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# Annex 1.1 Our Commitments

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PRINCIPAL PARTNER  
**UN CLIMATE  
CHANGE  
CONFERENCE  
UK 2021**

IN PARTNERSHIP WITH ITALY

# Introduction to this Annex

This annex contains the full list of our 100 proposed RIIO-ED2 Business Plan commitments. They are expanded upon here with further detail on RIIO-ED1 performance (if applicable) and indicative proposals for measurement of the outcome during RIIO-ED2. These represent the key outcomes that we are seeking to deliver for our customers and stakeholders.

Our commitments are aligned to our three strategic pillars for RIIO-ED2, based on the priorities of our customers and stakeholders. These are integral to the vision, strategy, and delivery of our plan.

## Our Strategic Pillars

### Develop a network that's ready for Net Zero



These commitments relate to our network investment and processes to enable decarbonisation. Within this, we will enable the growth in low carbon technologies, realise the Distribution System Operator model, improve service reliability and safety, and deliver more efficient and effective services for our customers.

### Be the trusted partner for customers, communities and stakeholders



These commitments ensure that the customer remains at the heart of our business as we enable the path to Net Zero. We will focus on continuing our leading service performance, expand our role and actions for vulnerable customers, and deliver a step-change in support to local stakeholders for community energy and local green initiatives.

### Ready our business for a digital and sustainable future



These commitments summarise our response as a business to our new Net Zero direction. We will lead by example in delivering Net Zero for our own organisation, ahead of legislated targets, alongside enhanced sustainability outcomes. Our organisation will also grow and develop a workforce fit for the future, supported by a radical enhancement of our digital capabilities – which will also enable external innovators through data provision.

## Customer and Stakeholder input

All of our commitments emerged from customer and stakeholder engagement and/or were extensively tested and revised through engagement. The journey of building each commitment through our phases of engagement is outlined visually in the Triangulation dashboard, which can be found at the start of each of our Triangulation records. These can be found in [Annex 3.1c-3.1m](#).

## Delivering on our commitments

Progress against all of our commitments will be reported on annually as part of our annual Distribution Performance Report, supported by extensive datasets provided to, and published by Ofgem.

These commitments are proposed as part of our final baseline plan submission to Ofgem. As they depend on the expenditure and activities proposed in this plan, they are dependent upon Ofgem's draft and final determinations on RIIO-ED2. This will set the final scope for our RIIO-ED2 plan (such as by setting our expenditure allowances) and potentially influence our ability to deliver these commitments. As such, we will re-state our commitments following the conclusion of Ofgem's determination process.

## SIGNPOST FOR OFGEM'S BUSINESS PLAN REQUIREMENTS

### Ofgem BP Guidance No 2.5

*"...An integral element of these strategies is an explanation of what key indicators the DNO intends to use to monitor performance within RIIO-ED2 so that it knows whether their strategic approach is effective. Our assessment of the Business Plan will take into account the level of commitment set out in the plan for delivering the outcomes it contains, and how it will use performance against these key indicators to support this commitment..."*

### Our response to Ofgem BP Guidance No 2.5

*Throughout this annex we explain the key indicators that we propose to use to monitor performance within RIIO-ED2 (see column "proposed measure"). Note – Our Triangulation records, [Annex 3.1c-3.1m](#) include all the evidence collated from customer and stakeholder feedback, across 4 phases of engagement to support each commitment and its level of ambition.*

## OUR RIIO-ED2 COMMITMENTS

# Develop a network that's ready for Net Zero



## Develop the network of the future

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<p><b>1</b> We will install innovative fault level monitoring across 41 constrained locations on our HV and EHV network to help safely accommodate more renewable generation.</p>	<p><b>New for RIIO-ED2.</b></p> <p>During RIIO-ED1 we have been trialling active and real-time fault level management innovations.</p>	Number of locations installed.	<i>Pg 46</i>
<p><b>2</b> We will develop a network that enables our communities to transition to Net Zero with over 590 smart-substations, 750km of cable, and 43,000 service cables. We will size and co-ordinate interventions to 'touch the network once' where this delivers benefits for our customers.</p>	<p><b>New for RIIO-ED2.</b></p>	Volume of assets installed, alongside a summary of our technical justifications where we propose to 'touch the network once', considering our long-term network demand forecasts.	<i>Pg 46</i>
<p><b>3</b> We will continue to assess flexibility, smart, innovative, and reinforcement solutions for all our Load related interventions, and carefully select the most efficient, co-ordinated, and economical interventions within RIIO-ED2. This will include assessing energy efficiency actions ahead of starting any work.</p>	<p>In RIIO-ED1 we already follow the common evaluation methodology for interventions and have already started to test the flexibility market for all of our qualifying Load related projects.</p>	All of our Load related intervention justifications are documented and the outcomes of these will be reported annually.	<i>Pg 46</i>
<p><b>4</b> We will increase visibility of our low voltage networks by delivering over 14,100 LV network monitors at large secondary substations and enhancing our use of smart meter data. This will enable us to maximise utilisation of the existing network, identify targeted areas for upgrades, and facilitate customer flexibility.</p>	<p>Our entire 132kV and 33kV network, as well as the vast majority of our 11kV network, is monitored (predominantly at source for 11kV).</p>	Number of LV network monitors installed.	<i>Pg 46</i>
<p><b>5</b> We will deliver £87.2m of savings for our customers in RIIO-ED2 by embedding learnings from our innovation projects into BAU and adopting best practice from successful industry trials. We will keep innovation at the core of everything we do, to continue to deliver benefits for our customers and the wider energy system.</p>	<p>We have been one of the industry leaders in the delivery of innovation project funding during RIIO-ED1.</p>	Value of savings realised for customers by delivering innovative project solutions in line with forecast.	<i>Pg 46</i>
<p><b>6</b> We will continuously work with the ESO, UK, Scottish and Welsh governments, and other key stakeholders, to accurately forecast our customers' future needs and to facilitate Net Zero pathways. This will include updating our DFES forecasts annually.</p>	<p>We published our first DFES in 2020 (and updated in 2021), which has informed our RIIO-ED2 plan</p>	Publication of annual DFES forecast.	<i>Pg 46</i>
<p><b>7</b> We will be a neutral facilitator of an open and accessible distribution flexibility services market during RIIO-ED2. This market will be aligned with industry best practice, utilising a range of services to meet network requirements. This will be supported by efficient dispatch processes and transparent procurement.</p>	<p>We have run 4 flexibility tenders since 2019, across 2,705 sites. We have tendered 2,746W and awarded 747.9 MW to date. We have published the results, including our reasons for accepting/ rejecting each bid.</p>	Volume of flexibility services tendered, procured and dispatched.	<i>Pg 55</i>

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<p><b>8</b> We will deliver a discrete DSO directorate for RIIO-ED2 responsible and accountable for delivering DSO. It will increase transparency and be supported by external assurance and stakeholder input. This directorate will be established by the start of RIIO-ED2.</p>	<p><b>New for RIIO-ED2.</b></p> <p>In RIIO-ED1 we appointed our Head of DSO to provide an initial focus on strategy, engineering and flexibility development.</p>	<p>Creation of a discrete DSO directorate and functional delivery model.</p>	Pg 55
<p><b>9</b> We will share planning, operational, and market data with customers, stakeholders, and market participants through our systems and an online data portal within RIIO-ED2. This will include visibility of our user friendly short and long-term forecasts.</p>	<p>We make a range of network data available, such as via the Long-Term Development Statement, and we are developing our data publication process for stakeholders in collaboration with industry.</p>	<p>Usage of our new online data portal, including volume of data made available.</p>	Pg 55
<p><b>10</b> We will implement a dedicated whole system planning function. Using whole system planning at the start of the investment process, this team will ensure whole system solutions are considered in each of critical decision-making junctures (for example on system design for connections). This will achieve a step change in whole system planning, solutions and outcomes over the RIIO-ED2 period.</p>	<p><b>New for RIIO-ED2.</b></p> <p>This builds on customer engagement and technical approaches that have resulted in whole system outcomes during RIIO-ED1.</p>	<p>Implementation of a whole systems planning function.</p>	Pg 61
<p><b>11</b> We will use a structured process to review our existing policies and procedures, identify gaps and implement required changes, to fully embed whole system planning as business as usual. This will have oversight at director level with accountability and reporting to our senior executives. We will use this to engage strategically with other electricity network companies, National Grid ESO and licenced utility companies to work towards achieving whole system outcomes throughout RIIO-ED2.</p>	<p><b>New for RIIO-ED2.</b></p>	<p>Evidence of whole systems solutions and outcomes delivered.</p>	Pg 61
<p><b>12</b> We will engage with all local authorities in SPD and SPM to support the strategic siting of public EV ChargePoint hubs, utilising our extensive network knowledge and working collaboratively with local stakeholders in optioneering, to identify the optimal locations. We will publish a report on our work at the end of the price control, reporting the number of optioneering reports we completed with local authorities and the consumer benefits delivered in relation to reduced connection charges.</p>	<p>Under our ground-breaking project PACE, we have supported delivery of a 200% increase in public EV charging across two local authorities in SPD. This will deliver savings between £1.3–£2.6m.</p>	<p>Number of EV optioneering engagements, reports and projects completed.</p>	Pg 61
<p><b>13</b> We will provide a dedicated team of specialists (Strategic Optimisers) that will partner with Local Authorities (and regional Governments) to support the development and implementation of Local Heat and Energy Efficiency Strategies (LHEES) and Local Area Energy Plans (LAEPS).</p>	<p>We have been involved in a strategic heat working group with the Scottish Government, as well as collaboration with Liverpool Combined Regional Authority to support the development of their Net Zero plans.</p>	<p>Number of LHEES and LAEPS in development.</p>	Pg 61

## Ensure a safe and reliable electricity supply

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<p><b>14</b> As a steward of critical national infrastructure, we will maintain our ISO55001 accreditation and ensure all our asset managers are certified with the Institute of Asset Management. We will continue our strategic partnership with the IET and our leading contribution to the IEEE, CIGRE and CIRED.</p>	<p>We have achieved ISO55001 and have certified 12 asset managers with the Institute of Asset Management.</p>	<p>Retention of ISO55001 accreditation and increase volume of professional certification with the Institute of Asset Management.</p>	Pg 65
<p><b>15</b> We will continue to optimise the level of network risk, reducing asset deterioration from around 5.4% per year without intervention to around 1.1% through our targeted and optimised asset modernisation programme over RIIO-ED2.</p>	<p>Over RIIO-ED1, our asset modernisation programme has reduced deterioration from around 6% per year without intervention to around 3% per year.</p>	<p>We will report annually to the regulator, and through our public performance report, on asset risk.</p>	Pg 65
<p><b>16</b> We will improve the reliability of our supply to customers, ensuring that on average customers will be 19% less likely to experience an unplanned interruption, and average duration will reduce by 19%. We will do this over the duration of RIIO-ED2 by investing in new and proven technologies and embedding innovation.</p>	<p>Over RIIO-ED1, our number and duration of unplanned interruptions have varied year on year, remaining broadly consistent overall and out-performing our regulatory targets.</p>	<p>We will report annually to the regulator, and through our public performance report, on network reliability.</p>	Pg 69
<p><b>17</b> We will improve reliability for 7,857 of our 'Worst Served Customers' by reducing their number of interruptions by 33% through delivery of 22 dedicated network circuit performance schemes.</p>	<p>On average in RIIO-ED1, we have 4,700 Worst Served Customers per year. Changes in the criteria for RIIO-ED2 means more customers will be captured by the definition, and we have greater opportunity to improve performance funding.</p>	<p>Number of Worst Served Customer schemes delivered and quantification of performance improvement.</p>	Pg 69
<p><b>18</b> We will ensure that in an exceptional event, no customer should be off supply for more than 36 hours.</p>	<p>In RIIO-ED1, we have managed this commitment to our customers during over ten severe weather events.</p>	<p>Number of customers affected for more than 36 hours during an exceptional event.</p>	Pg 69
<p><b>19</b> Building on our extensive RIIO-ED1 work, we will take a proactive approach to overhead line issues by adopting a risk based, digitalised inspection regime with the use of LiDAR (flying one third of our network per annum). In addition to this we will rectify all reported and confirmed overhead line clearance issues within 12 months of discovery.</p>	<p>We have a current policy of routinely inspecting our overhead line network to identify possible issues.</p>	<p>Amount of network inspected per annum and rate of overhead line clearance infringement issues rectified within 12 months.</p>	Pg 70
<p><b>20</b> We will continue to improve the flood resilience of our network by working with our regional environment agencies and continue to target 100% compliance as flood maps and assessments evolve during RIIO-ED2.</p>	<p>Maintained compliance with latest flood map data at over 90% of our sites achieving resilience to main waterways and coastal flooding.</p>	<p>Rate of compliance to flood resilience requirements, reported annually through our performance report.</p>	Pg 70
<p><b>21</b> We will improve fire safety at over 1,000 substations integrated in third party buildings, through a prioritised, risk-based investment programme during RIIO-ED2.</p>	<p>We are assessing the fire risk of all substations that are integrated within other buildings during RIIO-ED1, updating all information on our corporate systems.</p>	<p>Number of substations integrated in third party buildings where we have improved fire safety.</p>	Pg 73
<p><b>22</b> We will deploy smarter security measures and access restrictions to 100% of our ground mounted substation sites over the course of RIIO-ED2, to reduce unauthorised access and improve traceability and management of our third-party contractors.</p>	<p>We have deployed security measure and access restrictions to 50% of our ground mounted substations.</p>	<p>Volume of ground mounted substation sites with smarter security measures deployed.</p>	Pg 73

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<b>23</b> We will safeguard around 14,000 residents of flats and tenements each year over RIIO-ED2 by proactively managing the remaining risk associated with deterioration of Rising and Lateral LV Mains (regardless of asset ownership). We will do this through our risk-prioritised modernisation programme by upgrading poor condition assets where they are identified over RIIO-ED2.	We are one of few DNOs to proactively address this risk on behalf of our customers and have modernised rising and lateral mains for around 15,000 customers every year over RIIO-ED1.	Number of residencies safeguarded by proactively managing deterioration of Rising and Lateral LV Mains.	<i>Pg 73</i>
<b>24</b> We will improve public safety risk by replacing over 2,000 of our last remaining poorest condition underground link boxes and modernising nearly 2,000 low voltage pillars in publicly accessible areas during RIIO-ED2.	We will replace around 75% of our end-of-life link boxes by the end of RIIO-ED1.	Volume of link boxes and pillars replaced.	<i>Pg 73</i>

## Provide timely and efficient connections

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<b>25</b> We will offer 100% of customers a pre-quotation consultation, using either face to face or virtual technology, to achieve improved upfront communication with customers by 2025.	<b>New for RIIO-ED2.</b>	Percentage of customers offered a pre-quotation consultation (by 2025).	<i>Pg 80</i>
<b>26</b> We will nominate a point of contact to all customers requesting 30 or more quotations per year, or who have a single project exceeding £1m in value, using dedicated account management to foster better relationships with repeat customers, by 2025.	<b>New for RIIO-ED2.</b>	No customers in this category without a single point of contact (by 2025).	<i>Pg 80</i>
<b>27</b> We will offer 80% of HV and EHV customers the choice of a firm and a flexible connection where a known constraint exists to achieve more coordinated network planning by 2025.	Although we offer flexible connections within RIIO-ED1, these offerings are not prevalent in our volumes of offers issued (<1%).	Percentage of HV and EHV customers offered the choice of a firm and a flexible connection where a known constraint exists (by 2025).	<i>Pg 80</i>
<b>28</b> We will quote within 70% of guaranteed standard timescales for Major Connections customers using our improved digital solutions. By 2028, 100% of customers to receive a budget offer at the point of enquiry.	<b>New for RIIO-ED2.</b>	Quoting within 70% of guaranteed standard timescales and % of customers receiving a budget offer at point of enquiry.	<i>Pg 80</i>
<b>29</b> We will make increasing amounts of connections related network information available in near real time, including capacity and constraint analysis. This will use increased digital data sets by 2025.	<b>New for RIIO-ED2.</b>	Amount of connections related network information made available in near real time (from 2025).	<i>Pg 80</i>
<b>30</b> We will improve connections delivery timescales by 2% year on year from the start of RIIO-ED2.	<b>New for RIIO-ED2.</b>  Currently this is not measured across all work types, a baseline position will be measured before the end of RIIO-ED1.	Percentage improvement in connections deliver timescales.	<i>Pg 80</i>

## OUR RIIO-ED2 COMMITMENTS

# Be the trusted partner for customers, communities and stakeholders



## Deliver excellent satisfaction and enhanced services for all customers

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<b>31</b> For customers receiving any service from us, no matter the contact channel, we will deliver satisfaction levels of 9.4 out of 10 by the end of RIIO-ED2.	Our RIIO-ED1 average customer satisfaction from 2015/16 to 2020/21 across our 2 licence areas is 8.91, under services measured by the BMCS regulatory incentive. This is calculated as an average of each year's average performance.	Published results from Ofgem's BMCS incentive.	<i>Pg 90</i>
<b>32</b> 90% of complaints resolved in one working day. At least 99% of complaints resolved in 31 days. We will also target zero repeat complaints in 12 months and for any complaint where the customer engages the Energy Ombudsman, we will ensure none of the findings are against us.	Our 2015/16 to 2020/21 average Day 1 closure rate was 84.9% and our Day 31 was 97.6%. This is calculated as an average of each year's average performance. We have had no repeat complaints over this period or any Ombudsman cases found against us.	Published results on customer complaints resolved and Energy Ombudsman findings.	<i>Pg 90</i>
<b>33</b> When a customer contacts us to report a power cut or an emergency, we will respond in 10 seconds or less, regardless of the channel used. We will make sure less than 1% of telephone calls in this area are abandoned.	Our RIIO-ED1 average across both our licence areas is 10.97s, with an abandoned rate of 0.81%, which includes performance during exceptional events and is measured only for telephony. This is calculated as an average of each year's average performance.	Response time during power cut or emergency and % of telephone calls abandoned.	<i>Pg 91</i>
<b>34</b> When a customer contacts us regarding a non-urgent matter, we will respond on average within five minutes, providing the customer with key information.	<b>New for RIIO-ED2.</b>	Average response time for non-urgent matters.	<i>Pg 91</i>
<b>35</b> We will provide a service for customers to register their preferred method of contact and language and will use this during any contact with them throughout RIIO-ED2. We will promote this in our awareness campaigns every year.	<b>New for RIIO-ED2.</b>	Provision of a new service for customers to register their preferred method of contact and evidence of promotion of this to customers.	<i>Pg 91</i>
<b>36</b> Any customer will be able to register with us to receive proactive contact through their preferred method of communication when a power cut occurs. This will include updates throughout the power cut and notification when power is restored. We will contact at least 99% of those who have requested this using their preferred method.	<b>New for RIIO-ED2.</b>	Ability of customer to register to receive power cut notifications and percentage of customers contacted via preferred method.	<i>Pg 91</i>
<b>37</b> We will talk to customers face to face in advance of a planned power cut and ensure we speak with 95% of those on our PSR or classed as high risk.	<b>New for RIIO-ED2.</b>	Percentage of customers met face-to-face in advance of a planned power cut and percentage of high-risk customers met face to face in advance of a planned power cut.	<i>Pg 91</i>

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<p><b>38</b> We will proactively contact all customers registered on our Priority Services Register when a power cut occurs via their preferred method of contact including updates throughout the power cut and notification when power is restored. For those customers in our high risk groups (e.g. medically dependent on electricity or struggle with mental health) we will proactively contact them with a personalised phone call to provide additional comfort.</p>	<p>We proactively contact all PSR customers via SMS if they have a mobile number on our records, or voice alert if they have a landline.</p>	<p>Percentage of customers proactively contacted.</p>	Pg 91
<p><b>39</b> During an unplanned loss of supply, at least 99% of updates provided will include the following information: Expected Restoration Times, Resources Attending (Name), Reason for the outage, Location of the cause, Support available for vulnerable customers.</p>	<p>This is current practice but we do not provide all information, such as staff names.</p>	<p>Percentage of updates provided during unplanned loss of supply containing the outlined information.</p>	Pg 91
<p><b>40</b> During an unplanned loss of supply, at least 80% of customers will have their electricity supply restored within the restoration time initially stated.</p>	<p>Our current performance is circa 70%.</p>	<p>Percentage of customers with supply restored within the restoration time initially stated.</p>	Pg 91
<p><b>41</b> All customers will be notified in writing at least 10 working days ahead of a planned outage, with at least 90% notified by preferred method of contact 48 hours before work starts. At least 99% of letters will include 5 key pieces of information our customers tell us are important.</p>	<p>There is a requirement to notify customers in writing at least 2 days before a planned outage. Our current practice is to notify 10 working days in advance, based on customer feedback, and also text the day before.</p>	<p>Percentage of customers notified.</p>	Pg 91
<p><b>42</b> When customers ask us to carry out safety checks, we will make sure 99% or more are visited within three hours of the initial contact.</p>	<p>Our ED1 average is 99.78% across both licences under GS1 standards of Service. This is calculated as an average of each year's average performance.</p>	<p>Percentage of visits made within 3 hours of contact.</p>	Pg 91
<p><b>43</b> When customers ask us to support requirements such as new earthing, shrouding or maintenance work, we will deliver 90% of this work to the customers required date (subject to access and traffic management).</p>	<p>This work is carried out currently within a varied range of delivery timescales.</p>	<p>Percentage of delivery to customer timescales.</p>	Pg 91
<p><b>44</b> Any customer will be able to register with us to receive a range of services aimed at helping to reduce household or business costs, drive efficiency and help them access the benefits of the low carbon transition. These services will be promoted through Awareness campaigns and direct contact with customers. These will be delivered to 40,000 customers across the RIIO-ED2 period and deliver an NPV of £20m. There will be an SROI of £1.47 for every £1 spent.</p>	<p><b>New for RIIO-ED2.</b></p>	<p>Number of customers who receive additional services and the resulting value delivered, calculated through SROI.</p>	Pg 92
<p><b>45</b> We will undertake a Power Cut Risk assessment for all Commercial Customers signing up to our Advice Services and our Proactive Contact service. We will review the Risk Assessment for these customers and record appropriate actions within 3 months of registration.</p>	<p><b>New for RIIO-ED2.</b></p>	<p>Number of Commercial Customers who signed up for this service and rate of compliance to follow-up actions.</p>	Pg 92

## Support vulnerable customers and communities to ensure no-one is left behind

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<b>46</b> We will transition our partnership model to be proactive by creating a coalition of organisations with shared goals and data sharing governance to deliver holistic and efficient support.	New for RIIO-ED2.	Evidence of a proactive partnership model.	<i>Pg 99</i>
<b>47</b> We will lead the creation of a single vulnerability register which our PSR will be part of, linking the organisations in our coalition partnership model. This "Register Once" service will make it easy for customers to register for vulnerability services with multiple organisations.	New for RIIO-ED2.	Creation of a single vulnerability register across multiple organisations.	<i>Pg 99</i>
<b>48</b> We will register 80% of customers across every common needs code for PSR Registration by 2028 based on nationally available data.	Currently we have over 1.06m households registered for PSR. We measure that our reach ranges from 5% to 87% across needs codes.	Percentage of customers registered across every common needs code in PSR based on nationally available data.	<i>Pg 99</i>
<b>49</b> We will widen our view of vulnerability, capturing needs broader than common utility codes, building these into our service offerings and coalition partnership model.	New for RIIO-ED2.	Evidence of wider vulnerabilities captured from customers and evidence of using the data to support service offerings and partnerships.	<i>Pg 99</i>
<b>50</b> We will contact 100% of all our vulnerable customers every 2 years, achieving a minimum 60% fully validated data.	We currently contact 100% of our vulnerable customers every 2 years but we don't currently validate the data.	Percentage of vulnerable customers contacted / fully validated.	<i>Pg 99</i>
<b>51</b> We will use data creatively to understand those customers likely to face barriers in accessing low carbon technology (LCT) due to social factors and overlay this with technology data creating an LCT prioritisation ranking to enable us to best target our services.	New for RIIO-ED2.	Evidence of creating an LCT prioritisation ranking and use of this to target services.	<i>Pg 99</i>
<b>52</b> We will benchmark our service externally every year to measure up against best practice, achieving relevant recognised international standards and score in Top 5 UK companies through ICS (Institute of Customer Service) service benchmark.	We benchmarked 1st against all UK service sectors in the ICS (Institute of Customer Service) Customer Service Index, achieved the BSI (British Standards Institution) Customer Service Kitemark and vulnerability standard.	Achievement of recognised international standards and score and ranking in ICS service benchmark.	<i>Pg 99</i>
<b>53</b> We will support customers in a number of ways during a power cut and capture their individual needs through our contact channels with no less than 99% of needs being met.	99% of known needs are currently met, and in RIIO-ED2 we intend to enhance our way of capturing and actioning on individual needs to shape future service delivery.	Percentage of customers' needs met.	<i>Pg 100</i>
<b>54</b> We will deliver direct support services to 276,000 vulnerable and disadvantaged customers.	We have provided Fuel Poverty support to 1,100 customers per year.	Number of customers supported via direct support services.	<i>Pg 100</i>

## Work with our communities to facilitate the energy system transition

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<p><b>55</b> We will work in partnership with local support organisations to deliver community energy awareness campaigns at scale and educational outreach activities to raise knowledge and awareness of the changes coming to the energy sector and how individuals and their communities can participate and benefit. We will review our engagement, including who/how best to deliver information, throughout ED2 and remain flexible and innovative in our approach.</p>	New for RIIO-ED2.	Evidence of community energy awareness campaigns delivered including reach.	Pg 105
<p><b>56</b> We will submit a Community Energy Strategy with our RIIO-ED2 Business Plan to clearly show how we will embed community energy thinking across our business and set our approach to leveraging resources to cost-effectively support community anchor organisations and their community energy projects across our licence areas. Our strategy will be independently reviewed every year to make sure we are learning as we go and adjusting to changes in the external environment.</p>	New for RIIO-ED2.	Independent review of our community energy strategy.	Pg 105
<p><b>57</b> Through dedicated Community Energy advisors (who will work with our whole system advisors), we will offer technical advice and optioneering as well as sign-posting to impartial, local support organisations and local energy planning activities and hand-hold local groups in need of additional support through our connections process.</p>	New for RIIO-ED2.	Evidence of Community Energy advisors supporting local groups.	Pg 105
<p><b>58</b> We will ring-fence ~25% of our proposed Distribution Net Zero Fund for community-led energy projects to increase upfront funding. Community groups will still be able to access other categories of the fund.</p>	New for RIIO-ED2.	Amount of funding allocated to community-led energy projects.	Pg 105
<p><b>59</b> We will create a £30m Distribution Net Zero Fund which will support low-carbon projects within our licence area. The fund will be aligned to Scotland's, Wales and the UK's Net Zero aims whilst supporting our cities and local communities' decarbonisation ambitions. The fund will create positive environmental benefits, deliver strong social value, support the most vulnerable in our society, generate shared learnings and boost local economic growth.</p>	New for RIIO-ED2.	Amount of funding allocated to low-carbon projects.	Pg 106
<p><b>60</b> We will publish our Just Transition Strategy by the start RIIO-ED2. We will embed the principles of a just transition into our business planning throughout RIIO-ED2 and continue to engage our customers and stakeholders to understand local needs. We will review our progress via an independent annual review.</p>	New for RIIO-ED2.	Annual independent review conducted.	Pg 30

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<p><b>61</b> We will deliver industry leading stakeholder engagement through the principles of inclusivity, materiality, responsiveness and impact. To validate this and help inform our continuous improvement we will seek achievement of the AA1000SE industry standard for stakeholder engagement. We will aim to reach the highest categorisation phase possible on the AccountAbility maturity ladder following a robust evidence check and senior manager interviews – demonstrating our commitment to industry leading engagement practices.</p>	<p>We have aligned to the AA standard for stakeholder engagement throughout RIIO-ED1 – for the last 4 years we have enlisted AccountAbility to conduct a full health check audit of our engagement strategy and processes.</p> <p>Performance to date:            2018: 66%            2019: 72%            2020: 78%            2021: 81%</p>	<p>Score achieved on AA1000SE maturity ladder.</p>	Pg 199
<p><b>62</b> We will re-test our priorities with customers and stakeholders on an annual basis and present results to our independent external group every year along with our action plans. Our plans will be inclusive ensuring our engagement covers all stakeholder and customer groups.</p>	New for RIIO-ED2.	<p>Results from an annual survey of stakeholders and associated actions presented to independent external group.</p>	Pg 199
<p><b>63</b> We will launch a fit-for-purpose online tool, which gives our stakeholders easy access to a collaboration and engagement platform where they can engage with relevant content and influence our decision making. We will ensure better targeting of stakeholder communications, increasing active participation rates by 20% by the end of RIIO-ED2.</p>	<p>Active participation rates on our online community for 2021 reached almost 10%,</p>	<p>Participation rate % of new online tool.</p>	Pg 199
<p><b>64</b> By embedding an annual programme of engagement across each of our strategic topic areas, we'll give stakeholders the chance to influence our decisions and assess the delivery of our plans. At an executive level, we will hold director-led strategic stakeholder engagement events demonstrating senior-level buy in and engagement with our stakeholders. We will measure the effectiveness of our engagement through impact delivered and stakeholder satisfaction.</p>	<p>Our Strategic Stakeholder Panels are currently embedded within our annual engagement activity. This is an area of best practice we wish to take forward in to RIIO-ED2 as part of our enduring stakeholder engagement strategy.</p>	<p>Number of stakeholder events held, evidence of impact and stakeholder satisfaction.</p>	Pg 199
<p><b>65</b> We will report annually on our latest engagement performance through transparent stakeholder reporting, including social return on investment generated by our stakeholder initiatives. We will commit to achieving a positive social value for every £1 spent on a project or initiative over a 5-year period.</p>	New for RIIO-ED2.	<p>SROI generated via stakeholder engagement initiatives.</p>	Pg 199

## OUR RIIO-ED2 COMMITMENTS

# Ready our business for a digital and sustainable future



## Deliver an environmentally sustainable network

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<p><b>66</b> We will embed environmental sustainability considerations in our business processes whilst maintaining and continually improving our ISO14001 certified Environmental Management System. This will enable us to achieve 'beyond compliance' environmental performance and our sustainability goals.</p>	<p>We have been continuously certified to ISO14001 since 1997 and successfully achieved recertification in 2021.</p>	<p>Environmental performance against ISO14001.</p>	<p><i>Pg 110</i></p>
<p><b>67</b> We will continue to provide transparent reporting of our environmental and sustainability performance by publishing an annual report of our progress against all environmental and sustainability commitments – in line with metrics and a format developed in collaboration with the other DNOs.</p>	<p>We have published our Environment and Innovation report annually in line with RIIO-ED1 requirements.</p>	<p>Publication of an annual report against commitments.</p>	<p><i>Pg 110</i></p>
<p><b>68</b> We will improve the quality of environmental data collected and analysed at all stages of the asset lifecycle, investing in enhanced IT systems and formalising data sharing collaborations with key stakeholders.</p>	<p><b>New for RIIO-ED2.</b></p>	<p>Evidence of improved data quality and analysis.</p>	<p><i>Pg 110</i></p>
<p><b>69</b> We will continue to ensure that our staff, contractors and suppliers have the skills and knowledge to allow us and our supply chain to move beyond compliance and achieve our Sustainability Goals, by identifying and ensuring delivery of appropriate environmental training.</p>	<p>We are part way through an environmental training programme to ensure that staff have the knowledge to be able to competently manage environmental issues.</p>	<p>Number of staff, contractors and suppliers with environmental training delivered.</p>	<p><i>Pg 110</i></p>
<p><b>70</b> We will further enhance environmental sustainability standards and performance metrics in our contracts by 2023 and will collaborate with our supply chain to target more than 80% of RIIO-ED2 suppliers (by value) meeting these standards.</p>	<p>During RIIO-ED1, we updated our standard contract terms, pre-qualification questionnaires, and specifications, to report on their environmental management standards. We also became a partner of the Supply Chain Sustainability School (SCSS) and require all suppliers on new contracts to use this.</p>	<p>Evidence of enhancing environmental standards and performance metrics in contracts by 2023 and percentage of suppliers (by value) meeting these.</p>	<p><i>Pg 111</i></p>
<p><b>71</b> We will deliver efficient and economic actions to reduce our scope 1, 2 and 3 business carbon footprint by 67.2% by 2035 from a 2018/19 baseline, in line with validated Science-Based Targets aligned to a 1.5°C pathway.</p>	<p>Since 2013/14, the year of our baseline measurements, SPD and SPM have jointly achieved 57% reduction in Scope 1 and 2 business carbon footprint, excluding losses. In 2013, we set a target to reduce emissions by 15% by 2023, and achieved this in 2015/16.</p>	<p>Business carbon footprint.</p>	<p><i>Pg 113</i></p>
<p><b>72</b> We will minimise our carbon footprint to achieve Net Zero carbon by 2035.</p>	<p><b>New for RIIO-ED2.</b></p>	<p>Business carbon footprint.</p>	<p><i>Pg 113</i></p>

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<b>73</b> We will achieve Carbon Neutrality by 2023 for our Scope 1 and 2 business carbon footprint excluding Losses.	New for RIIO-ED2.	Scope 1 and Scope 2 business carbon footprint, excluding Losses.	Pg 113
<b>74</b> We will decarbonise our operational fleet by 2030, replacing 100% (over 800) of our cars and vans with electric alternatives in line with the Iberdrola EV100 commitment and will seek to further accelerate this to 2028.	The carbon impact from distribution operational transport has decreased by 15% and related fuel use has reduced by 14% since the start of RIIO-ED1.	% of cars and vans which are electric.	Pg 114
<b>75</b> We will reduce our SF <sub>6</sub> leakage by 10% over the RIIO-ED2 period compared to RIIO-ED1.	Since 2013, annual SF <sub>6</sub> leakage as a percentage of total volume has remained comparatively low, staying within target at 0.75% of total mass against a target of 0.85%.	SF <sub>6</sub> leakage reduction.	Pg 114
<b>76</b> We will analyse our generator use and set targets for reduction in carbon emissions to be achieved by end of RIIO-ED2.	We have expanded the coverage of our reporting of red diesel and are now able to include fuel use for hire generators, providing greater visibility of the carbon footprint of our fuel use.	Reduction of emissions from generators and then achievement against them.	Pg 114
<b>77</b> We will continue to purchase green electricity through a 100% UK-based renewable energy tariff backed by Power Purchase Agreements (PPA) for all our buildings. Beyond this, we will reduce our buildings and substations energy consumption by a minimum of 15.2GWh (8%) over the RIIO-ED2 period.	The move to the green tariff has reduced our recorded emissions from buildings energy use in SP Distribution from 6,029 tCO <sub>2</sub> e in 2018/19 to 218 tCO <sub>2</sub> e in 2020/21. In SP Manweb it was reduced from 4,918 tCO <sub>2</sub> e in 2018/19 to 42 tCO <sub>2</sub> e in 2020/21.	Evidence of the purchase of a renewable energy tariff backed by Power Purchase Agreements for our buildings and GWh reduction in building and substation energy consumption.	Pg 115
<b>78</b> In RIIO-ED2, we will continue to implement our Losses Strategy to avoid an estimated 36GWh of network losses, thereby limiting losses to a lower level than would otherwise be the case.	Since 2013, distribution network losses have averaged 6-7% of the total energy transmitted, and the carbon intensity of these losses has steadily decreased.	Avoided network losses in GWh.	Pg 115
<b>79</b> We will continue to implement our 2021 Business Travel Policy to reduce business travel emissions by at least 580 tCO <sub>2</sub> e during RIIO-ED2.	SPM and SPD business travel carbon footprint has steadily decreased by 29% throughout RIIO-ED1 – from 2,417 tCO <sub>2</sub> e in 2015/16 to 1723 tCO <sub>2</sub> e in 2019/20.	Reduction in business travel emissions in tCO <sub>2</sub> e.	Pg 116
<b>80</b> We will require strategic suppliers to set Science-Based Targets within 5 years, aiming for 80% of our supply chain by value.	New for RIIO-ED2.	% of supply chain by value who have set Science-Based Targets.	Pg 116
<b>81</b> We will continue to target zero environmental regulatory interventions and notifiable breaches.	Over the RIIO-ED1 period we have achieved full reporting of environmental incidents, by staff and contractors, and reduced the number and severity of such incidents.	Environmental regulatory interventions and notifiable breaches.	Pg 118

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
82 We will implement Pollution Prevention Plans at 100% of our RIIO-ED2 132kV projects.	New for RIIO-ED2.	Percentage of 132kV projects with Pollution Prevention Plans.	Pg 118
83 We will reduce the volume of fluid (oil) used to top up our pressurised cables by around 3,490 litres (10%) by replacing 19.429km of our leakiest fluid filled cable.	We have reduced fluid filled cable leaks by 85% since reporting year 2015/16.	Volume of fluid (oil) used to top up pressurised cables in litres and km of fluid filled cables replaced.	Pg 118
84 We will eliminate PCBs from our network by the end of 2025, in line with legislation and the risk-based industry approach agreed with the environmental regulators.	During RIIO-ED1, we have been working towards a gradual removal of contaminated equipment (containing more than 0.005% or 50ppm of PCBs) at end of life, targeting equipment with fluid volumes >5 litres.	Volume of assets with suspected PCBs remaining on our network.	Pg 118
85 We will use low carbon alternatives to concrete bunding for our RIIO-ED2 retrofit projects where technically feasible.	Over the RIIO-ED1 period we have intervened at 136 sites as part of our oil mitigation schemes.	Percentage of projects where alternatives to concrete bunding used.	Pg 118
86 We will continue to proactively minimise the impacts of noise resulting from the construction, maintenance and operation of our electrical infrastructure and take timely action to rectify noise complaints from our plant and sites.	7 noise interventions in SPD and 19 noise inventions in SPM.	Number of enquiries received in relation to noise and evidence appropriate action taken.	Pg 118
87 We will deliver 10% enhancement of biodiversity on 25 hectares across our existing network, on our non-operational land and existing linear infrastructure through collaboration with landowners, communities and local wildlife groups.	New for RIIO-ED2.	Number of hectares of land with biodiversity enhancement.	Pg 118
88 We will deliver 500 biodiversity units across our RIIO-ED2 work programme to not only fully mitigate our impacts but enhance local biodiversity.	New for RIIO-ED2.	Number of biodiversity units delivered.	Pg 118
89 We will remove 35km of overhead lines in Areas of Outstanding Natural Beauty, National Parks, and National scenic areas	14.6km of overhead lines removed from designed areas during ED1.	Volume of overhead lines removed from Areas of Outstanding Natural Beauty, National Parks and National scenic areas.	Pg 119
90 We will divert 100% of our waste from landfill by 2030, excluding compliance waste.	During RIIO-ED1 we have diverted on average 87% of our operational waste from landfill. We are on track to meet our 2023 target of 95%.	Percentage of waste diverted from landfill, excluding compliance waste.	Pg 119
91 We will establish a baseline and targets for waste reduction per £1m of total annual expenditure, to be achieved by the end of RIIO-ED2 and 2030 in line with our zero waste to landfill date.	New for RIIO-ED2.	Waste produced per £ of total annual expenditure.	Pg 119

## Build a Net Zero Workforce

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<p><b>92</b> We will grow our own talent from the communities we serve through a blended approach of multiple inclusive trainee and upskilling programmes and direct recruitment, to achieve a safe, skilled workforce. We will do this on an annual basis throughout RIIO-ED2, by filling 90% of our roles for our field staff and 50% for our engineering and technical workforce using our trainee programmes.</p>	<p>To date during RIIO-ED1 we have successfully recruited over 600 trainees onto our programmes, with the addition of upskilling 65 of our staff to become technical craftspersons and 43 of our staff to become engineers. Through our programmes we have formed our core pipeline of highly skilled engineering and technical staff. 95% of our craft roles and 75% of our core engineering and technical roles were filled through our trainee pipeline. Our RIIO-ED2 commitment factors in the step change in additional FTE required and the mix of skills, particularly new skills, which will mean to will need to recruit partially from market as well as trainees in order to maintain appropriate supervision for our trainees and achieve rapid growth.</p>	<p>Percentage of field staff roles filled by trainees and percentage of engineering and technical workforce filled by trainees.</p>	Pg 124
<p><b>93</b> We will create opportunities for our staff to develop new skills through development, upskilling and training plans aligned to our digital transition and journey to Net Zero to achieve a workforce who are motivated and confident to embrace the challenges we face. We will do this through annual internally recruited trainee programmes and annual upskilling plans for our people.</p>	<p><b>New for RIIO-ED2.</b></p>	<p>Number of staff upskilled, number of trainees recruited and average number of hours of training per employee.</p>	Pg 124
<p><b>94</b> We will continue our relentless drive to achieve a truly inclusive and diverse workforce through our improved policies, recruitment processes and by supporting and training our people leaders in Diversity and Inclusion (D&amp;I) Legal training, inclusive recruitment and inclusive leadership by 2025. We will aspire to achieve D&amp;I collection rates of 60% or more for our existing workforce to support the measurement of our diversity improvements by 2025.</p>	<p>During RIIO-ED1 we developed our strategy and action plan, delivering new programmes (such as our award-winning breaking barriers partnership), enhanced employee training and support, and also increasing the number of women in STEM and senior roles – from 20% to 30% for STEM roles and from 13% to 21% in senior management roles.</p>	<p>Percentage of people leaders trained in D&amp;I, inclusive recruitment and inclusive leadership and collation rate of D&amp;I information from workforce.</p>	Pg 125
<p><b>95</b> We will continue our long-standing commitment to safeguard the physical and mental health and wellbeing of our people to achieve a resilient, engaged workforce. We will engage with staff and implement actions plans from their feedback through our LOOP survey every two years and specific topic PULSE surveys and we will increase the number of our mental health first aiders to a 1:25 standard by 2024.</p>	<p>In RIIO-ED1 we established our mental health first aider programme, as well as our detailed employee surveys through LOOP and PULSE.</p>	<p>Evidence of completion of staff surveys and number of mental health first aiders, compared to a 1:25 standard.</p>	Pg 125
<p><b>96</b> We will embed a digital and sustainable culture within our workforce to support our journey to Net Zero. We will do this through ensuring our current and future workforce benefits from new and enhanced capabilities, providing them with necessary skills for the future through RIIO-ED2.</p>	<p><b>New for RIIO-ED2.</b></p>	<p>Evidence of digital and sustainable culture change, including delivery of training to number of staff and hours of training.</p>	Pg 125

## Embed digitalisation and unlock the value of data

Our Commitment	Current RIIO-ED1 performance	Proposed measure	Location
<p><b>97</b> We will operate a risk-based approach to the management of vulnerabilities and threats to the cyber-security and resilience of our IT and OT estate and data. We will continually assess our current position, review the threat landscape and create action plans to apply proportionate technical and organisational mitigation steps. This will be a stepped increase from ED1 as cyber threats evolve.</p>	<p>The Cyber Resilience Plans for RIIO-ED2 are an extension of the plans underway today for RIIO-ED1 and indeed for RIIO-T2. The solutions and systems used are applied across all 3 licenses.</p>	<p>Creation of appropriate action plans, with evidence of delivery.</p>	<p><i>Pg 131</i></p>
<p><b>98</b> We will create a new Digital environment to meet our customers', stakeholders' and business' future plans and strategies. We will build a Digital representation of our energy system and operation. Metrics will be published in line with our Digitalisation Strategy and Action Plan (DSAP).</p>	<p><b>New for RIIO-ED2.</b></p>	<p>Publication of metrics, in line with our DSAP.</p>	<p><i>Pg 131</i></p>
<p><b>99</b> We will track, measure and publish our progress via the Digitalisation Strategy and Action Plan (DSAP). The Digitalisation Strategy will be refreshed and published at least every 2 years, and the Action Plan at least every 6-months.</p>	<p><b>New for RIIO-ED2.</b></p>	<p>Publication of a refreshed DSAP every 2 years and actions plan every 6 months.</p>	<p><i>Pg 131</i></p>
<p><b>100</b> We will treat data as an asset and make data more accessible for more people (internally and externally) so that we can deliver more value for our customers and stakeholders. We will make our data presumed open by applying the principles from Ofgem's Data Best Practice Guidance.</p>	<p>We have already launched our Energy Data Landing Page and this will continue to evolve as new datasets become available to share.</p> <p>We have agreed a new Data Triage governance process to facilitate external Data requests.</p> <p>We are actively working with the ENA on delivering the recommendations of the Energy Data Taskforce (EDTF) on a Strategy for a Modern Digitalised Energy System, and continue to have representation on the latest Energy Digitalisation Taskforce (EDiT).</p>	<p>Amount of data made more accessible to external parties, and evidence of application of principles from Ofgem's Data Best Practice Guidance.</p>	<p><i>Pg 133</i></p>



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