

# Report

## 2018-19 Stakeholder Engagement (and Consumer Vulnerability) Incentives Panel Report

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### Overview:

The Stakeholder Engagement Incentive (SEI) encourages gas distribution, gas transmission and electricity transmission network companies to engage proactively with stakeholders.

The Stakeholder Engagement and Consumer Vulnerability Incentive (SECV) encourages electricity distribution network companies to engage with stakeholders and to address consumer vulnerability issues.

The assessment process involves two steps: first, an internal assessment against the Minimum Requirements and second, a Panel assessment against the Panel Assessment Criteria.

This 2018-19 Stakeholder Engagement (and Consumer Vulnerability) Incentives Panel Report sets out the Panel's assessment of network companies' 2018-19 performance under the SEI and SECV. The report includes the Overall Panel Scores awarded by the Panel, as well as feedback, including examples of best-practice and areas for improvement.

## Associated Documents

Consumer Vulnerability Strategy

<https://www.ofgem.gov.uk/ofgem-publications/75550/consumer-vulnerability-strategy.pdf>

**Transmission and Gas Distribution:** Stakeholder Engagement Incentive (SEI) Guidance

[https://www.ofgem.gov.uk/system/files/docs/2018/12/sei\\_guidance.pdf](https://www.ofgem.gov.uk/system/files/docs/2018/12/sei_guidance.pdf)

**Electricity Distribution:** Stakeholder Engagement and Consumer Vulnerability (SECV) Incentive Guidance

[https://www.ofgem.gov.uk/system/files/docs/2018/12/secv\\_incentive\\_guidance.pdf](https://www.ofgem.gov.uk/system/files/docs/2018/12/secv_incentive_guidance.pdf)

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## Introduction

This report sets out the Panel's assessment of the performance of the gas and electricity network companies in relation to their stakeholder engagement activities in the year 2018-19, including the Overall Panel Score awarded to each network company and detailed feedback on network companies' performance.

As set out at paragraph 4.15 of the guidance, the Panel is comprised of at least four voting members and a non-voting Chair (who is an Ofgem employee). This year, the Panel was chaired by Anna Rossington, Deputy Director of Retail Price Protection, Ofgem.

The voting Panel Members for 2018-19 were:

- Colin Browne, strategic communications consultant
- Ashleye Gunn, consumer policy consultant
- Angela Love, energy consultant
- Stephen Workman, regulated markets and corporate social responsibility expert

## Purpose of the incentives

Stakeholder engagement is a core element of the RIIO<sup>1</sup> framework, which was first implemented in 2013<sup>2</sup>. RIIO aims to emphasise engagement by requiring network companies to engage with their stakeholders to inform their Business Plans. It also incentivises network companies to undertake ongoing engagement throughout the price control period through the SEI and SECV incentives.

The SEI and SECV incentives aim to encourage network companies to engage proactively with stakeholders in order to anticipate their needs and to deliver a consumer-focused, socially responsible and sustainable energy service. In addition, the SECV incentivises the electricity distribution network operators (DNOs) to play a full role in addressing consumer vulnerability issues.

To be rewarded under the incentives, companies need to deliver high quality stakeholder engagement and outcomes that go beyond their business as usual activities.

## Assessment process

This section provides an overview of the assessment and the Panel's decision making process for the SEI and SECV incentives. The assessment process for the incentives are set out in the associated SEI Guidance and SECV Guidance documents.<sup>3</sup>

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<sup>1</sup> Revenue = Incentives + Innovation + Outputs ("RIIO"). RIIO is Ofgem's framework for setting the revenues recovered by the monopoly companies who run the gas and electricity networks in Great Britain.

<sup>2</sup> RIIO price controls for Gas Transmission, Gas Distribution and Electricity Transmission run from April 2013 – March 2021. The price control for Electricity Distribution runs from April 2015 – March 2023.

<sup>3</sup> SEI Guidance: [https://www.ofgem.gov.uk/system/files/docs/2018/12/sei\\_guidance.pdf](https://www.ofgem.gov.uk/system/files/docs/2018/12/sei_guidance.pdf)  
SECV Guidance: [https://www.ofgem.gov.uk/system/files/docs/2018/12/secv\\_incentive\\_guidance.pdf](https://www.ofgem.gov.uk/system/files/docs/2018/12/secv_incentive_guidance.pdf)

### Company submissions

Each year, network companies are invited to submit applications to Ofgem on their engagement activities and the resulting outcomes in the past Regulatory year.<sup>4</sup> The gas distribution network companies and transmission owners (GDNs and TOs) submit evidence in two parts, while DNOs also submit a third part:

- Part 1 is aimed at demonstrating that the network company meets the Minimum Requirements.<sup>5</sup>
- Part 2 is aimed at demonstrating network company performance against the Panel Assessment Criteria.
- Part 3 is aimed at demonstrating DNO's performance against the Panel Assessment Criteria for Consumer Vulnerability.

### Panel Session

Companies that meet the Minimum Requirements are invited to a Panel Session. The Panel Session lasts 40 minutes, in which companies deliver a 10-minute presentation, followed by 30 minutes for questions and answers.

The Panel assess the companies against the Panel Assessment Criteria<sup>6</sup> and award each company an Overall Panel Score out of 10. The Overall Panel Score determines the allocation of any financial reward under the incentive mechanism.

Ofgem expects network companies to build on and highlight progress they have made, and are making, on their activities from previous years.<sup>7</sup>

### Decision making process

Whilst the Panel's assessment was focussed on Part 2, and for the SECV, also on Part 3, of the submissions, they were provided with the companies' complete submissions for information purposes. The Panel Session also formed part of the Panel's assessment against the Panel Assessment Criteria.

Each Panel Member undertook an initial assessment against the Panel Assessment Criteria, based on their reading of Parts 2 and 3 of the submissions, in advance of the Panel Sessions. The Panel then discussed these initial assessments before the Panel Sessions. Immediately after each Panel Session, the Panel reviewed the assessment. Following the completion of all Sessions, the Panel considered the companies' performances compared to one another, and then decided on the scores and rankings of all companies.

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<sup>4</sup> For example, in July 2019, network companies were assessed on their performance for the 2018-19 Regulatory Year.

<sup>5</sup> Ofgem carries out a Minimum Requirements check and those companies that meet the Minimum Requirements are invited to a Panel Session.

<sup>6</sup> While some criteria are common or similar across the incentives, companies are judged by a separate set of Panel Assessment Criteria for the SEI and SECV. These are set out in the Criteria and Scores chapter of this report.

<sup>7</sup> See paragraph 2.4 in the SEI or SECV Guidance documents.

## **Companies assessed in 2018-2019**

The following TOs and GDNs were assessed under the SEI:

- Cadent
- Northern Gas Networks (NGN)
- Wales and West Utilities (WWU)
- Scotia Gas Networks (SGN)
- Scottish Power Transmission (SPT)
- National Grid Electricity Transmission (NGET)
- National Grid Gas Transmission (NGGT)
- Scottish Hydro Electric Transmission plc (SHET)

The following DNOs were assessed under the SECV Incentive:

- Western Power Distribution (WPD)
- UK Power Networks (UKPN)
- Electricity North West Limited (ENWL)
- SP Energy Networks (SPEN)
- Northern Powergrid (NPg)
- Scottish and Southern Electricity Networks (SSEN)

## General Feedback

In 2018-19, a number of companies reviewed and revised their stakeholder engagement approach. However, in some cases the Panel could not sufficiently evidence that the revised strategy had yet been embedded into the business. Where these revisions are effective and successfully embedded in the business, they could have the potential to deliver higher scores in subsequent years. The Panel will continue to reward outcomes delivered for stakeholders within the year.

## Examples of best practice

Company specific examples of best practice can be found in bold type throughout Appendix 2.

- Companies who performed strongly were clear about the knowledge base that informs their initiatives, and how their strategy enables those ideas to become actions. The best performers were able to exemplify that a feedback loop is in place to ensure transparency of its activities and to verify the effectiveness of its outcomes for stakeholders. The highest performers clearly demonstrated proactively engaging with stakeholders, as well as a recognition of the two-way benefits of this engagement, through which, as demonstrated by UKPN's work across its departments, a network company can test if it's fit for purpose, while improving services for its diverse stakeholders. SGN provided a strong example of stakeholder engagement delivery across the business in their training of engineers to identify vulnerable customers during home visits.
- Some companies made effective use of partnerships as a means by which to reach a wider range of stakeholders; the Panel view these as most effective where the companies are working with partners to achieve outcomes for the network companies' stakeholders that they could not otherwise have achieved.
- Specifically on the SECV, the DNOs are all successfully driving forward on their priority services registers. Targeted activities around fuel poverty (WPD in particular) and working with strategic partners on mental health (notably NPg) were a distinguishing feature of the highest performers.

## Areas for improvement

- In general, there was a lot of repetition within the submissions. The Panel would recommend focussing on headline initiatives or key successes, in addition to providing context of how these sit within the company's wider stakeholder engagement work.
- It is positive that companies are thinking more widely about the measurement of benefits delivered through engagement activities, including social return on investment (SROI) and willingness to pay (WtP) metrics. The Panel notes, however, that these form part of a measurement framework. Companies who were viewed to be using SROI and WtP most successfully clearly substantiated their qualitative findings with quantitative evidence.
- Companies need to demonstrate that they are using stakeholder feedback effectively, and to demonstrate how activities go above and beyond its business as usual engagement. One example would be safety and reliability, which forms a core part of network companies' work. While it is recognised that this will always be of

importance to stakeholders, focusing on these topics is not in itself exemplary of high quality stakeholder engagement.

## **Activities excluded from consideration**

- The SEI and SECV incentives are designed to reward network companies for undertaking high quality engagement activities and for using the outputs from this process to inform how they plan and run their business on an ongoing basis. In this way, the incentives drive companies to embed stakeholder engagement in all areas of their businesses. Paragraph 5.2 of the SEI and SECV Guidance requires that companies clearly identify the driver for activities where that driver is a statutory body incentive or intervention. The Panel rewarded these initiatives as part of their assessment where it has been clearly demonstrated that the stakeholder engagement or consumer vulnerability activities go beyond the outcome of what was originally incentivised. It is the companies' responsibility to demonstrate the added value, specific to stakeholder engagement or consumer vulnerability, above and beyond the expectations or requirements of the original reward.
- In 2018-19, it was apparent in many cases that the newly established Consumer Engagement Groups and User Groups for GDNs and TOs have resulted in significant changes to companies' engagement approaches. The Panel found that this RIIO-2 activity was not clearly distinguished from RIIO-1 activities and outcomes in most of the submissions or presentations. We therefore ask companies, in the remaining years of the incentives in RIIO-1, to set apart those preparations for RIIO-2 which are required by the regulator from those activities which exceed requirements for the benefit of stakeholders in the present.



## Appendix 1: Criteria and Scores

### Panel Assessment Criteria

The Panel assess GDNs and TOs against the SEI Panel Assessment Criteria, and DNOs against the SECV Panel Assessment Criteria.

Table 1: SEI Panel Assessment Criteria

Criterion	Weighting
Initiatives which are part of an holistic approach embedded in their business	15%
Initiatives which reflect innovative thinking in responding to needs of stakeholders	25%
Initiatives which best serve specific interests of challenging groups of customers/communities/future stakeholders and result in measurable benefits,	25%
Initiatives which are supported by robust project management processes and appropriate resources,	10%
Initiatives resulting from stakeholder engagement activities which may be recognised as smart practice and could be replicated across the industry	25%

Table 2: SECV Panel Assessment Criteria

Criterion	Weighting
Initiatives are part of a holistic approach embedded in their business	15%
Initiatives reflect innovative thinking that may be recognised as smart/best practice and could be replicated across the industry	25%
Initiatives which best serve specific interests of challenging groups or hard to reach stakeholders	10%
Initiatives result in measurable benefits for stakeholders	25%
The quality of the network company's strategy to address consumer vulnerability and the quality of the outcomes delivered	25%

The Panel use the Consumer Vulnerability Sub-Criteria for guidance purposes in their assessment of the DNOs under the SECV.

Further information on the Panel Assessment Criteria can be found in the SEI Guidance and SECV Guidance.

### Scoring

The Panel scored the network companies out of 10 on each of the relevant criteria. The Overall Panel Score is then derived by applying the weightings in tables 1 and 2 to the

score for each criterion. The Overall Panel Score determines the allocation of a financial reward (if any) under the incentive mechanisms.

Table 3: Score descriptions

<b>Score</b>	<b>Below 5</b>	<b>5</b>	<b>6-7</b>	<b>8</b>	<b>9-10</b>
<b>Description</b>	Weak	Average	Fair	Good	Excellent

Scores of 4 or less receive no reward, while scores of 9 and above receive the maximum financial reward available to them.

## Overall Panel Scores

The Panel awarded the following Overall Panel Scores out of 10 for each of the network companies (rounded to 2 decimal places). Using the stakeholder engagement methodology<sup>8</sup>, the financial reward for each GDN, TO and DNO group is shown in 2018-19 prices. This adjustment will be applied to the 2020-21 revenues.

Table 4: Overall Panel Scores and rank 2018-19

<i>Company</i>	<i>Score/10</i>	<i>Rank</i>
Cadent	6.33	6
NGN	5.96	7
SGN	6.76	4
WWU	5.43	9
NGET	5.54	8
NGGT	4.85	11
SHET	4.06	13
SPT	4.94	10
ENWL	4.54	12
NPg	7.01	3
SPEN	6.71	5
SSEN	3.95	14
UKPN	7.95	2
WPD	8.35	1

<sup>8</sup> [https://www.ofgem.gov.uk/sites/default/files/docs/2014/07/se\\_reward\\_decision.pdf](https://www.ofgem.gov.uk/sites/default/files/docs/2014/07/se_reward_decision.pdf)

## Appendix 2: Detailed Feedback

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## Cadent Feedback

### Overall Panel Score: 6.33

Cadent improved significantly from last year. It is clear that key investment in stakeholder engagement has led to this step change. However, its strategic approach is new. RIIO-2 preparations were hard to distinguish from stakeholder engagement activities which go above and beyond; Cadent's future submissions should distinguish its RIIO-1 work from RIIO-2 preparations.

### Detailed feedback

<i>Criteria</i>	<i>Comments</i>	<i>Score</i>
<b>1 - Initiatives which are part of an holistic approach embedded in their business</b>	Cadent's <b>regionalisation of strategic engagement</b> was viewed positively by the Panel, with dedicated teams sharing approaches and outcomes through comparison of regional statistics. It is not clear that the strategic approach has been embedded yet, though it was recognised that this could be a consequence of recent reorganisation. Another positive note was the inclusion of customer outcomes in service provider contracts. There could have been greater detail of specific stakeholder engagement activities (e.g. supplementing the two-page table with more detail on the activities), and senior level buy-in was not clearly evidenced.	6.5
<b>2- Initiatives which reflect innovative thinking in responding to needs of stakeholders</b>	The use of technology to identify customer caller sentiment and speeding up the customer experience to 15 minutes was noted as innovative. Some other initiatives, while not necessarily innovative, were demonstrably effective when used together at scale. Cadent's focus on seeking root causes and mining complaints data was positive, however it was unclear how stakeholder feedback was driving this action or its future planning.	7.38
<b>3 - Initiatives which best serve specific interests of challenging groups of customers/communities/future stakeholders and result in measurable benefits</b>	While Cadent did identify initiatives targeting hard to reach groups, little detail was provided on the specific stakeholder engagement activities involved, its value, and how or if this is assessed. However, it was noted that mapping was used well to identify priority locations across Cadent's licence areas.	5.5
<b>4 - Initiatives which are supported by robust project management processes and appropriate resources</b>	Cadent did not provide detailed analysis but the Panel were pleased with the use of data and technology. While stakeholder engagement makes projects more complex, there is evidence that Cadent is acting on this input. They appear to be more closely attuned to customer needs through working with elected representatives.	5.75

<p><b>5 - Initiatives resulting from stakeholder engagement activities which may be recognised as smart practice and could be replicated across the industry</b></p>	<p>Machine learning has been applied well this year, in the gathering and analysis of 'sentiments', and Cadent was one of the few companies to mention artificial intelligence (AI). There were, however, some corporate social responsibility (CSR) initiatives that were included in this category under the banner of stakeholder engagement. While stakeholder engagement can form part of CSR, the terms are not interchangeable.</p>	<p>6.25</p>
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## NGN Feedback

### Overall Panel Score: 5.96

NGN's score has come down marginally from last year; the Panel found some inconsistency in the use of 'customer' and 'stakeholder', and while there is a focus on delivering value, it is not always clear who benefits from it. However, it is positive that NGN are moving towards a more strategic approach, and senior level buy-in is evident in the submission. The Panel recognised a number of good initiatives in the past year, but noted few examples of NGN leading these initiatives.

### Detailed feedback

<i>Criteria</i>	<i>Comments</i>	<i>Score</i>
<b>1 - Initiatives which are part of an holistic approach embedded in their business</b>	NGN's approach to engagement did not appear to form part of a wider strategic engagement plan. For example, the Panel noted NGN's focus on the numbers of stakeholders engaged with, rather than on the type or quality of the engagement. NGN did not demonstrate that they distinguished between the value of face to face engagement over website views. The Panel did note, however, that NGN's work on its value framework was very positive, and there was evidence of embedding stakeholder engagement practices across the business.	6.5
<b>2- Initiatives which reflect innovative thinking in responding to needs of stakeholders</b>	NGN has participated in and funded these schemes but there was limited evidence of it acting as a leader of new initiatives. There was also limited evidence that they are using stakeholder input in the development of innovative approaches. The Panel found NGN's social listening exercise on decarbonisation interesting, as shared in the Panel Session, and looks forward to seeing the outcomes in later years from NGN's plans around heat. The pop-up hubs were another good example noted under this criterion.	6
<b>3 - Initiatives which best serve specific interests of challenging groups of customers/communities/future stakeholders and result in measurable benefits</b>	NGN's preference for doing everything in-house may be cost effective, but the expertise of key partners could deliver value in this area. NGN's strategy on engagement with hard to reach stakeholders was unclear. While NGN has 2.5m customers, they are only reaching a few thousand with their current initiatives; however, the Panel noted that NGN had evidenced good connections with local authorities. Benefits noted in the submission appear to be attributed only to NGN rather than to its customers.	5.5
<b>4 - Initiatives which are supported by robust project management processes and appropriate resources</b>	The initiatives appear to be good value for money, but detail of cost benefit analysis was absent from the submission. Any assessment of benefits was solely focused on cost.	5.5
<b>5 - Initiatives resulting from stakeholder engagement activities which may be recognised as smart practice and could be replicated across the industry</b>	While it is positive that NGN are looking outside of the energy industry to adopt best practice, the Panel could not evidence that the chosen direction of travel is driven by stakeholder engagement. The Canopy Enhanced Housing project was noted as a good initiative but this is small in scale, and there appears to be no clear pathway to or intention of upscaling. Considerate construction was not	6.25

	seen as a strong example of stakeholder engagement, as this is generally good business practice and public relations.	
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## SGN Feedback

### Overall Panel Score: 6.76

The Panel were impressed with SGN's submission and presentation, which reflects its increase in score from last year. The use of an evaluation framework is positive, but qualitative measures, such as social return on investment (SROI) or willingness to pay (WtP) should not be overly relied upon when calculating and presenting the benefits of stakeholder engagement activities due to their limitations.

### Detailed feedback

<i>Criterion</i>	<i>Comments</i>	<i>Score</i>
<b>1 - Initiatives which are part of an holistic approach embedded in their business</b>	SGN seems to be working more strategically through its panels and events, and has evidenced analysis of both formal and informal stakeholder input. It was positive to hear that impacts on stakeholders are now being highlighted to the investment committee, which reflects a bedded-in strategy. The Panel found that SGN performed well on its community engagement around major works. The new evaluation framework is good; however, it appears that SGN may be leaning a little heavily on the 'social value' measurement in its assessment of benefits, which in isolation is a tool unlikely to provide robust evidence.	7.5
<b>2- Initiatives which reflect innovative thinking in responding to needs of stakeholders</b>	<b>Good examples were provided of stakeholder engagement on the decarbonisation of heat.</b> SGN's Referral App, which captures data and sends it to partners, was also noted as an innovative initiative.	6.5
<b>3 - Initiatives which best serve specific interests of challenging groups of customers/communities/future stakeholders and result in measurable benefits</b>	SGN's work with the Energy Savings Trust on <b>predictive modelling for fuel poverty and the improvement of fuel poor connections</b> was very positive, particularly as it is an area that not all companies are targetting. Work around willingness to pay was viewed positively, but with similar reservations as those expressed under criterion 1 above. SGN demonstrated a broad understanding of and holistic approach to vulnerability, however the Panel noted that there is room for improvement in this space.	7
<b>4 - Initiatives which are supported by robust project management processes and appropriate resources</b>	The Panel found SGN's activities to be well organised and structured, with evidence of senior level buy-in and cost benefit analysis, including social factors.	7
<b>5 - Initiatives resulting from stakeholder engagement activities which may be recognised as smart practice and could be replicated across the industry</b>	SGN provided examples of taking on best practice and sharing across gas and electricity, local authorities, the Institute of Gas Engineers and Managers (IGEM) and Scottish Water. The adoption of WWU's Pathfinder modelling was positive to see, and tailored project delivery was very well demonstrated.	6.25



## WWU Feedback

### Overall Panel Score: 5.43

The Panel found that WWU have made good improvements in its stakeholder engagement since last year, and has robust processes in place. There was a heavy focus on process and assessment in the submission; however, delivery or outcomes for customers as a result of stakeholder engagement was not sufficiently set out. Next year, WWU may consider going into greater detail on a handful of key outcomes or projects for the year.

### Detailed feedback

<i>Criteria</i>	<i>Comments</i>	<i>Score</i>
<b>1 - Initiatives which are part of an holistic approach embedded in their business</b>	WWU have a comprehensive strategy, and the Panel noted both the triangulation work and use of the Critical Friends Panel as positive. There was a lot of emphasis on the measurement, and less detail on the stakeholder engagement activities themselves. While there appeared to be good breadth in WWU's examples, these sometimes appeared to be one-off events, such as a single workshop with university students, which was not replicated or scaled. However, it did appear that there were good processes in place, notably around local engagement.	6.25
<b>2- Initiatives which reflect innovative thinking in responding to needs of stakeholders</b>	While WWU processes appeared much improved on last year, the Panel did not identify innovative thinking. While some research and modelling has been completed in the past year, WWU did not demonstrate what has been delivered for stakeholders as a result of this. It is positive that WWU is working towards UN targets for carbon emissions, exemplifying that WWU is coming in line with industry best practice.	5.25
<b>3 - Initiatives which best serve specific interests of challenging groups of customers/communities/future stakeholders and result in measurable benefits,</b>	There is little detail on value for money of WWU initiatives. Some good examples of stakeholder engagement were provided, such as the work around new generation connections; however, a number of others appeared small scale and low impact, such as the super-prioritisation of customers issued CO monitors. Activities such as desk-based research on the needs of large industrial customers was considered a business as usual activity.	5.75
<b>4 - Initiatives which are supported by robust project management processes and appropriate resources,</b>	WWU did not evidence considerable senior level buy-in, but day-to-day monitoring of customer outputs was well evidenced, as well as the use of PSR data to inform the Fuel Poverty Network Extension Scheme. There was little evidence of reporting of scale and impact, however, and of WWU driving projects forward under their own initiative.	5.5
<b>5 - Initiatives resulting from stakeholder engagement activities which may be recognised as smart practice and could be replicated across the industry</b>	While the Panel noted some good initiatives, such as WWU's work with Welsh Water, its schools work, and streetworks signage, there did not appear to be any evidence of sharing best practice.	4.75

## NGET Feedback

### Overall Panel Score: 5.54

NGET improved considerably this year; however, NGET did not demonstrate that stakeholders can have a real impact on their business planning. NGET need to distinguish between its CSR activities and stakeholder engagement, though the examples of stakeholder engagement that were provided were well received by the Panel.

### Detailed feedback

<i>Criteria</i>	<i>Comments</i>	<i>Score</i>
<b>1 - Initiatives which are part of an holistic approach embedded in their business</b>	NGET have shown great improvement in its overarching strategy and culture, but the Panel noted that the initiatives were relatively small scale. NGET did not clearly indicate what it has delivered for its stakeholders. A number of projects presented were more closely aligned with CSR. Further, the impetus for a number of improvements have come from business as usual T2 preparations (namely, its Consumer Engagement Group).	6
<b>2- Initiatives which reflect innovative thinking in responding to needs of stakeholders</b>	NGET noted some good initiatives, though the Panel questioned how innovative or effective these were, for example, where engagement was top-down, or stakeholder feedback resulted in initiatives that were developed without further stakeholder input.	5.5
<b>3 - Initiatives which best serve specific interests of challenging groups of customers/communities/future stakeholders and result in measurable benefits,</b>	The Panel did not see enduring value for stakeholders in the hand-out rather than hand-up approach to fuel poverty, which involves providing pay-outs to fuel-poor customers; however the Panel understand this is being applied by NGET as an interim solution. NGET have a number of good initiatives, but some of these have been on going for some years, eg STEM, and NGET has not in all cases demonstrated continuous improvement from previous years. NGET's portfolio of initiatives appear mostly small scale, and scalability and outcomes were not sufficiently evidenced.	5.5
<b>4 - Initiatives which are supported by robust project management processes and appropriate resources,</b>	Evidence was provided of senior level buy-in within the business; however, there was insufficient information on project management processes, and no clear indication of the resource dedicated to stakeholder engagement work. The Panel, in some cases, could not trace back from action to the stakeholder input, and there appears to be no feedback loop with stakeholders.	4.5
<b>5 - Initiatives resulting from stakeholder engagement activities which may be recognised as smart practice and could be replicated across the industry</b>	Some good examples were provided, such as the sharing and reuse of materials from the Thorpe Marsh works; however, there was no demonstrable evidence or recognition by NGET of how this is being, or could be, shared. There does not seem to be a plan in place for the scaling of successful initiatives.	5.75

## NGGT Feedback

### Overall Panel Score: 4.85

While NGGT have improved from last year and were able to provide some good examples of innovative initiatives, NGGT did not adequately evidence how stakeholder engagement is having a meaningful impact on its business. Stakeholder engagement appeared small scale and low impact, without a demonstrable understanding of its purpose.

### Detailed feedback

<i>Criteria</i>	<i>Comments</i>	<i>Score</i>
<b>1 - Initiatives which are part of an holistic approach embedded in their business</b>	The Panel had some doubts about the impact of stakeholder engagement in setting NGGT's strategic priorities. There are, however, good examples of stakeholder engagement done well and its influence, for example, at a local level. The submission would have benefitted from a quantification of benefits and a clearer link between activities and their outcomes. There did not appear to be a clear feedback loop in NGGT's strategic approach.	5.5
<b>2- Initiatives which reflect innovative thinking in responding to needs of stakeholders</b>	NGGT provided examples of a number of good innovations, such as three day modelling and incentivising sustainability in the supply chain; however they did not describe the associated stakeholder engagement activities. Safety, for example, is a business as usual area of work and NGGT did not sufficiently evidence the influence of stakeholder engagement in this area. With regards to the use of Gas Future Operability Planning, NGGT did not evidence that this was an ongoing listening exercise.	5.25
<b>3 - Initiatives which best serve specific interests of challenging groups of customers/communities/future stakeholders and result in measurable benefits,</b>	There were some good examples across a range of focus areas, although the Panel would have benefitted from sight of the cost benefit analysis for these activities. There was also little description of the actual stakeholder engagement: while the work at Brisley included relevant detail, in the case of CLoCC and the faster connections work with Centrica, there is no clear explanation of the stakeholder engagement carried out, or its use in those projects. In its assessment of NGGT's work to minimise contractor damage to pipelines, the Panel noted a focus on dissemination rather than listening to stakeholders. Initiatives such as Grid for Good sit more comfortably under Corporate Social Responsibility than stakeholder engagement.	5.5
<b>4 - Initiatives which are supported by robust project management processes and appropriate resources,</b>	Not much detail was provided on NGGT's project resources or processes; however, the Panel noted good examples of where stakeholder engagement around works had led to positive outcomes.	5.25
<b>5 - Initiatives resulting from stakeholder engagement activities which may be recognised as smart practice and could be replicated across the industry</b>	NGGT's stakeholder engagement initiatives appear to mostly be small scale and low impact, while others included in the submission could be categorised as BAU or CSR. NGGT should demonstrate and describe the SE undertaken, and make clear its understanding of the distinct SE activity and purpose in each case.	3.25

## SHET Feedback

### Overall Panel Score: 4.06

While SHET provided good examples of engagement activities in the past year, these were small in scale and not clearly delivered in a structured way. SHET's strategy is yet to be embedded, but the Panel expect that if successfully embedded in the business this could lead to improvements in SHET's stakeholder engagement activities.

### Detailed feedback

<i>Criteria</i>	<i>Comments</i>	<i>Score</i>
<b>1 - Initiatives which are part of an holistic approach embedded in their business</b>	SHET's strategy is much improved but there was little evidence of outcomes or the impact of their SE in the past year. SHET should demonstrate that revisions are effective, and successfully embedded in the business over the course of the next year. There was also a heavy focus on RIIO-2 preparations in this year's submission, much of which is required by Ofgem, and these were not evidenced to go above and beyond BAU requirements. The Panel ask that this is clearly separated from RIIO-1, in-year activities and benefits realisation. With regards to the submission, the Panel noted good use of actions and outputs in its tables, but would have benefitted from greater detail of the stakeholder engagement undertaken and its impact.	5
<b>2- Initiatives which reflect innovative thinking in responding to needs of stakeholders</b>	There were good examples of innovative thinking in the stakeholder engagement space, the Panel noted SF6 <sup>9</sup> initiatives and managing connections queues in particular, but descriptions of initiatives were limited. For example, on how connections queues were managed and how they have changed as a result of stakeholder engagement. The use of mediums such as webinars and the publication of FAQs were seen to be standard practice across the other network companies. Holding joint events to avoid stakeholder fatigue did not appear to be directly driven by stakeholder needs, and in any case referred to BAU RIIO-2 preparations.	4.5
<b>3 - Initiatives which best serve specific interests of challenging groups of customers/communities/future stakeholders and result in measurable benefits,</b>	In examples such as the new Land Assembly strategy, it was not clear what the role of stakeholder engagement had been. Little detail was provided on the value of proposals, though those that were mentioned were deemed to have potential.	4
<b>4 - Initiatives which are supported by robust project management processes and appropriate resources,</b>	There was evidence of greater commitment and senior level buy-in, but SHET did not provide specific details on costs, benefits and resources.	3.75
<b>5 - Initiatives resulting from stakeholder engagement activities which may be</b>	The Panel viewed SHET's work on SF6 replacement and the Land Assembly to be its best examples, but did not evidence	3.25

<sup>9</sup> Sulfur hexafluoride, a gas commonly used in the insulation of high voltage and transmission equipment. SF6 is a potent greenhouse gas.

<b>recognised as smart practice and could be replicated across the industry</b>	that tools were in place to disseminate that learning either within the organisation or with interested parties.	
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## SPT Feedback

### Overall Panel Score: 4.94

The Panel viewed the reassessment of SPT's strategy positively, but could not evidence that this has become embedded in the business. SPT should provide greater detail of the stakeholder engagement activities undertaken and their purpose. Many of the examples provided, particularly the larger projects, appeared to involve little stakeholder engagement.

### Detailed feedback

<i>Criteria</i>	<i>Comments</i>	<i>Score</i>
<b>1 - Initiatives which are part of an holistic approach embedded in their business</b>	The Panel noted that SPT's updated strategy, while it appears to be a positive move, is not yet embedded or delivering outcomes for stakeholders. It is positive that social return on investment (SROI) is being considered, however SPT did not sufficiently evidence its use for the benefit of stakeholders in the past year. SPT did not evidence stakeholder engagement in larger scale projects, including the impact of this engagement on project planning. The Panel would have benefitted from greater evidence of nuanced engagement and its influence on business decisions.	6
<b>2- Initiatives which reflect innovative thinking in responding to needs of stakeholders</b>	Examples provided by SPT were mostly small scale and at an early stage, mainly initiated by external parties. While there were interesting initiatives, for example around SF6, little detail was provided on the type of stakeholder engagement undertaken and its impact on the projects. Teccy Bites appeared to be a good initiative and was presented as such in the submission; however, at presentation the Panel were told the scheme was to be wrapped up.	5
<b>3 - Initiatives which best serve specific interests of challenging groups of customers/communities/future stakeholders and result in measurable benefits,</b>	Again, SPT did not provide much detail on specific stakeholder engagement activities. In cases such as the Green Economy Fund, SPT did not evidence taking an engaged role. The Panel did consider a number of the examples, such as planning scenarios and quicker connections work, to fall under BAU engagement. It is important that SPT make clear the distinction between expectations and delivery.	4.75
<b>4 - Initiatives which are supported by robust project management processes and appropriate resources,</b>	SPT's processes were not demonstrated fully. It is noted that 70 staff were trained in Tractivity, but no further evidence on resourcing towards stakeholder engagement was set out.	3.5
<b>5 - Initiatives resulting from stakeholder engagement activities which may be recognised as smart practice and could be replicated across the industry</b>	It is positive that SPT are working on SF6 replacement, and the Panel noted that others were as well. The work monitoring outage times was praised and seen to be replicable. The results of the international sharing of the FITNESS project were not clear, nor how this went beyond the dissemination requirements of the Network Innovation Competition governance. The Panel noted that, though a SROI methodology was in use, in particular for its Green Economy Fund, its findings could be strengthened by the use of a range of measurement tools.	5

## ENWL Feedback

### Overall Panel Score: 4.54

ENWL's review of its strategies will take some time to deliver positive outcomes, and what was undertaken in the year 2018/19 appears small scale, or the result of partner organisations efforts. The Panel would emphasise the need to focus on outcomes and impact rather than outputs, and for ENWL to demonstrate senior level buy-in throughout its engagement activities, as a means to achieving strategic approach to stakeholder engagement which achieves benefits and enacts change within its business.

### Detailed feedback

Criteria	Comments	Score
<b>1 - initiatives are part of a holistic approach embedded in their business</b>	This criterion focuses on outcomes or impacts, while ENWL put much of its emphasis on outputs. While there was considerable information on process and governance, the Panel noted that the strategy provided in Part 1 of the submission was far more comprehensive than that provided later in the submission. We would remind ENWL that the Panel formally assess only Parts 2 and 3 of the submissions. ENWL has started afresh on their strategy and this does not yet appear to have bedded in. The Panel also noted that ENWL were more often participants, for example, taking part in industry or government initiatives, or in their 'neutral but not silent' approach to DSO engagement. Engagement activities appear mostly formal and low impact with little scope for stakeholders to set the agenda, and could not evidence much action resulting from the insight provided by KPMG.	5.3
<b>2 - initiatives reflect innovative thinking that may be recognised as smart/best practice and could be replicated across the industry</b>	The Panel noted some good initiatives and partnerships; however, the impact of stakeholder engagement was not clear in many cases, and in some instances, it was not evidenced that stakeholder engagement had been sought out beyond working with the usual project partners. Benefits mapping was seen to be positive and replicable.	4.8
<b>3 - initiatives which best serve specific interests of challenging groups or hard to reach stakeholders</b>	In the case of the Sustainability Advisory Panel, there is considerable explanation of their roles and membership rather than the influence of their input. While initiatives like the Community Connects workshops were positive, these are very small scale, and it is unclear what has been achieved with the Community and Local Engagement Strategy beyond the arms-length grant funding, which while positive, does not clearly result in benefits to ENWL's stakeholders. ENWL have worked with organisations who have approached them with ideas, but there does not appear to be a method in place to scale those projects which are viewed to be replicable. The Customer Voice panel again seems to rely on stakeholders taking an independent interest in signing up, which can lead to a narrow representation of stakeholders' views.	3.8
<b>4 - initiatives result in measurable benefits for stakeholders</b>	The benefits are mostly set out as Willingness to Pay vs actual cost, and the benefit being the difference between the two. WTP is only one tool in the measurement of value/benefits. Senior level buy-in is apparent through the governance, though this is not necessarily evident in the SE initiatives described throughout the submission.	3.8
<b>5 - the quality of the network company's</b>	It is positive that ENWL have taken on board lessons from other DNOs with regards to mapping of vulnerable customers. The Panel	5

<b>strategy to address consumer vulnerability and the quality of the outcomes delivered</b>	sought greater detail on outcomes, from a wider range of activities. ENWL's use of partnerships is good, but these do not appear to be the result of targeted engagement. There is little focus on fuel poverty and activities in the consumer vulnerability space appear small scale.	
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## NPg Feedback

### Overall Panel Score: 7.01

NPg saw a marginal reduction in its score from last year. The Panel found that NPg have an excellent strategy in place that achieves positive outcomes for its stakeholders, but that could make way for some novel approaches. NPg were one of few companies that did not place much focus on the environment as a stakeholder priority, which might result from the structure of its engagement. NPg continues to perform highly in the consumer vulnerability space.

### Detailed feedback

Criteria	Comments	Score
1 - initiatives are part of a holistic approach embedded in their business	NPg demonstrated a cost-focussed company culture that values stakeholder engagement. While NPg held many events and round-tables, with its panels being well-utilised, the Panel would have liked to have seen more variety in NPg's approach. NPg also did not sufficiently evidence using stakeholder engagement to influence business planning.	7.5
2 - initiatives reflect innovative thinking that may be recognised as smart/best practice and could be replicated across the industry	The Panel noted a number of innovative initiatives that considered the needs of a range of stakeholders, including domestic battery storage for medically electrically dependent persons, though this is small scale. The publication of a report on NPg's DSO vision was noted as positive, given that NPg are one of few to do so at this stage, as well as the DSR gaming app. The replicability of these initiatives was also demonstrated.	6.8
3 - initiatives which best serve specific interests of challenging groups or hard to reach stakeholders	NPg's submission would have benefitted from showing the cost analysis of its initiatives. <b>It was positive to see SMEs included in this category</b> , which shows a level of understanding of the needs of stakeholder groups.	7
4 - initiatives result in measurable benefits for stakeholders	The reporting of benefits was highly qualitative, and often took into consideration factors outside of the influence of NPg's initiatives. This would be improved with the inclusion of some quantitative analysis, as well as clarifying risks or uncertainties in the evaluation of project benefits. It would also be beneficial to note what projects have been concluded as a result of poor outcomes, and the assessment that led to this conclusion.	6
5 - the quality of the network company's strategy to address consumer vulnerability and the quality of the outcomes delivered	NPg continue to have an excellent focus and strategy on vulnerable customers, which builds on existing schemes year on year. There is however little focus on fuel poverty. Its activities still go well beyond the requirements of the PSR, and the Panel noted that <b>NPg are further along than other DNOs with regards to targeting mental health</b> , with better coverage and clearer motivations in this area.	8

## SPEN Feedback

### Overall Panel Score: 6.71

SPEN scored marginally higher this year, and appear to have the right mechanisms in place which, if successfully embedded in the business, could deliver positive outcomes for stakeholders in future. The Panel would have benefitted from detail of specific stakeholder engagement. There have been some good outcomes evidenced for stakeholders in the past year as a result of SPEN's initiatives, which is why SPEN has performed slightly better than others who have refreshed their strategies.

### Detailed feedback

Criteria	Comments	Score
1 - initiatives are part of a holistic approach embedded in their business	While SPEN's new shared strategy with the transmission business appears to be a comprehensive approach with measurement of wider benefits, staff training and targeted objectives, the Panel notes this reflects best practise across the industry. As it is new, this strategy does not yet appear to be fully embedded, but the Panel does recognise that it is beginning to achieve results.	6.8
2 - initiatives reflect innovative thinking that may be recognised as smart/best practice and could be replicated across the industry	The examples provided tended to be early-stage and small scale initiatives, often not driven by SPEN. While there was mention of many partnerships launched, there was less evidence of action taken in the past year - though the Panel did recognise the value of SPEN's partnership CBA. Stakeholder input into projects around smart cities appears to be expected but not planned for, and stakeholder engagement around does not DSO appear coordinated. However some examples provided were strong, such as the new tool for filling PSR data gaps.	6.8
3 - initiatives which best serve specific interests of challenging groups or hard to reach stakeholders	A number of initiatives in this category appeared to be BAU or rewarded through other mechanisms, however the Panel recognised SPEN's work in targeting specific gaps in EVs and DSO work to consider hard to reach and challenging groups.	5.8
4 - initiatives result in measurable benefits for stakeholders	There was a <b>firm focus on cost benefit analysis</b> in each example given, with outcomes and evidence clearly presented. Good project management processes were noted from this evidence, however the Panel did not find great detail on the specific procedures in SPEN's submission.	6.5
5 - the quality of the network company's strategy to address consumer vulnerability and the quality of the outcomes delivered	<b>SPEN have established appropriate partnerships for its consumer vulnerability work</b> , and provided comprehensive evidence of outcomes for vulnerable customers. The Panel considered this a holistic approach that is well embedded in the business.	7.3

## SSEN Feedback

### Overall Panel Score: 3.95

SSEN's score fell considerably this year. Its submission relied heavily on business as usual and corporate social responsibility (CSR) activities, and the wants and needs of its stakeholders were not well evidenced; SSEN did not demonstrate that it uses stakeholder feedback to challenge its key areas of business. SSEN's electric vehicle (EV) initiatives, while good, are innovation- and business driven, rather than being shaped by stakeholder input.

### Detailed feedback

<i>Criteria</i>	<i>Comments</i>	<i>Score</i>
<b>1 - initiatives are part of a holistic approach embedded in their business</b>	SSEN would have benefited from adopting a holistic approach, or evidencing that the initiatives are the result of stakeholder feedback. The relaunch of the strategy does not yet appear embedded. The main stakeholder engagement activity for the year appears to have been a quantitative customer survey, the results of which endorsed the company's core areas of business, including safety and security of supply. This does not suggest that stakeholders are given the opportunity to shape business decisions. While it is positive that SSEN have increased the number of partners they work with, it is not clear how these partners have been chosen. Time periods for reference, in one case 30 years, make it difficult for the Panel to draw out what can be assessed in the year 2018-19. The Panel could not sufficiently evidence an indication of interest in or understanding of the value of stakeholder engagement to the business.	3.5
<b>2 - initiatives reflect innovative thinking that may be recognised as smart/best practice and could be replicated across the industry</b>	The communication initiatives around the website and translation are business as usual. While work on flexibility is good, SSEN are not alone in doing this initial groundwork. Engagement around subsea cables appears to have taken place in 2015-17, and no evidence is provided of how this was carried out, nor what took place in the year 2018-19. The Panel found that where SSEN are listening to stakeholders, actions taken are small scale and low impact (for example, the videos around power cuts).	4
<b>3 - initiatives which best serve specific interests of challenging groups or hard to reach stakeholders</b>	The Online Community as a means to engage with hard to reach stakeholders does not demonstrate a comprehensive understanding of those groups which are truly hard to reach, as those who participate are unlikely to fall into the hard to reach category. SSEN's reliance on feedback polls risks misuse and misinterpretation. However, it was noted that SSEN's definition of 'hard to reach' was good, and this should be translated into its engagement with those groups. Again, it is not clear what is driving the activities in this space.	3
<b>4 - initiatives result in measurable benefits for stakeholders</b>	The Panel could find limited detail of benefits realisation or the influence of stakeholder engagement on developing the importance of initiatives in SSEN's business plans. Costs of projects are reported, but benefits are not quantified, or qualitative detail provided. There is no evidence of working with stakeholders, or senior level buy-in.	3.3
<b>5 - the quality of the network company's</b>	SSEN performed quite well in the consumer vulnerability area, but there does not appear to have been overall coordination or	5.3

<b>strategy to address consumer vulnerability and the quality of the outcomes delivered</b>	plan. They have not shown how their incentive money has been reinvested. The PSR uptake this year and power cut services provided are fairly good, but this is standard practice across the DNOs. While SSEN have an internal handbook on the PSR, other DNOs provide training.	
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## UKPN Feedback

### Overall Panel Score: 7.95

UKPN's submission was impactful and well supported by its presentation to the Panel. The strategy is effective, clearly embedded, and there is a genuine recognition of the benefits that can be achieved through stakeholder engagement, for both stakeholders and the business. Continuous improvement should always remain high on the agenda.

### Detailed feedback

Criteria	Comments	Score
1 - initiatives are part of a holistic approach embedded in their business	<b>A continuous improvement process and proactive approach to getting stakeholder input were well evidenced.</b> The strategy is thorough, with considerable evidence of senior level buy-in. The Panel was able to evidence a genuine enthusiasm for stakeholder engagement and its resulting projects. UKPN have delivered comprehensive training to its staff. However UKPN spoke of its engagement being 'mature', which the Panel would place in the context of the energy networks, and notes that there will continue to be scope for improvement in light of the rapidly changing industry.	8.8
2 - initiatives reflect innovative thinking that may be recognised as smart/best practice and could be replicated across the industry	The Panel were impressed with UKPN's <b>stakeholder engagement in relation to EVs and it is clear that UKPN are coordinating this engagement.</b> Real-time customer feedback, borrowed from Fintech was worthy of note, given that UKPN are the first to make that connection. There also appears to be a firm focus on the future market and what it means for vulnerable customers. UKPN were the only network to put a spotlight on air quality as a stakeholder priority.	8.3
3 - initiatives which best serve specific interests of challenging groups or hard to reach stakeholders	UKPN demonstrated that they are taking action on a number of issues identified that affect a range of stakeholders, and have good <b>rollout mechanisms in place.</b>	8.3
4 - initiatives result in measurable benefits for stakeholders	UKPN saved households on the PSR £23.8m, and the Panel were pleased with its work with the Red Cross and extensive partnerships in the past year, which delivered £18.7m net benefit to customers. A number of strong examples were provided, and there appeared to be careful evaluation before and after the commissioning of projects.	7.3
5 - the quality of the network company's strategy to address consumer vulnerability and the quality of the outcomes delivered	UKPN demonstrated an in depth and nuanced understanding of the needs of vulnerable consumers. The continuous improvement approach is again strongly demonstrated here, with specific commitment from senior management on vulnerability. UKPN have mental health partners in place, and have their CV mapping tool in use on a daily basis.	7.8

## WPD Feedback

### Overall Panel Score: 8.35

WPD demonstrate a highly professional approach to stakeholder engagement, providing strong examples of stakeholder engagement making an impact on its business decisions. Their introduction of a social contract is a great means for stakeholders to test WPD's delivery on its commitments, and they continue to perform above and beyond requirements in the consumer vulnerability space.

### Detailed feedback

Criteria	Comments	Score
1 - initiatives are part of a holistic approach embedded in their business	WPD demonstrated that stakeholder engagement is integral to its business, and evidenced that they are seeking stakeholder input to influence decisions and shape projects. There is also <b>evidence of a culture of continuous improvement</b> . WPD are the only network company working on a social contract. The Panel were impressed with the Customer Collaboration Panel, as well as the recognition of poor value or ineffectual projects which have been closed.	8.5
2 - initiatives reflect innovative thinking that may be recognised as smart/best practice and could be replicated across the industry	WPD is engaging stakeholders on projects around flexibility markets and electric vehicles (EVs), and demonstrated that they are working with and seeking input from stakeholders throughout the process. <b>The social contract is a good response to criticisms around the value of CSR activities</b> , and WPD have been clear on how they have developed the contract, and how they will test it.	8
3 - initiatives which best serve specific interests of challenging groups or hard to reach stakeholders	There appears to be a genuine wish for input and coordinated planning with stakeholders, thinking about what would be useful and what they can learn from certain groups. <b>Initiatives noted by the Panel were: local energy plans; capacity managed zones; WPD's DSO strategy; flexibility map; the smart phone app for sufferers of sleep apnea</b> . It was noted that these were communicated especially successfully in the presentation.	8.3
4 - initiatives result in measurable benefits for stakeholders	There was a clear focus on cost, and <b>very good work carried out with PwC on the triangulation of benefits</b> . WPD also worked with UKPN to improve their cost assessment, and also demonstrated a clear understanding of the difficulties presented by measurement tools to capture wider benefits.	8.3
5 - the quality of the network company's strategy to address consumer vulnerability and the quality of the outcomes delivered	WPD are doing a lot in this area, proportionate to its large customer base, and were <b>the only DNO to mention a stakeholder challenge on its role in tackling fuel poverty</b> . There is breadth and depth to the CV strategy. The Panel would however flag WPD's sole focus on power cuts, but this appears to be driven by stakeholders. The principle of 'no one left behind' when looking to how networks will operate in the near future is very positive and necessary work.	8.8

### Appendix 3: Historic Scores

	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	Rank this year
<b>WPD</b>	8.40	8.05	8.75	8.75	8.53	8.75	8.35	1
<b>UKPN</b>	7.15	6.55	5.85	7.53	7.53	7.25	7.95	2
<b>NPg</b>	7.85	7.65	7.65	6.50	6.50	7.50	7.01	3
<b>SGN</b>	5.25	6.05	6.40	5.75	7.00	6.25	6.76	4
<b>SPEN</b>	n/a	6.65	6.50	6.78	6.28	6.35	6.71	5
<b>Cadent</b>	6.40	7.15	5.90	6.90	6.90	6.00	6.33	6
<b>NGN</b>	5.75	6.75	5.50	6.80	7.25	6.15	5.96	7
<b>NGET</b>	3.4	5.75	6.00	6.25	7.00	5.10	5.54	8
<b>WWU</b>	6.15	6.30	7.05	6.05	6.00	5.00	5.43	9
<b>SPETL</b>	3.40	4.90	5.50	6.25	6.25	6.40	4.94	10
<b>NGGT</b>	3.40	5.75	6.25	6.15	6.50	4.25	4.85	11
<b>ENWL</b>	7.90	6.45	6.10	6.90	6.38	5.75	4.54	12
<b>SHETL</b>	3.00	5.40	6.00	6.00	5.40	3.25	4.06	13
<b>SSEN</b>	6.85	5.50	5.00	5.73	5.23	5.5	3.95	14