

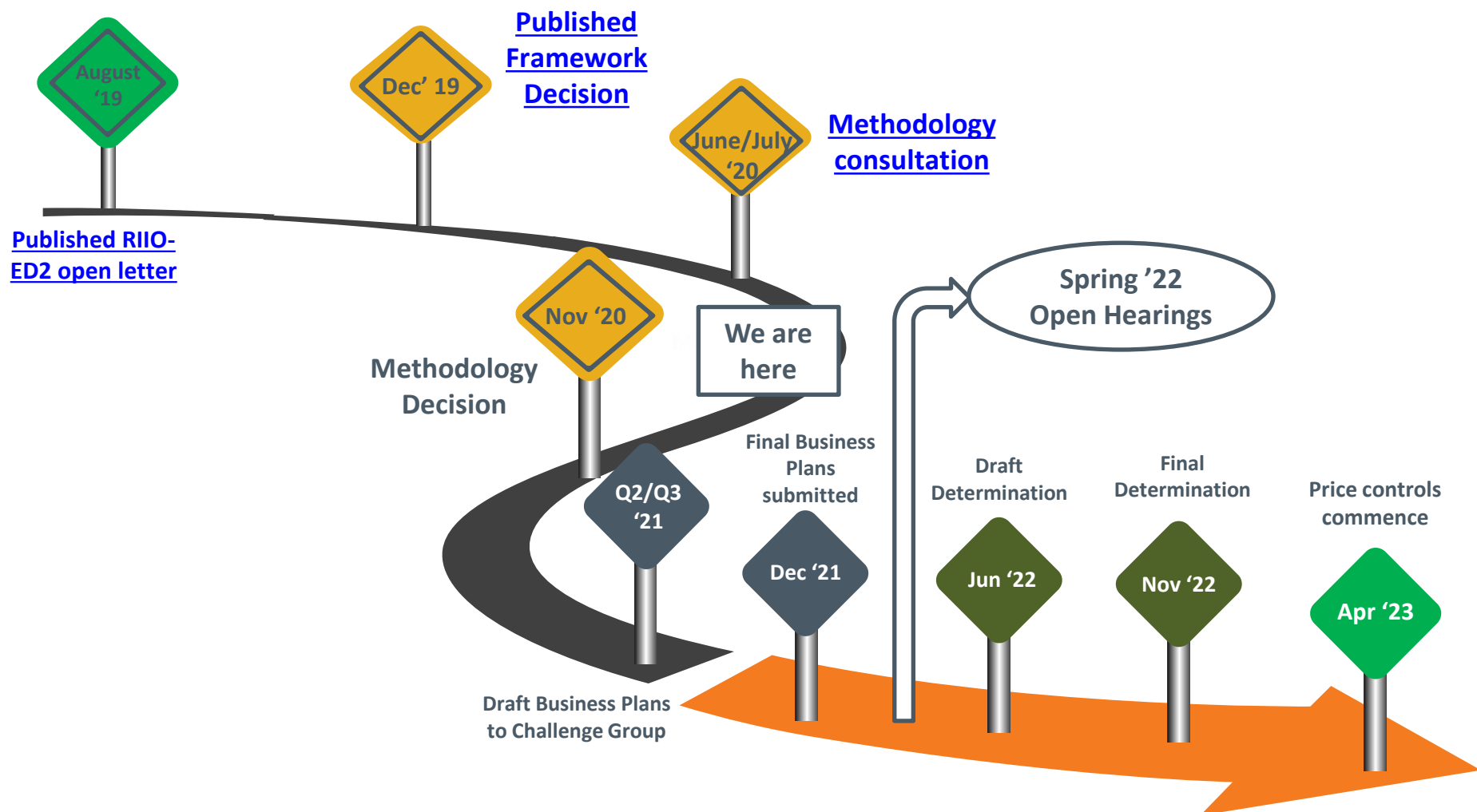
Safety, Resilience, and Reliability Working Group

Meeting 22 – NARM



RIIO Electricity Distribution
14/10/2020

- Welcome and introductions: 10:00-10:10
- Interaction with the BPDTs: 10:10-11:10
- Role of Information Gathering Plans (IGPs): 11:10-11:40
- Review of ED1 performance against Network Asset Secondary Deliverables (NASDs): 11:40-12:00
- Actions, Next Steps, AOB: 12:00-12:15



Interaction with BPDTs

The Voice of the Networks

Energy Networks Association



RIIO-ED2 BPDT: Proposals for NARM related tables

14th October 2020

Phil Mann

Asset Replacement (CV7a/ CV7b): NARM/ non-NARM assets

- The NARM deliverable relates to the condition based risk improvement (measured through Network Asset Indices) delivered by Asset Replacement and certain Refurbishment activities for assets within a defined set of RRP Asset Register Categories. Each asset type can therefore be considered to be a 'NARM' or 'non-NARM' asset.
- The SSMC proposes that the asset categories included within the RIIO-ED2 NARM deliverables should be consistent across all licensees and should encompass all sixty one RRP Asset Register Categories covered by CNAIM.
- The draft BPDT template circulated on 30th July 2020, allocates Asset Replacement activities (costs, additions volumes and removals volumes) across two tables:-
 - CV7a: Asset Replacement NARM; and
 - CV7b: Asset Replacement non-NARM.

The accompanying guidance states that this allocation is based on whether, or not, they are “for condition based replacement of assets that would be included in the measure of delivery of the NARM”.

Asset Replacement (CV7a/ CV7b): NARM/ non-NARM assets (2)

- Where an Asset Replacement intervention involves only:-
 - removal of ‘NARM assets’; and
 - addition of ‘NARM assets’then all costs and volumes clearly should be entered on CV7a.
- Where an Asset Replacement intervention involves only:-
 - removal of ‘non-NARM assets’; and
 - addition of ‘non-NARM assets’then all costs and volumes clearly should be entered on CV7b.
- Where Asset Replacement involves replacement of ‘NARM assets’ with ‘non-NARM assets’ then the treatment becomes less clear. The draft guidance on allocation based on whether, or not, cost and volume data relates to “condition based replacement of assets that would be included in the measure of delivery of the NARM” is potentially ambiguous.

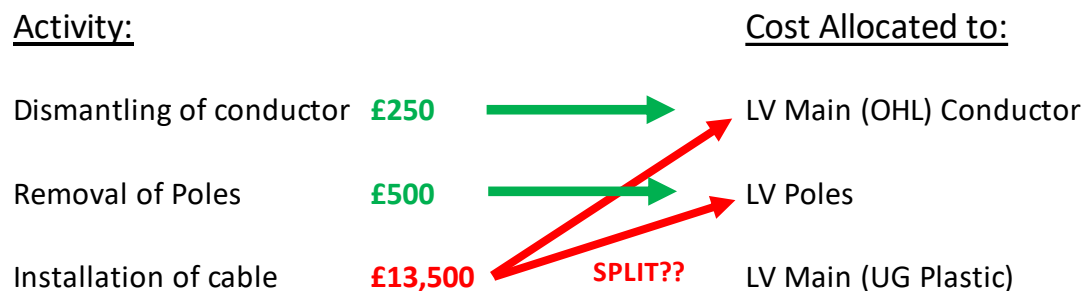
Asset Replacement (CV7a/ CV7b): Cost Reporting Considerations

- For Asset Replacement costs are reported against the asset type that is installed. Installation costs make up the bulk of the cost of asset replacement works (decommissioning/ dismantling costs are normally a small proportion of the replacement cost). This facilitates cost assessment by creating a consistent 'unit' that enables efficiency of delivery to be revealed.
- NARM delivery is a measurement of the reduction in condition based risk that is achieved by removing a 'higher risk' asset and replacing it with a 'lower risk' asset. NARM delivery is therefore driven by asset removals.
- The cost reporting used in CV7 therefore does not align costs with NARM delivery, at an asset category level, unless the replacement is 'like-for-like'. This complicates identification of 'NARM related expenditure' where 'NARM assets' are replaced by 'non-NARM' assets.
- Cost reporting against assets removed would address the identification of 'NARM related expenditure' but does not provide the consistency in unit cost required for cost assessment.

Asset Replacement (CV7a/ CV7b): Cost Reporting - Example

EXAMPLE: 100m of LV overhead network is in poor condition and requires replacement. The replacement works involve undergrounding the section of LV network.

- The following works are undertaken:-
 - the dismantling of 100m of LV Main (OHL) Conductor: £250
 - the removal of four LV Poles: £500
 - installation of 150m of LV Main (UG Plastic): £13,500
- Where costs are reported against the asset installed, all costs (£14,250) are allocated to LV Main (UG Plastic).
- Where costs are reported against asset removed introduces a requirement to allocate installation costs (which creates a consistency issue that can undermine cost assessment):-



Asset Replacement (CV7a/ CV7b): NARM/ Non-NARM Replacements

- Allocation of costs, addition volumes and disposal volumes between CV7a and CV7b based on asset type would correctly identify expenditure impacting NARM delivery where 'NARM asset types' are replaced by 'NARM assets'.
- The expansion of NARM to the sixty one asset categories for RIIO-ED2 significantly reduces the instances where a replacement intervention would involve replacement of a NARM asset with a non-NARM asset types (or vice versa).
- Replacement of LV and HV overhead networks with underground cable (particularly LV and HV networks) is the most significant area where NARM assets (poles but not conductor) are replaced with non-NARM assets.

Asset Replacement (CV7a/ CV7b): Materiality

- By examining RIIO-ED1 RRP reporting, it can be estimated that the value of the pole replacements that occur due to undergrounding of overhead networks is less than 1% of the value of Asset Replacement expenditure (across all DNOs) on the sixty one asset categories to be included in the RIIO-ED2 NARM:-

ED1 (to date) Asset Replacement Expenditure on Asset Types Proposed To Be Included In ED2 NARM (£m at 12/13 prices)	£1836m
ED1 (to date) Volume of LV & HV Poles Removed As Asset Replacement	224121
ED1 (to date) Volume of LV & HV Poles Added As Asset Replacement	214863
Difference In Pole Volumes (LV & HV)	-9258
Value of Difference In HV & LV Pole Volumes (Using Ofgem Expert View Unit Cost from ED1 Cost Assessment) £m in 12/13 prices	£14m
Value of Difference In HV & LV Pole Volumes as % of Asset Replacement Expenditure on Asset Types Proposed To Be Included In ED2 NARM	0.77%

- Given the materiality of this issue, it is recommended that it would be inappropriate to complicate BPDT/ RRP reporting to identify where NARM assets are removed by installing non-NARM assets.

Asset Replacement (CV7a/ CV7b): Materiality (2)

- For eleven DNOs the materiality is estimated at less than 1.0% of the Asset Replacement expenditure across the proposed sixty one RIIO-ED2 NARM categories. For two further DNOs, the materiality is less than 1.5%. For one DNO, where significantly higher proportions of overhead network are undergrounded, the materiality is approximately 4%.
- It is recommended that where it may be necessary to identify the cost of delivery of NARM as part of the RIIO-ED2 close-out process, then a step to consider whether any material NARM delivery has resulted from expenditure on non-NARM assets should be built into the close-out process.
- This permits:-
 - CV7a to be used for the reporting of cost, additions volumes and disposal volumes associated with NARM assets; and
 - CV7b to be used for the reporting of cost, additions volumes and disposal volumes associated with non-NARM assets.

Asset Replacement (CV7a/ CV7b): Proposal

- Proposed revisions to the CV7, CV7a and CV7b BPDT tables and guidance have been developed by NEDWG that:-
 - clearly identify that the allocation across CV7a and CV7b is based on asset type:-
 - Costs associated with installation of NARM asset types are included on CV7a (irrespective of the asset types (i.e. NARM or non-NARM) that they replace);
 - Addition volumes for NARM asset types are included on CV7a;
 - Disposal volumes for NARM asset types are included on CV7a;
 - Costs associated with installation of non-NARM asset types are included on CV7b (irrespective of the asset types (i.e. NARM or non-NARM) that they replace);
 - Addition volumes for non-NARM asset types are included on CV7b;
 - Disposal volumes for non-NARM asset types are included on CV7b.
 - amend the data entry cells to align with the common sixty one NARM asset categories proposed in the SSMC

Asset Replacement (CV7a/ CV7b): Proposal (2)

- The NEDWG proposals for revision of the CV7, CV7a and CV7b BPDT tables are outlined in the following:-
 - ‘NEDWG_CV7_ED2_BPDT_Proposal_v0.1.xlsx’; and
 - ‘NEDWG_CV7_ED2_BPDT_Proposal_v0.1_Guidance.docx’

Refurbishment (CV8/CV9): NARM/ non-NARM Activities

- Tables CV8 and CV9 are used for costs and volumes relating to Refurbishment activities.
- Some Refurbishment activities can be considered in the measure of delivery against the NARM output. For these particular interventions, the deliverable is the improvement in risk measured by changes in the Network Asset Indices.
- Other Refurbishment activities are not considered in the delivery of the Network Asset Indices. These tend to be either:-
 - ‘one-off’ activities that are not routinely expected to be undertaken in the life of an asset (and therefore have the potential to distort comparability of R&M activity).; or
 - activities where a long term health improvement is expected but the improvement cannot be quantified at the time the refurbishment is undertaken, making it unsuitable for inclusion in a delivery metric.

Refurbishment (CV8/CV9): NARM/ non-NARM Activities (2)

- For a Refurbishment activity to contribute to the NARM deliverable:-
 - the Refurbishment activity must be undertaken on an asset type where a NARM deliverable has been agreed; and
 - the Refurbishment activity must be an intervention type that is considered as delivering a NARM improvement (as defined in the RIGs Glossary).
- To enable identification of Refurbishment expenditure and activity contributing to NARM delivery, the BPDT cost and volume tables need to enable expenditure on 'NARM assets' and 'NARM activities' to be separated from other Refurbishment expenditure.

Refurbishment (CV8/CV9): Cost Reporting – RIIO-ED1

- RIIO-ED1 RRP reporting:-

	CV8 No-SDI activity (activity delivers no Secondary Deliverable impact)	CV9 SDI activity (activity delivers a Secondary Deliverable impact provided the asset type is included within the agreed NASD deliverable)
Assets types included in agreed NASD identifiable in col. H on CV9 table in RIIO- ED1 reporting pack	Asset type included in agreed NASD	Intervention NOT included in NASD delivery
	Asset type not included in agreed NASD	Intervention NOT included in NASD delivery

- Allocation of activities between 'SDI' and 'No SDI' defined in RIGs Annex A Glossary (Refurbishment and Repairs & Maintenance Task Allocation Tables)
- For RIIO-ED1 the asset types where Network Asset Secondary Deliverables (NASD) are agreed differ between licensees.

Refurbishment (CV8/CV9): Considerations For RIIO-ED2 BPDT

- Draft RIIO-ED2 BPDT tables were issued on 30th July 2020, replicating the split of Refurbishment across CV8 and CV9 based upon the type of activity undertaken. The draft tables did not include any provision for subdivision of CV9 expenditure based upon asset types included with NARM/ asset types not included in NARM.
- A couple of developments in relation to NARM, discussed in SRRWG, have potential to impact the RIIO-ED2 BPDT tables and guidance for Refurbishment:-
 - the SSMC proposal that the asset categories included within the RIIO-ED2 NARM deliverables should be consistent across all licensees and should encompass all asset categories covered by CNAIM; and
 - the methodology for calculating Network Asset Indices has been reviewed and revised by NEDWG. The consultation on CNAIM v2 includes proposals to reallocate a small number of Refurbishment activities between 'NARM' and 'non-NARM'.

Refurbishment (CV8/CV9): Proposal

- Proposed revisions to the CV8 and CV9 BPDT tables and guidance have been developed by NEDWG that:-
 - incorporate the changes to allocation of activities between NARM and non-NARM proposed as part of the CNAIM v2 consultation;
 - take account of the proposed common set of sixty one NARM asset categories proposed in the SSMC; and
 - enable identification of the expenditure associated with NARM delivery through Refurbishment.
- The NEDWG proposals for revision of the CV8 and CV9 BPDT tables are outlined in the following:-
 - ‘NEDWG_CV8_CV9_ED2_BPDT_Proposal_v0.1.xlsx’;
 - ‘NEDWG_CV8_CV9_ED2_BPDT_Proposal_v0.1_Glossary.docx’; and
 - ‘NEDWG_CV8_CV9_ED2_BPDT_Proposal_v0.1_Guidance.docx’

Refurbishment (CV8/CV9): Proposal (2)

- CV9 is used only for the cost and volumes of Refurbishment activities on asset types that are included in the NARM deliverable, where the intervention type is a type that can be included in the measure of NARM delivery; and
- CV8 is used for all other Refurbishment activities i.e.:
 - all Refurbishment activities on asset types that are not included in the NARM deliverable; and
 - Refurbishment activities undertaken on asset types that are included in the NARM deliverable, but are intervention types that are not included in the measure of NARM delivery.
- Under this proposal all expenditure shown on table CV9 relates to NARM delivery.

	CV8 Activities not counted in NARM delivery	CV9 Activities counted in NARM delivery
Asset type included in agreed NARM	Intervention NOT included in NARM delivery	Intervention INCLUDED in NARM delivery
Asset type not included in agreed NARM	Intervention NOT included in NARM delivery	

Refurbishment (CV8/CV9): Proposal (3)

- This involves a small number of activities being reallocated in the Refurbishment and Repairs & Maintenance Task Allocation Tables (from SDI activities in RIIO-ED1 to 'non-NARM' in RIIO-ED2):-

Asset Register Category	Activity
6.6/11kV CB (PM); 6.6/11kV Switch (PM); 6.6/11kV Switchgear - Other (PM); 20kV CB (PM); 20kV Switch (PM); 20kV Switchgear - Other (PM); 33kV Switchgear – Other; 33kV Switch (PM); 66kV Switchgear – Other; 132kV Switchgear - Other	Complete replacement of the operating mechanism
6.6/11kV Transformer (PM); 20kV Transformer (PM); 33kV Transformer (PM)	Complete workshop/factory refurbishment
132kV Pole	Pole Strengthening (e.g. clamping a steelwork supporting bracket to an existing pole)
	Small footprint steel masts: Replacement of individual steelwork members

Refurbishment (CV8/CV9): Proposal (4)

- The proposal includes the addition of a memo item on table CV9, disaggregating volumes of activity for tower assets and transformers to assist with analysis of Business Plan proposals), e.g.:-

Refurbishment: 33kV Tower - Painting of tower

Refurbishment: 33kV Tower - Replacement of individual steelwork members

Refurbishment: 33kV Tower - Replacement of tower foundations

Refurbishment: 33kV Transformer (GM) - On site processing to recondition oil

Refurbishment: 33kV Transformer (GM) - Other refurbishment activity

It is not appropriate to include expenditure at this level of disaggregation, as multiple activities may be undertaken on a single asset as a single unit of 'work'.

- Other features of this proposal are:-
 - asset units shown in col D of table CV9 aligned to the guidance;
 - the data entry cells for costs and volumes in CV8 and CV9 tables have been aligned to the Refurbishment and Repairs & Maintenance Task Allocation Tables;
 - the activity allocations in the Refurbishment and Repairs & Maintenance Task Allocation Tables in the glossary have been updated to reflect the updates to allocations proposed in the CNAIM v2 consultation.

NARM BPDT Tables: Proposal – Initial Draft

- NEDWG have developed an initial draft proposal for NARM BPDT tables. These are outlined in the following:-
 - ‘NEDWG_NARM_tables_ED2_BPDT_Proposal_v0.1.xlsx’; and
 - ‘NEDWG_NARM_tables_ED2_BPDT_Proposal_v0.1_Guidance_v0.1.docx’
- The draft proposal meets the minimum information required to facilitate operation of the RIIO-ED2 NARM Price Control Deliverable:-
 - provides the health & criticality profile in the year of BPDT submission*;
 - provides a forecast of the impact of deterioration to the end of RIIO-ED1;
 - provides a forecast of the health & criticality profile at the start of RIIO-ED2 taking account of planned interventions in the remainder of RIIO-ED1*;
 - provides a forecast of the impact of further deterioration to the end of RIIO-ED2;
 - identifies the forecast movements in health & criticality due to NARM related interventions in RIIO-ED2.

{ - note: as it is proposed that the ED2 BPDT is completed using a different version of CNAIM to the version of CNAIM used for ED1 reporting, these profiles will differ from the reported RIIO-ED1 view}*

NARM BPDT Tables: Proposal – Initial Draft (2)

- Sheet NARM1 contains the Risk Index weightings to be applied to the volumes in each health/ criticality combination in the Risk Matrices. In this draft, these are fixed values taken from the version of CNAIM v2 that has recently been consulted on. These values shall need to be updated in accordance with the version of CNAIM that will ultimately be directed for use in RIIO-ED2 BPDT submissions.
- Sheet NARM2 provides forecast health and criticality information for the RIIO-ED1 period. This follows the principles used in the RIIO-ED1 BPDT, where the impact of planned interventions is shown on the asset population profile but is not separately broken down by investment driver.
- Sheet NARM3 provides forecast health and criticality information for the RIIO-ED2 period. The table requires input of only the forecast movements due to planned interventions that contribute to NARM delivery (i.e. Asset Replacement and Refurbishment (NARM) interventions). These movements are quantified in terms of monetised risk within this table.

NARM BPDT Tables:

Completing development of the tables

- There are a number of points for consideration in further development of proposals for the NARM BPDT tables:-
 - the current draft NARM3 table includes movements due to asset replacement and Refurbishment (NARM) interventions undertaken as part of high value projects within the 'NARM related' interventions. This may/ may not be appropriate depending on the treatment of high value projects in RIIO-ED2 and their interaction with NARM (noting the SSMC proposes not to maintain the HVP uncertainty mechanism “in its current form”). Does HVP still have a role?;
 - will the assessment of Business Plans require information on health/ criticality movements for other investment drivers? (and for what purpose?);
 - will the assessment of Business Plans require Asset Replacement and Refurbishment (NARM) interventions in the 'remainder of RIIO-ED1' to be identifiable?
 - will the NARM tables be included within the main BPDT pack (enabling check cells to be incorporated to cross check against Asset Register volumes on V1 etc.)?
 - what will be the requirements for any commentary on the NARM tables (and how does it interact with the activity commentary on CV7 & CV9)?
- Decisions around these points are required to complete development of the NARM BPDT tables.

Role of IGPs

The Voice of the Networks

Energy Networks Association



RIIO-ED2 Information Gathering Plan Proposals

14th October 2020

Bob Wells

- The Information Gathering Plan (IGP) is an ED specific requirement within SLC51 (Part E)
- Plans are required to demonstrate:
 - How the Licensee will gather and record information required for CNAIM (51.12)
 - The scope, form and frequency of the data and data collection to permit reporting to occur (51.14)
 - The Authority will review and may or may not direct the report, with or without amendment (51.15)
 - The licensee must keep the plan under review. Modification are at the discretion of the Authority (51.16)
- Condition Objective:
 - Ensure that the licensee can accurately report progress against its NASD (51.13 also introduces the concept of a requirement for ‘sufficient information’ to implement CNAIM)

Note – Condition 51.13 provides for an exception to issue a report but was not used in ED1.

- The need to review the IGP is undertaken by the DNOs in accordance with the licence
- Where changes to the IGP are identified by the DNO no process has been agreed as to how these should be actioned and the revised plan approved and hence directed by the Authority
- Had the CNAIM methodology been revised within the ED1 period then a defined process is defined in Part I
- In this case the IGP would need to have potentially been revised and re directed, again the licence is silent on this process.
- If the IGP is to be retained in the ED2 period then the process and procedures associated with its governance will require revision

- For RIIO 1 there is no requirement for Transmission or Gas T or D Companies to produce an IGP
- Current licence drafting for the RIIO 2 period has no requirement to produce one, however:
 - Special Condition (CS1 Part C) NARM Modification does require some of the data issues identified in the IGP to be submitted to the Authority to support the proposal.
- To align the Cross Sector based on the T&D (Gas) licence proposals the following options are available:
 - The IGP requirements for the ED sector should be removed for ED2 or
 - The requirement should be introduced in to the T&D (Gas) licence proposals or
 - The IGP should be retained in the ED sector with improvements to the governance requirements, in the licence, for the period given the current level of development of NARM in the sector.

- **Pros**

- Acts as a point of reference for all interested parties
- Defines the licensees commitments in first implementing the methodology
- Provides a public statement of the above as the plans are directed and published by Ofgem
- A standard content and level of detail has been established for the report
- Permits progress against the plan to be reviewed.

- **Cons**

- Does not align with T&D Licence proposals for RIIO2
- Lack of clarity as to the processes for reporting progress to Ofgem against the plan in RIIO-ED1 Licence
- Lack of methodology to facilitate changes to the plans by the Licensees for ED1

- Slide 4 had detailed the options as to the future of the IGP Cross Sector.
 - 1 Remove the requirement across all sectors
 - DNO Impact – There will be no formal requirement under the licence to state and agree how the revised methodology (CNAIM V2.0) is to be implemented by the DNOs with Ofgem.
 - 2 Requirement for T&D to create IGPs
 - DNO Impact – minor assuming a common template and content is required aligned to the ED1 requirements
 - 3 Retain in the DNO Sector Only
 - DNO Impact - Minimal
 - Format is already defined
 - Requirement to create for the ED2 period only
 - Revision and Reporting requirements need to be enhanced and agreed

- In order to determine the appropriate approach to the IGP in RIIO-ED2 it is necessary to consider:-
 - the purpose that it is intended to fulfil in the period; and
 - how it will be used in the regulatory framework.
- Given that CNAIM v1 is now established is there still a requirement for DNOs to demonstrate that they collect sufficient information to implement the requirements of CNAIM? (noting that the number of asset categories included in NARM will differ from each DNO's RIIO-ED1 NASD);
- Is there a requirement to incorporate updates on progress against the IGP (data collection / data quality measures?), potentially changing the shape & form of the IGP, and what would be the purpose of this within the regulatory framework?;
- Does Ofgem envisage any further role for the IGP in RIIO-ED2 (or maybe thinking ahead, in ED3)?

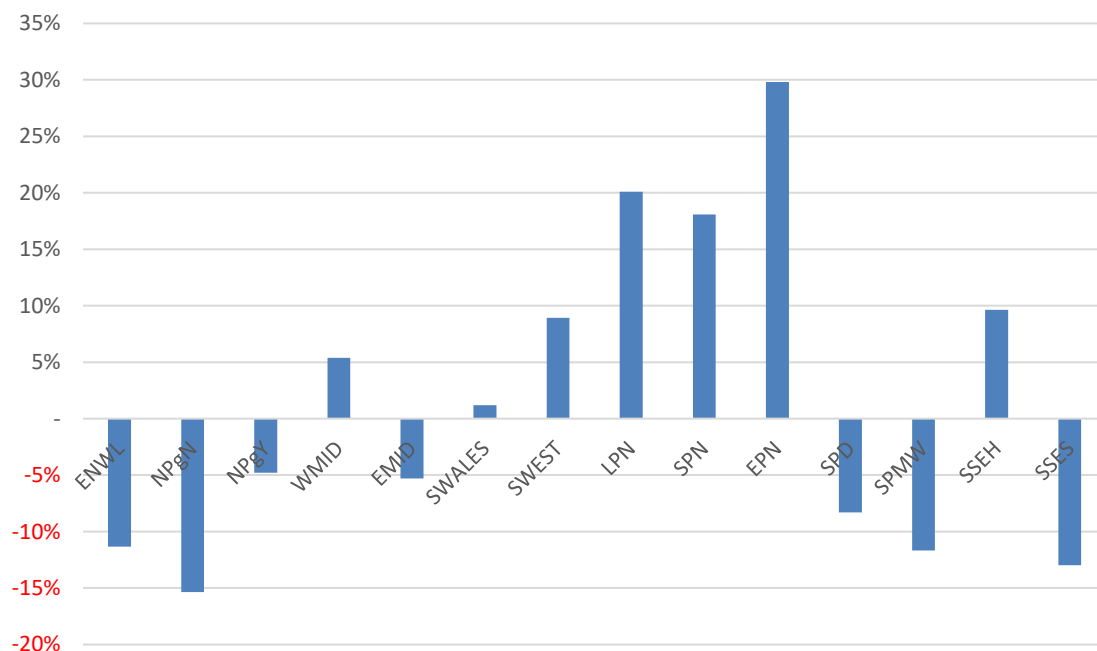
- In order to enhance the governance of the IGP the following need to be considered:
 - Renaming the requirement to *“CNAIM Implementation Plan for RIIO-ED2”*
 - Continuation of the need for Ofgem to review, oversee and direct the plan
 - Confirmation of minimum content (Template?)
 - Reporting of the outcome of the regular review – Including the format
 - DNOs reporting requirements of progress against the Plan (eg A single report min period, Multiple annual reports and at Close-out)
 - How will additional requirements identified in the ED2 period for Implementation in ED3 (CNAIM Light) be incentivised
 - Create a “MoU” as to how and when a revision of the document is required – Include in an appropriate RIG Annex?

Review of ED1 performance against NASDs

ENWL Five Year Risk Point Analysis

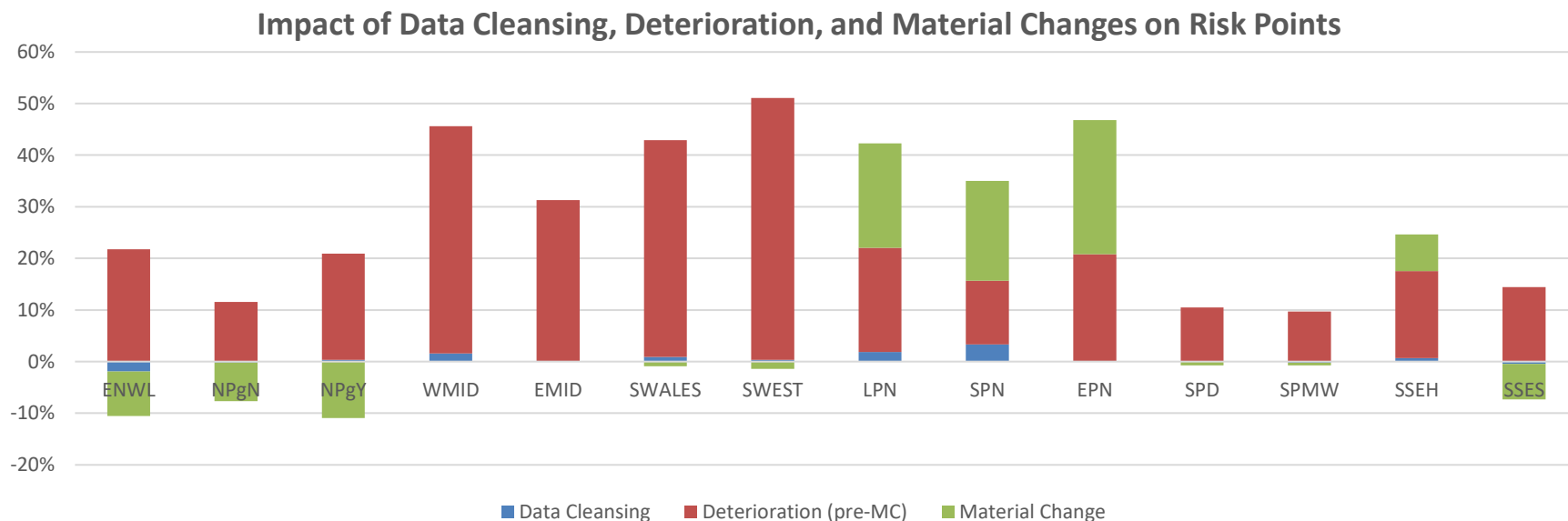
- Risk points delivered by DNO across ED1 to date along with the associated Asset Replacement and Refurbishment costs
- Analysis developed to summarise data from the Costs and Volumes and Secondary Deliverables RIGs returns.

Movement in Monetised Risk - 5 years

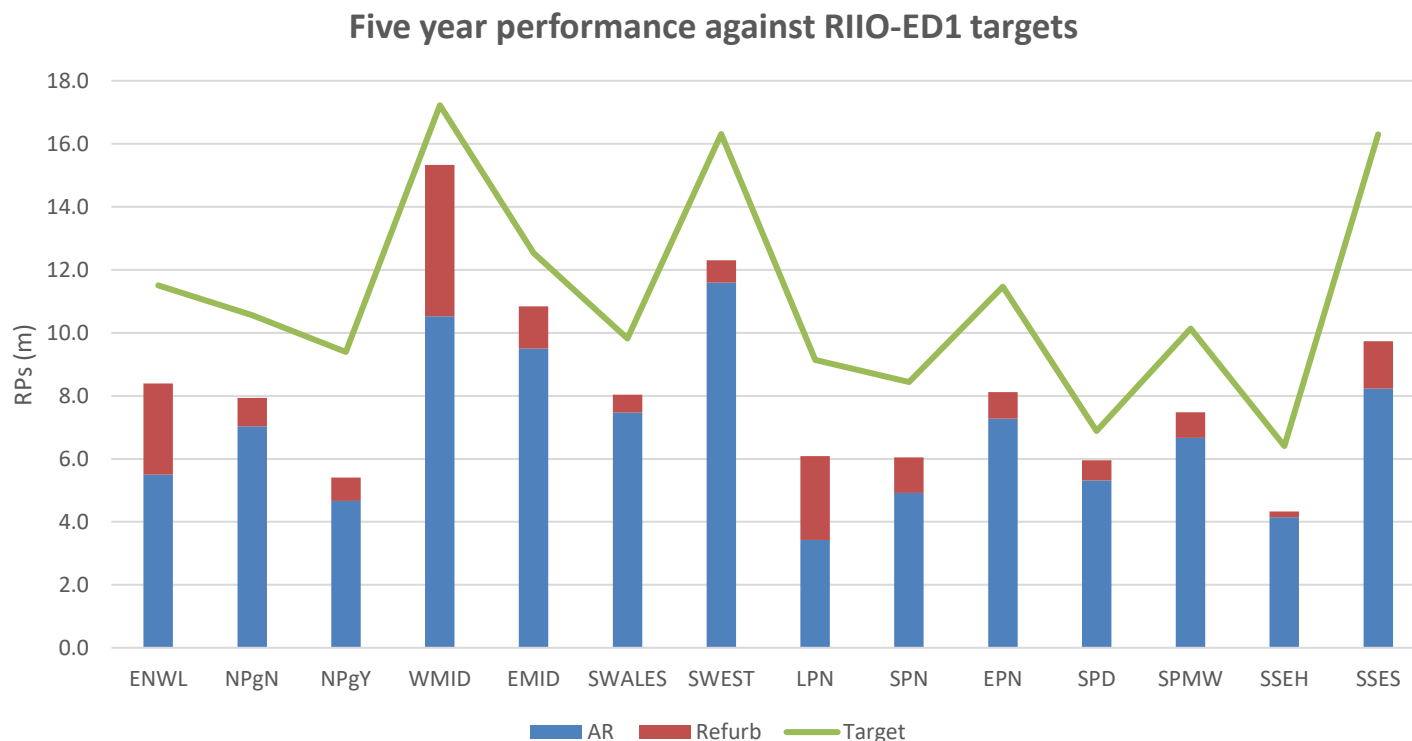


- Monetised Risk movement due to Asset Replacement, Refurbishment, General Reinforcement, Fault, HVP (AR, Refurb, other) & All other activities.
- Impact of data cleansing & deterioration (pre-material change) and variance due to material change accounted for.
- Variation between 15% reduction and 30% increase in risk point movement.

- Data cleansing :
 - Low impact (3% to -2%)
 - Positive changes in data cleansing may need review.
- Deterioration (pre-material change):
 - Condition of assets worse than initial view
 - Larger impact (10% to 51%)
- Material change:
 - Systematic change to data set, because of new data overriding old set, resulting in more accurate data which could increase or decrease risk
 - Further investigation required into significant changes

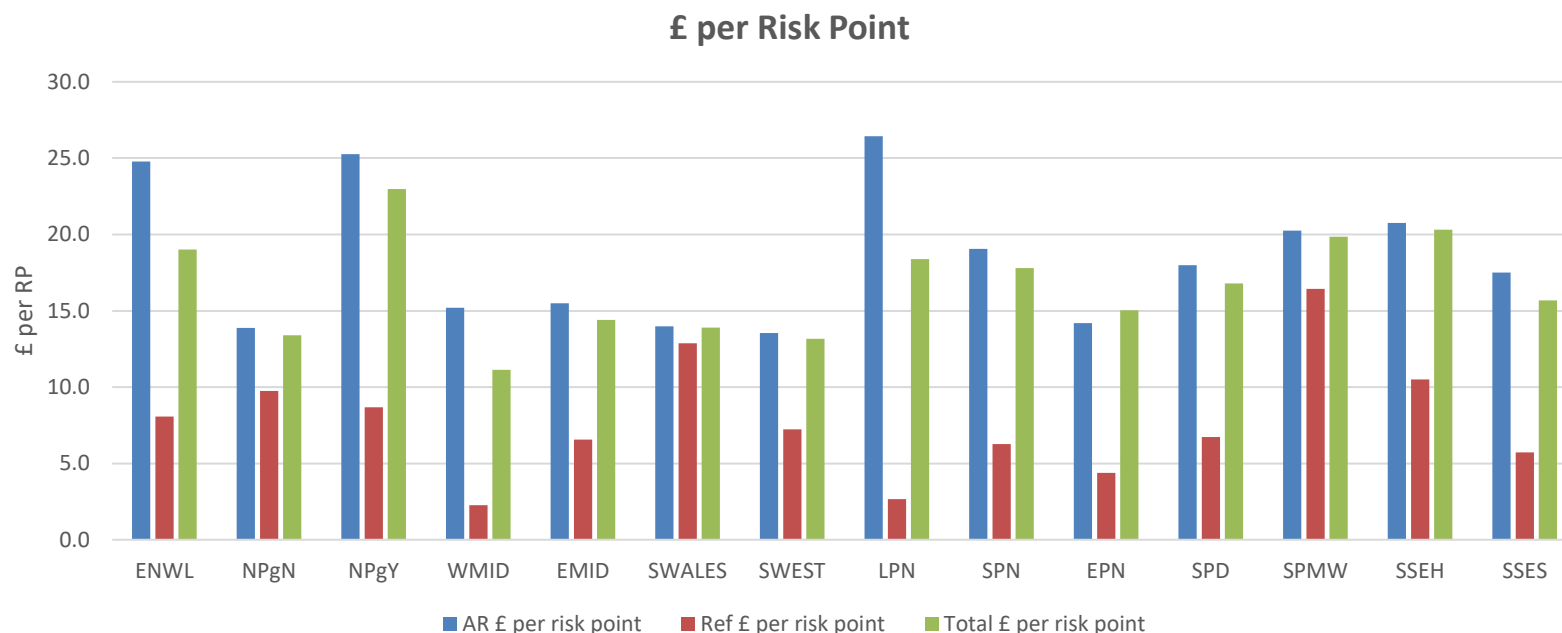


- Sector average = 74% of RIIO-ED1 target achieved. Ranging from 89% (WMID) to 58% (NPGY).
- Percentage delivered in first five years against RIIO-ED1 targets for Asset Replacement ranges from 41% (LPN) to 92% (SPD), and for Refurbishment ranges from 30% (SSEH) to 600% (WMID).



- Balance between Asset Replacement and Refurbishment varies widely between DNOs.

- For Asset Replacement the range is between £13.5 (SWEST) and £26.4 (LPN) per risk point with an industry average of £17.3.
- For Refurbishment the range is between £2.3 (WMID) and £16.4 (SPMW) per risk point with an industry average of £5.9. Significant spread which requires further investigation.



Actions, next steps and AOB

SRRWG & Date	Agenda Items	Key Task Details
SRRWG-23 12 th November	Interaction with the Business Plan Data Templates (BPDTs), cost assessment, CBAs and EJPs	- As above.
	NARM incentives	<ul style="list-style-type: none"> - Review T2/GD2 NARM Funding Adjustment and Penalty Mechanism - Review ED1 NASDs incentive properties. - Develop proposals around the ED2 incentive package.
	Revision of methodology (CNAIM v2.0)	<ul style="list-style-type: none"> - DNOs to develop and present views on the setting of input values to the methodology. - ENA to provide update on consultation on adoption of CNAIM v2.0.
	Expansion of the methodology	- DNOs to develop and present views on the proposals on the treatment of Non-NARM assets in ED2.

- The next session on NARM is Wednesday 14th October.
- We will circulate notes and an actions log from this meeting.

Our core purpose is to ensure that all consumers can get good value and service from the energy market. In support of this we favour market solutions where practical, incentive regulation for monopolies and an approach that seeks to enable innovation and beneficial change whilst protecting consumers.

We will ensure that Ofgem will operate as an efficient organisation, driven by skilled and empowered staff, that will act quickly, predictably and effectively in the consumer interest, based on independent and transparent insight into consumers' experiences and the operation of energy systems and markets.