







Wales & West Utilities **Stakeholder Engagement Submission** 2013/14









working with you

### GDN Details:

**Company:** Wales & West Utilities **Licensee(s):** Wales & West Utilities Ltd. Address: Wales & West House, Spooner Close, Celtic Springs, Newport Postcode: NP10 8FZ

### Contact Details:

Name: Mark Oliver Title: Director of Business Services Telephone: 02920 278886 Email: mark.oliver@wwutilities.co.uk

Please provide supporting evidence and high level overview of how your company has met the minimum requirements set out below:

• hov	w it keeps stakeholders informed about relev	te stakeholder engagement strategy, which sets out: ant issues, business activities, decision-making and other developments; stakeholders via appropriate mechanisms to inform decision making.	T
Doc Ref	Evidence submitted within application (i.e., evaluation, assurance report, survey, etc.)	Overview of your arguments demonstrating compliance with requirement. Clearly signpost as to additional relevant evidence/information within submission	Page ref
		Purpose Vision & Goals	
A	Stakeholder Engagement Strategy	• Clear vision & purpose – refocus and adjusted strategic objectives based on stakeholder feedback – Demonstrates commitment to continuous improvement.	pp1-2
		<ul> <li>Alignment of goals with business strategy – Solid expectations from stakeholder engagement process, supported by relevant strategic frameworks</li> </ul>	
		<ul> <li>Short, medium and long-term goals – demonstration of evolvement through time and follow-up on KPIs – a measurable plan of action over the remaining price control period.</li> </ul>	
	Stakeholder Engagement Strategy	Engagement vision is consistent with relevant accreditation schemes:     AA1000 Stakeholder Engagement Standard	
B	Governance Structure	Governance & Strategy	p.3
0	Critical Friends' Panel Terms of Reference	• Solid oversight and accountability – Graham Edwards personally chairs Critical Friends' Panels – demonstrating our strong top-level focus on quality responsive engagement	
		Organisational commitments and policies	
		• Stakeholder engagement activity is <b>regularly</b> (monthly, quarterly) <b>reviewed</b> <b>by senior management</b>	
D	Investment Paper Template	• Cross functional inclusion of executives due to broad business reach of stakeholder engagement activity	
		• Integration across business in decision-making – investment papers cite key stakeholders affected how they were consulted and have influenced the paper to ensure we deliver outputs stakeholders' value.	
		• Robust crisis management mechanisms enable key members of stakeholder steering group to set up an incident room and <b>meet daily in the event of a major incident.</b>	
E	Extract from Business Requirements Manual	<ul> <li>Engagement strategy links to existing internal controls, tools and processes:</li> <li>Our business risk register is designed around the delivery of outcomes stakeholders value</li> </ul>	
		<ul> <li>Our business requirements manual clearly articulates the importance of effective engagement to our operating model</li> </ul>	

### Minimum requirement;

The company has a comprehensive and up to date stakeholder engagement strategy, which sets out:

• how it keeps stakeholders informed about relevant issues, business activities, decision-making and other developments;

• how it enables timely input and feedback from stakeholders via appropriate mechanisms to inform decision making.

Doc Ref	Evidence submitted within application (i.e., evaluation, assurance report, survey, etc.)	Overview of your arguments demonstrating compliance with requirement Clearly signpost as to additional relevant evidence/information within submission	
F	Extract from Performance Management Framework	<ul> <li>Roles responsibilities and resources – Performance linked bonus for all staff directly links to delivering outputs stakeholders value</li> <li>Stakeholder and corporate strategies align to leverage greater value from engagement</li> </ul>	р.3
		Capacity Building Staff are crucial in all of our touch points with stakeholders	p.9
		• Skills and capabilities – activity of listening, capturing feedback and training staff on effective communications and engagement	
G	Replacement communications toolkit	<ul> <li>Regular training through communication and culture skills development at all levels of the organisation:         <ul> <li>Communications toolkit</li> <li>Stakeholder engagement manual being developed to ensure long-term diffusion of message and approach.</li> <li>Plain English campaign training to improve communication accessibility.</li> </ul> </li> </ul>	
		<ul> <li>Knowledge sharing mechanisms (both internal and external) – partnerships with fellow industry leaders to share best practice around stakeholder issues</li> </ul>	р.6 р.10
Н	Business Vision and Values	• Building stakeholder capacity to engage – emphasis on; corporate culture, brand refresh, marketing communications all <b>improve</b> approachability motivate staff and attract talent and ensure that when engaging externally with stakeholders we live and breathe our engagement strategies.	
		• Delivering with partners – working with you to shape the future of our business – we care, we listen and we act	p.1/p.6
		• Extensive engagement of independent assessors and auditors around procedures:	
V	Scope of ongoing gap analysis work	Gap analysis being undertaken against AA1000 Stakeholder     Engagement Standard	
W X Y Z	Critical Friends' letter of assurance to panel ISO55001 audit findings & Certificate ICS audit findings Crystal Mark certificate	<ul> <li>Critical Friends' Independent Panel Report</li> <li>First distribution network to achieve ISO55001 which specifically assesses quality of engagement</li> <li>Awarded Institute of Customer Service (ICS) Service Mark after receiving</li> </ul>	
		'world-class' customer service scores	

A bro	A broad and inclusive range of stakeholders have been engaged.				
Doc Ref	Evidence submitted within application (i.e., evaluation, assurance report, survey, etc.)	Overview of your arguments demonstrating compliance with requirement. Clearly signpost as to additional relevant evidence/information within submission	Ū		
В	Governance Structure	Engagement Procedures	р.3		
		• Review processes are in place and documents regularly updated			
1	Full stakeholder list – segmented with Steering Group Owners	<ul> <li>Mapping stakeholders – initially mapped by executive and senior management team. Recognising this will evolve over time, the stakeholder steering group members (directors and senior managers) now own each of our segmented stakeholder groups.</li> </ul>	p.5		
J	Extract from stakeholder database	<ul> <li>Identifying material issues – the stakeholder steering group used business plan engagement as a baseline to inform our internal decision-making.</li> <li>We developed a materiality matrix and consulted our Critical Friends' Panel on our emerging material issues.</li> </ul>	p.5-6		
K	Internal Engagement Survey	• Part 2 of our submission details how we have engaged each of these groups in different ways when delivering our engagement priorities:			
L	Domestic Customer engagement Report				
М	Vulnerable Customer Forum Report				
Ν	Critical Friends' Panel Reports				

The c tailor		echanisms to inform and engage their stakeholders – these have been groups, and are fit for purpose in allowing a detailed analysis of a breadth	
Doc Ref	Evidence submitted within application (i.e., evaluation, assurance report, survey, etc.)	Overview of your arguments demonstrating compliance with requirement. Clearly signpost as to additional relevant evidence/information within submission	Page ref
K B	Internal Engagement Survey Results CO Conference Report	• We have developed both internal and external stakeholder strategies and communication systems that work to: inform, consult, involve and collaborate on material issues. Our aim is to empower both our internal and external stakeholders to share in our decision-making.	p.6
G P	Replacement communications toolkit Storyboards	• Recognising there is no single most effective method to involve stakeholders in any given decision, our <b>toolkits and training help tailor our approach to specific stakeholder groups</b> in relation to the issue on which we are looking to engage.	p.11
С	Critical Friends' Panel Terms of Reference	• We have set up <b>enduring consultative frameworks</b> including: Critical Friends', Domestic, and Vulnerable stakeholder panels to allow for regular interaction, <b>undertaking 'deep dives' into material issues</b> .	
R D	Media Report Investment Paper Template	• We have both qualitative and quantitative performance measures in place to monitor the success of our engagement. They link to our investment decision making to ensure that we only continue to invest in successful campaigns.	p.7

### Entry Form

S T	Case Study of Customer Service App	• Part 2 of our submission details how we have engaged each of these groups in different ways when delivering our engagement priorities:	
		• Review practices are in place and our approach is regularly updated to reflect emerging concerns of stakeholders over time.	p.19

The	The company can demonstrate it is acting on input / feedback from stakeholders					
Doc Ref	Evidence submitted within application (i.e., evaluation, assurance report, survey, etc.)	Overview of your arguments demonstrating compliance with requirement. Clearly signpost as to additional relevant evidence/information within submission	ref			
		Reporting & Evaluation	<i>pp7/8</i>			
Τ	Customer Service App	• We have a wide range of tools metrics and systems in place to record feedback. We continue to invest in and improve these, for example our customer service app now allows us to record and respond to customer feedback in real time.				
U	Critical Friends' Panel feedback – self restoration and isolation case study	• We continue to integrate feedback into our organisation, strategy and culture across our business priorities:				
AA	Priority Service Register investigation scope	• Utilisation of feedback in reporting procedures and transparency of reporting communications both internally via KPIs and externally through our stakeholder website	pp8/10			
BB	2013 CO Conference feedback	• Evaluating quality of engagement through both qualitative and quantitative measures we ensure our engagement adds value to those involved whilst achieving its goal	p.7			
CC	Service termination doc	• Outcomes are communicated and reported in a timely manner – internally, through our stakeholder governance and control processes and externally through independent reports to those involved which are then made publicly available on our website.	p.3/7			
DD	Connections quotation system	• We work closely with corporate communications to ensure our media strategies support our external engagement.				
V W X Y Z	Scope of ongoing gap analysis work Critical Friends' letter of assurance to panel ISO55001 audit findings & Certificate ICS audit findings Crystal Mark certificate	<ul> <li>Extensive engagement of independent assessors and auditors around procedures: <ul> <li>Gap analysis being undertaken against AA1000 Stakeholder</li> <li>Engagement Standard</li> <li>Critical Friends' Independent Panel Report</li> <li>First distribution network to achieve ISO55001 which specifically assesses quality of engagement</li> <li>Awarded Institute of Customer Service (ICS) Service Mark after receiving 'world-class' customer service scores</li> </ul> </li></ul>	p.4			

## Delivering outcomes that benefit stakeholders is and continues to be central to our business strategy.

Taking care of the 7.5 million people who live within our network, and the 2.5 million people who rely on us for their energy, is the reason we exist as a business. The views of our stakeholders are critical, and their input has underpinned our business planning since our establishment in 2005.

We have, and will continue to engage with a broad range of stakeholders, from consumers who receive our services, through to regulatory bodies such as the Health and Safety Executive, Local Authorities, Highway Authorities, third sector organisations and Ofgem. This comprehensive stakeholder engagement process helps us to shape our strategy across all areas of our business.

This year we continue to deliver significant outputs that our stakeholders really value, including:

**Outstanding Service** – Retaining our position as a leading distribution network for customer service.

**Safety** – Maintaining our world class safety record of 0.14 lost time injuries per 100,000 hours worked against a world wide benchmark of 0.5.

**Environmental footprint** – Following stakeholder feedback, prioritising investment to deliver a 4% reduction in carbon dioxide emissions, double our forecast for the first year of the price control.

Value for money – Being one of the most efficient networks, consistently delivering all our regulatory and business obligations.

### 66 ...we are not complacent. We strive for continual improvement **99**

Below: Graham Edwards chairs panel session



<sup>1</sup> Critical Friends' Panels consist of over 40 individual and organisational representatives from each of our stakeholder groups. Panels meet formally twice a year with independent facilitators. We are in regular consultation with one or more on an almost daily basis.

Despite this success, we are not complacent. We strive for continual improvement, which is why, following feedback and a review of last year's trial submission, we have reviewed our strategy and approach. In headline terms we have:

- Adopted a more targeted approach aligned to our key business priorities to ensure we deliver outcomes that mutually benefit our stakeholders and business strategy
- Set up enduring consultative frameworks such as our Critical Friends' and Domestic Customer Panels, and Vulnerable Customer working group. These allow for regular consultation throughout the business. We are addressing the needs of our critical friends<sup>1</sup> and vulnerable customers
- Developed our partnership working strategy to strengthen our capacity to deliver our engagement programme
- Refreshed our brand and tone of voice and crystal marked our external communications to appeal to a broader audience
- Led the collaborative approach adopted by network companies to share best practice in key areas
- Aligned our strategy to examples of best practice, over and above the minimum requirements

While our submission highlights the significant progress we have made over the last 12 months, it also demonstrates our ongoing journey and our commitment to deliver quality outcomes for all our stakeholders.

Mark Oliver, our Director responsible for Stakeholder Engagement works with the senior management team to review our strategy regularly and annually refresh and sign off the commitments we have made to stakeholders.

We are committed to continuing to engage regularly and proactively with all our stakeholders, and use their feedback to:

- Inform our strategies to innovate and deliver outputs that are valued by our stakeholders
- Improve our daily operations, policies, procedures and processes
- · Shape our current and future business plans
- Inform and educate stakeholders of developments that they may wish to influence or be involved in
- Provide further support to vulnerable stakeholders
- Meet and, where possible, exceed their expectations

More broadly, I encourage everyone at WWU to be a champion for our customers and stakeholders. Being open and transparent in our dealings with them, communicating effectively, keeping our promises, and ensuring that stakeholders are an integral part of everything we do as a business.

We will continue to ensure stakeholders are informed, engaged and empowered to influence our business decisions.

Graham Edwards, Chief Executive

Undertaking Effective Engagement

Part 1 Overview of Evidence

# Our Engagement Strategy

We have a comprehensive and up to date stakeholder engagement strategy in place, which sets out:

- How we keep our stakeholders informed about relevant issues, business activities, decision-making and other developments
- How we receive timely input and feedback from stakeholders via appropriate mechanisms and use these to inform our decision making

#### Setting strategic objectives

Following last year's trial submission, and in light of feedback received, we have reviewed and updated our engagement priorities and signed onto short, medium and long term engagement goals which have helped to:

#### • Focus our efforts

While we recognise and support all areas of our business in their day-to-day stakeholder engagement activities, we now recognise that our initial engagement strategy was too broad. In streamlining efforts, we have been able to improve the quality of our engagement activities over and above business as usual. Particularly in relationship to supporting vulnerable customers and raising awareness of carbon monoxide poisoning as detailed in Part 2 of this submission.

#### Deliver outcomes that benefit everybody

Working with stakeholders, we have been able to identify and close gaps in our current strategy, processes and daily operations in order to improve business performance and service levels.

Although we inevitably engage with all our stakeholders on an almost daily basis, we have refocused our strategy to deliver outcomes, using targeted engagement to close the gaps between where we are now and where we want to be. The governance structure, detailed on page 10, allows additional issues to be raised, the five executive members of a seven-strong executive team who sit on our monthly stakeholder steering group facilitate quick decision-making and implementation. Consequently, the engagement team is extremely responsive to feedback. For example, within a fortnight of the domestic customer panel asking for clearer communications, we had the investment approved and a framework in place for the Plain English Campaign to 'crystal mark' all our external communications.

Our stakeholder engagement strategy was not updated in isolation. Following feedback from an internal engagement survey, we have delivered this in conjunction with a review and re-launch of our company vision and values. One of the key elements to our approach is the recognition that our staff are crucial in all of our touch points with stakeholders and one of our key focus areas

has been to completely refresh our internal engagement strategy to ensure that staff can clearly identify with our organisation and where it is headed. This means that we are all speaking the same language when we engage with stakeholders.

Our engagement strategy is better aligned to our business ambition and company priorities. This renewed focus on our stakeholders provides a better cultural fit with our values and priorities and empowers people to take action where appropriate.

#### Our engagement vision

## working with you to shape the future of our business.

By aligning our engagement priorities to WWU's core vision, priorities and values, we've been able to develop a stakeholder engagement strategy, which clearly works to improve business performance by collaborating with our stakeholders.

#### Our business ambition

To deliver outstanding levels of safety and service so we are trusted and valued by the millions of people we serve every day. Quality engagement, and acting upon feedback is an essential foundation to achieve this ambition.

#### **Our business priorities**

Demanding <b>SAFETY</b> , ALWAYS	
Driving OUTSTANDING SERVICE	
Delivering VALUE FOR MONEY	- 🍎 -
Doing all we can to Promote SUSTAINABILITY	
Designing FOR OUR FUTURE	OUR FUTURE

Letters reference supplementary evidence page 21

#### **Our engagement vision 'The What'**

Across all our business priorities we use our engagement to ensure stakeholders are informed, engaged and empowered to influence our business decisions. Specifically, we:



 Drive safety forward, continually looking for ways to improve standards for both customers and colleagues

- Raise awareness of CO poisoning inspire behaviour change, influence policy and support technical innovation.
- Give our customers great service, peace of mind and value for money by putting their needs at the core of our planning, services and communications
- Improve our daily operations, policy procedure and process, particularly to address vulnerability delivering quality outcomes for those in most need



• Spend money wisely based on what delivers the very best value, every time driving additional value through collaboration and innovation



- Support local communities, protect and enhance the environment, both now and for the future
- Invest in our people so we have the skills, confidence and innovative mind-set to build our business long into the future, creating a company people aspire to work for
- Work with partners to address industry challenges including fuel poverty and smart metering
- Improve business performance, and develop current and future business plans

#### **Our engagement values 'The How'**

#### We Put Our Stakeholders First

We build trust through listening and taking acting on feedback. We are a valued part of the communities we serve and are inclusive in our relationships and collaborations

#### We Take Pride

We take ownership and are accountable for our own work, proactively consulting with a broad and inclusive range of stakeholders and supporting colleagues to do the same

#### We Work as a Team

We build relationships with colleagues, share best practice and prioritise open communication, and leverage value from partners and networks as appropriate

#### We Challenge Ourselves

We strive to do better by embracing new ideas and innovative solutions. We strengthen outcomes and learning through evidence-based research

#### We Bring Energy

We approach all our work with enthusiasm, going above and beyond to get great results, engaging effectively and appropriately in a timely manner





#### **Our engagement principles**

#### Transparent

• We ensure relevant information is easy to access and understand

#### Inclusive

• We acknowledge stakeholders' right to be heard, and engage in a variety of ways to allow everyone to be involved

#### Material

 We engage on material issues informed by what is important to us and to our stakeholders

#### Responsive

• We respond to stakeholders' and the organisation's material issues – showing stakeholders how we have taken their views into account. Where we have not, we will explain why

### we care, we listen, and we act.

Undertaking Effective Engagement

#### **Continuous improvement**

#### Our submission reflects the journey we

**ORE ON;** some of our plans are still under development and our strategy will continue to evolve. However, having clearly articulated what success looks like, and having consulted on our engagement priorities, mission and vision, we are confident we have;

- Made substantial progress in the last 12 months
- Delivered valuable outcomes to stakeholders
- Improved our business and daily operations through engagement

Short term – this report will detail outcomes delivered by our engagement strategy in 2013/14.

Medium term – this report describes how we have reevaluated our priorities and are investing in our people, systems and partnerships to continue our journey.

Long term – this report outlines our plans to help stakeholders influence our 8 year business plan investment and beyond.

#### Internal governance and controls<sup>®</sup>

#### Our governance structure ensures that people at every level of the organisation are accountable for engagement.

We review the quality of this engagement every month thanks to a steering group that includes five members of the executive team. These directors are responsible for >90% of employees and contract staff. This structure allows us to respond quickly to issues raised and incorporate feedback into our decisionmaking. Through this forum, we ensure stakeholder engagement continues to be a focus at the top level of our business. The full executive team review progress quarterly, as a minimum, and sign off plans annually. Graham Edwards, Chief Exec, personally chairs our Critical Friends' Panels and is keen to ensure we deliver on all of our commitments.



The Director of Business Services, Mark Oliver, is the Executive owner of our stakeholder strategy. Our Stakeholder Engagement Manager, Danielle Royce is one of only five direct reports to Mark. Working closely with all areas of the business, Danielle monitors and reports on our 'business as usual' engagement. She also, facilitates additional events to close any gaps in our engagement strategy. Additionally, Mark's senior management team drives our social obligations strategies:

- Nigel Winnan, Connections Manager, is responsible for delivering our Fuel Poverty Strategy and leads the national offgrid gas mapping initiative. This is currently being shared with, and undertaken by the other gas networks
- Claire Edwards, Customer Service Manager, has delivered continual improvement in the customer experience. Claire has also won Industry Manager of the Year 2014 and works with Danielle to deliver our Vulnerable Customer Strategy
- Danielle is also responsible for the delivery of our Carbon Monoxide strategy in close collaboration with our operational managers and other gas distribution networks

Fortnightly Senior Management meetings give us an opportunity to focus on our social obligations and monitor progress against plan.

#### **Measurable benefits**

In order to ensure our efforts are focussed in the right areas, and to identify appropriate resource requirements, we are developing a suite of stakeholder key performance indicators with the support of external consultants, Trinity Horne.

Day to day, our performance management framework and Business Requirements Manual reflects the importance of stakeholder engagement. <sup>C</sup> <sup>C</sup> All WWU's direct labour and contract employees understand that 'how' we do things is as important as 'what' we do. This has been a core part of our bonus-linked performance framework since 2008, with anything up to 95% of each employees reward linked directly to delivery of outcomes stakeholders value. In 2014, we are updating our competency framework to place an even bigger emphasis on measurement of behaviours. We plan to link this into a stakeholder engagement manual currently under development, which will help further embed the necessary skills and techniques to undertake successful engagement.

Taking our staff with us on this journey is essential to the success of our business performance and engagement activities. Internal engagement motivates staff and ensures we retain and attract talent. This, in turn, improves the focus of our external engagement, for example:

- Oliver, the environment manager, who approves an additional few hundred pounds to leave a community with a kingfisher tunnel and otter holt after a remediation project
- Andrew, the call handler, who volunteers to wear our Clive the dog suit in Gas Safety Week to raise awareness of the importance of safety checks with Gas Safe Register
- Wayne, the connections designer who forfeits his weekend to work at the county shows and raise awareness of CO poisoning

We are moving to a place where all staff live and breathe our engagement strategy.

#### Frameworks and assurance

#### AA1000 Stakeholder Engagement Standard

We've developed our stakeholder strategy, processes and documentation in line with the best practice outlined in AA1000SES. During 2013, we worked with external consultant TwoTomorrows who assessed the detail within and evidence behind our stakeholder submission against Ofgem guidance. We received a management report from them and developed a workplan to close the gaps identified. We are now working with AccountAbility to undertake a full gap analysis of our strategy, engagement and plans against AA1000SES.<sup>V</sup> This will be completed over the summer 2014 and will form an ongoing annual audit requirement in order to ensure we deliver an effective plan which results in measurable business benefits and stakeholder outcomes.

#### Critical Friends' Panel report

Our Critical Friends' Panel is made up of volunteers from a cross section of all our stakeholder groups.<sup>©</sup> The plan has always been to move the position of chair from Graham Edwards, CEO, to an independent member of the group. This was agreed as part of the group Terms of Reference. It is the group's role to hold WWU to account in our engagement and the group has been instrumental in the development and implementation of our stakeholder strategy. One of the members volunteered to write an independent view of our engagement activities with the panel to date. This is included in our supplementary evidence.

66 MM senior management team approach to engagement is transparent, genuine and well thought out, using a wide range of methods. 99

Duncan McCombie Director of Operations, Energy Saving Trust

#### First Gas Distribution Network to achieve ISO 55001

In February 2014, WWU transferred from certification against PAS55 to ISO55001 Asset Management standard. The standard, only released by the International Standards Organisation in January 2014, outlines the requirements for best practice in managing assets, and has a much greater emphasis on stakeholder engagement than its predecessor. Section 4.2 of the standard specifically covers "understanding needs and expectations of stakeholders."

In attaining this new standard, WWU achieved an industry first. The auditor commented on the professionalism demonstrated by all those he interviewed and a demonstrable awareness of how we all contribute to the business objectives.

There were no areas of non-conformance and the auditor was particularly impressed with our work on both internal and external stakeholder engagement.

#### Institute of Customer Service (ICS)

ServiceMark, a national standard, recognises an organisation's commitment to, and achievement in customer service. In 2014, we achieved world-class scores and were awarded the mark until 2016.

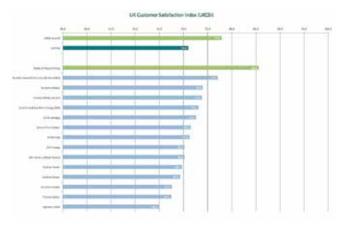
Extracts from auditors findings: "Measurement of staff and customers' perceptions is wide ranging and undertaken through a variety of sources... A number of initiatives were seen during the assessment that had been instigated from the surveys, many more where already in operation or planned for completion in the next few months whilst linking with the strategic plan."

"Processes throughout are considered, monitored, evaluated and amended when required as part of the remit to the customers' and Wales & West's values and requirements."

"Continuous improvement and how to ensure customers' results are monitored, evaluated and actioned are effective and all inclusive."







#### Clear communication



We believe that everyone should have access to clear and concise information. We are working with the Plain English campaign to Crystal Mark all our external correspondence removing gobbledygook, jargon

and any potentially misleading information. We dig not excavate.

#### Next steps

We are working towards undertaking a gap analysis against the standard, which will form an independent check on an annual basis. Currently, our independent ISO55001 auditor from SGS services reviews our processes annually.

# Undertaking Effective Engagement

### We have engaged with a broad and inclusive range of stakeholders.

#### Mapping our stakeholders – identify and understand

Initially we identified our key stakeholders through a process led by the Executive Committee in conjunction with senior managers as part of our business planning process. However, we realise our stakeholder groups and interests will evolve over time. In order to ensure we engage with the right stakeholders in areas specific to their needs we regularly review and update who they are, and our understanding of their needs through our Stakeholder Steering Group. This is then sense checked and signed off by our Critical Friends' Panel, which represents a cross section of these stakeholder groups.

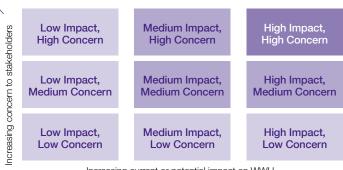
Our Critical Friends' Panel, reviewed our stakeholder matrix in November 2013, they identified no new groups at this review and they considered the groups were represented appropriately on our panel.

#### Store and manage

Our stakeholder log is segmented into a number of categories and consists of >10,000 individuals and groups. This helps us to manage interactions with our stakeholders logically and effectively and includes the contact details, lists engagement preferences, planned engagement and stores information from the business.

#### Identifying and prioritising issues

In order to decide our areas of focus over the last 12 months, the stakeholder steering group we revisited our company goals and mapped the issues that would support our achieving this vision using a materiality matrix. The development of our 8-year business plan enabled us to consult broadly upon priorities and acted as a baseline to inform our prioritisation exercise.



Increasing current or potential impact on WWU

Issues in this box set the agenda for our engagement strategy

By mapping the issues against two axis: (1) increasing concern to stakeholders, and (2) current or potential future impact on WWU, we were able to identify our material issues. Following consultation with our Critical Friends' Panel, addressing gas theft was added and our engagement priorities were agreed.

Internal	Government Bodies	Industry Groups
Customers	Consumer Bodies	Vulnerable Customer Groups
Other networks	Education and skills	Supply chain partners

#### **Engagement priorities**

	Demanding <b>SAFETY</b> , ALWAYS
	<ul> <li>Carbon Monoxide – raise awareness</li> <li>Ensure we are prepared for a major incident</li> <li>Capacity planning</li> </ul>
	Driving OUTSTANDING SERVICE
У	<ul> <li>Deliver first class customer satisfaction and quality outcomes for those in most need</li> <li>Fuel Poor – assist those in fuel poverty</li> <li>Vulnerable Customers – Go above and beyond</li> </ul>
_	Delivering VALUE FOR MONEY
	<ul><li>Innovate to improve service and reduce cost</li><li>Addressing the theft of gas issue</li></ul>
	Doing all we can to Promote
	<ul> <li>Support local communities &amp; protect the environment</li> <li>Reducing our CO<sub>2</sub> emissions</li> <li>Cost effectively addressing the risks posed by our contaminated land</li> </ul>
	Designing FOR OUR FUTURE
	<ul> <li>Improve the skills, capability and culture of our workforce to deliver valuable outcomes for stakeholders</li> <li>Assisting the move to smart metering</li> <li>Facilitate the injection of biomethane into the network</li> </ul>
$\rightarrow$	Developing a plan for engagement
У	Stakeholders are the responsibility of specific executive

members and senior managers, who then determine the most appropriate method(s) of engagement. To help this process we have developed a toolkit. Where specific non-Business as usual engagement is required, this is reviewed on a materiality basis and included within our planned events programme as appropriate.

## Learning from others and identifying potential partners

We aspire to deliver benefits beyond our expertise and to this end we always look for appropriate partnerships. Our partnership work operates across a spectrum of activities and relationships, from oneoff engagements to significant long-term collaborations. In between these extremes lies a range of interactions, reflecting the focus and capacity of our partners. The way we partner with the arts has been recognised as unique amongst the gas industry and best practice within business. In 2013, WWU won two coveted Arts & Business Cymru awards for our use of the arts to raise awareness of CO with Theatr na nÓg and the Royal Welsh College of Music and Drama. The outcomes of these partnerships, including our employing recent college graduates to develop an innovative way to engage with Secondary school pupils, are detailed in Part 2 of this submission. We meet regularly with the other distribution networks, as well as those in the wider sector. We systematically compare processes and performance, to identify new ideas and good practice. We benchmark both inside and outside our industry to improve by learning from others.

#### Develop supporting frameworks for engagement

We also put in place frameworks to allow regular consultation throughout the business, such as our Critical Friends' Panel and vulnerable customer forum. To build a powerful, flexible and ongoing mechanism for seeking consumer feedback on a range of issues we are pulling together an online consultative community and already have >5,000 individuals with whom we have previously engaged who have agreed to form part of this group. This will enable fast, regular and proactive feedback from targeted segmented audiences on specific and relevant business issues. This is best practice in marketing sectors and was identified as part of a benchmarking exercise.

We have used a variety of appropriate mechanisms to inform and engage stakeholders and have tailored these mechanisms to meet the needs of our various stakeholder groups.

- These are fit for purpose
- Allowing us to carry out a detailed analysis of a breadth of stakeholder perspectives

There is no single, most effective method to involve stakeholders in any given decision. In many cases, a number of differing methods are employed, sequentially or in combination, to maximise the flow of information in the most effective and efficient way possible.

Monitor & Keep Informed Monitor views via media and internet tracking. Keep informed through bulletins and letters. Speeches, conferences / public presentations, road shows, pres releases, media advertising.		Transact / Consult / Involve / Collaborate / Empower Surveys, focus groups, one to one meetings and workshops. Insumer forums, online feedback & discussion. Participatory in decision making process. Joint projects, multi stakeholder initiatives, partnership working. High
Education / Information Provision "How can we help" Proactive approach based on specific issues. React to demands and needs. Link to specific groups.	) W	Monitor & Keep Informed Innovate to Engage Surveys, focus groups, one to one meetings and workshops. Consumer forums, online feedback & discussion. Look for innovative solutions

Methods we use both internally and externally include:

**Inform** – We provide stakeholders with balanced and objective information to assist decision-making and change through:

- Increasing understanding of issues, alternatives or solutions such as brochures, newsletters and media releases
- Increasing stakeholder/community ability to address issues through both proactive and responsive community education and training programmes
- Improved access to our organisation online and via social media, we are trialling a new approach with the Royal Welsh College of Music and Drama to move our social media presence into a more consultative space and we will monitor the results

There are methods we have considered and not implemented such as the conscious decision not to letter drop either the 7.4 million people and 2.4 million supply points within our network following a cost benefit analysis.

**Consult** – We ask for feedback on specific information to understand points of view on analysis, alternatives or decisions. This ranges from written consultation such as surveys, newsletters asking for comment and documents made available for public comment, through to those involving dialogue and debate such as a public meeting or focus groups where stakeholders or the community – in relation to planned works – are able to influence proposed options Involve – We work directly with the public to ensure that we are consistently understanding and considering public concerns and aspirations. We are proud of our bespoke storyboards that we have used to consult on, and develop, our vulnerable customer strategy simply describe the touch points of our processes to allow the group to fully understand before they comment.

**Colloborate** – We partner with the community in each aspect of the decision, including the development of alternatives and the identification of the preferred position. Ownership is shared between the organisation and the stakeholders. Such as agreeing to donate land for much needed community use when undertaking statutory remediation. (See Part 2 for details).

**Empower** – Placing decision-making in the hands of our stakeholders is the final step of our journey. We are working to deliver this internally to ensure our staff are empowered to make the 'right' decision based on the situation which presents itself to them. This is particularly relevant when assessing vulnerability and supporting these stakeholders.

#### Measuring effectiveness

The success of our engagement links directly to the success of our business. At the highest level, our newly developed media report, reviewed monthly by the Exec Team, tracks the success of our external media and community engagement and the perception of our business.

The report is collated externally and since its development six months ago, our average positive and balanced mentions are 89% as a result of our more proactive media approach. Over the same period. We have maintained a 45% share of the voice.

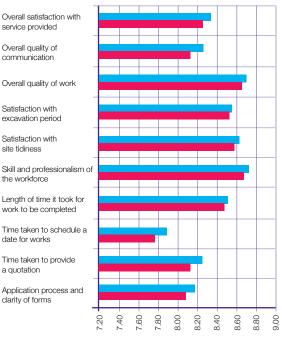
We use each interaction with our stakeholders as an opportunity to gather feedback on our performance. Over time we will use this data to track improvement, continue to invest in successful formats, and to target those areas where we may not be performing as well as we would expect. We share data with other networks via our quarterly collaboration forum.

#### Feedback from Critical Friends' Panel



In order to improve comparisons within our own datasets, this year, we have reviewed our Customer Satisfaction Reporting. We are now reporting at a much more granular level in each of the three Ofgem categories; Connections, Emergency and Planned Work. This helps to identify and address issues within individual teams as opposed to regions.

#### **Connections Satisfaction Scores**



Mean score past implementation (Q1-Q4) Mean score pre implementation (Q1-Q3)

As the above report shows, within Connections, we need to improve the time taken to provide a quotation and the quality of our communication. This is clearly letting us down in relation to other areas. Following consultation with major users such as British Gas, and customer focus groups made up of members of the general public who had previously experienced our services, we have worked with Crystal Mark to ensure all our standard communication letters are in plain English and **developed an innovative and industry first online self-quote system**. Our Critical Friends' Panel has helped us to optimise the system for one off customers. The solution has now gone live and was praised by our critical friends as innovative. It is the first service of its kind in the utility sector. Since the implementation of these initiatives, we have seen a marked improvement in our scores.

#### **Raising awareness of CO**

Our measurement of the effectiveness of our CO awareness activities shows:

 Average scores (based on means) of well over 9/10 for all age groups, but ratings tend to increase with age (e.g. 9.3/10 for under 25s, compared to 9.5/10 for the 65+ group<sup>9</sup>

Sample sub-group	Awareness Before	Awareness After	Improvement	Commit to pass on message
Total sample	6.67	9.41	2.74	87%
Aged <25	6.24	9.16	2.92	88%
Aged 26-35	6.43	9.33	2.90	89%
Aged 36-45	6.57	9.42	2.85	87%
Aged 46-55	6.77	9.49	2.72	86%
Aged 56-65	6.88	9.48	2.60	87%
Aged 65+	6.99	9.46	2.47	86%

# Creating a plan for action

We can demonstrate how we act on input and feedback from stakeholders.

#### Strengthening our ability to respond

#### Improving our processes

Our vulnerable customer focus group has recently met and have already made an impact on the way in which we operate. In order to address feedback we need to improve the data available to inform our decisions prior to our arrival on-site, we have commenced a piece of work in partnership with WPD and British Gas. The projects aims are to:

- Conduct and audit of company practice in relation to PSRs
- Offer best practice recommendations based on the material audited
- Identify areas for further improvement and share these with other suppliers and network companies

The first piece of research looking at improving data-flows for utility sector PSR customers. The work will benefit all utilities and improve service for vulnerable customers.

#### Investing in systems

Our operational staff have been collecting customer feedback cards since December 2007. The feedback has informed our improvement plans and continues to inform these plans. Our ICS auditor has noted this.

With the significant step change over recent years in the use of smart technology, our domestic customer panel asked if we could provide a more accessible feedback mechanism. We have therefore developed and introduced a customer service app. This has the added benefit of allowing us to process greater quantities of feedback more efficiently. It means we can now take on board and respond to customer feedback more quickly, ensuring we address any negative or less than complimentary feedback in real time, to improve the customer experience.



Our investment process, which includes a section on delivering 'stakeholder valued outputs,<sup>(2)</sup> ensures we always consider stakeholder value when introducing new systems. Our new streetworks system Elgin links to a site called roadworks.org and has additional customisable content. Through this, we plan to raise awareness of not only our street-works but also links to social media and other relevant safety messages such as site safety and carbon monoxide poisoning.



The investment in Elgin was triggered by consultation with Highway Authorities and local councils following our Business Plan submission. We asked how they would like us to keep the public informed of our works in their area. We were proposing to invest in the development of a WWU portal. Following feedback from those at the meeting we changed our solution to invest in a central repository as opposed to developing our own solution.

The consensus of those who participated in the consultation was that the public's first point of call would be the council. Improving the data available via the council website would prevent an additional hand-off whilst allowing both us and the council to monitor progress and coordinate our response on particularly sensitive projects.

#### **Delivering with partners**

Where we do not have appropriate capacity or skills, to deliver our projects in house, we try to work with the most appropriate partner to achieve the best outcome. Part two of our submission details the outputs of these partnerships in detail. For each of our deliverables, our partnership strategy has enabled us to drive additional value from collaboration and innovation. Spending money wisely and **delivering value for money** across all our business priorities.

Undertaking Effective Engagement Creating a plan for action

**Demanding safety always** – our "Create a Campaign" in partnership with Swansea Sound was borne out of a prohibitively costly quotation for radio advertisements. Instead, children wrote and starred in their own radio commercial. The competition reached >300,000 listeners at a third of the cost. This cost effective model is being extended across other regions in our geography.

**Driving outstanding service** – collaboration with our fuel poor partners has helped >3,600 homes out of fuel poverty this year alone. Our proactive approach has more than doubled our annual target. With an average annual fuel bill saving of  $\pounds774$  per household, this is a fantastic outcome for all those involved.

Doing all we can to promote sustainability – working with local communities to gift land and provide value added community benefits whilst investing in innovative techniques to reduce the cost of our works.

**Designing for our future** – In order to deliver Government targets of eradicating fuel poverty by 2016, we need to adopt an approach which extends beyond properties within close proximity to the existing gas network. Our Connections Manager, Nigel Winnan is working with DECC to deliver an Off-Grid Gas Mapping project which will look to provide the most cost efficient solution for each off grid property across the UK.

#### Allocating appropriate resource

As our Governance Structure suggests, our core stakeholder team is minimal, however, the cross-functional inclusion of executives in our Stakeholder Steering Group – due to the broad business reach of our engagement activities. The way our engagement strategy links to existing internal controls such as our Business Requirements Manual and Risk Register. Our integration of stakeholder engagement into investment process' and cross business decision making, along with the development of a 'pull' culture where staff volunteer to support our community engagement, all ensure the team has a wide and varied pool of resources available.

#### Developing skills capability and culture

Stakeholder engagement is central to our business. Thanks to the right information, techniques and support, our 1,300 direct employees and contractors engage with stakeholders on a daily basis. In 2013 we instigated an engagement review in order to engage our staff, ensure they were clear on our business priorities and find out where we could improve. It was important to capture as many views as possible so we used an online survey, interviews and focus groups. Over 600 people took part.<sup>(6)</sup> "We want to be involved in the early stages of change programmes so that we can use our knowledge to really help them succeed."

This confirmed that throughout our business, people recognise that working together is important. They want new ways to make collaboration easier. They also want to understand and be more involved in key areas of the business. An outcome of the review has been the refreshed approach to community engagement when we undertake significant works in an area. This culminated in the development of a communications toolkit and decision tree for first line managers to help assess the most appropriate and useful method of engagement with each community.<sup>6</sup>

The supporting media relations strategy and linking with other key messages, namely our "say NO to CO" campaign to raise awareness of carbon monoxide poisoning whilst in that community, ensures we are delivering added value, whilst communicating clearly with everyone, and providing additional support to vulnerable premises and people where required.

Our focus on 'people,' those impacted by our work, or the attitude and emotional intelligence of those doing the work, links into the greater focus our competency framework will have on behaviour. Our communications toolkit and stakeholder manual will provide employees with the skills to outperform stakeholder expectations.

#### Culture – being approachable



To break down barriers to effective engagement, we are taking action to raise awareness of WWU as an organisation. Currently, not everyone we serve understands who we are, what we do and the values we stand for. This is the nature of the type of work we do and so we recognise that we don't need to be a household name. However, we want to continue to ensure that we have a brand that is accessible to all and portrays how we want to shape and define

our business. Further to feedback from our own people and our Critical Friends' Panel, we have made a conscious decision to move away from our traditionally corporate tone of voice, which distanced us from our stakeholders. We are refreshing our brand to adopt a more friendly, approachable tone of voice. We have consulted our Critical Friends' Panel and the trade unions on our proposed changes and they have been very well received.

This will feed into our website review and social media strategy.

Our Engagement Strategy Undertaking Effective Engagement Creating a plan for action

#### Implementing new ideas

Sometimes we receive feedback that, following analysis, we decide not to act on. For example, there was no support to fund our gas holder demolition programme. However, in order to meet statutory obligations, the programme was a necessity. We informed our stakeholders of this requirement along with the plans we have developed in order to keep costs to a minimum. These plans include, 100% sustainable reuse of materials onsite as demonstrated by our Ammanford case study (p.24 Part 2).

In this instance, we fed back to those stakeholders to tell them the reasons why we could not take their suggestions forward.

Changes we have made following stakeholder feedback are detailed in part 2 but include;

- Improving our crisis management procedures, allowing self restoration and isolation of appliances in consultation with the HSE and our both our domestic customer and Critical Friends' Panels' about how this would work in practice and should be communicated, particularly to the vulnerable<sup>1</sup>
- Launch of an innovative and industry first online self-quote system<sup>10</sup>
- Customer service app to enable real time feedback on which we can act<sup>1</sup>

#### **Sharing and learning**

We openly share our approach – those initiatives that went well and those that didn't – with other networks at our best practice quarterly forum meetings and support other networks' stakeholder events. Pooling the resource and experience of four companies as opposed to one, we are able to achieve so much more as demonstrated both by our work on raising awareness of Carbon Monoxide. Following a meeting between the gas distribution networks, the big six gas suppliers, Energy UK, charities and the All-Party Parliamentary Carbon Monoxide Group Co-Chair Barry Sheerman MP in late 2013, WWU has taken a lead on a new, collective campaign approach to prevent deaths and illness caused by Carbon Monoxide poisoning. WWU commissioned a consultant, Cause Action, to workshop a way forward. The output will ultimately form the basis of public information films supported by the Cabinet Office.

By working collaboratively and sharing funds, resource and experience, achieving this single consistent campaign approach now seems possible. Meanwhile, we can now apply the lessons we've learned from working on this high profile campaign to any smaller campaigns we run within each of our individual networks.

#### We have also been working with local utility companies to identify shared values and facilitate slicker utilities engagement across our region.

This approach has been very much welcomed by our shared stakeholders. Western Power Distribution are an active member of our Critical Friends' Panel and have been involved in the shaping and development of initiatives across our shared geography.

#### **Reviewing our engagement process**

In September 2014 we will publish our annual report to stakeholders. This will include the details about our performance against each of the different goals or 'outputs' for year 1 of RIIO and list the outcomes delivered to date. We will use this opportunity to consult on our plans for the remainder of our 8 year price control period in order to make sure we keep investing in the right areas and improving our stakeholder engagement. This annual consultation opportunity will inform the planned midpoint review at 2017.

Our focus on 'people,' those impacted by our work, or the attitude and emotional intelligence of those doing the work, links into the greater focus our competency framework will have on behaviour. Our communications toolkit and stakeholder manual will provide employees with the skills to outperform stakeholder expectations.

## Reporting back and giving assurance to our stakeholders

External facilitators support our key stakeholder events. They draft an independent post engagement report, which is circulated to stakeholders to agree key messages and the actions we are taking forward. These are circulated more widely for comment and published on the stakeholder section of our website to allow other people to add their opinions.



Part 2 of our submission goes on to discuss how we turn discussion and feedback into outcomes valued by our stakeholders. Driving Outstanding Service Delivering Value for Money Doing all we can to Promote Sustainability

### Part 2 Delivering our engagement strategy

## Demanding **SAFETY**, ALWAYS



### We will use our engagement to:

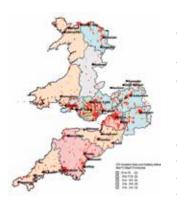
- Drive safety forward, continually looking for ways to improve standards for both customers and colleagues
- Raise awareness of CO poisoning inspire behaviour change, influence policy and support technical innovation

What our stakeholders said	What we have done
Taking into account carbon monoxide (CO) is not solely a gas issue, continue investment to proactively raise awareness	We have delivered a variety of awareness programmes, informed by our data, tailored to each stakeholder group. We are also taking a lead in a broader response to tackling the risks of CO

#### WWU Say NO to CO

For Wales & West Utilities (WWU), delivering a safe and reliable gas supply is our number one priority. This centres around the communities our infrastructure serves. Following consultation with our stakeholders, raising awareness of CO forms a central part of our social obligations. We are always looking for new ways to raise awareness of the dangers of CO and, acting on stakeholder feedback, have worked to tackle this issue more widely than those connected to the gas network. We are delighted to be widely acknowledged as the leaders in this field; working closely with valued partners to encourage innovation we are committed to continuing our efforts to **raise awareness, inspire behaviour change, influence policy and support technical innovation** to eradicate the risk of accidental CO poisoning.

#### **Tailoring our approach**



Research shows the effects of CO poisoning can vary between individuals, with the young, elderly and some other vulnerable groups being particularly susceptible. By using the quality data our Emergency engineers collect onsite to map our incidents geographically, we designed and produced a 'hotspot' analysis. We were the first

GDN to proactively target our campaigns to those communities most at risk. We also use this analysis as a hook with local media and ministers to help promote and support our campaigns in at risk constituencies. So far, over one million people have benefitted from our campaign, with vulnerable groups including children, students and older people being specifically targeted.

#### Different stakeholders, different methods

We recognise that different methods of engagement will resonate with different stakeholder groups and have worked with our partners to deliver a range of initiatives raising awareness of CO poisoning.

#### Innovating with the arts





The way we partner with the arts to get our message across is recognised as unique amongst the gas industry and best practice within business<sup>3</sup>. WWU won two coveted Arts & Business Cymru awards: Arts, Business and Young People and Arts, Business and the Community, for our projects.

'A Breath of Fresh Air' our play with Theatr na n'Óg involves WWU FCOs and local schoolchildren to shape, produce and take part in the play which they then present to their grandparents, another vulnerable group.

Our film – The Silent Killer- which Baroness Finlay of Llandaff, Co-Chair of the All-Party Group, "gave five stars," was developed in partnership with the Royal Welsh College of Music and Drama. Extending our partnership with the college, WWU are employing recent graduates to deliver our first outreach programme for theatre: a unique 10ft puppet that interacts with secondary school students. We are working with the RWCMD outreach team to engage with schools and teachers about the best methods for them to share the message with family and friends, to reach a wider, more diverse audience.

<sup>3</sup>http://www.aandbcymru.org.uk/news/2013/07/09/performing-in-perfect-partnership/



#### Innovating with technology

Recognising the large number of rural communities in Wales, we have worked in partnership with Techniquest to develop an interactive learning environment. Our bespoke campaign has gone on to target major shows including the Royal Welsh Show and National Eisteddfod. Wales has a population of around 3million so, with the Royal Welsh Show alone receiving 214,000 visitors, we were able to engage directly with at least 8% of the Welsh population. We have directly interacted with over 10,000 families via this means, providing each with safety advice and an opportunity to test their improved knowledge winning a CO alarm; we were awarded 'Best Stand of Educational Value' for our innovative approach and have already saved one family who – after receiving and using their alarm from the Eisteddfod, discovered a CO problem. The family returned the following day to thank WWU 'for potentially saving our lives'

Working with the elderly – Older people are being reminded of how to look out for signs of CO through our unique partnership with Age Cymru. We've distributed. 30,000 cardboard thermometers that give key advice on how to keep warm and facts about CO.

One of the visitors to Age Cymru's the day centre said:

66 You can bet that I'll be getting the chimney swept now. I've also got the free alarm and I'll make sure I use it 99

#### Taking an industry lead in a broader response

Our industry conference on CO safety – Ignorance can be fatal – held in June 2013 included shippers, suppliers and representatives from other fuel groups. It was the first event of its kind addressing CO.<sup>®</sup> Barry Sheerman MP, Co-Chair of Carbon Monoxide All Fuels Action Forum described it as; 

Following the success of last year's conference, we have joined forces with other gas distribution networks to deliver Knowledge is Power, the second industry conference

which will focus on behaviour change. The next stage of our campaign.

#### Changing our processes and culture

All our emergency engineers now wear personal alarms to detect CO and we've issued all 1300 staff with a CO alarm for their homes. In addition to the positive impact our investment in their safety has had on our employees, we are seeing a large number volunteer to support our outreach campaigns at national shows and events, as well as locally within their communities. Gaining their buy-in into the project has meant they now act as ambassadors, raising awareness and providing invaluable energy and resources to the campaign.

#### **Resourcing our projects**



Internal staff engagement in events has resulted in a 'pull' culture where colleagues outside the project team support the business in ensuring social benefits of projects are realised. This is a significant shift in behaviour from the 'push' culture adopted initially. This enables WWU to go above and beyond standard business objectives without having to fund any additional business resources. i.e. Wayne,

one of our staff volunteers, usually works in complex quotations, explains the dangers of CO to a group of schoolchildren at the Royal Welsh Show.

We know that effective partnerships are critical, so each part of our CO campaign has a strategic partner; Age Cymru, Theatr na nÓg, IGEM,Gas Safe Register to name a few of those we have worked with over the last 12 months. These partnerships allow us to maximise any and every opportunity to raise awareness of this silent killer in a cost effective manner. Driving Outstanding Service Delivering Value for Money Doing all we can to Promote Sustainability

#### Monitoring our results

Socially, the benefits are wide reaching with over 1 million people benefitting from our campaign and 15,000 alarms distributed. Each of these represents a direct interaction with a member of the public in order to educate them of the dangers, advise them of what action to take to reduce the risk and inspire them to pass the message onto a friend or family member.

We have developed a reputation for being a leader for CO awareness. We have been invited to sit on a number of groups including a task and finish group in Wales and the All Party Parliamentary Group Carbon Monoxide Action Forum in Westminster. By acting locally we have been able to influence national policy.

In summary, WWU has used its data analysis tool to develop a strategy based on our geography, enabling engagement with a variety of groups and communities – in areas at most risk. We have maximised partnership-working to ensure messages are delivered effectively, by trusted people within local communities, at minimum cost to the consumer.

#### **Measuring success**

Each of the campaigns mentioned have a number of measures in place. This includes quantitative data measuring increase in awareness and intention to take action; purchase alarm, have appliances serviced, discuss CO with their friends and family, seek medical attention. We measure the step change in awareness with a minimum 2-point change being necessary to continue the investment. For example, our participation at the National Eisteddfod showed awareness rose from <7 to >9. Overall feedback from surveys has verified the message has been effective with >90% citing an improvement in awareness, and >85% committing to pass the message onto a friend or family member.<sup>9</sup>

Ofgem annually assess the effectiveness of distribution networks' campaigns and award a discretionary payment to those demonstrating best practice. WWU has been placed first for the last two consecutive years. We have been fortunate in being able to reinvest these funds into a number of our social campaigns and are an active member of the collaboration forum to share this best practice with the other distribution networks.

# Driving OUTSTANDING SERVICE

### We will use our engagement to:

- Give our customers great service, peace of mind and value for money by putting their needs at the core of our planning, services and communications
- Improve our daily operations, policy procedure and process, particularly to address vulnerability delivering quality outcomes for those in most need

What our stakeholders said	What we have done
Do more for those in need and consider vulnerability in its many varied forms	Developing a Vulnerable Customer Strategy, that equips our employees with the emotional intelligence and freedom to do the right thing
Improve the quality of data around vulnerability to ensure it is fit for purpose in a "crisis"	Working with WPD and British Gas to develop a common approach to data collection, recording and sharing
Working to address fuel poverty is a key concern, particularly in the current economic climate	Reviewed promotion of fuel poor scheme and worked with partners to increase connection rate
Improve customer communication	Developed online services tool and undertook a programme to get all correspondence Crystal marked by Plain English Campaign

At WWU, we are proud of our reputation for delivering quality service. This year, we achieved a score of 85.6 in an external customer satisfaction survey conducted by the Institute of Customer Service (ICS)<sup>4</sup>. This is considerably higher than the utility sector average and the average of all the ICS member companies across all sectors. Regular consultation and acting upon feedback has been the key to our success.

#### Serving vulnerable customers

At the first meeting of our Critical Friends' Panel in November 2013, we consulted on a number of our social obligations, including services offered to vulnerable customers. At this meeting, there was group consensus that WWU can and should do more. A Vulnerable Customer Forum was established, including representatives from the Salvation Army, the Fire Service, Business in the Community and Energy Utility Skills.<sup>™</sup> The group met to undertake a deep dive into WWU's processes looking at each touch point with customers and how these may be affected by vulnerability in its varying forms. The majority of suggestions made by the group, including the provision of additional advice, support and facilities were considered best practice by WWU and are being undertaken. However, this is not always the case. We are working to develop our vulnerable customer strategy in close consultation with this forum in order to ensure that operations and back office staff are equipped with the skills, supported by appropriate partners, and empowered to make the right choices whilst working in our local communities.

#### WWU / WPD and BG partner to improve Priority Service Register for all

In order to improve the data available to inform our decisions prior to our arrival onsite we have commissioned a piece of work in partnership with WPD and British gas.<sup>(A)</sup> The project has three aims:

- Conduct an audit of company practice in relation to PSRs
- Offer best practice recommendations based on the material audited
- Identify areas for further improvement and share these with other suppliers and network companies

#### Supporting vulnerable communities

When consulting on vulnerability, it was suggested by stakeholders at our Critical Friends' Panel that it is not only people who become vulnerable, whole communities could be thrust into vulnerability. This became evident in the height of the flooding. Along with much of the seawall and road, our gas main was swept away. Worst hit was Riviera Terrace, Dawlish, where we worked closely with emergency service providers to isolate damaged mains overnight providing alternate cooking and heating to residents during ever worsening extreme weather conditions.

- This year saw the wettest January since records began in 1766
- Approximately 65 million cubic metres of water flooded the Somerset Levels

When the floods hit Somerset, getting around in regular forms of transport was almost impossible for our engineers. Peter Frearson, a technician with our Emergency team said, – "We went around in anything volunteers made available. We've had floods in the past, of course, but this was nothing like I'd seen before. Putting in the extra hours to do what we could to help was the least we could do."



#### Working to address fuel poverty

Following consultation with Stakeholders including our fuel poor partners, local, regional and national Government charitable organisations such as NEA, and the Energy Savings Trust, Wales & West Utilities have formed a strategy for fuel poverty based upon the following approaches:

Improved Data	<ul> <li>To identify the proximity of off gas properties to our network and identify concentrations of those in fuel poverty</li> </ul>
Proactive partnerships	<ul> <li>To assess Social Housing stocks and to identify where gas offers a cost effective solution for households</li> </ul>
Community Engagement	Canvassing of private households via     Community Events and local information
Communication and knowledge sharing with customers and organisations	• To understand the various sources of funding available to tackle fuel poverty, in particular energy efficiency
Whole house solution	• To offer customers where gas is not the best option direction for obtaining independent advice on the options available to them

In our RIIO business plan we committed to undertaking at least 10,800 funded connections over the 8 year period. In 2013/14 we connected 2,325 homes to our network with funding from our Warm Home Assistance Scheme representing 30% of the total connections made to existing homes. These were split evenly between Wales and the south west.

The 2,325 connections equate to a theoretical like-for-like energy saving of £1.1m per annum and 280,000 tonnes of lifetime carbon savings.

In Wales, we have worked with the administrators of the Welsh Government ARBED scheme to deliver three community network extensions schemes involving 10km of mains and 450 new services. We have also worked with the NEST team targeting hard to treat homes resulting in almost 250 gas connections.

In England, the lack of a government-led energy efficiency scheme has resulted in a different approach. Working with British Gas we have started a fuel switch programme in Cornwall that will target 600 connections in 2014 and at least 1,000 in each of the next four years with our scheme funding the gas services and ECO money funding the heating systems.

<sup>&</sup>lt;sup>4</sup> A uniform questionnaire is used to survey customers across all sectors including retail, finance, automotive, tourism etc. which asks customers to rate their levels of satisfaction with all areas of a company's service including, calls to the call centre, complaint handling as well as the face to face service.

Demanding Safety, Always Driving Outstanding Service Delivering Value for Money Doing all we can to Promote Sustainability Designing for our Future

We have also continued to develop our relationships with local authorities and housing associations and have delivered around 90 schemes ranging from five to 100 properties across our network.

## Flintshire Case Study: New gas main hope to cut bills by hundreds of pounds

Figures in a council report show around 20,000 households in Flintshire are living in fuel poverty – struggling to meet their energy bills. WWU has made it a priority to tackle the issue, working with Flintshire council to see if it is financially viable to install gas pipelines to Aston and Mostyn.

Claire Budden, Head of Housing at Flintshire County Council, states: "Current statistics suggest that one in three Flintshire households are in fuel poverty. Tackling this is a priority, as it contributes to improved health, reducing social exclusion and supporting the economy both in terms of jobs and providing households with more disposable income."

In Aston and Mostyn – 111 and 806 homes will benefit respectively. Delyn AM Sandy Mewies highlighted the project in the Senedd "based on today's prices, (the project) will secure a saving of about £774 per household per year."

#### Improving our customer communications

In order to improve our customer communications in light of our Connections Customer satisfaction scores and feedback from our root cause analysis of complaints, we consulted a domestic stakeholder panel. Attendees had experienced work from one of our three main processes (connections, replacement, or emergency) and were incentivised with a £20 Tesco voucher to spend an afternoon providing us with some honest feedback.

Their feedback	Our action
Too much jargon in forms and correspondence	Undertook a programme to get all correspondence Crystal marked by Plain English Campaign.
Why can't we have an appointment time?	Team now call day before work commencement to confirm arrival time.
No future support offered to customers using gas – how to get a supplier, energy efficiency	Put together a new completion pack to include information about finding a gas supplier, energy efficiency in the home, advice on switching suppliers, CO awareness, the gas emergency number

We will monitor the success of these improvements via customer satisfaction scores and complaint analysis. We have scheduled regular review points and have committed to review again with a Domestic Panel in 12 months to identify any additional improvements.

## Engaging with impacted properties and communities

WWU invests £2m per week in improving the safety and reliability of our network. This can mean we are working in an area for extended periods. In order to minimise the disruption caused by our streetworks, WWU works closely with local highway authorities to plan works and has developed a proactive media relations strategy which includes a decision tree for programme controllers of who to engage with, when and how. The toolkit includes tips and support for drafting updates, arranging community drop-ins and engaging through different methods including social media. We are beginning to see improvements in our performance as reflected by the case studies in our supplementary evidence.

#### Improving our customer satisfaction

Within Connections, we needed to improve the time taken to provide a quotation and the quality of our communication. Targeting these areas for feedback, we consulted with domestic customers<sup>(1)</sup>, suppliers (British Gas), Housing Associations and other third parties.

Their questions	Our response
Can we see your maps?	We have developed an online
Can we get prices for different options without having to complete lots of forms?	<ul> <li>portal which provides:</li> <li>Access to maps with intelligent routing of pipes</li> <li>Indicative costs</li> <li>Firm costs were no defined risks</li> </ul>
Can we order and pay online as we can for other companies services?	<ul> <li>Ability to select a preferred date for the work prior to payment</li> </ul>

Ompan	INCLOSE TO HALLS & NE ST UTILITIES INCLUSE OPERATION PORTAL
)= 00,000	
Name de la consente 4 Porte de consente 4 porte de porte de po	A set to depend on an of well is set to set of a
	The second secon

Thanks to further development in May to July 2014, we will soon be able to use this innovative new application to allow our call centre staff and quote teams to log and quote jobs during telephone calls and will reduce prices to all customers in line with savings recognised in back office.

We are seeking feedback from customers who received a quote they did not accept. This allows us to improve our online service and give advice on grants and funding where cost was the reason they did not proceed with the work.

# Delivering VALUE FOR MONEY



### We will use our engagement to:

• Spend money wisely based on what delivers the very best value, every time driving additional value through collaboration and innovation

What our stakeholders said	What we have done
Addressing the theft of gas issue	Cleansed data and improved processes to highlight theft
Innovate to reduce cost	Developed a one man tool for meter box replacement saving both time and money

Achieving best value runs throughout all our projects. Spending money wisely is part of how we deliver our regulatory commitments, with savings shared between shareholders and consumers this is mutually beneficial.

#### **Reducing 'gas theft'**

The energy watchdog has called for new action to tackle gas theft – where criminals bypass gas meters. Estimates suggest this costs the UK £138m each year<sup>5</sup>. In the current climate, where affordability is a real concern, WWU is addressing this issue through active engagement with Gas Suppliers, Ofgem, Xoserve IGTs and UIPs.

Their concerns	Our response
Quality of available data	Cleansed data
No proactive monitoring of	Undertook a series of
new supplies that have been	visits to the top 50 highest
connected to ensure a gas	consumers where the was
supplier is in place before gas	no supplier in place and
is taken at the property	cleansed these records
Apparent lack of data	Agreed internal approach
controls leading to misleading	to gaining warrants and back
address data for billing	billing for theft of gas

#### Cost effective radio campaigns

Our 'Create a Campaign' in one of our targeted CO hotspots with Swansea Sound was born out of a prohibitively costly quotation for radio advertisements. We knew we needed to find an innovative solution so we held a competition that encouraged children across the region to write and star in their own radio commercials raising awareness of CO and its dangers. The competition reached >300,000 listeners at a third of the cost. This cost effective model is being extended across other regions in our geography.

#### Turning colleagues' bright ideas into reality

Innovation is saving WWU both time and money, the benefits of which can be passed onto consumers. Keith Nash, Emergency and Metering Manager from Redruth, came up with a new meter box adapter that could be installed without the need to involve an engineering gang to cut off and reconnect the gas supply to a domestic property. The benefits of time and cost are significant, allow engineering teams to respond to other emergencies and end the need for any excavation works on the public highway or domestic properties.

### "The industry had a whole list of problems needing solutions and everyone can benefit if we share the learning"

Lucy Mason, Innovation Manager.

#### Treating and reusing gas holder sludge

One of the costliest aspects of a gasholder demolition project is the handling and disposal of gasholder sludge. WWU has developed an unique and innovative way of managing sludge. Using technologies most commonly used in the remediation industry, we have commenced four stage treatment process full scale innovation project. The project enables sludge to be transformed into a material suitable for re-use. Anticipated cost savings of 30% compared to traditional approaches (high temperature incineration) and is projected to save 50% carbon emissions – equivalent to 66tCO<sub>2</sub>e

<sup>5</sup>http://www.thisismoney.co.uk/money/bills/article-2120435/Ofgem-calls-crackdown-gas-theft-help-save-households-6-year.html

Driving Outstanding Service Delivering Value for Money Doing all we can to Promote Sustainability

## Doing all we can to promote SUSTAINABILITY 🎭

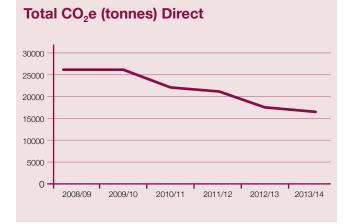
### We will use our engagement to:

• Support local communities and protect and enhance the environment, both now and for the future

What our stakeholders said	What we have done
Mitigate our impact on climate change by continuing to reduce our $\rm CO_2$ emissions	Pulled investment forward to deliver 4% $\rm CO_2$ reduction this year against a target of 16% over RIIO
Support local communities & protect the environment	Recycled green waste for community and environmental gain, gifted land to communities and built additional stakeholder benefits into projects i.e. otter holt

#### Protecting our environment

Delivering a low carbon, sustainable gas network is a key commitment for WWU. Our environmental strategy, developed in close consultation with stakeholders, has delivered a reduction of 4% in  $CO_2$  emissions in 2013/14.



Our world-leading ISO14001 performance – being the first utility ever to achieve no non-conformances in a full 3-year certification period – demonstrates how we are placing environmental management at the centre of our operations and continuous improvement in this area.

#### Addressing the risk of contaminated land

We further reduced our risk profile in 2013/14 undertaking statutory remediation at six sites including a former gasworks location in Ammanford. The project, completed in July 2013, won us the Brownfield Briefing award for most sustainable reuse of materials. A staggering 100% of the materials were re-used on site.

Throughout the Ammanford project, we worked closely with stakeholders (local authority, Natural Resources Wales and nearby residents and businesses). Following their feedback, we have gone beyond our obligations to respond to community need and combine our remediation and riverbank protection objectives with a range of habitat enhancement features. Nest and roost boxes were installed in addition to an artificial Otter Holt and Kingfisher Tunnel.



Similarly, in Llangefni, following remediation we are now in a position to work with Ynys Mon council to transfer the land into their ownership for much needed community use.

## Recycling Green Waste for Community and Environmental Gain

When clearing vegetation to facilitate these essential remediation works, a number of large trees often have to be removed to provide site access. This process regularly generates large volumes of what could otherwise have been seen as green waste. As a sustainable and practical alternative, we work to recycle the material within the local community. Several tonnes of wood chip were provided to local community projects this year including volunteer groups, allotments and a small community farm. Larger logs were also provided to local businesses to heat their office facilities and workshops.

## WWU investment paves the way for cost efficient onsite remediation

Balancing the needs of the stakeholders who are immediately impacted by the risk of contamination and our remediation work, with those future consumers who will ultimately foot the bill is a challenge.

During consultation, our stakeholders recognised the need for remediation but did not want us to spend more money on it. So, we took an innovative approach, collaborating with, globally respected organisation, Contaminated Land: Applications in Real Environments (CLARE) and the Energy Innovation Centre to fund a project to identify and understand the application of emerging technologies to gasworks contaminated land. Ultimately, this will allow all gaswork sites to undertake more efficient management of former gaswork sites owned by other GDNs, Electricity Distribution Networks, Local Authorities and other private asset owners for the wider benefit of consumers. The outcome of the study will help to deliver more cost efficient sustainable onsite treatment of soil and ground water. This will reduce the volume of materials needing to go offsite to landfill and distant treatment centres. It will also reduce the import to site of aggregate materials for backfill.

## World's first climate change driven remediation project

We have taken a two-pronged approach to climate change; mitigation of our carbon emissions and adaption to climate change forecasts, resulting in the world's first climate change driven remediation project at one of our former gasworks sites at Wem, Shropshire. For this, we won Business in the Community Wales Environment award in July 2013. "It was very interesting to see WWU taking a proactive and forwardthinking approach to assessing potential statutory risks. We applaud the novel integration of climate change predictions into contaminated land risk assessments."

#### Dr Morwenna Carrington, Defra

Principles applied at Wem apply to every investigation and remediation project we do, however, we have since taken addressing the risk of climate change to a completely new level at a former gasworks site in Briton Ferry.

Current, and future, climate change conditions highlighted a quantifiable step change in risk between now and 2020 at this site. In order to mitigate this risk we have commenced an onsite sustainable remediation project, which will be complete by December 2014. This is a very sensitive project as the image below demonstrates. The area inside the red boundary line is our responsibility. Both proximity to local housing and access are key issues. Government led remediation of the gardens surrounding our site put a lot of strain on the local community and a number of the residents are still upset. We are engaging with the local council and community to develop a plan to complete our works with minimum disruption. We will work with the community and wider stakeholders to explore the options for gifting the remediated site for valuable community use.

Natural Resources Wales Local Authority, Contaminated Land Officers, Environment Agency, GDNs and ENA are visiting the site in August at which point we hope to share how we have successfully dealt with the project's challenges to support their own embryonic contaminated land programmes.



Driving Outstanding Service

Designing FOR OUR FUTURE

Delivering Value for Money Doing all we can to Promote Sustainability

OUR FUTURI

# We will use our engagement to:

- Invest in our people so we have the skills, confidence and innovative mind-set to build our business long into the future, creating a company that people aspire to work for
- Work with partners to address industry challenges including, fuel poverty and smart metering
- Improve business performance, and develop current and future business plans

What our stakeholders said	What we have done
Minimise potential disruption caused by smart metering	Worked with supply and distribution to mitigate risks
Play your part in delivering the government's fuel poverty target	We are supporting solutions beyond the gas network leading a sub group of the national off grid gas group which looks to extend the mapping exercise first undertaken in Wales across the UK
Support the injection of biomethane into the gas network	Invested in research to facilitate biomethane injection into all distribution networks

#### Assisting the move to smarter homes

We have an important role to play in the supplier-led roll out of smart meters. We are mindful of the potential disruption to consumers, and are engaging with suppliers to find solutions to these issues so that we can facilitate delivery of a safe and efficient rollout in line with Government targets.

We have led the development of an industry Service Termination Document<sup>6</sup> for use by both distribution and supply. This document lists all the issues that suppliers will come across when installing a smart meter and provides next steps and advice for suppliers on how to proceed in order to minimise the disruption to the customer.

We have worked with ENA, Energy UK and the other GDNs to engage with the suppliers on business as usual issues such as moving meters for Replacement jobs and also for customer driven service alterations.

Post Emergency Metering Services is a key revenue stream for the GDNs. We have tried to engage with suppliers regarding their future requirements. The likely outcome is that we will cease to do PEMs meter exchanges after smart meter rollout commences. There is a potential risk for WWU in terms of customer service because we can no longer replace meters. We have raised this issue with suppliers but are considering engaging the central delivery body to agree a way forward.

#### Investing in our people

During 2013/14 we have undertaken a significant staff engagement programme which has sought to improve our communications, relationships and the way in which we work. The company training plan is reflective of the skills we need to engage both externally and internally. Engagement with 100% of colleagues demonstrates our ongoing commitment to invest in our people. Which, in turn, delivers benefits for external stakeholders.



Demanding Safety, Always Driving Outstanding Service Delivering Value for Money Doing all we can to Promote Sustainability Designing for our Future

#### **Eradicating fuel poverty**

In order to deliver Government targets of eradicating fuel poverty by 2016, we will adopt an approach which extends beyond properties within close proximity to the existing gas network. In order to develop our strategy we have consulted with MPs / AMs and councillors, residents of properties off gas, consumer groups and companies with access to other funding (British Gas, Happy Energy, plumbers).

They said	We did
How many properties are off the gas network in an area?	Used available data from DECC and work with Welsh Government to produce an information pack for each MP and AM in our area
Which properties could be connected economically taking advantage of the WWU fuel poor funding?	Worked with the national Off Gas Grid forum to carry out a mapping exercise to identify every off gas grid property in the UK and to establish the distance to the nearest gas network and the indicative cost of connecting.
Which properties are in IMD top 20% areas and would qualify without the need for household assessment	Built a decision tree for households and organisations to access the data to establish options and funding streams for that household or community and to target priority customers
How can we better support the true fuel poor and vulnerable households?	Worked with British Gas to map all 17,000 social housing properties in Cornwall not connected to the gas grid The partnership approach to funding has led to a programme of fuel switching in Cornwall over the next five years targeting a least 5,000 homes.
	Engaged with charities to look at options of providing support to vulnerable customers. Our principle is that the services offered should cover a broad geographical area and not just a local initiative.
	Influencing government policy and future funding by providing case studies of customers who qualified for WWU scheme funding but could not get support for the internal measures meaning that they did nothing.

#### Addressing challenges identified through consultation

We are working with charities to provide training and support to their network of advisers and are also putting options in place for connecting to IGT mains which are closer to communities than our network – two key challenges identified during our consultation process.

We will engage on the future of the GDN fuel poor scheme at our next vulnerable customer forum in June 2014. This will feed into our forecast workload and engagement with Ofgem during their review of the scheme.

## WWU engineering expertise beckons new era in UK gas distribution

There is a major opportunity for our industry to reduce greenhouse gas emissions by injecting gas generated from renewable sources directly into the existing gas distribution network. To support this exciting new opportunity, WWU is playing a key role in tackling some of the technical issues surrounding Distributed Gas. We have partnered with GL and REA to complete a detailed two-part study into internal corrosion of metal mains. Biomethane, the gas that many producers want to inject into the distribution systems, contains more oxygen than is currently allowed by the Gas Safety (Management) Regulations. We have carried out a study that was designed to provide evidence to the Health and Safety Executive that increasing the allowed oxygen limit to 1% from the current 0.2% by volume was safe and satisfied the very strict safety test they have to apply.

The report has been accepted by the HSE and builds on the work completed by Scotia Gas Networks and Southampton University. As a result of all our research, the HSE issued a class exemption to SGN who are using it at their site in Poundbury. Ultimately, the exemption will apply to all gas transporters and will enable plants to inject biomethane using this class exemption rather than having to seek individual exemptions for each plant, an activity that is both time consuming and expensive. This work removes a major obstacle to the development of biomethane injection into gas distribution systems in Great Britain. WWU's investment in this project, enabling full scale Biomethane onto the National Network, has a massive payback in carbon terms. 10% Biomethane represents a reduction of 3million tCO<sub>2</sub>e per annum nationally, with an abatement value of £162m pa maximising benefits for gas consumers and the wider industry.

#### **Continuing our journey**

Throughout the price control we will report to stakeholders on progress made against outputs in a way that enables them to understand; outcomes delivered, at what cost, why these outcomes are important and how they can influence our plans going forward. We are already developing a timeline for consultation around the mid-point review. This will include, workshops, surveys, online feedback and open consultation events. We are keen to work with stakeholders to identify further opportunities to deliver great service.

# Supplementary Evidence

#### Comprehensive and up to date engagement strategy

P Storyboards
Q County show analysis
Media Report & sample news stories
S Case study of efforts undertaken to reduce impact of replacement project in High Street and Temple Street
T Customer Service App
Acting on stakeholder feedback
Critical Friends' Panel feedback – self restoration & isolation case study
5
Scope and Terms of Reference for ongoing
<ul> <li>Scope and Terms of Reference for ongoing gap analysis work</li> <li>Critical Friends' letter of assurance to panel</li> </ul>
<ul> <li>gap analysis work</li> <li>W Critical Friends' letter of assurance to panel</li> <li>SGS industrial services independent report</li> </ul>
<ul> <li>gap analysis work</li> <li>W Critical Friends' letter of assurance to panel</li> <li>SGS industrial services independent report &amp; ISO55001 Certificate</li> </ul>
<ul> <li>gap analysis work</li> <li>Critical Friends' letter of assurance to panel</li> <li>SGS industrial services independent report &amp; ISO55001 Certificate</li> <li>ICS auditor's findings</li> </ul>
<ul> <li>gap analysis work</li> <li>W Critical Friends' letter of assurance to panel</li> <li>SGS industrial services independent report &amp; ISO55001 Certificate</li> </ul>
<ul> <li>gap analysis work</li> <li>Critical Friends' letter of assurance to panel</li> <li>SGS industrial services independent report &amp; ISO55001 Certificate</li> <li>ICS auditor's findings</li> </ul>
<ul> <li>gap analysis work</li> <li>Critical Friends' letter of assurance to panel</li> <li>SGS industrial services independent report &amp; ISO55001 Certificate</li> <li>ICS auditor's findings</li> <li>Plain English campaign members certificate</li> </ul>
<ul> <li>gap analysis work</li> <li>Critical Friends' letter of assurance to panel</li> <li>SGS industrial services independent report &amp; ISO55001 Certificate</li> <li>ICS auditor's findings</li> <li>Plain English campaign members certificate</li> <li>Priority Service Register investigation scope</li> </ul>

Variety of appropriate mechanisms

O 2013 CO conference report







**W**wutilities wwutilities.co.uk