	£1,200	1,000

<sup>1</sup> We have attached the methodology developed for us which provides the detailed model and underlying numbers.

### Where the proposal relates to a new or enhanced service or to stretching commitments, explain why the proposal is not already business as usual or incentivised either through the existing RIIO-ED2 framework or under ED3 proposals that we are consulting on

No funding will be requested for any activity we carry out currently as BAU (e.g. BAU provision of generators/batteries, food, hotels, welfare checks and warm spaces). This strategy would support bespoke, targeted projects with consumer benefit that would not be funded through BAU or other sources on a proactive basis (rather than reactive).

Some of these proposals are a continuation of NIA innovation projects, but without further funding these would be less likely to be rolled out, as this is not part of baseline funding or otherwise incentivised.

None of these initiatives can be funded through incentive performance either as they relate to supporting very specific customers. EG this is not incentivised through the BMCS or the vulnerability incentive.

### Where the proposal relates to a new or enhanced service, explain why DNOs are best placed to undertake the activity described under the proposal

As part of this proposal we suggest that DNOs will be able to access a UIOLI allowance for enhanced services (beyond the proposal to set stretching commitments). DNOs already provide a wide range of support in storms to customers and are responsible for restoring the power supply as quickly as possible. We have additional responsibilities and obligations to our most vulnerable customers, which we take very seriously.

We believe there are gaps in the provision of support for these customers which have not been addressed by others and need to be filled to prevent customer harm, particularly for those vulnerable customers who are likely to be more significantly impacted by storm disruption. These gaps are risks closely associated with the supply of electricity. To ensure it is appropriate for DNOs to be funded here we propose that the initiatives are as targeted as possible, including to areas of the network that are more susceptible to interruptions and customers who are the most vulnerable (medically dependent and in rural isolated locations). Under these conditions we believe DNOs are the right organisations to deliver this support funded by billpayers.