RIIO GD2 Business Plan Appendix Customer & Vulnerability Plan 2021-2026 December 2019





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Assurance statement

Our Business Plan, including Appendices, has been subject to a rigorous assurance process which is detailed in Chapter 3 of the Plan and the Board Assurance Statement.

Our Director of Stakeholder Engagement was appointed as the Sponsor for the Customer (including vulnerable) which has been through the following levels of review and assurance:

First Line

This was undertaken at project level by the team producing the document, as a regular self-check or peer review.

Second Line

This was undertaken independently within the organisation to review and feedback on product development, including workshops on Customer Narrative and Customer Value Proposition. Both Senior Manager and Director sign-off was obtained.

Our RIIO-GD2 Executive Committee: (1) considered the appropriateness of assurance activity for the Appendix and (2) provided assurance to SGN's Board that the Business Plan meets Ofgem's assurance requirements.

Third Line

This was undertaken by external advisors and groups providing critical challenge during the development of products within the Business Plan. In addition to the feedback and challenge provided by the Customer Engagement Group (CEG) and Customer Challenge Group (CCG) this Appendix was developed after consultation with and advice from:

Advisor / Group	Contribution	
35 Stakeholders	Reviewed the Vulnerable Customer Plan.	
DJS Consultancy	Consultancy advice and support to underpin the creation of the plan; and test and iterate elements of the plan.	
Impact Utilities Consultancy		

Third Line

This was undertaken by independent and impartial external providers:

Advisor / Group	Contribution
British Standards Institute	BSI 18477: Inclusive Service Verification of current services



1 Introduction

Our people are proud to deliver an essential service to the public and we take our responsibilities to society seriously. We have a long heritage of care and concern for our customers, particularly those in vulnerable circumstances.

Customers are at the core of our long-standing mission - *to keep our customers safe and warm by leading the way in energy delivery.* By anticipating and responding to all our customers' needs and expectations, we increase our effectiveness and create better outcomes for our business and for society. Providing excellent service to all our customers makes good business sense and is simply the right thing to do.

An essential element of keeping the interests of our customers and stakeholders at the heart of our business, is total commitment from the top leadership team and CEO. This we have in SGN with our CEO John Morea taking a leading interest in all our customer service activities and developments. He champions a culture across the company which puts the customer first and encourages our people to think about the position of the customer in front of them, while ensuring we are listening to our stakeholders too.

One of our corporate strategic priorities is to keep pace with the increasing expectations of all our stakeholders as technology, energy and society change. This plan explains how we intend to achieve this over the next price control period.



2 Customer experience in RIIO-1 GD1 (GD1)

We have invested significantly in improving customer experience during GD1, within a regulatory framework of licence conditions, guaranteed standards of performance and financial incentives. We achieve excellent scores for customer satisfaction, comparable with the highest scoring organisations within and outside our industry ranging from retail to aviation. Our Scotland network has held the No1 GDN position for customer satisfaction for the last three years running and is currently on track to achieve this for the fourth year 2019/20. We also hold the best GDN track record for handling our ever-reducing complaints well, with some of the lowest GDN volumes of complaints, and have done so for the last 4 years running in Scotland.

At the start of GD1, we laid the foundations through systematic engagement with our people and our customers to fully understand what we needed to do to improve our service. We worked with our people to understand how they can deliver a 10/10 service and we were able to invoke the strong sense of pride that our engineers feel in doing a good job. We have succeeded in our aim to ingrain 10/10 service in our people's DNA. Everywhere you go in SGN you will see and hear about 10/10 and the great stories about how we take great care of our customers.

Our customers helped us too, by telling us about their experiences, good and bad, through different forums and channels, and we have continued to use all possible forms of insight available to us – qualitative and quantitative customer research, insight from our contact centre enquiries and interactions, and feedback from our people who work jointly with our customers to tell us what more we can do to keep improving and offering great service.

We have also sought the specialist expertise of stakeholders and partners to provide guidance on a full range of support for our customers in vulnerable circumstances. We work directly with expert partners and we also set up specialist stakeholder panels, asking for advice and co-creating solutions to the challenges faced by customers in vulnerable circumstances including those in fuel poverty. We have worked with vulnerable customer advocacy groups who have invited customers in vulnerable circumstances to provide their insight into our practices to support their needs. We listened to whether our services meet their needs and asked them for help with future proposals. The vulnerable circumstances we have explored with trusted partners have included disability, mental health difficulties and circumstances that make people harder to reach such as those with caring responsibilities, or those who do not have English as first language.

2.1 Our vision for excellent customer experience in GD1

We set out a clear vision for the future in GD1, mapping what customers told us was important to them against our workstreams of emergency, replacement and connections. We then worked with colleagues from all areas of SGN to create the four elements of our service ambition.



Figure 1:



2020 There when and where, and only for as long as we are needed

Outcome Sector leading in - right first tme



2020 Leverage IT to deliver leading capability just in time

Outcome The sector benchmark for innovation & capability



2020 Deliver a great engineering and customer experience

Outcome Top gas network for service



2020 Flexible cost to serve model to enable investment decisions

Outcome Best comparatble service cost metric

To achieve our ambition, we focused on five levers of change:

- 1. People resourcing and a skills framework
- 2. Ways of working a flexible operating model and landing change seamlessly
- 3. Insight bringing customers to life and knowing when we're doing it right
- 4. Process effortless experiences and customer centricity
- 5. Technology the right tools, future proofing and digital channel development

Working together with our people and using insight from customer contacts, enquiries, surveys, focus groups, focussed interviews, workshops, site visits and colleague roadshows we built our transformation roadmap which identified the initiatives we needed to develop and deliver. We designed our customer journeys, defined our future service blueprints linked to our different customer personas, to ensure our initiatives would meet our ambitions. Many of our initiatives are now complete or in flight and we are on track to complete most of these by the start of GD2. We work in an agile manner allowing us to adapt our plans where and when required, innovating to keep in step with the expectations of our customers.

2.2 Our commitment to supporting vulnerable customers in GD1

As part of our GD1 ambition to deliver excellence in customer service we developed an additional strategy and four-stage plan to focus specifically on vulnerable customers. Our commitment is to keep **all** our customers safe and warm by ensuring services are readily accessible and by prioritising and responding to the specific needs of customers in vulnerable circumstances.

Our aims are:

- to embed in our people a strong understanding and capability to respond to the needs of customers in vulnerable circumstances;
- to ensure our approach, communication and processes are accessible to all; and,
- to provide extra value by connecting customers in vulnerable circumstances to energy or safety partners.

2.2.1 Embedding understanding and building capability to respond

We do this by mapping types of vulnerable circumstances, understanding how our core services impact on individuals in those circumstances and developing partnerships with organisations to help us mitigate those



impacts. We are involving our employees, customers and stakeholders in creating and driving this approach and have benefited from significant advice, collaborative working and time commitment from partners and stakeholders. With the assistance of our stakeholders we provided a simple framework for vulnerability and trained our front-line staff to recognise and offer support.

We provide training to our operational teams to help them understand how to interact effectively with those in vulnerable circumstances, with videos to showcase best practice among their colleagues. We are a dementia friendly organisation with 2335 colleagues already trained and signed up as a dementia friend. This has helped our people identify customers with signs of dementia and gives them information about communicating with patience and consideration. Our engineers have practical guidance to help them identify those in vulnerable circumstances on the doorstep, however, they are all empowered to consider each customer as unique and determine the right course of action based on individual circumstances.

We provide alternative heating and cooking facilities when we interrupt the gas supply to vulnerable customers, as required by our Guaranteed Standards of Performance, however where necessary we will also provide alternative accommodation, hot food or other services where gas outages are prolonged. Our engineers and support teams will identify all vulnerable customers during incidents or emergencies by means of the Priority Service Register (PSR) and visiting all occupiers, always prioritising their needs.

2.2.2 Support for customers living in fuel poverty in GD1

Under the Fuel Poor Network Extension Scheme, we offer free or discounted connections to our gas network to eligible customers living in fuel poverty. We were asked in 2015/16 to increase the targets set at the start of RIIO1 to provide help to lift more households out of fuel poverty. These higher targets are shown in the table below.

We have already delivered our increased eight-year GD1 target in Scotland; however, we are lagging behind our increased GD1 target in Southern. There are several reasons for this disparity in the number of fuel poor connections between the two network areas. They include:

- Fuel poverty affects a greater proportion of Scottish households.
- Funding is available in Scotland for in home measures such as central heating systems.
- Funding is not readily available in England for central heating measures, and the support system for all advice and in-house measures is very fragmented.

Fuel poor network extension scheme	Scotland		Southern	
		GD1 Eight-year target	GD1 to end 2018/19	GD1 Eight-year target
Number of connections	19,078	17,130	7,016	10,367

Table 1: Fuel poor network extension scheme

With the support of our shareholders, we have set aside £20million in GD1 to support those in fuel poverty as part of the £145m voluntary contribution we made to customers in 2017. The contribution is split between Scotland, where it is used to pay for the unfunded connections over our target number and, in Southern, where it is used to provide a grant contribution towards the cost of a new gas central heating system to accompany a fuel poor connection.

We worked with a specialist panel of stakeholders in Southern to design a scheme to make the best use of the £10m grant fund, and to help us overcome the additional hurdle of a change of eligibility rules to remove any geographical criterion. Creating coordinated projects with partner organisations such as local authorities, housing associations, landlords, and ECO agencies has proved to be the most effective route to acquiring the



blend of skills, funding and resource required to overcome the convoluted processes and policy landscape of fuel poverty and energy efficiency schemes. We still face a considerable challenge in achieving our revised target for fuel poor connections in Southern but believe that we will be near the target at the end of GD2.

We followed the advice of our specialist stakeholder panel members to use all available datasets to map and find households living in fuel poverty. We have subsequently created an online mapping tool which combines small area datasets for property, household, and vulnerability characteristics with information about proximity to the gas network in order to improve targeting and help more fuel poor households.

2.2.3 Accessible services

During GD1, we have also improved the accessibility of our services and communication channels and subsequently achieved the British Standard Institute's Inclusive service provision standard BS 18477, for identifying and responding to consumer vulnerability, achieving accreditation for our processes and procedures.

2.2.4 Providing extra value through partners

In each of our two network areas, we established a specialist panel of stakeholders to focus on supporting those customers at risk and worked with them specifically on our second aim – to provide extra value by connecting those at risk to other energy or safety service partners. On the advice of our specialist stakeholder panel, we asked our people which vulnerable circumstances they found most difficult to walk away from, and then found solutions to those challenging situations.

As a result, in winter 2018 we began trialling a referral network through which our engineers could refer customers to a range of additional services from partners including fire and safety visits, energy efficiency advice including benefit maximisation, locking cooker valve installation, priority services registration or our winter voucher for vulnerable home owners whose appliances are disconnected on safety grounds. Our engineers use a referral app, empowering them to refer customers in vulnerable circumstances to the range of additional services. Customers are surveyed following referral to additional services to ensure the service provided matched their needs. We have measured the value of additional services provided to customers in vulnerable circumstances.

2.3 Performance against Guaranteed Standards of Performance in GD1

In GD1 we have worked hard to meet or exceed Guaranteed Standards of Performance and we pay customers compensation in the small number of cases where we do not meet standards.

In its 2017 report 'Living up to the standards?' Citizens Advice completed a detailed analysis of networks' performance against guaranteed standards. The report concluded that gas networks 'are living up to the standards – most of the time and especially when looking at average figures.' Each comparative chart in the report (see pages 20 - 22) shows each of the SGN networks to be performing above the average for all gas network areas. However, the report goes on to call for all networks to be ambitious and continue to strive to improve. We know that there are times that we do not deliver what is expected of us, and we need to remain vigilant to maintain our high standards and continue to reinforce great service.

2.4 Positive outcomes for customers in GD1

We have delivered significant benefits to our customers in GD1. As a result of the improvements we have implemented since 2013/14, levels of customer satisfaction have greatly increased, and our volumes of complaints have greatly decreased across both of our networks. Our people are now more engaged and taking care of our customers is part of our DNA.



Customer satisfaction and complaints handling scores are shown below and have improved further in 2019/20 for both networks



Figure 2:	Customer satisfaction	performance
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2018/19 Overall Customer Satisfaction			
Network	Score		
Scotland	9.24		
Wales & West	9.18		
Northern Gas Networks	9.08		
Southern	8.98		
North West	8.77		
East of England	8.76		
West Midlands	8.5		
London	8.28		

Figure 3: Complaint handling performance



2.4.1 Best practice in customer experience

Along the way on our journey through GD1 we have picked up several prestigious awards for our levels of service and initiatives we have implemented, which we now continue to steadily embed. We are also accredited members of the Customer Contact Association (CCA), where we work with over 500 well-known brands to learn new methods and techniques in the customer service industry to keep up with increasing customer expectations and new solutions for better service.



- UK Customer Experience Awards 2015 Silver award for the Utilities category
- Gas Industry Awards 2016 Special recognition award for our Head of Customer Experience
- UK Business Awards 2016 Gold for Utilities
- UK Business Awards 2016 Silver for customer centric organisation (Process)
- UK Complaints Handling Award 2017 Gold award for the utility category
- CCA Global Excellence Awards 2017- Emerging leader award Head of Customer Experience
- UK IT Industry awards 2017 IT project team of the year highly commended for customer experience project
- CCA Global Excellence Awards 2018 shortlisted customer experience brand of the year
- CCA Member of the Year 2018 Outstanding commitment to customer service excellence
- CIPR award 2018 emergency response to loss of gas, putting customers first and keeping them very well informed throughout the incident
- Gas company of the year in 2019 IGEM/EUA awards reflecting our high customer satisfaction scores and complaints handling, as well as our leading performance on stakeholder engagement



3 Making a positive impact in GD2:

3.1 Our ambitions

We plan to continue our customer experience journey through GD2, taking care of all our customers ensuring we keep them safe and warm.

To align with our customers' priorities that we provide an excellent service and support vulnerable communities we are committed to making a positive impact for our customers and communities.

- We will make a positive impact by providing a great service to our customers, scoring higher than 9 out of 10 every year.
- We will make a positive impact by helping 250,000 vulnerable customers to use energy safely, efficiently and affordably.
- And all the time we are mindful of delivering a cost-efficient service, which provides sustainable value to society at a price customers are prepared to pay.

We have discussed these ambitions with our customers and stakeholders, refining them in the light of their feedback as we describe in our business plan (chapter 6) and summarise in 4.2 below.



4 Our GD2 customer experience plan

We will create 'a great experience that delivers value for all' underpinned by seven principles.



We follow a continuous, systematic loop of engagement, insight gathering and improvement. By continuing to develop a deeper understanding of our customers' needs, we will prioritise the most important improvement opportunities, based on the value to our customers and our business. We will continue to work in an agile way, adapting to change efficiently and keeping our costs of service low. We have illustrated our continuous insight and improvement loop below.



4.1 Implementing our cycle of continuous improvement in RIIO2

Figure 4: Our continuous improvement loop



4.1.1 Identifying our customers

In the creation of our business plan, we have engaged with all the groups below as well as with stakeholders that represent the interests of specific groups of customers.

Over the next five years we will continue to engage with these groups of customers we directly affect and will also regularly review this list to assess whether there are additional customer segments not sufficiently represented in the categories below.

- Domestic customers
- Small and medium businesses
- Large gas users, industrial and commercial
- Customers in vulnerable circumstances
- Hard to reach customers
- Future customers
- Members of the public
- Commercial customers who connect to our network.



4.1.2 Tailoring our research and insight gathering

We have described below the ways in which we have gathered insight from our customers for our ongoing activities and in the preparation of this plan.

Table 2:

Customer group	Insight gathering
Domestic customers	Contact centre interaction records
Small and medium businesses	Satisfaction surveys
Small and medium businesses	Complaints
	Qualitative workshops
	Quantitative workshops Quantitative prioritisation research
	Willingness to pay research
	Acceptability testing
Lavas and visit industrial and as muchanial	
Large gas users, industrial and commercial	Quantitative survey
	Programme of in-depth bilateral discussions
Customers in vulnerable circumstances	Contact centre interaction records
	Satisfaction surveys
	Complaints
	Focus groups with residents of high-rise flats
	Qualitative workshops
	Quantitative prioritisation research
	Willingness to pay research
	Acceptability testing
	Engagement with representative groups
Hard to reach customers	Qualitative workshops
	Quantitative prioritisation research
	Willingness to pay research
	Acceptability testing
	Engagement with representative groups
Future customers	Qualitative workshops
	Quantitative prioritisation research
	Willingness to pay research
	Acceptability testing
	Online customer panel
Members of the public	Contact centre interaction records
-	Online survey
Commercial customers who connect to our	Quantitative survey
network	Workshop

To continue to evolve our research methods and make best use of all available insight, we will develop our research and analysis expertise with an in-house team and consult with external experts to gain additional insight and challenge. We are developing a more detailed research and insight plan covering customers and broader stakeholders and are discussing our draft plan with our Stakeholder Advisory Panel. We will also continue to engage with our direct customers who have experienced our works to gauge their input for potential improvements and expectations through annual independent customer focus sessions.



4.1.3 Listening to our customer and employees

Feedback from customer satisfaction surveys highlights the areas that are most important to our domestic and small business customers.



Figure 5: Customer satisfaction feedback

Our customers also contact us to rectify any problems around our works. We try to resolve complaints straight away and analyse them daily to understand how we can get better. The main areas that we know we need to improve are:

- 20% of complaints are about connections communication, quality of work, pricing;
- 35% of complaints are about emergency repair communication, quality of work, skill and professionalism; and
- 43% of complaints are about replacement quality of work, reinstatement and broken promises.

These are the most common categories of dissatisfaction when our **domestic customers** contact us. We categorise all contacts to enable us to understand why customers contact us and what we can do to improve.

Commercial customers who connect to our network include developers, independent gas transporters, utility infrastructure providers, biomethane connectors. Through our engagement with these groups, we understand that they also prioritise communication and timescales.

The needs and expectations of **large gas users** have been given particular weight in other parts of our business plan including future long-term investment decisions, peak energy requirements and our approach to the future of heat.

Additional needs of **customers in vulnerable circumstances** are covered specifically in later sections of this plan, including **customers in multi occupancy buildings** and those **living in fuel poverty.** Encouraged by our CEG we have reviewed the needs of vulnerable small business customers with whom we engage through our planned work projects. For example, in Rye Lane Peckham we engaged systematically with 380 small traders considered vulnerable by the local council. Chief concerns were around the impact of disruption on trade, particularly duration and timescales for compensation payments for loss of business. This has built our understanding of the financial vulnerability of these small business customers, and we will investigate this further in GD2.

We will continue to investigate and understand whether and how the views and needs of **harder to reach customers** differ from other customers on specific topics.

The needs and expectations of **future customers** will be given particular weight in other parts of our business plan including future long-term investment decisions and our approach to the future of heat.



4.1.4 Responding to our customers and improving

We will add extra focus on three areas that our customers have prioritised: Quality service, communication and timescales.

4.1.4.1 Quality service

We will measure our performance improvement in several ways:

- Volumes of reduced rework site visits
- Reduction in complaints around quality of work
- Increase in customer satisfaction scores for quality of our work
- New ease of effort question score.

Some examples of what we will do:

- We will further enhance our customer experience training to seek out new techniques, technology and skills to better equip our people and our contractors to always offer excellent service and ensure our people understand our customers' true journey and the key points where they can make the difference We will leverage digital capabilities to enhance our training techniques. Some examples are: introduce more relevant scenario-based training using video technology, e-learning packages, small video clips explaining our works for customers. We will continue to look at other industries to understand what more we can do to train our people to offer great service especially at the points that may cause difficulties.
- We will ensure we have the right people at the right times, that matter, interacting with our customers and offering the best levels of service and support required.
- We will further invest in interactive technology, e.g. better use of video to live stream our works allowing customers and our business to quickly see the quality of our finished works and have real-time two-way interactions, avoiding costly repeat visits and inconvenience to our customers.
- We will enhance the ways we capture whether our customers are happy with the quality of our works and our service and ensure our sites are kept tidy at all times. We will do this by continuing to develop our real time customer satisfaction app to ensure we are offering and promoting our services for customers e.g. the addition of capturing PSR referrals.

4.1.4.2 Communication

We will measure our performance improvement in several ways:

- First time call resolution customer satisfaction scores
- Increased customer satisfaction scores around communication
- Decrease in voice contacts and increase in digital contacts.

As members of the Customer Contact Association we participated in research with 73 well-known brands to understand the biggest challenges in customer behaviour. 57% of these companies say the biggest challenges are to meet the expectations of a quick, simple joined up service and 55% said the biggest challenge is improving communications to reduce the need for customers to get in touch.



Figure 6: What do you think will be the biggest challenge you face related to changing customer behaviour 2019? (Based on 73 respondents from the CCA membership, Feb 2019)



Some examples of what we will do:

- We will improve the way that we communicate with all our customers using appropriate channels and technology. We will look for ways to offer more choice to all of our customers, e.g. we will ask our connections customers how they would like to be communicated with and offer them services like SMS, email or voice contacts. We will continue to explore the use of artificial intelligence enabling our customers to quickly self-serve while allowing us to build our knowledge bank to help future customers. We will offer this as an additional service to keep pace with changing expectations or requirements.
- Customers' questions could be answered by use of an artificial intelligence knowledge bank if preferred.
- We will offer better online application services which are easier and faster to use for domestic and nondomestic customers.
- We will invest in analytics to link our channels of communication, giving us better insight and faster routes to communicate proactively with customers, saving time and effort for both our customers and our business.
- Our website will be further developed to ensure our services are inclusive and accessible.
- For our direct connection's customers, we plan to improve the application process and reduce our customers' effort in interacting with us. We will improve our online self-service functions on our website to enable our customers to apply on-line, receive a quote, accept and pay.
- We will investigate ways for this group of customers to access our maps to show them the distances from our mains to their properties, allowing them to self-serve and quote more easily.
- We will develop our training to ensure our office and field teams also understand more around what matters most to our customers and where they make the difference, to provide the right levels of support, service and communication required.

4.1.4.3 Timescales

We will measure our performance improvement in several ways:

- Reduction in complaints around broken promises
- Increase in customer satisfaction scores around timescales
- Reduction in re-planned works.



Some examples of what we will do:

- We will look at ways of using innovative technology to keep our customers informed about the timescales of our works at all stages, e.g. looking at other industries to understand how customers are able to track the status of their works/engineers and offering this service to customers.
- We will include robust processes into our training, all of which will be aligned back to our customers' journeys to make sure we are using the right methods to update our customers at the times that are important to them. This links back to our business to understand where we can become more efficient and effective thereby avoiding repeat contacts and costly revisits.
- One option we will explore further with customers is the creation of new processes and booking systems to allow our customers to plan ahead and book convenient daily time slots for new gas connections and meter alterations work.
- In circumstances where we may fail to give our planned work customers enough notice of interruption to their gas supply (GSOP13), we will develop processes and systems to allow us to automatically pay compensation to our customers via their supplier.
- For GSOP 13, the minimum notice period for planned interruptions has been extended from 5 days to 7 days in Ofgem's sector specific decision document. This change will impact on our business processes and the processes and costs of our contractors, however, we will absorb the resultant cost increases that arise due to increased scheduling, planning and unproductive time.

4.1.5 Measuring the value and the impact we have

We connect our customer and commercial agenda, always monitoring and measuring current performance and future potential to ensure we are not only efficient and sustainable, but importantly we are adding value to our customers.

We will measure our value and performance in several ways:

- Monitoring and improving the cost per contact of our customer service centre
- Volume of contacts made by our customers and changes in channel shifts from traditional telephony
- The positive social value and return on investment generated by our activities
- The negative social value of the impact of our works including human, environmental and economic impacts.

Some examples of how we will do this:

- Our customer service centres will evolve to allow us to interact with our customers through evolving digital channels. This switch to faster, digital solutions will drive reductions in cost.
- Using the right technology, we will enable our workforce to proactively communicate to customers prior to our works, proactively reducing customer contacts.
- We will share best practice with other organisations outside of our sector to find innovative future solutions for our customers to save time and effort.
- We are proposing to improve the measurement of the social value of our activities as explained in section 6.14 of our business plan. Our activities have both a positive and a negative social impact. There are at least three dimensions of social impact economic, human and environmental. For example, gas networks cause significant disruption through works, but we can reduce that negative social impact if we are able to shorten the duration of roadworks, or ensure that residents, traffic, cyclists and pedestrians can continue unimpeded by careful planning and management of the works. Some of the initiatives in our business plan may also have a direct positive social value, for example building local skills, supporting the development of small businesses. Other positive social impacts could be created by for example sharing non-personal data



which can be of value to other organisations and innovators. We have worked with an economic research consultancy to begin to systematically assess our social impact and the net value we generate from our activities and will continue to improve our evaluation during GD2.

• We have heard a strong message from our customers throughout our engagement that they want us to collaborate with other utilities and reduce our combined impact by working on joint projects to dig once. We are therefore proposing a social value collaboration incentive to overcome the legal, logistical and cultural barriers to joint working. The incentive is designed to drive a change in our behaviour and lead the way with other utility companies to reduce the negative impact on local customers and communities and improve social value. Further details of the proposed incentive will be found in section 6.14.4 of our business plan. The methodology and results of the regression analysis carried out to calibrate the incentive is included in the annex to this appendix.

4.1.6 An agile approach during GD2

The importance of our continuous insight and improvement loop is that it drives us to adapt and implement changes that are outcome focused, rather than fixing a plan up front for many years ahead.

We have described examples of the types of improvement activity that we plan to undertake, however we know that many of these ideas will be superseded by better solutions – technology may move on, we may learn to do things differently from others, the expectations of our customers and stakeholders may change, or we may find more cost-effective ways of achieving the same outcomes.

Our customer and IT teams follow an agile way of working and we have built the teams' capabilities in testing, piloting, evaluation, project and change management. Our plan includes annual investment in technology of £0.5m in line with our average annual investment over GD1 to ensure we keep pace with evolving customer expectations for ease, convenience and automation and continue to deliver a great customer experience.

4.2 Customer and stakeholder feedback on our customer experience plan

Our early research into customer expectations¹ told us that we should maintain our strong track record of achieving high levels of customer satisfaction and continue to provide excellent customer service. In willingness to pay research² we found that customers gave a higher priority to initiatives to support vulnerable customers than they did for overall service improvements for all customers.

In our workshops dedicated to discussions about customer service, customers told us that our principles of customer service were comprehensive and that our plans for improvements to services were in line with what other companies are offering. Customers in southern England placed a higher importance on investing in customer service.³

Stakeholders were broadly supportive of our continued investment in IT development to implement these service improvements. ⁴ While improving our digital communication is important, we will not forget about those who choose to interact with us in other ways – a point reinforced by feedback from our customers. ³

One enhancement to communication that we discussed with customers was the addition of Customer Liaison Officers during larger emergency and repair situations. Staff with customer and community facing expertise could provide improved communication and service to residents, and ensure that local customers, local charities, and

¹ Explorative Qualitative Workshops and interviews (Exploratory Phase) (ref 002)

² Conjoint & WtP Summary report (Valuation Phase) (ref 005)

³ Qualitative workshops - Customer Service & Supporting Vulnerable (ref 085)

⁴ SGN Positive Impact round table event - (London combined with Scotland) (Ref 088)

other service companies are kept informed. The annual average cost of providing this service at each of our depots would be £0.6m a year. Many customers did not support this additional investment, some of those that did suggested that it should be focused on vulnerable customers.³We have acted on this feedback and removed the proposal from the plan.



5 Our GD2 plan for customers in vulnerable circumstances

We welcome Ofgem's additional focus on vulnerable customers in GD2. Along with our stakeholders, we strongly support the allowance for gas networks to provide additional services for customers in vulnerable circumstances.

Our simple definition of vulnerable circumstances is over 65, children under five including pregnancy, disability, language or communication difficulties, long-term health issues including mental health, fuel poor, plus any other combination of circumstances that may require additional support (for example bereavement, social isolation, young care leavers). We view each situation, combination of circumstances and individual as unique and empower our employees to take the most appropriate course of action.

There are four elements to our vulnerable customer plan in GD2, which will be facilitated by the new vulnerable customer allowance.

- 1. Embedding in our people a strong understanding and capability to respond to the needs of customers in vulnerable circumstances
- 2. Ensuring our approach, communication and processes are accessible to all
- 3. Providing extra value including connecting customers in vulnerable circumstances to other energy or safety service partners
- 4. Innovating to amplify or accelerate benefits for vulnerable customers.

This plan builds on our work in GD1 but adds a specific focus on innovation to ensure that we keep pace with increasing expectations and technological developments.

We describe below the four elements of our vulnerable customer plan.

5.1 Embedding understanding and building capability to respond

Vulnerability is defined by Ofgem's Consumer Vulnerability Strategy 2025.⁵ The Priority Services Register (PSR) identifies vulnerable customers through 27 needs codes, which are aligned across gas and electricity. Using these needs codes, we used an external economics consultancy, Frontier to estimate the number of vulnerable customers on the network using publicly available data. This involved mapping the 27 needs codes onto data recorded by the Office for National Statistics (ONS). Using this estimation approach, we estimate that around **31% of customers over our network are vulnerable, with 36.8% on the Southern network, and 21.6% on the Scotland network**.

These numbers are materially higher than operational experience suggests, based on recorded vulnerable customers information in incidents and emergencies. The main driver for this is related to people of a pensionable age who are classified as vulnerable as defined in the needs code, but most of whom require no special operational support. To adjust for this, we analysed a subset of pensioners, specifically people over the age of 80. This might be a more appropriate subset of individuals in the needs code which are more likely to require operational support. On that basis, we found that around **23.3% of customers on our Southern network could be considered vulnerable,** and **15.7% on our Scotland network.** This equates to around one million customers in vulnerable circumstances across both our networks.



⁵ https://www.ofgem.gov.uk/publications-and-updates/consumer-vulnerability-strategy-2025

With support from our stakeholders at our specialist panels and moving forward together workshops we agreed simple guidance of vulnerability for our engineers:

- Long term health issues including mental health
- Disability
- Language or communication difficulties
- Fuel poor/financial hardship
- Children under 5 including pregnancy
- Over 65
- Life event (e.g. bereavement)
- Higher degree of isolation (living alone)
- Young adult recently out of care
- Plus, any other combination of circumstances that may require additional support.

Clearly not everyone in these categories is vulnerable and others outside these categories need additional support. All our frontline employees have been trained and are now empowered to spot signs of vulnerability and refer customers for additional support.

Engineers will ask whether the customer requires any additional assistance as some disabilities are hidden. They will listen to the customers, giving a few examples of what is available and make the necessary arrangements. But each situation will be assessed on its own merit with our employees putting in place additional support as and when required.

To deepen our understanding, we have been engaging with research panels via SCOPE, a pan disability charity, who over many years have been working with disabled people, building up a diverse network of supporters, advocates and representatives. The large group panels are made up of individuals with a direct lived experience of being disabled or as parents of disabled children who can articulate their experiences and provide their opinions on how products, services and policies impact on their lives.

A highlight from a recent workshop informed us that when considering vulnerability, we should consider the 'barriers' and 'impact on wellbeing' rather than the actual disability, given the complexity of an individual.

One individual's disability, condition or impairment could produce several impacts, which are unknown and could not be captured on any database or register – with the added complication that conditions may fluctuate. This has confirmed that we need to provide a variety of solutions bespoke to the vulnerable customer, rather than a single package. Our vision is to create a triage team of experts in vulnerability to develop a matrix of goods and services at local level which can be called upon.

Our ambitions to support customers in vulnerable circumstances show close alignment with the new Licence Obligation proposed by Ofgem. This would require the gas networks to identify and understand the characteristics, circumstances and needs of customers in vulnerable circumstances. It would also require us to ensure our actions are resulting in customers in vulnerable circumstances being treated fairly, and that our actions result in good outcomes for them.

5.1.1 Services provided as business-as-usual in GD2 for vulnerable customers

Our business-as-usual services for customers in vulnerable circumstances will continue to include:

- All our frontline employees are trained to recognise circumstances that may make customers vulnerable, with a particular emphasis on mental health awareness.
- Engineers will continue to prioritise the needs of vulnerable customers in all our work.
- We will refer customers to the Priority Service Registers held by electricity networks.
- We provide additional support in incidents, often working in partnership with resilience partners.
- CO awareness advice is provided to customers when we visit, including those who are vulnerable.



- We run a dedicated telephone care line promoted by our engineers to those customers who need additional help.
- We create specific access arrangements during our works for customers with additional needs.
- We will fit locking cooker safety valves for customers who suffer from dementia.
- Our ongoing stakeholder engagement strategy includes a commitment to build partnerships with organisations to support vulnerable customers.

5.1.2 Support for those in fuel poverty through the Fuel Poor Network Extension Scheme

Our strong commitment to supporting households living in fuel poverty continues in our planning for GD2. We had a number of conversations with stakeholders over several months about how to set stretching, achievable targets to provide free or discounted gas connections to households eligible for the Fuel Poor Network Extension Scheme (FPNES).

There is an inherent difficulty in setting targets for the FPNES, due to the reliance of the scheme on the availability of funding for first time central heating systems. The situation is very different between Scotland, England and Wales, with funding much more readily available in both Scotland and Wales. The targets set will therefore be specific to each network's local circumstances.

We know that the government ECO scheme will be revised or replaced mid-way through the price control period, which will have an impact on the ability of the networks to achieve any targets set upfront – either overachieving or underachieving dependent on the changes implemented. There may also be changes to government policy on decarbonisation which could impact the scale of ambition for additional gas connections. If the UK Government was to announce a move away from utilising the gas networks or towards a hydrogen solution to decarbonisation, that would either decrease or increase the suitability of a natural gas connection.

We worked with stakeholders to refine our thinking and propose five-year targets of 13,000 connections in Scotland and 5,000 connections in Southern in the plan. As part of our ongoing stakeholder engagement during GD2, as well as reporting our progress to Ofgem, we will review the appropriateness of the target and our performance against it with informed expert stakeholders, to gain an ongoing understanding of our progress in the context of changing policy environments in Scotland and in the South.

In order to identify fuel poor households, we will make extensive use of our mapping tool, sharing our learning with other gas networks and partners and working collaboratively to find better ways of reducing fuel poverty across the UK. Partnerships and multi-agency, well- coordinated projects have proved to be the most effective way of funding and providing support for fuel poor households, and we plan to continue this approach.

5.2 Ensuring accessible communication and processes

In 2019 we achieved the British Standard Institute's standard for vulnerability BS 18477 which provides accreditation of the processes and procedures of our central teams and our front-line engineers. We plan to maintain this accreditation throughout RIIO2.

Our website and other communication services will be further developed to ensure our services remain inclusive and accessible. Working closely with organisations who represent the interests of vulnerable



customers, we will assess investments in new technology as they become available as part of our inclusive customer service plan.

We will continue to train our people, with a particular emphasis on mental health awareness, maintaining high levels of participation in the Dementia Friends scheme (around half our workforce and some of our contractors are already trained), and provide additional training for our customer service advisors.

5.3 Providing extra value through partnership to leverage our new allowance

To improve outcomes for vulnerable customers and improve CO safety, we will build partnerships and fully leverage the new use-it-or-lose-it allowance of around £1.6m per annum for SGN, with £1.2m included in our expenditure proposals in our business plan.

5.3.1 Collaboration with other networks

Twenty five percent (£400k) of the allowance will be directed towards collaborative initiatives with other gas and electricity networks. We have set up a GDN consumer vulnerability group with WWU, Cadent and NGN. Initial meetings outlined the responsibilities of the group, the GDN collaborative groups that will report in, terms of reference and the governance process. The group will manage the joint use-it-or-lose-it allowance, and approve budget, strategy, co-ordination of projects and influencing policy. Other permanent attendees in the group will be Gas Safe Register (CO coverage) NEA (Fuel Poverty) and Energy UK for supplier connectivity and collaboration.

5.3.2 Developing our approach

Our provisional plan is to roughly apportion the remainder of the allowance between vulnerable customers (approximately £1m) and CO safety initiatives (£200k). This provisional plan is based on current ideas and associated costs; however, we welcome the flexibility that the allowance provides to choose initiatives that provide the greatest value at the time of assessment, and we are discussing the split with experts in CO safety.

In November 2018, we asked stakeholders to help us to identify initiatives that we could further develop to support customers in vulnerable circumstances, and how we could deliver measurable outcomes from those initiatives. We refined, added to, and iterated possible initiatives and partnerships with stakeholders at a second set of workshops in February 2019, in specific discussions about the proposed vulnerability allowance.

We plan to create a Vulnerability and CO Steering Group including members of our Stakeholder Advisory Panel to support the selection of appropriate initiatives, drawing on the expertise of external stakeholders. Following discussions with stakeholders⁶⁷ we have subsequently developed principles to steer our activity, which will be reviewed regularly by the Vulnerability and CO Steering Group.

- 1. We will understand and target hard to reach or under-represented individuals.
- 2. We will prioritise according to need with a higher focus on provision during the winter.
- 3. We will focus on our first interaction with customers to identify those in vulnerable circumstances.
- 4. We will provide a flexible service according to need, working with partners to refer to appropriate additional support.
- 5. We will research best practice and update our approach regularly.

⁷ Supporting our communities (Scotland) 1 (ref 018), Supporting our communities (Scotland) 2 (ref 019), Supporting those at risk (South) 1 (ref 020), Supporting those at risk (South) 2 (ref 021), Fuel poverty (South) (ref 022)



⁶ Moving forward together workshops 2016, 2017, 2018 & 2019 (doc ref 006,007,008,009,010,011,012,013,014,015,016,017)

We plan to use the decision-making tool we established in GD1 to assess new ideas which are proposed by our colleagues or designed in partnership with stakeholders. The tool assesses the cost of initiatives compared with the anticipated benefits, scored against six criteria:

- Does the activity fit with the overarching approach?
- What measurable benefits would the initiative deliver?
- How innovative is the thinking behind this initiative?
- What degree of support does the initiative have from stakeholders or customers?
- What is the potential for embedding this initiative in processes within our business?
- What is the potential for replicating this initiative across industry? Or is this initiative the result of learning from others?

Our steering group will provide a process of oversight and governance of the vulnerability allowance.

To ensure a regular flow of ideas and programmes we will continue to work with external members of our specialist panels with expertise and knowledge of communities, fuel poverty and supporting those at risk.

These forums provide us with opportunities for co-creation of ideas in solving shared challenges. Trusted partners are hosting workshops with vulnerable customers on our customer journeys and assisting us with identifying what else we can do to minimise disruption.

We developed and tested some ideas with stakeholders, with some early high priorities shown below. The two tables that followed were later discussed at workshops held with stakeholders and separately with customers in both Scotland and Southern. Feedback from all these interactions has helped us to develop and refine a three-tier framework for our additional vulnerability services (see section 5.3.3).

% of stakeholders who would prioritise the idea	Idea	Detail of idea
93%	Triage team	Dedicated team within SGN to understand vulnerability and be first point of call for engineers. They will refer to partners, act as experts, build a reference library and source additional funding etc. This idea was tested at our SCOPE pan disability workshop in August, with 100% of the attendees suggesting that triage and liaison officers were a must for any disability. In their opinion this would ensure that SGN develops a true understanding of customer needs, be able to act upon them and offer suitable solutions to impact on our works both in emergency and planned operations.
51%	Appliance servicing on CO evidence	Process to refer vulnerable customers to have their appliances serviced through trusted partners.
35%	Installation of CO Alarms	Process to refer vulnerable customers for installation of free CO alarm.
35%	National PSR	Work with other utilities and third parties to create national Priority Service Register.

Table 3: Ideas tested with stakeholders



Table 4: Additional ideas co-created with stakeholders

ldea	Detail of idea			
Increase in referral partners	Develop additional services and partners - food banks, CAB, etc.			
Collaborative working	Creating collaboration with other gas and electricity networks – mental health, financial difficulty, living alone, elderly.			
Partnerships	Create projects to be delivered with partners within local footprints.			
Locking cooker valve	Extending the reach – for severe autism, learning difficulties, assisted housing and mental health conditions.			
CO battery callouts	Referring for installation of free CO alarm for vulnerable customers following battery failure call.			
Additional services available to contractors	Develop and embed a process for our contractors to utilise the referral network for additional services – this will increase referrals in our networks.			
Face to face appointments	Face to face appointments to discuss our works and customer requirements for all Priority Service Register customers 5 working days before their planned interruption.			
Visit all PSR customers within eight hrs	In the event of large gas interruptions affecting more than 250 properties we could visit all Priority Service Register customers within 8 hrs to provide bespoke services according to their specific needs.			
Hot food	We could offer hot food within 8 hours to all Priority Service Register customers who request this after 24 hrs of supply interruption.			
Customer liaison officers for customers living in vulnerable circumstances	Following our SCOPE pan disability workshop, outputs conclude there is a significant need to create the role of customer liaison officers who will be called upon to assist customers in vulnerable circumstances, understanding needs and utilising the triage desk to ensure suitable solutions are available for emergency and planned work.			
MOB – dedicated Customer Liaison Officers	For customers living in multi occupancy buildings we could offer dedicated Customers Liaison Officers in highly populated properties of 6 or more floors which are affected for 24 hours or longer.			
MOB - facilities	Where supplies will be interrupted for longer than 24 hours we could offer pre-arranged visits to all customers on the Priority Service Register to meet their additional needs e.g. additional heating and cooking facilities, access to showering facilities, hot food and for some of our customers who need specialised help, the option of alternative accommodation.			
Fire and Rescue support	Fire and Rescue carry out safety visits for vulnerable customers. We will consider coordinating with a gas safety visit.			
Future employment	Work with local organisations to support vulnerable groups gaining employment – e.g. SCOPE – pan disability charity.			
Holiday homes	Our footprints have a high volume of holiday homes, caravan parks etc. We will work with these sites on CO awareness.			



5.3.3 Our three-tier framework approach

We developed a pyramid approach to analyse the value that we could provide for customers in vulnerable circumstances. We could either provide a large number of people a lower level of support or provide a smaller number of people with a higher degree of support. Or somewhere in the middle. Discussions with stakeholders and customers helped us to revise our approach as illustrated below.

Figure 7: Our three-tier approach to vulnerability services



A consensus emerged from two stakeholder workshops and from two customer workshops ⁸ that we should provide higher levels of support for fewer numbers of people. We have adopted stakeholders' suggestions, that the lower tier focus on a triage, identification and support service.

Additional feedback from stakeholders emphasised the importance of partnerships to increase the value of our allowance in generating positive outcomes for customers.⁹ This feedback was reflected in the examples of potential initiatives discussed with customers:

- **Potential tier 1 initiatives:** Referral for appliance servicing, dedicated vulnerable customer liaison officers in multi-occupancy buildings during supply interruptions, alternative accommodation and additional support during supply interruptions.
- **Potential tier 2 initiatives:** Additional services through referral partners such as energy efficiency advice and measures, food banks providing energy vouchers, extending the use of locking cooker valves for autism, learning difficulties, or assisted housing, face to face appointments before planned works, coordinating gas safety visits with Fire and Rescue home safety checks.
- **Potential tier 3 initiatives:** Triage, identification and support service, referral for installation of CO alarms, participation in the development of a cross-sector PSR, CO awareness campaigns for holiday homes and park homes, energy efficiency campaign.

Domestic customers generally favoured the tier 1 initiatives at the top of the pyramid in order to make a real difference. This was especially the case in Scotland.

⁸ Qualitative workshops - Customer Service & Supporting Vulnerable (Ref 085) Positive Impact round table event - (London combined with Scotland) (Ref 088)

⁹ Positive Impact round table event - (London combined with Scotland) (Ref 088) Agility eco report (ref 091)

We are proposing to spend 12% of the allowance on carbon monoxide (CO) awareness work

We are refining our 2018 Carbon Monoxide Strategy¹⁰ for GD2 with additional support from stakeholders. The strategy builds on extensive appliance data that we collected from more than 7500 properties to understand the condition of appliances, frequency of servicing and use of CO alarms.

We also surveyed our front line engineers to understand the circumstances that they find on the ground, and to ask for their ideas about initiatives that would make the most difference in improving CO safety for our customers.

Building on this input, we discussed our CO strategy, engineer survey results, engineer ideas and initiatives with experts at two roundtables in November 2019, one in Scotland and one in the South¹¹. Our strategy and proposals were supported by attendees, who asked us to also focus on recording outputs and dissemination within the wider CO community. We are building this feedback into our plans for GD2.

Five key issues and potential solutions are identified in our strategy. We will continue to update the solutions to these issues with expert input from stakeholders, and regularly review sources of data that provide additional information about other emerging issues.

The five main issues identified from our extensive data gathering are:

- Encouraging older people to service their appliances regularly
- The dangers of CO alarms fitted in cupboards
- Classification of CO detection
- Targeting specific demographics the young and the old
- Low customer awareness that different types of appliance can create different levels of risk.

For the first two years of GD2, we propose to target spending from our allowance on the issues identified above, followed by a rolling review of emerging issues carried out with the Vulnerability and CO Steering Group.

5.4 Innovation and amplification to accelerate customer benefits

We support Ofgem's proposal to include a focus on projects addressing customer vulnerability in a reformed Network Innovation allowance and have included a provisional allowance of £2.9m for innovation allowance projects including those supporting vulnerable customers.

We have an established process to develop innovative ideas and programmes to assist customers living in vulnerable circumstances, planning collaboratively with stakeholders, generating ideas, piloting initiatives and embedding those that are successful across our business.

Our Vulnerability and CO Steering Group will play a role in reviewing innovation ideas and understanding the impact of broader innovations on customers in vulnerable circumstances.



¹⁰ https://www.sgn.co.uk/uploadedFiles/Marketing/Pages/Publications/Docs-Stakeholder/SGN-CO-Strategy-2018.pdf" 2018 Carbon Monoxide Strategy

¹¹ CO Specialist round table event - combined report (Ref 102)

Figure 8: Innovation process to quickly scale successful ideas



Our work to extend outcomes for vulnerable customers will be driven by a small, expert, in-house team, working in close liaison externally and internally, supported by the Operational Stakeholder Governance Group and our working groups which lead the adoption of initiatives throughout our operations.

Building on our many previous discussions with vulnerable customers and representative organisations, we created provisional areas of focus for innovation which we tested and refined with stakeholders.

We will focus our innovation in the following areas:

- 1. Mitigating the risk of energy transition
- 2. Joining up information flows to provide better service
- 3. New ways of minimising the impact of supply disruptions
- 4. Adoption of new solutions through inclusive design to improve
 - Identification of customers with additional needs
 - Access to services
 - Security and peace of mind
 - Affordability.

5.5 Measuring our performance

5.5.1 An evaluation framework to benchmark performance

Working within the overall three-tier framework described above in 5.3.3, both customers and stakeholders highlighted the need for cost benefit analysis of potential initiatives to ensure that we deliver valuable outcomes for vulnerable customers.¹²

In GD1, we developed an evaluation framework to assess the outcomes of initiatives developed with stakeholders to support vulnerable customers as part of the GD1 financial stakeholder engagement incentive reward. We used this evaluation framework and examples of actual initiatives we delivered in 2018/19 to assess the likely costs and potential outcomes of our three-tier framework. This gives us an outline against which to measure our subsequent performance in GD2.

¹² Qualitative workshops - Customer Service & Supporting Vulnerable (ref 085) SGN Positive Impact round table event - (London combined with Scotland) (Ref 088)



	Tier 1	Tier 2	Tier 3	Total per annum
Approximate funding	£255,000	£300,000	£445,000	£1m
Approximate number of households supported	1,500	4,000	44,500	50,000
Target cost per household	£170	£75	£10	
Target direct financial benefit per household	£1,100	£300	No comparator in GD1. Target to recover cost = £10	
Target social value per household	£7,500	£1,300	No comparator in GD1. Target to provide social value of twice cost = £20	
Total of direct financial benefits to households	£1.65m	£1.2m	£0.45m	£3.3m
Total of social value to all households	£11.25m	£5.2m	£0.9m	£17.3m

Table 5: Costs and potential outcomes of our three-tier framework

5.5.2 Common metrics for vulnerability

In addition to the evaluation framework identified above, we are contributing to Ofgem's development of common vulnerability metrics, which are not yet defined. We are engaging with Ofgem and the other gas networks to contribute our own and our stakeholders' feedback.

Early ideas for measurement tools were discussed with stakeholders and include:

- Percentages of Priority Service Register customers visited in large gas outages
- Customer satisfaction scores for PSR customers
- Number of customers referred through our referral networks and further extra services received
- Accreditation for inclusive service provision
- Progress against fuel poor connection targets
- Number of customers in vulnerable circumstances supported
- Number of priority service register referrals to all utility registers
- Number of volunteer hours supporting customers in vulnerable circumstances
- Number of locking cooker valves
- Reach and engagement of awareness campaigns
- Increase in CO awareness.

We have described the development of our social value framework earlier in Section 4.1.5 above. Working with external experts, before the start of GD2 we will extend the social value framework to include measures of the social value of prevention of carbon monoxide poisoning. We believe that the social value generated would provide an effective means of comparison between all energy networks.

Our performance may also be reviewed as part of an ongoing role for the Customer Engagement Group in



monitoring the reputational consumer vulnerability incentive. We will produce an annual vulnerability report and include our performance against common vulnerability service metrics. Knowledge and best practice will also be shared at annual showcase events.



6 Annex

Study of valuation of the impact of works and supply disruption





7 Glossary

All acronyms and associated descriptions can be found within the Glossary appendix.

