SPEN Environmental Sustainability Plan 2021

Approved

IMS Executive Management Review

25th January 2021

Business Transformation milestones added February 2021

Approved via email 23rd February 2021

	Primary Objective	Action/ RIIO2 Commitment	Sub-Action Sub-Action	Due
Process				Date
Environmenta	8.1 Fully comply with all Environmental	Overall action - Implement environmental/ ecology call off	Create specification for environmental/ ecology call off framework for delivery of	Mar-21
I Compliance	legal obligations	framework for delivery of works carried out by SPEN staff.	works carried out by SPEN staff.	
	8.1 Fully comply with all Environmental		Identify and source appropriate consultants for 'environmental/ ecology call off'	Jun-21
	legal obligations		framework delivery, tender and implement framework.	
	8.1 Fully comply with all Environmental		Refine processes to address gaps via procedure or amending existing. Provide	Jun-21
	legal obligations		communications/training to users.	
	8.1 Fully comply with all Environmental		Implement and amend operational practices to include the requirements of the	Sep-21
I Compliance	legal obligations		refined procedure(s)	
			Produce template for District General Manager briefing on PPP and associated	Mar-21
I Compliance	legal obligations	on environmental responsibilities. Include site specific	actions (template slide pack to be populated with site specific details).	
		information i.e. pollution prevention plan.		
Environmenta	8.1 Fully comply with all Environmental		Undertake depot site visits to complete PPP Risk Assessment. (13 depots in 2021)	Dec-21
I Compliance	legal obligations		and visit all WML sites not at depots once.	
Environmenta	8.1 Fully comply with all Environmental		Develop TBTs/Env Expresses as required to communicate substation and depots	Mar-21
I Compliance	legal obligations		PPPs to staff.	
	8.1 Fully comply with all Environmental		Present findings and produce plan for action closure	Dec-21
	legal obligations			
		Overall action - Fully compliant PCB procedure	Implement PCB Management Procedure (ASSET 04-070) and Policy (ASSET 01-	Dec-21
	(PCBs) from our network in line with	implemented.	031). Plan for identification and replacement of all relevant equipment by 31 Dec	
	relevant legislation		2025.	
		Overall action - Ensure contract framework for scrap metal	Scrap metal framework for SPD and SPT similar to SPM arrangement.	Dec-21
	legal obligations	includes appropriate environmental requirements.	3	
		Overall action - Waste Transfer Notes in use as required	Produce practical template for SPEN Waste Transfer Notes.	Jun-21
	legal obligations	and available for completion via tough books.	Trouble production plate is: or all tradice transfer trades	0 0 2 .
	8.1 Fully comply with all Environmental		Develop TBTs/Env Expresses and other training as required to embed waste	Jun-21
	legal obligations		management process.	Journ 21
	8.1 Fully comply with all Environmental		Support and Implement use of waste transfer notes in internal movements of waste	Sen-21
	legal obligations		from the field to the depot.	COP 2
		Overall action - Consignment Notes in use as required and	Produce template for SPEN Consignment Notes and work with IT to upload onto	Jun-21
	legal obligations	available for completion via tough books.	tough book system. (Initial focus on waste oil consignment).	Journ 21
	8.1 Fully comply with all Environmental		Purchase Consignment Note Codes from SEPA.	Jun-21
	legal obligations		I dichase consignment Note codes from SETA.	Juli-21
	8.1 Fully comply with all Environmental		Develop TBTs/Env Expresses and other training as required to embed hazardous/	Jun-21
	legal obligations		special waste consignment process.	Juli-21
	8.1 Fully comply with all Environmental		Support and Implement use of waste consignment notes in internal movements of	Sep-21
	legal obligations		waste from the field to the depot.	Sep-21
		Overall action - Have required WML / Permits in place.	Provide application pack information and fees.	Jun-21
	legal obligations	Overall action - nave required wwil / Permits in place.	Create new Working Plan and apply for permits for each identified site.	Juil-21
i Compliance	legal obligations		Create new Working Plan and apply for permits for each identified site.	
Environmenta	8.1 Fully comply with all Environmental		Fund and build a new oil storage compliant bulk oil storage facility at Oswestry	Dec-21
	legal obligations		depot.	
	8.1 Fully comply with all Environmental		Ensure SPEN WAMITAB certified person in place.	Dec-2
	legal obligations		The second secon	
	8.1 Fully comply with all Environmental		Continue to implement improvements to SF6 and F gas controls. Minimise losses	Dec-2
	legal obligations		as far as practicable.	2002

Env CAP Page 2

Driver / Process	Primary Objective	Action/ RIIO2 Commitment Sub-Action	Due Date
	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Continue to identify and investigate opportunities to eliminate or reduce waste produced e.g. Resin buckets and jointing packs - collaboration with our supply cha as required.	Dec-21
Environmenta I Compliance	8.3 Continuous improvement of the EMS	Review current (Creosote) wood pole storage arrangements and update to current procedural (OHL-04-018) requirements. Include short term mitigation measures where planned improvements are planned later than 2021.	Dec-21
	8.4 Increase knowledge and commitment of staff	Roles and Responsibilities templates and procedure to be agreed and issued.	Jan-21
	8.4 Increase knowledge and commitment of staff	Develop personal goals template for use by directorates to aid understanding of personal environmental responsibilies and to deliver environmental compliance pla actions.	Jan-21
	8.4 Increase knowledge and commitment of staff	Include environmental objectives in personal goals as appropriate.	Jan-21
I Compliance	8.6 Improve the quality of environmental data collected and analysed at all stages of the asset lifecycle	Implement Smartwaste for waste and carbon reporting. Inform contractors of change in reporting requirements and train contractors.	Jun-21
I Compliance	8.6 Improve the quality of environmental data collected and analysed at all stages of the asset lifecycle	Implement Smartwaste: Where data is not reported, incomplete or poor quality, it is fed back to the contractor and addressed. including simple checks on data where appropriate.	Dec-21
I Compliance	8.6 Improve the quality of environmental data collected and analysed at all stages of the asset lifecycle	Compile oil top up data electronic records for quarterly reporting to the Sustainabili Data Analyst (RRP). Provide training and a consistent reporting process.	y Jun-21
Environmenta I Compliance	8.3 Continuous improvement of the EMS	Prepare for the revocation of RPS211 (classification of excavated wastes) by engaging with, and contributing to the Street Works UK programme of work. Contribute towards the phase 2 sampling programme.	Sep-21

Env CAP Page 3

Driver / Process	Primary Objective		Due
Internal Audit, RIIO2 Implementation and legislative Compliance	Awareness/ Desire		Dec-21
Internal Audit, RIIO2 Implementation and legislative Compliance		Directorates to introduce best practice and information sharing mechanism(s) for environmental compliance and sustainability e.g. SPM Environment Call	Jun-21
SP COP26 Sponsorship	Awareness/ Desire/ Ability	Active involvement in SPEN COP26 Steering Group and associated activities through business area Champion and ensuring that individual has opportunity to communicate activities and recruit BIK (Benefit In Kind) support where necessary	Dec-21
	Awareness/ Desire/ Ability/ Reinforcement	Environmental compliance and sustainability roles and responsibilities reinforced through the adoption and communication of Roles and Responsibilities documents. This is delivered in 2021 by reviewing and communicating the Roles and Responsibilities Procedure and setting suitable environmental personal goals for all.	Mar-21
Internal Audit	Knowledge/ Ability	Environmental Training Matrix and associated Training Plan reviewed to align with the Roles and Responsibilities, Environmental Compliance Plan and Sustainability Plan.	Jun-21
Internal Audit	Knowledge/ Ability	Directorate review of the training needs for each job function listed in the Roles and Responsibilities Procedure to feed into a training profile for each job function, to be documented in the Environmental Training Matrix.	Jun-21
RIO2 Commitments	Awareness/ Knowledge/ Ability	Supply Chain Sustainability School communication and sign up of teams	Mar-21
Internal Audit	Awareness/ Desire/ Reinforcement	Directorates regularly review individuals training plan progress driving completion of mandatory environmental training	Jun-21
	Awareness/ Desire/ Knowledge and Ability	Managing with environmental sustainability and leading with environmental sustainability leaders courses adapted to incorporate transformation programme	Mar-21
	Awareness/ Desire/ Knowledge and Ability	Managing with environmental sustainability and leading with environmental sustainability leaders courses implemented and attended by SPEN leaders	Jun-21
	Awareness, Desire, Knowledge, Ability and Reinforcement	Personal Goals, Roles and Responsibilities and Training Plan - more focused communications through management meetings and line managers - develop material and roll out	Jun-21
	Awareness, Desire, Knowledge, Ability and Reinforcement	Personal Goals/ responsibilities and training plans - more focused communications through management meetings and line managers - Directorate delivery down the line	Sep-21
Internal Audit, RIIO2 Implementation and legislative Compliance	Awareness, Desire, Knowledge, Ability and Reinforcement	Development and delivery of Sustainability and Environmental Compliance Internal Engagement Plan to focus on key topic areas to assist delivery of transformation	Mar-21
Internal Audit, RIIO2 Implementation and legislative Compliance	Desire/ Reinforcement	Internal collaboration on identifying and implementing methodology for receiving feedback on implementation and carry out continuous review	Jun-21

Bus Transformation Page 4

Driver / Process	Primary Objective	Action/ RIIO2 Commitment	Sub-Action	Due Date
Carbon and Energy Reduction	10.1 Integration of environmental, social and economic issues in business decision making	Implement Carbon Management Processes in line with PAS2080		Jun-21
Carbon and Energy Reduction	10.1 Integration of environmental, social and economic issues in business decision making	Implement Carbon Management Processes in line with PAS2080	carbon considerations in key business processes	Jun-21
Carbon and Energy Reduction	10.1 Integration of environmental, social and economic issues in business decision making	Implement Carbon Management Processes in line with PAS2080	revision to align with PAS2080	Jun-21
Carbon and Energy Reduction	10.1 Integration of environmental, social and economic issues in business decision making	Implement Carbon Management Processes in line with PAS2080	Draft PAS2080 Implementation Plan & recommendations for ongoing improvements	Jun-21
Carbon and Energy Reduction	10.1 Integration of environmental, social and economic issues in business decision making	Implement Carbon Management Processes in line with PAS2080	Deliver PAS2080 Implementation Plan actions for 2021	Dec-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Implement Carbon Management Processes in line with PAS2080	Identify the key staff members who require enhanced and basic level awareness training in relation to their jobs and develop training plan	Mar-21
Carbon and Energy Reduction	losses) by 15% by 2023 and by 80% by 2030	Implement Carbon Management Processes in line with PAS2080		Sep-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Implement Carbon Management Processes in line with PAS2080	Identify key staff groups within the business who can be incentivised contractually to enable accountability and support the delivery of Circular Economy / Sustainable Procurement / Low Carbon outcomes and then incentivise accordingly (via Personal Goals)	Dec-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Implement Carbon Management Processes in line with PAS2080	Agree Scope 1&2 carbon metrics	Jun-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Implement Carbon Management Processes in line with PAS2080	Establish baselines to allow future comparison and reduction target setting e.g. for different types of project	Dec-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Implement Carbon Management Processes in line with PAS2080	Review potential grant funding routes to help finance some of the development and research work required to enhance the carbon understanding and knowledge within the business.	Sep-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Adopt Science Based Targets for Scope 1,2 & 3 Carbon emissions	Develop action plan to achieve Scopes 1&2 target (supported by Carbon Trust)	Mar-21
Carbon and Energy Reduction	losses) by 15% by 2023 and by 80% by 2030	Adopt Science Based Targets for Scope 1,2 & 3 Carbon emissions	Submit Science Based Targets commitment letter to SBTi	Mar-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Adopt Science Based Targets for Scope 1,2 & 3 Carbon emissions	Submit Science Based Targets information to Ofgem with respect to T2 Commitments	Mar-21

Driver /	Primary Objective	Action/ RIIO2 Commitment	Sub-Action	Due
Process				Date
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Adopt Science Based Targets for Scope 1,2 & 3 Carbon emissions	Calculate and agree Scope 3 target	Apr-21
Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Adopt Science Based Targets for Scope 1,2 & 3 Carbon emissions	Develop action plan to achieve Scope 3 target (supported by Carbon Trust)	Apr-21
Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Identify, and subsequently monitor, metrics to track progress towards the Science-Based carbon reduction Targets	Identify Scope 3 metrics, based on embodied carbon tool outputs and advice from Carbon Trust	Mar-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Identify, and subsequently monitor, metrics to track progress towards the Science-Based carbon reduction Targets	Establish Scope 3 baseline against which to measure progress	Dec-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Introduce, trial and embed measurement tools for embodied carbon in new (T2) projects	Develop Manual of Standard Cost Tool for Substations then roll out	Dec-21
Carbon and Energy Reduction	and manage scope 3 carbon emissions	Introduce, trial and embed measurement tools for embodied carbon in new (T2) projects	Deveop and implement Bill Of Quantities Carbon Tool (Detailed Design & As Built)	Jun-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Introduce, trial and embed measurement tools for embodied carbon in new (T2) projects	Implement online tool to collect supply chain and contractor carbon data	Jun-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Introduce, trial and embed measurement tools for embodied carbon in new (T2) projects	Implement carbon product calculator tool	Mar-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Establish an embodied carbon baseline and set a reduction target for T3	Carry out a hotspot analysis of the detailed studies and Environmental Performance Declarations (EPDs) in order to prioritise the products and areas to focus within projects and the business.	Jun-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Establish an embodied carbon baseline and set a reduction target for T3	Develop carbon abatement cost curve to inform efficient carbon reduction actions	Mar-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Collaborate with supply chain and other TO's to drive embodied carbon footprint reductions	Develop plan to collaborate with supply chain and other TO's to drive embodied carbon footprint reductions	Sep-21
Carbon and Energy Reduction	9.3 Identify priority areas for collaboration with key stakeholders	Collaborate with supply chain and other TO's to drive embodied carbon footprint reductions	Agree collaboration approach wrt supply chain and embodied carbon with other TOs	Jun-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Collaborate with supply chain and other TO's to drive embodied carbon footprint reductions	Issue joint TO supply chain letter regarding RIIO-T2 environmental sustainability ambitions and expectations	Jun-21
Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Establish an embodied carbon baseline and set a reduction target for T3	Set carbon reduction targets within 3 projects/contracts in advance of ITT and track reductions	Dec-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Collaborate with supply chain and other TO's to drive embodied carbon footprint reductions	Develop a supply chain communications plan in collaboration with NG and SSE	Jun-21

Driver /	Primary Objective	Action/ RIIO2 Commitment	Sub-Action	Due
Process	0.4.14			Date
Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Collaborate with supply chain and other TO's to drive embodied carbon footprint reductions	assessment and award criteria	Jun-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Identify, and subsequently monitor, metrics to track progress towards the Science-Based carbon reduction Targets	Develop suite of carbon management KPIs as part of overall supplier KPIs and supply chain management	Jun-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Collaborate with supply chain and other TO's to drive embodied carbon footprint reductions	Supply Chain engagement agendas	Mar-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Collaborate with supply chain and other TO's to drive embodied carbon footprint reductions	Supply Chain Sustainability School system	Jun-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Implement Carbon Management Processes in line with PAS2080	Explore the potential to remove procurement barriers around "least cost basis" to incentivise innovation and reward whole life costs and other sustainability benefits	Sep-21
Carbon and Energy Reduction	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Collaborate with supply chain to implement sustainable project sites to reduce carbon and other impacts	Develop outline of 'sustainable project site' via discussion with key contractors and implement pilot	Dec-21
Carbon and Energy Reduction	1.6 Reduce depot and substation energy use by 25% by 2023	Deliver T2 energy efficiency building refurbishment programme (48 Substations)	Develop programme of works and progress through IP, SCA, ITT and award contract	Mar-21
Carbon and Energy Reduction	1.6 Reduce depot and substation energy use by 25% by 2023	Deliver T2 energy efficiency building refurbishment programme (48 Substations)	Install meters at sample of 48 substations to be refurbished in T2, to track energy use pre & post refurbishment	Dec-21
Carbon and Energy Reduction	1.6 Reduce depot and substation energy use by 25% by 2023	Deliver T2 energy efficiency building refurbishment programme (48 Substations)	Monitor and analyse electricity consumption data from sample substations to inform works, to improve consumption estimation methodology and to calculate efficiencies achieved	Dec-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Develop and deliver programme of works to release unused non-operational land to local community energy projects	Carry out further analysis of non operational land and identify a minimum 5 sites for upload to PowerPaired platform.	Dec-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Develop and deliver programme of works to release unused non-operational land to local community energy projects	Develop and implement an engagement plan to increase awareness of PowerPaired potential projects with community energy orgainsaitons/ groups.	Dec-21
Carbon and Energy Reduction	1.7 Minimise the leakage of SF6 gas from our network by reducing the quantity, volume and leakage rate of new SF6 equipment and addressing leaks urgently	Minimise SF6 leakage in compliance with F Gas Regs, repairing leaks quickly and where unsuccessful replacing assets before anticipated end of life where reasonably practicable		Mar-21
Energy Reduction	1.7 Minimise the leakage of SF6 gas from our network by reducing the quantity, volume and leakage rate of new SF6 equipment and addressing leaks urgently	Minimise SF6 leakage in compliance with F Gas Regs, repairing leaks quickly and where unsuccessful replacing assets before anticipated end of life where reasonably practicable	Develop a process to manage SF6 assets that are not connected to the system, including assets held as spares or on site, considering the full life cycle from pre-commissioning through to full decommissioning.	Jun-21
Carbon and Energy Reduction	1.7 Minimise the leakage of SF6 gas from our network by reducing the quantity, volume and leakage rate of new SF6 equipment and addressing leaks urgently	Review and implement recommendations from the SF6 IMS Audit	Review each of the actions and develop plans to implement recommendations prior to T2 regulatory reporting period.	Mar-21

Driver / Process	Primary Objective	Action/ RIIO2 Commitment	Sub-Action	Due Date
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2030	Put in place carbon offsetting mechanism to offset remaining emissions of high leakage equipment	Research options for certified/robust carbon offsetting and make proposal	Mar-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2031	Put in place carbon offsetting mechanism to offset remaining emissions of high leakage equipment	Obtain agreement for best carbon offsetting option	Jun-21
Carbon and Energy Reduction	1.1 Reduce our carbon footprint (excluding network losses) by 15% by 2023 and by 80% by 2031	Put in place carbon offsetting mechanism to offset remaining emissions of high leakage equipment	Set up partnership with carbon offsetting partner	Dec-21
Carbon and Energy Reduction	1.4 Decarbonise our fleet by 2030 or sooner in line with our EV100 Commitment	Replace 100% (72) SPT cars & vans with electric alternatives by end of T2	Transfer all SPT vehicles provision to fleet managed by General Services	Jan-21
Carbon and Energy Reduction	1.4 Decarbonise our fleet by 2030 or sooner in line with our EV100 Commitment	Replace 100% (72) SPT cars & vans with electric alternatives by end of T2	Agree and update Policy and Substation Specifications to support EV Transition and Place of Work charging	Jun-21
Carbon and Energy Reduction	1.4 Decarbonise our fleet by 2030 or sooner in line with our EV100 Commitment	Replace 100% (72) SPT cars & vans with electric alternatives by end of T2	Agree roadmap for EV transition including quick wins	Mar-21
Carbon and Energy Reduction	1.4 Decarbonise our fleet by 2030 or sooner in line with our EV100 Commitment	Replace 100% (72) SPT cars & vans with electric alternatives by end of T2	Introduce total of 8 EVs to the SPT fleet	Dec-21
Carbon and Energy Reduction	1.5 Reduce fleet vehicle fuel use and business travel carbon footprint by 15% by 2023	Continue to use our vehicle management systems to monitor driving styles and mileage, and use NAMS SAP enhancements to increase efficiency of allocation of jobs to reduce fuel use	Move to new vehicle management system and establish systems to monitor fuel consumption and identify actions to reduce	Sep-21

Driver / Process	Primary Objective	Action/ RIIO2 Commitment	Sub-Action	Due Date
Land and	3.4 Incorporate Natural Capital Assessment in	Develop a common approach and rebuct moth adelegies for	Engage with WSP and wider stakeholders on the development of	
Biodiversity	our business decision making processes, as a	Develop a common approach and robust methodologies for	the Innovate UK funded Natural Capital planning tool.	Jui-21
	precursor to a multi-capital approach, with the	delivering Natural Capital assessment and enhancement, in	Title Illilovate OK Turided Natural Capital planning tool.	
Improvement	aim of increasing the value of natural capital on	collaboration with our stakeholders, including the other		
	our sites and around our assets	Transmission Operators.		
Land and	3.4 Incorporate Natural Capital Assessment in	Develop a common approach and robust methodologies for	Collaborate with the TOs and WSP to identify and develop	Dec-21
Biodiversity	our business decision making processes, as a	delivering Natural Capital assessment and enhancement, in	additional requirements for Nat Cap/ biodiversity tool	D60-21
	precursor to a multi-capital approach, with the	collaboration with our stakeholders, including the other	additional requirements for that eapy blockversity tool	
in provenient	aim of increasing the value of natural capital on	Transmission Operators.		
	our sites and around our assets	Transmission Operators.		
Land and	3.4 Incorporate Natural Capital Assessment in	Develop a common approach and robust methodologies for	Identify training needs for implementation of Natural Capital and	Dec-21
Biodiversity	our business decision making processes, as a	delivering Natural Capital assessment and enhancement, in	biodiversity assessment and develop a training plan	
,	precursor to a multi-capital approach, with the	collaboration with our stakeholders, including the other	31	
•	aim of increasing the value of natural capital on	Transmission Operators.		
	our sites and around our assets	- Allocation of Charles		
Land and	3.4 Incorporate Natural Capital Assessment in	Develop a common approach and robust methodologies for	Engage with SPT, SPD and SPM internal and external	Feb-21
Biodiversity	our business decision making processes, as a	delivering Natural Capital assessment and enhancement, in	stakeholders through implementation of a Biodiversity and	
Improvement	precursor to a multi-capital approach, with the	collaboration with our stakeholders, including the other	Natural Capital workshop to further develop approach	
	aim of increasing the value of natural capital on	Transmission Operators.		
	our sites and around our assets			
Land and	3.2 Implement a methodology to measure	Pilot biodiversity and natural capital methodologies and associated	Pilot Biodiversity Metric 2.0 on selected T1 and T2 projects	Dec-21
Biodiversity	biodiversity and make relevant business	tool(s) on selected T2 projects		
Improvement	decisions to deliver biodiversity net gain			
Land and	3.2 Implement a methodology to measure	Pilot biodiversity and natural capital methodologies and associated	Pilot the WSP tool for Natural Capital and biodiversity on a range	Jul-21
Biodiversity	biodiversity and make relevant business	tool(s) on selected T2 projects	of projects, in collaboration with the other TOs.	
Improvement	decisions to deliver biodiversity net gain			
Land and	3.2 Implement a methodology to measure	Identify metrics to baseline and track the levels of biodiversity and	Agree biodiversity metrics	Sep-21
Biodiversity	biodiversity and make relevant business	the value of natural capital on our sites, and the achievement of our		
	decisions to deliver biodiversity net gain	targets.		
Land and	3.2 Implement a methodology to measure	Identify metrics to baseline and track the levels of biodiversity and	Agree Natural Capital metrics	Sep-21
	biodiversity and make relevant business	the value of natural capital on our sites, and the achievement of our		
Improvement	decisions to deliver biodiversity net gain	targets.		
Land and	3.2 Implement a methodology to measure	Deliver at least 'no net loss' in biodiversity and implement options	Collate SPEN wide site information. Develop a methodology for	Oct-21
Biodiversity	biodiversity and make relevant business	for delivering 'net gain' for T2 projects and across SPEN existing	baselining current biodiversity/ natural capital value of sites,	
Improvement	decisions to deliver biodiversity net gain	sites.	create a baseline and identify sites providing opportunity for	
			enhancement	
Land and	3.2 Implement a methodology to measure	Deliver at least 'no net loss' in biodiversity and implement options	Develop project processes to embed Natural Capital and	Dec-21
	biodiversity and make relevant business	for delivering 'net gain' for T2 projects and across SPEN existing	biodiversity tool to inform decisions	
	decisions to deliver biodiversity net gain	sites.		
Land and	3.2 Implement a methodology to measure	Deliver at least 'no net loss' in biodiversity and implement options	Investigate options for partnering with external organisations to	Oct-21
Biodiversity	biodiversity and make relevant business	for delivering 'net gain' for T2 projects and across SPEN existing	provide biodiversity enhancements	
-	decisions to deliver biodiversity net gain	sites.		
Land and	3.2 Implement a methodology to measure	Deliver an increase in the natural capital on existing sites.	Integrate biodiversity and natural capital into the 'Maximising the	Dec-21
•	biodiversity and make relevant business		environmental benefit from non operational land' project and	
	decisions to deliver biodiversity net gain		promote to community groups on appropriate sites.	
Land and	3.2 Implement a methodology to measure	Introduce stakeholder engagement processes to work with local	leave blank	Dec-21
Biodiversity	biodiversity and make relevant business	communities, landowners and other stakeholders to deliver biodiversity		
Improvement	decisions to deliver biodiversity net gain	and natural capital targets		

Land and Biodiversity Page 9

Driver /	Primary Objective	Action/ RIIO2 Commitment	Sub-Action	Due Date
Process Sustainable	4.1 Divert 95% of waste from landfill by	Require project Waste Management Plans for all new projects in RIIO-	Review WMPs submitted in tender bids for adequacy and ensure	Dec-21
	end 2023 and 100% by end 2030.	T2 and beyond	shortfalls addressed before contract placement	Dec-21
Sustainable Resource Use	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Require project Waste Management Plans for all new projects in RIIO- T2 and beyond	Ensure waste performance indicators are included in relevant contracts, to drive delivery of 95% landfill avoidance target	Dec-21
Sustainable Resource Use	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Divert 95% of waste from landfill by end 2023 and 100% by end 2030	Identify programme of actions to reduce and reuse rest of top 5 waste streams	Jun-21
Sustainable	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Divert 95% of waste from landfill by end 2023 and 100% by end 2030	Quantify carbon impact of waste streams to inform prioritisation of impact reduction actions	Sep-21
Sustainable	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Identify solutions to reduce the use and disposal of aggregates, (soils and stones) including increased use of secondary aggregates via collaboration with other TOs, our supply chain and other infrastructure operators	Identify and quantify other uses of aggregates (than access roads)	Mar-21
Sustainable Resource Use	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Identify solutions to reduce the use and disposal of aggregates, (soils and stones) including increased use of secondary aggregates via collaboration with other TOs, our supply chain and other infrastructure operators	Identify opportunities to minimise use of aggregates e.g. innovative solutions to trial	Mar-21
Sustainable Resource Use	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Identify solutions to reduce the use and disposal of aggregates, (soils and stones) including increased use of secondary aggregates via collaboration with other TOs, our supply chain and other infrastructure operators	Identify opportunities to maximise reuse/recycling of aggregates	Mar-21
Sustainable Resource Use	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Identify solutions to reduce the use and disposal of aggregates, (soils and stones) including increased use of secondary aggregates via collaboration with other TOs, our supply chain and other infrastructure operators	Include requirement/incentivisation to reduce use of aggregates, maximuse use of secondary aggregates and reuse/recycle surplus materials in relevant contracts	Dec-21
Sustainable Resource Use	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Identify solutions to reduce the use and disposal of aggregates, (soils and stones) including increased use of secondary aggregates via collaboration with other TOs, our supply chain and other infrastructure operators	Assess waste aggregates data and information to estimate quantities/proportion suitable for reuse (in line with SEPA agreement).	Jun-21
Sustainable Resource Use	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Identify solutions to reduce the use and disposal of aggregates, (soils and stones) including increased use of secondary aggregates via collaboration with other TOs, our supply chain and other infrastructure operators	Forecast impact of aggregates reductions and reuse on total waste quantities and fate and compare to 95% landfill avoidance target	Sep-21
	4.1 Divert 95% of waste from landfill by end 2023 and 100% by end 2030.	Identify solutions to reduce the use and disposal of aggregates, (soils and stones) including increased use of secondary aggregates via collaboration with other TOs, our supply chain and other infrastructure operators	Collaborate with other construction companies, aggregates suppliers and SEPA with the aim of reaching agreement on the conditions for the reuse of aggregates across projects and companies	Dec-21
Sustainable Resource Use		Implement metrics to measure the sustainability of our resource use, with the aim of establishing a baseline to enable target setting during RIIO-T2	Identify and agree resource consumption metrics	Jun-21
Sustainable Resource Use		Implement metrics to measure the sustainability of our resource use, with the aim of establishing a baseline to enable target setting during RIIO-T2	Collate actual consumption data for identified priority resources, where available	Dec-21
Sustainable Resource Use		Implement metrics to measure the sustainability of our resource use, with the aim of establishing a baseline to enable target setting during RIIO-T2	Identify actions required to fill data gaps on chosen sustainable resource use metrics, with delivery programme	Sep-21
Sustainable Resource Use		Implement metrics to measure the sustainability of our resource use, with the aim of establishing a baseline to enable target setting during RIIO-T2	Map key raw materials (inputs) and waste streams (waste outputs)	Dec-21
Sustainable Resource Use	4.4 Identify top five resource consumption priorities and set quantified targets by end 2020	Identify top five resource consumption priorities	Identify priority resource inputs based on carbon impact (from Scope 3 SBT baseline)	Jun-21
	4.4 Identify top five resource consumption priorities and set quantified targets by end 2020	Identify opportunities to reduce top five resource consumption priorities	Identify opportunities to reduce top five resource consumption priorities	Sep-21

Sustainable Resource Use Page 10

Driver / Process	Primary Objective	Action/ RIIO2 Commitment	Sub-Action	Due Date
Society	6.3 Understand SPEN mapping to the Sustainable Development Goals and address gaps as required	Further develop the SDG mapping exercise completed in 2018/19, identifying gaps or areas for improvement and proposing actions to start to address	leave blank	Sep-21
	6.5 Broaden Sustainable Society Driver as appropriate	Engage to define strategic vision for social and economic sustainability and develop new drivers and objectives as appropriate.	leave blank	Sep-21
	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Develop Supply Chain Sustainability Strategy	Engage with internal and external stakeholders via a Sustainable Supply Chain workshop to advise supply chain management strategy	Mar-21
Sustainable Society	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Develop Supply Chain Sustainability Strategy	Review Supply Chain Management Strategy with all stakeholders and revise/develop to deliver T2 and wider SPEN commitments	Sep-21
	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Develop Supply Chain Sustainability Strategy	Business approval of Supply Chain Management Strategy and securing of necessary funding and/or structure as required	Sep-21
	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Collaborate with suppliers and industry peers to develop a suite of targets and impact metrics to drive environmental improvement throughout our value chain	Develop Supply Chain Sustainability KPIs for discussion with supply chain	Mar-21
Sustainable Society	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Further enhance environmental management standards and KPIs in contract specifications and supplier codes of conduct (including requirements for public disclosure of metrics) and cascade to all relevant suppliers	Review SPM and SPD contract documentation to include environmental considerations	Sep-21
Sustainable Society	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Target more than 80% of T2 suppliers by value meeting enhanced environmental standards, and report on actual % achieved	Develop methodology for implementing and reporting suppliers meeting enhanced environmental standards	Dec-21
	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Engage with suppliers throughout duration of contract to continue to reduce impacts and optimise benefits	Collaborate with suppliers on best practice and innovation through introduction of suppliers innovation and best practice sub group	Sep-21
	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Introduce consideration of environmental sustainability in our procurement processes in line with ISO20400, including a carbon metric as a minimum	Complete the ISO20400 self assessment heat map by categories of spend to identify areas for focus, prioritising high sustainability impact	Sep-21
Sustainable Society	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Become a Supply Chain Sustainability School Partner, requiring contractors and suppliers for all new contracts to become members and undertake relevant sustainability and environmental training	Demonstrate 90% Supplier membership of Supply Chain Sustainability School	Dec-21
Sustainable Society	6.1 Work with our supply chain to better quantify and manage scope 3 carbon emissions	Become a Supply Chain Sustainability School Partner, requiring contractors and suppliers for all new contracts to become members and undertake relevant sustainability and environmental training	Provide active participation as a Supply Chain Sustainability School partner through attendance and contribution to the SCSS Leaders Group, steering School strategy and development	Dec-21

Sustainable Society Page 11

Driver / Process	Primary Objective	Action/ RIIO2 Commitment	Sub-Action	Due Date
Water Efficiency and Protection	5.1 Have zero water pollution incidents	Deliver T2 programme of mitigation measures (oil containment) for pollution prevention	Establish delivery milestones and track progress against annual targets (for RRP and Annual Environmental Report)	Dec-21
Water Efficiency and Protection		Quantify oil leakage for annual reporting (RRP and Annual Environmental Report)	Quantify oil leakage by establishing data collection process (oil top ups recorded in SAP)	Mar-21
Water Efficiency and Protection	5.2 Reduce oil leakage rate	Quantify oil leakage for annual reporting (ED2 RRP and Annual Environmental Report)	Quantify oil leakage by establishing data collection process (oil top ups recorded in SAP)	Dec-21
Climate Change Resilience	events	Publish a report in line with the 3rd Round of Adaptation Reporting under the Climate Change Act, in line with the ENA work to produce a sector report	leave blank	Dec-21
Climate Change Resilience	events	Undertake detailed Flood Risk Assessments at remaining 10 high risk sites and implement measures to mitigate the risk to the network from flooding	high risk sites	Dec-21
IMS and Business Processes	10.1 Integration of environmental, social and economic issues in business decision making	Embed circular economy principles where relevant throughout our businses processes, considering whole life cycle environmental impacts. Implement processes for carbon management in relevant business activities, aligned with PAS2080 Carbon in Infrastructure	Review IP process to meet all RIIO2 commitments and sign off revision	Dec-21
Stakeholder Engagement and Collaboration	9.1 Align with key stakeholders' views of a Sustainable Networks Business	Collaborate with SEPA on a Sustainable Growth Agreement	leave blank	Dec-21
IMS and Business Processes	8.6 Improve the quality of environmental data collected and analysed at all stages of the asset lifecycle	Improve the quality of environmental data collected and analysed at all stages of the asset lifecycle, investing in enhanced geospatial systems and formalising data sharing collaborations with key stakeholders	Fill environmental data gaps by including new or improved data in existing systems or introducing new tools, to meet RIIO2 Commitments and external reporting requirements	Dec-21
Stakeholder Engagement and Collaboration	9.1 Align with key stakeholders' views of a Sustainable Networks Business	Consider stakeholder input when reviewing the Sustainable Business Strategy and in particular the Sustainable Business Vision statement	leave blank	Sep-21
Stakeholder Engagement and Collaboration	9.3 Identify priority areas for collaboration with key stakeholders	Deliver the Sustainability Stakeholder Engagement Plan, which addresses the relevant identified priority areas	leave blank	Dec-21
IMS and Business Processes	8.6 Improve the quality of environmental data collected and analysed at all stages of the asset lifecycle	Work with Iberdrola and SP colleagues to deliver SYGRIS enhancements with respect to SPEN data, as defined in spreadsheet submitted last year	leave blank	Sep-21

Other Page 12