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James Veaney
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Dear James,

RIIO-ED1 Stakeholder Engagement and Consumer Vulnerability (SECV) incentive consultation

Scottish and Southern Energy Power Distribution welcomes the opportunity to respond to the recent consultation on the RIIO-ED1 Stakeholder Engagement and Consumer Vulnerability guidance document.

Overall, we consider the proposed amendments to be reasonable and, in particular, we welcome the increased focus on vulnerable customers, which aligns with our advanced strategy internally to continue to find more ways to help these customers. We do have some comments and suggestions on the guidance document, which are detailed below.

Third party visit

An independent third party visit to all network companies to assess performance in relation to vulnerable customers seems a sensible proposal and one that would provide the panel with a better understanding of companies' strategies in relation to these customers and the ongoing engagement that is carried out. To maximise the benefit of these visits, it would be helpful, perhaps as part of the trial in the summer, to develop agreed upon procedures setting out the scope of the visits. This would allow companies to ensure that they are fully prepared and able to provide all of the relevant information, with the appropriate people available to discuss the relevant topics.

Assessment criteria

We note that the weightings associated with the assessment criteria, which already exist on the Stakeholder Engagement Scorecard, have been included in the guidance document. This is helpful and ensures that the process is transparent. Historically, further detail on each of the assessment criteria has also been included in the Scorecard. In the interests of transparency, it would be useful if this further detail could also be included in the guidance document.

Panel

Understanding the areas of expertise of the Panel members allows us to ensure that our presentation addresses the key areas of interest for the Panel. We note that at least one member of the Panel will have consumer vulnerability expertise; we would welcome a high level summary of the expertise and key interest areas of other panel members too in advance of the submission date.

Modifications

Given that this incentive is likely to develop over the course of RIIO-ED1, an explanation of the process that would be followed if any modifications to the document were to be implemented should be included in the guidance document.

Finally, a minor, administrative point is that there are references to transmission and RIIO-T1 in the footnotes of the guidance document which are no longer relevant and should be deleted.

If you have any questions on our response or would like to discuss our comments in more detail then please do not hesitate to contact me.

Yours sincerely,

Gwen MacIntyre
Regulation, Networks