

Steven McMahon
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

Dear Mr McMahon,

Consultation On Changes To The Stakeholder Engagement And Consumer Vulnerability Incentive Guidance - Northern Powergrid Response

In response to the proposed changes within the SECV guidance for 2018 / 19 published on 5th November 2018, I can confirm that we have reviewed each of the changes and I enclose our official response, in line with Ofgem's guidance.

In summary, Northern Powergrid supports the proposed revisions to the Stakeholder Engagement Incentive (SEI) and Stakeholder Engagement Consumer Vulnerability (SECV) guidance documents. We feel that each of these changes broadly reflect the conversations already held with the Ofgem team and within the working group held with the DNOs prior to the start of the formal consultation period. We do have a couple of points of clarification regarding the panel assessment schedule and subsequent performance feedback and one suggestion for consideration regarding the alignment of one part of the assessment criteria between the gas and electricity guidance documents.

For clarification:

The revisions include the introduction of a panel report (ref: 4.12) after the Panel assessment has taken place; the guidance documents suggest that publication will happen by 30th November, in line with notification of final directions. The guidance, however, does not define what feedback will be received before this date to each of the companies.

It is not clear what feedback will be received on the day of the panel, e.g. headline scores, and what level of feedback - verbal and / or written will be provided within what timeframe post the panel assessment day. We would welcome clarification of what will be provided and within what timeframe we part of the guidance document.

Furthermore, could you clarify whether the removal of the consumer vulnerability audit as part of the DNO assessment have an impact on when the panel assessment day takes place? Will this date be brought forward in the schedule or will it remain in July? We would welcome further clarification on this including a broad assessment of the

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timeframe, e.g. first two weeks in July, for planning purposes in a similar vein to the detail on the notification of who the panel members will be, which is to be published before the end of May (5.8)?

For consideration:

The proposed amendments do not align the assessment criteria descriptions used for Gas and Electricity, acknowledging that Consumer Vulnerability assessment is only relevant for Electricity.

Northern Powergrid would suggest that greater alignment would be beneficial and aid collaboration and the sharing of good practice. A specific example includes the descriptions used in the (4.9/4.10 Panel Assessment Criteria (Part 2) - Electricity, compared to the equivalent Gas criteria description:

Electricity SECV Guidance: Electricity - 4.10. c) Initiatives which best serve the specific interests of challenging groups or hard to reach stakeholders.

Gas SEI Guidance: (4.11) Panel Assessment Criteria (Part 2) Gas: 3) Initiatives which best serve specific interests of challenging groups of customers / communities / future stakeholders and result in measurable benefits.

We suggest that the gas description is more comprehensive and would be beneficial to adopt.

We would ask that Ofgem considers our points above and I would be grateful if you could write to me with more information in response to the enclosed enquiries.

Yours sincerely,



Patrick Erwin
Policy & Markets Director
Northern Powergrid

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