

Annex 3.2: FULL SUITE OF OUR RII0-ED2 COMMITMENTS

Ofgem BP Guidance Requirements
Various via full suite of commitments

DEVELOP A NETWORK THAT'S READY FOR NET ZERO

Develop the network of the future

Summarised commitment	Our commitment	Our RIIO-ED1 performance
NZ1 <i>We will enable the connection of low carbon technologies on our network through a mix of flexible, smart, and reinforcement solutions. By managing capacity on our network our current and future customers will retain choice on the time and scale of their technology use.</i>	NZ1.1 We will install innovative fault level monitoring across 40 constrained locations on our HV and EHV network to help safely accommodate more renewable generation.	We have been developing sector-leading active and real-time fault level management during RIIO-ED1.
	NZ1.2 We will develop a network that enables our communities to transition to Net Zero with over 700 smart-substations, 800km 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.	This is a step change commitment for RIIO-ED2. In ED1 to-date our load related activities have installed 52km of LV cable, 198 substation interventions and 658 service interventions.
	NZ1.3 We will continue to assess flexibility, smart, and reinforcement solutions for all of our load related interventions, and carefully select the most efficient, co-ordinated, and economical interventions. This will include assessing energy efficiency actions ahead of starting any work.	Our RIIO-ED1 contracted flexibility to date has potentially avoided £10.2m in reinforcement costs.
	NZ1.4 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.	We currently have <1% visibility of our LV network, during RIIO-ED1 this has been monitored at source.
NZ2 <i>We will deliver £84m of savings for our customers by embedding learnings from our innovation projects into BAU and adopting best practice from successful industry trials.</i>	NZ2.1 We will deliver £84m 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.	We have delivered over £27m benefits for our customers from innovation within RIIO-ED1 to date.
NZ3 <i>We will facilitate a neutral market for flexibility and embed whole systems thinking through our evolving Distribution System Operator role.</i>	NZ3.1 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.	We have published our first DFES in 2020, and will publish annually – using this to inform our RIIO-ED2 plan.
	NZ3.2 We will be a neutral facilitator of an open and accessible distribution flexibility services market. This will have efficient dispatch processes and infrastructure, transparent procurement, and will be underpinned by a comprehensive conflict management regime.	We have conducted 366MW and 38MVAR of flexibility tenders so far in RIIO-ED1.
	NZ3.3 We will share planning, operational, and market data with customers, stakeholders, and market participants through our systems and an online data portal. This will include visibility of our user friendly short & long-term forecasts.	We make a range of data available, such as via the LTDS and SWRR.

Ensure a safe and reliable electricity supply

Summarised commitment	Our commitment	Our RIIO-ED1 performance
<p>NZ4 <i>We will improve the safety of our network and business operations for our staff, customers, and communities through an ambitious programme of modernisation for assets in poor condition and increasing site security.</i></p>	<p>NZ4.1 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.</p>	<p>We will have removed over 6,000 end-of-life link boxes and over 2,000 end-of-life pillars by the end of RIIO-ED1.</p>
	<p>NZ4.2 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 routinely inspect our overhead line assets at 6-year intervals to identify any possible issues. In RIIO-ED1 we have reported resolution of over 106k overhead clearance issues.</p>
	<p>NZ4.3 We will improve fire safety at over 1,000 substations integrated in other buildings, through a prioritised, risk-based investment programme during RIIO-ED2.</p>	<p>We prioritise substation fire safety upgrades alongside site modernisation activities.</p>
	<p>NZ4.4 We will deploy smarter security measure 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 installed smart locks at around 30% of sites during RIIO-ED1 and will go even further on security measures in RIIO-ED2.</p>
	<p>NZ4.5 We will safeguard 70,000 residents of flats and tenements by proactively managing the risk associated with deterioration of Rising and Lateral LV Mains (regardless of ownership). We will do this through our risk-prioritised modernisation programme, which upgrades poor condition assets where they are identified.</p>	<p>We have modernised RLM for 15,000 customers every year and have invested over £70m during RIIO-ED1 so far.</p>
	<p>NZ4.6 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 ISO 55,001 and have certified 12 asset managers with IAM.</p>
<p>NZ5 <i>We will Invest in our network to increase its reliability such that customers will be 15% less likely to experience an interruption and the average duration reduced by 10%.</i></p>	<p>NZ5.1 We will continue to optimise the level of network risk and improve reliability, ensuring that on average, customers will be 15% less likely to experience an interruption, and the average duration should reduce by 10%.</p>	<p>We have achieved performance in excess of our RIIO-ED1 targets, and achieved X and Y for SPD and SPM< in excess of the target of 34 CML.</p>
	<p>NZ5.2 We will improve reliability for over 2,400 of our 'Worst Served Customers' by 25% through delivery of 45 dedicated network performance schemes.</p>	<p>We have identified and actively review our Worst served customers in RIIO-ED1.</p>
<p>NZ6 <i>We will increase the resilience of our network to withstand extreme weather events such as storms and floods.</i></p>	<p>NZ6.1 We will ensure that in an exceptional event, no customer should be affected for more than 36 hours.</p>	<p>We are working towards having 40% of our interconnected 11kV and 33kV OHL network built to storm resilient standards (ETR 132) by 2034.</p>
	<p>NZ6.2 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>

Provide timely and efficient connections

Summarised commitment	Our commitment	Our RIIO-ED1 performance
<p>NZ7 We will improve the connections quotation experience we provide our customers by offering 100% of customers a pre-quotation consultation and ensuring those customers who request 30 or more quotations a year or have a project exceeding £1m have a dedicated point of contact.</p>	<p>NZ7.1 We will offer 100% of customers a pre-quotation consultation (face to face or virtual).</p>	<p>This is a new commitment for RIIO-ED2.</p>
	<p>NZ7.2 We will nominate a point of contact to all customers requesting 30 or more quotations per year, or have a single project exceeding £1m in value.</p>	<p>This is a new commitment for RIIO-ED2.</p>
<p>NZ8 We will offer 80% of HV and EHV customers the choice of a firm and a flexible connection where a known constraint exists.</p>	<p>NZ8.1 We will offer 80% of HV and EHV customers the choice of a firm and a flexible connection where a known constraint exists.</p>	<p>Although we have a flexible connections policy in place now, these offerings are prevalent in our volumes of offers issues (<1%). This needs to be heightened in ED2 given expected increases in volumes. Aligns with Ofgem baseline standards.</p>
<p>NZ9 We will deliver an exemplary major connections service through the use of digital innovations to continuously improve our speed of quotation and delivery.</p>	<p>NZ9.1 We will meet the timescales our customers seek in relation to the provision of an offer, at least 90% of the time.</p>	<p>This is a new commitment for RIIO-ED2.</p>
	<p>NZ9.2 We will make capacity maps available from ED2 and will be updated every 3 months.</p>	<p>Currently static generation heat maps available.</p>
	<p>NZ9.3 We will improve delivery timescales by 2% year on year from the start of ED2.</p>	<p>This is a new commitment for RIIO-ED2.</p>

BE THE TRUSTED PARTNER FOR CUSTOMERS, COMMUNITIES AND STAKEHOLDERS

Deliver excellent satisfaction and enhanced services for all customers

Outcome	Our commitment	Our RIIO-ED1 performance
TP1 <i>We will deliver a proactive, tailored customer contact process through enhanced methods to ensure fast response times. We will always contact them in a language and channel of their choosing providing greater levels of information, and reliably delivering services.</i>	TP1.1 We will deliver customer satisfaction levels of 9.4 out of 10 across RIIO-ED2 for all areas in scope of BMCS.	We delivered 9.2 out of 10 in 19/20 - with the view of achieving 9.4 by the end of RIIO-ED1. In RIIO-ED2 we will receive increased volumes and so are committing to handle these and maintain performance at 9.4 out of 10.
	TP1.2 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.	No explicit satisfaction target existed in RIIO-ED1 for Major Connections customers - Major Connections customers were assessed via the ICE incentive which is an annual assessment process. This is being removed in RIIO-ED2 and a new framework implemented.
	TP1.3 When a customer contacts us regarding a non-urgent matter, we will respond on average within five minutes, providing the customer with key information.	In 19/20 our performance was 9.21 in SPD and 11.06 in SPM (due to storm Ciara). Abandoned calls were 0.71% in SPD and 0.83% in SPM.
	TP1.4 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.	This is a new commitment for RIIO-ED2.
	TP1.5 Complaints will be resolved within the following timescales: <ul style="list-style-type: none"> 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.	In 19/20 our performance was 9.21 in SPD and 11.06 in SPM (due to storm Ciara). Abandoned calls were 0.71% in SPD and 0.83% in SPM.
	TP1.6 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.	In 19/20 we achieved a performance of 100% in SPD and 99.72% in SPM this is covered under GS1 standards of Service.
	TP1.7 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).	This work is carried out currently with a range of delivery timescales. We did not make a commitment on timescales in RIIO-ED1.

Outcome	Our commitment	Our RIIO-ED1 performance
<p>TP2 <i>We recognise power outages as one of the highest customer priorities and will provide customers with improved support and response before, during and after either planned or unplanned occurrences with an enhanced approach for our most vulnerable and at-risk customers.</i></p>	<p>TP2.1 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.</p>	<p>This is a new commitment for RIIO-ED2.</p>
	<p>TP2.2 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>This is a new commitment for RIIO-ED2.</p>
	<p>TP2.3 During an unplanned loss of supply, at least 99% of updates provided will include the following information:</p> <ul style="list-style-type: none"> • Expected Restoration Times • Resources Attending (Name) • Reason for the outage • Location of the cause • Support available for vulnerable customers 	<p>Updates are provided to customers. We do not provide resource names currently, but all other information is provided.</p>
	<p>TP2.4 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.</p>	<p>99% of needs are currently met and although we currently do support customers in 8 ways during a power cut, in RIIO-ED2 we will have a more robust way of capturing and actioning on individual needs and reporting this to shape future service delivery.</p>
	<p>TP2.5 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.</p>	<p>In 19/20 our performance was 9.21 in SPD and 11.06 in SPM (due to storm Ciara). Abandoned calls were 0.71% in SPD and 0.83% in SPM.</p>
	<p>TP2.6 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. Customers will also be able to state at the point of registration if they would like to be contacted at all times of the day and night.</p>	<p>Whilst we proactively contact vulnerable customers in RIIO-ED1 we do not contact between 10pm and 8am unless explicitly requested to do so.</p>
	<p>TP2.7 We will proactively contact those customers who are in our highest risk groups via a personal phone call when they go off supply to give them additional comfort where they are Medically dependent on electricity or struggle with mental health.</p>	<p>Whilst we proactively contact via personal phone call customers who are Medically dependent or who have dementia in RIIO-ED1 we do not commit to a % contact for these customers in relation to personal calls.</p>
	<p>TP2.8 95% of Prioritised Customers (high Risk) will be spoken to face to face in advance of the planned power cut. Note - high risk relates to vulnerable & commercial customers.</p>	<p>We do not have a commitment on this in RIIO-ED1 however have this in as process. All customers who have an OHL outage delivered through our contractors are visited face to face - we target 100% for PSR and 70% for other customers - this does not cover SPEN own works.</p>

Outcome	Our commitment	Our RIIO-ED1 performance
	<p>TP2.9 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> <hr/> <p>TP2.10 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>There is a GS requirement to notify customers in writing at least 2 days before. Our current practice is to notify 10 working days in advance based on customer feedback and text the day before. Whilst this is our practice, we did not make a commitment to do this in RIIO-ED1.</p> <hr/> <p>We current perform around 70% in this area, but this was not a commitment in RIIO-ED1.</p>
<p>TP3 <i>We will help customers capitalise on the benefits of the energy transition by delivering advice services to 40,000 customers who register with us to help reduce costs, drive efficiency and access the benefits of low carbon technologies.</i></p>	<p>TP3.1 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.</p> <p>Services for any customer:</p> <ol style="list-style-type: none"> 1. Funding Advice Service 2. Energy Efficiency Advice 3. Energy Charges Support 4. Independent help for Tariff Support 5. Usage Portal <p>Additional Services available to Commercial Customers</p> <ol style="list-style-type: none"> 1. Energy Partner and Planning Service <p>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>This is a new commitment for RIIO-RIIO-ED2.</p>

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

Summarised commitment	Our commitment	Our RIIO-ED1 performance
<p>TP4</p> <p><i>We will re-define vulnerable and high-risk customers, and how we reach them, to better target and tailor the services we provide to these groups.</i></p>	<p>TP4.1</p> <p>We will register 80% of customers across every common needs code for PSR registration by 2028 based on nationally available data.</p>	<p>Currently we have over 1.06m households registered for PSR covering c.1.83m vulnerabilities. We measure our reach against each need code across our post code areas and currently this ranges from 5% to 87% across needs codes.</p>
	<p>TP4.2</p> <p>We will broaden our view of vulnerability, capturing needs broader than common utility codes, building these into our service offerings and coalition partnership model.</p>	<p>Whilst we have vulnerability mapping in RIIO-ED1 to identify fuel poverty and off gas grid we do not have a way of identifying if individual customers have other vulnerabilities such as being digitally excluded or low or no qualifications. We recognise through our engagement that additional support is important for these customers. This aspect is therefore NEW for RIIO-ED2.</p>
	<p>TP4.3</p> <p>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.</p>	<p>This is a new commitment for RIIO-ED2.</p>
	<p>TP4.4</p> <p>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.</p>	<p>In RIIO-ED1 we data share in a number of ways</p> <ol style="list-style-type: none"> 1. 2 way data flows with Suppliers 2. Data sharing agreements with some GDNS (2 of the 3 covering our area). GDNs do not have a licence obligation to hold a PSR and so do not want auto sharing from us but will ask for sharing in an incident. SPEN received sharing from GDNS and add to our register 3. Water data sharing - Not currently shared with Scottish Water as they are regulated separately and cannot take our data, but they will pass us information. We have a two-way arrangement with Severn Trent and share data with them 4. We also share customer data with consent with individual partners to deliver support services.
	<p>TP4.5</p> <p>We will contact 100% of all our vulnerable customers every 2 years, achieving a minimum 60% fully validated data.</p>	<p>We currently contact 100% of our vulnerable customers every 2 years.</p>
	<p>TP4.6</p> <p>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 service benchmark.</p>	<p>We benchmarked 1st against all UK service sectors in the ICS Customer Service Index, achieved the BSI CS kitemark and vulnerability standard and was a top 3DNO in the BMCS ranking each year in RIIO-ED1.</p>

Summarised commitment	Our commitment	Our RIIO-ED1 performance
<p>TP5 <i>We will deliver comprehensive support to our customers most in need throughout the energy transition in close partnership with social landlords, local authorities, and technology companies.</i></p>	<p>TP5.1 We will deliver direct support services to 272,000 vulnerable and disadvantaged customers.</p>	<p>We provided Fuel Poverty support to 1,100 customers per year of a £420,000 value.</p>
	<p>TP5.2 We will use data 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.</p>	<p>This is a new commitment for RIIO-ED2.</p>
<p>TP6 <i>We will ensure a stronger voice for our customers, stakeholders and communities throughout ED2 by continually listening and acting upon the views and needs through an increased range of methods and tools that are internationally recognised as best practice to drive impactful and inclusive engagement.</i></p>	<p>TP6.1 Through our robust stakeholder engagement strategy, 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 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>TP6.2 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 cover all stakeholder and customer groups.</p>	<p>This is a new commitment for RIIO-ED2.</p>
	<p>TP6.3 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%.</p>	<p>We currently have a stakeholder online community and are researching a better digital solution that will encourage greater active participation and drive more engagement through new platforms.</p>
	<p>TP6.4 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.</p>	<p>We have embedded our Strategic Stakeholder Panels into our annual engagement activity. Our panels currently meet three times per year - comprised of 10-15 stakeholders across SPM and SPD. In RIIO-ED2, we want to take this event further - holding panel events which directly align to and inform our strategic priorities. This demonstrates our commitment to continuing strategic level engagement with our stakeholders in light of the SECV incentive being removed in RIIO-ED2.</p>
	<p>TP6.5 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>	<p>We generated >£2 worth of SROI value across all projects assessed over a 5-year period.</p>

Work with our communities to facilitate the energy system transition

Summarised commitment	Our commitment	Our RIIO-ED1 performance
<p>TP7 <i>We will help our customers and local communities understand the energy landscape, and the facts and opportunities of the energy transition through a tailored awareness campaign.</i></p>	<p>TP7.1 We will deliver community energy campaigns similar to those we already do for our health and safety messaging at scale to raise awareness of the changes coming to the energy sector and how individuals and their communities can participate in local energy schemes.</p> <p>TP7.2 We will work alongside local delivery partners to deliver community energy outreach events such as Community Energy Futures that go beyond high-level discussions into the step-by-step aspects of how to develop a locally tailored community energy scheme. We will review methods and success of our engagement, including who/how best to deliver information, throughout ED2 and remain flexible and innovative in approach.</p>	<p>We commissioned online publication of independent WPI report 'Future of Community Energy' (published Jan 2021). Highlight opportunities (and current barriers) for local community energy schemes at scale. SPD and SPM CE focussed Strategic Stakeholder Panels in 2019. Funding Community Energy Scotland to deliver Community Energy Futures education outreach pilot projects via Green Economy Fund.</p>
<p>TP8 <i>We will support our communities develop their community energy ambitions through strategic planning and partnership working and the provision of technical advice, optioneering and sign-posting.</i></p>	<p>TP8.1 We will provide a dedicated team of technical specialists that will partner with Local Authorities and regional Governments to support the development and implementation of Low Carbon Technology roll-out.</p> <p>We will engage with 100% of local authorities and regional Government bodies to support the optimisation of network planning, design and implementation of public EV charging and heat electrification initiatives. We will publish an annual report on our work across these areas, identifying cost savings and benefits for customers.</p> <p>TP8.2 Where Local Authorities have been unsuccessful in finding an EV chargepoint provider to serve areas within their transport plan, we will work with them to assist in their EV chargepoint rollout by taking ownership of the EV charging infrastructure for a limited period (until an alternative suitable provider can be identified).</p> <p>We will respond to 100% of requests by Local Authorities to take on this role with the aim of becoming the last resort provider where this is feasible and approved by Ofgem.</p> <p>TP8.3 Alongside our ED2 business plan we will develop a stakeholder-led community energy strategy with not-for-profit, sister organisations Community Energy Scotland, Community Energy England and Community Energy Wales.</p> <p>TP8.4 Our strategy will set our approach to leveraging the resources we have across our business to partner with and support individuals and their local community groups toward more a more efficient and low carbon energy system. It will be reviewed every year to make sure we are learning as we go and adjusting to any changes in the external environment.</p>	<p>Under PACE, we have delivered connections savings of between £1.3m-£2.6m across 2 LA areas. Chargers have been installed quicker than they otherwise would have been (Scottish Government says the 2 LAs have gone from being lagging in infrastructure provision to leading as the number of chargers increased by 200%).</p> <p>We have commenced a strategic heat partnership with Scottish Government to understand scope of potential role in this area. We worked closely with Liverpool Combined Authority to optimise authority connection decisions.</p> <p>This is something we have been allowed to do since January 2021, but the regulatory mechanisms are not yet fully thought through to set out how this would work in practice; we want to propose an efficient solution to Ofgem.</p> <p>SPD and SPM Strategic panel events in 2019 focussing on CE. Bringing in staff to work for from CE sector. CES employee in ED2 Customer Engagement Group. Rachel Shorney - Community Stakeholder Manager in post.</p>

Summarised commitment	Our commitment	Our RIIO-ED1 performance
	<p>TP8.5 Through this strategy we will internally embed the role for domestic and community level low carbon technology solutions in our investment and planning decisions as well as our RIIO-ED2 delivery activities. For example - using digital tools to support our community groups to contribute to our annual distribution future energy scenarios data so we can more accurately plan for community energy over ED2 and beyond.</p> <p>TP8.6 We will also link in with wider area activities such as local energy planning initiative that we will have sight of, given our central role in the energy system.</p> <p>TP8.7 We will seek to offer extra hand-holding support to individuals and their local communities who wish to explore low carbon technology activities and community energy schemes in their local area.</p> <p>TP8.8 We will provide early technical advice and optioneering services, and sign-posting to impartial support organisations.</p> <p>TP8.9 We will ring-fence ~25% of our proposed Distribution Net Zero fund for community energy projects. Community groups will still be able to access other categories of the fund.</p>	<p>We currently provide community Stakeholder posts in district teams, ad hoc support from design engineers and connections teams. 'Self-service' resource information available on Zero Carbon Communities (ZCC) Hub. ZCC offers sign-posting to support organisation and funding around GB.</p> <p>Community groups have been able to access our SPT Green Economy Fund.</p>
<p>TP9 <i>We will create a £30m Distribution Net Zero Fund to facilitate low-carbon projects, aligned to Scotland, Wales and the UK's Net Zero aims, whilst supporting our cities, towns and local communities' ambitions.</i></p>	<p>TP9.1 For RIIO- ED2, we will look to create a £30m Distribution Net Zero Fund which will facilitate low-carbon projects within our licence areas. This fund will support projects across three of the UK's largest cities (Liverpool, Glasgow and Edinburgh) as well as three significant rural areas (North Wales, Scottish Borders and Dumfries & Galloway). The fund will leverage the learning of and build upon the success of the SP Transmission Green Economy Fund which has a proven track record for delivering demonstrable environmental, economic and societal benefits.</p>	<p>There was no fund in RIIO-ED1.</p>

READY OUR BUSINESS FOR A DIGITAL AND SUSTAINABLE FUTURE

Support an environmentally sustainable network

Outcome	Our commitment	Our RIIO-ED1 performance
DS1 <i>We will decarbonise our network, its assets and our business operations such that we achieve Net Zero Carbon by 2040, achieving 80% of our target by 2030.</i>	DS1.1 We will further enhance environmental sustainability standards and performance metrics in our contracts and will collaborate with our supply chain to target more than 80% of RIIO-ED2 suppliers (by value) meeting these standards.	Working with our suppliers and contractors throughout RIIO-ED1 has resulted in many solutions being piloted, such as the trial of the reuse of plastic buckets for jointing resin. This project has the potential to save over £29,000 each year from mixed recycling costs and save up to 220 tonnes of carbon dioxide equivalent (tCO ₂ e).
	DS1.2 We will deliver efficient and economic actions to reduce our Scope 1 & 2 business carbon footprint by 37.8% from a 2018/19 baseline, in line with a verified Science-Based Target.	Since 2013/14, the year of our baseline measurements, SPD and SPM have jointly achieved a 55% reduction in Scope 1 and 2, excluding losses. The carbon impact from distribution operational transport has decreased by 10% and related fuel use has reduced by 11% since the start of RIIO-ED1. The move to the green tariff has reduced our recorded emissions from buildings energy use in SPD from 6,067 tCO ₂ e in 2018/19 to 3,034 tCO ₂ e in 2019/20. In SPM it was reduced from 4,923 tCO ₂ e in 2018/19 to 2,199 tCO ₂ e in 2019/20.
	DS1.3 We will set a voluntary Scope 3 Science-Based Target by final RIIO-ED2 submission, to deliver efficient and economic actions to reduce our business carbon footprint during RIIO-ED2. (Proposed CVP).	SPM and SPD business travel carbon footprint combined has steadily decreased by 40% throughout RIIO-ED1 – from 2,417 tCO ₂ e in 2015/16 to 1,724 tCO ₂ e in 2019/20. Over the course of RIIO-ED1 we have increased the number of contractors providing us with their emissions data from seven in 2015/16 to 26 in 2019/20.
	DS1.4 We will minimise our business carbon footprint and achieve Net Zero Carbon by 2040.	Since 2013/14, the year of our baseline measurements, SPD and SPM have jointly achieved a 55% reduction in Scope 1 and 2, excluding losses.

<p>DS2 <i>We will reduce our impact on the natural environment and promote biodiversity across our licence areas through enhanced plans, standards and systems within our business and our supply chain.</i></p>	<p>DS2.1 We will target zero environmental regulatory interventions and notifiable breaches.</p> <hr/> <p>DS2.2 We will implement a Biodiversity & Natural Capital Action Plan process to guide local operation implementation with the aim of increasing environmental value across our network.</p>	<p>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. We are on a trajectory towards our goal of zero regulatory interventions and zero notifiable environmental breaches.</p> <hr/> <p>During ED1 we followed a 'Mitigation Hierarchy' approach. This led to project and location-specific mitigations where required, developed in collaboration with local wildlife and river trusts, and environmental regulators/agencies. These mitigations included Habitat Improvement Schemes designed to create and enhance connecting habitats for threatened invertebrates, vole and otters.</p>
	<p>DS2.3 We will divert 100% of our waste from landfill by 2030, excluding compliance waste.</p> <hr/> <p>DS2.4 We will remove 35km of overhead lines in Areas of Outstanding Natural Beauty National Parks, and National scenic areas.</p>	<p>During RIIO-ED1 we diverted on average 87% of our operational waste from landfill. We are on track to meet our 2023 target of 95%.</p> <hr/> <p>Lines removed to restore visual amenity in National Parks, Areas of outstanding natural beauty and National scenic areas.</p>
<p>DS3 <i>We will place sustainability in its broadest sense at the heart of everything we do, to deliver social and economic returns and a just transition.</i></p>	<p>DS3.1 We will embed environmental sustainability considerations in our business processes whilst maintaining and continually improving our ISO14001 certified Environmental Management System, with the aim of achieving 'beyond compliance' environmental performance and our sustainability goals.</p> <hr/> <p>DS3.2 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 improved our data collection, reporting and accuracy.</p> <hr/> <p>We have improved our data collection, reporting and accuracy.</p>

Promote an inclusive, skilled and community based workforce

Outcome	Our commitment	Our RIIO-ED1 performance
<p>DS4</p> <p><i>We will grow our own talent from the communities we serve through a blended approach of inclusive workforce renewal, up-skilling and direct recruitment, recognising the scale and timing of the increase in workforce and new skills.</i></p>	<p>DS4.1</p> <p>90% of our workforce renewal for our craft roles and 50% of our engineering and technical roles will come from our trainee programmes.</p>	<p>95% of our craft roles and 75% of our core engineering and technical roles were filled through our trainee pipeline.</p>
	<p>DS4.2</p> <p>We will work with our skills and academic partners on their range and content of training programmes to enable place-based recruitment of our trainees.</p>	<p>This is a new Commitment for RIIO-ED2.</p>
	<p>DS4.3</p> <p>We will employ Just Transition Principles through a range of pre-employment and social programmes to support disadvantaged groups into the employment pipeline.</p>	<p>We have undertaken a full review of our craft programmes, incorporating new training in data and digital skills whilst maintaining multi-skilling during the final stages of training.</p>
<p>DS5</p> <p><i>We will build a truly healthy, diverse and inclusive workforce through our recruitment, training and staff support programmes.</i></p>	<p>DS5.1</p> <p>We will continue our relentless drive to achieve a truly inclusive and diverse workforce through our recruitment processes and by supporting our people leaders:</p> <ul style="list-style-type: none"> • By the start of ED2 all programme and high-volume recruiting managers will complete the Inclusive Recruitment Workshops programme, all remaining managers will complete during the period of ED2 • We will apply inclusive recruitment practices to all our trainee programmes transparently auditing and reporting on applicants by 2024 and cascade practices to all internal and external vacancies by 2026 • All senior and high potential leaders will complete Inclusive Leadership Training by 2024, with this becoming the standard for all our people leaders during ED2 • By 2025, all our people leaders will have completed D&I Legal training • We will simplify and enhance our family friendly policies in line with our commitment to be an inclusive employer by 2025 • By 2024 we will review and develop a plan to update all our training materials and workforce manuals with gender neutral language and ensure accessible for all during the period of ED2. 	<p>We have developed our Policy on Diversity and Inclusion and our Strategy to embed a more inclusive culture. We launched Inclusion at Scottish Power – a dedicated section of our careers site detailing our commitment to building an inclusive culture, employee-led networks, maternity coaching and introduced our first Trans Policy. We introduced mandatory unconscious bias training for all our recruiting managers and external auditing of our selection process.</p>
	<p>DS5.2</p> <p>Through engagement with our workforce, we will continue our long-standing commitment to safeguarding the physical and mental health and wellbeing of our people:</p> <ul style="list-style-type: none"> • We will engage with staff and implement actions plans from their feedback through our LOOP survey every two years and on specific topics through our PULSE surveys. • More than 95% of the actions from our Annual occupational health and hygiene improvement plans will be delivered • We will increase the number of our mental health first aiders to match the 1:25 standard established for First Aiders by year two of RIIO-ED2. 	<p>During RIIO-ED1 we delivered our Occupational Health plan and implemented an online Occupational Health Management process, developing a formal auditing strategy, occupational hygiene assessment and biomechanical monitoring.</p> <p>We have established pulse surveys to gather data from a cross section of our workforce on topical issues or emerging challenges allowing us to develop a risk management process to assess and manage the risk of fatigue for our workforce.</p> <p>We have established a mental health and well-being steering group and trained 2% of our volunteer staff as mental health first aid.</p>

<p>DS6</p> <p><i>We will ensure our current and future workforce benefits from new and enhanced capabilities, to provide them with the necessary skills for the future.</i></p>	<p>DS6.1</p> <p>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:</p> <ul style="list-style-type: none"> • Personal leadership development plans for our future leaders. • Maintain our current skills through established training and refresher programmes • Annual internal trainee programmes in Technical Craft and Engineering to provide a route for staff progression • Digital upskilling across our workforce in-line with digital advancements during the period of RIIO-ED2 • As part of the specification and design of any new system we will integrate training to ensure the successful upskilling of staff and adoption and utilisation of the system • Environmental and sustainability upskilling across our workforce to embed sustainability into our day to day activities. 	<p>We have recruited our first cyber security graduate apprentices and data science graduates.</p> <p>We have successfully recruited 457 trainees into our range of workforce renewal programmes.</p>
	<p>DS6.2</p> <p>We will embed a digital and sustainable culture within our workforce:</p> <ul style="list-style-type: none"> • Deliver a digital cultural change programme during the period of RIIO-ED2 ensuring our people recognise the importance of data and digital skills • Support our people in this transition by equipping them with the right digital skills • Expand our graduate programme and recruitment policies to focus on digital talent • Use digital technology such as knowledge-based AI assistants for our people • Embed sustainability within our day to day business activities • Embed environmental responsibilities within line management roles and responsibilities • Ensure our sustainability culture is led by senior management. 	<p>This is a new commitment for RIIO-ED2.</p>

Embed digitalisation and utilise data to unlock benefits for customers and stakeholders

Outcome	Our commitment	Our RIIO-ED1 performance
<p>DS7</p> <p><i>We will transform our customers' experience, increasing access for market participants and delivering our plan efficiently through an ambitious programme of digital initiatives.</i></p>	<p>DS7.1</p> <p>We will create a new Digital environment to underpin our future plans and strategies. We will build a Digital representation of our energy system and operation which will enable the following:</p> <ul style="list-style-type: none"> • Forecast and model the uptake of low carbon technologies • Understand the impact of distributed energy resources • Develop solutions to operate a flexible low voltage network • Create a collaborative environment to facilitate whole system considerations and the sharing of data and information • Deliver customer focused solutions that meet the needs of our entire customer base • Undertake our operations as efficiently and effectively as possible <p>We will utilise technology to drive these initiatives, such as Machine Learning, AI, VR/AR, Robotic Process Automation, Drones, edge computing, new communication channels, cloud technology, and improved Data analytics.</p> <p>We will track, measure and publish our progress via the DSAP, at 6-month intervals, and provide a full refresh every 2 years.</p>	<p>We published our Digitalisation strategy in Dec 2019 and a subsequent addendum in Dec 2020. This has underpinned our plans for RIIO-ED2.</p>
<p>DS8</p> <p><i>We will fully harness data as an asset, to improve our decision making, operations, customer services, whole system solutions and innovative ways of working.</i></p>	<p>DS8.1</p> <p>We will create a data strategy which enables us to manage an increased volume, velocity and breadth of data, supports the move towards active management of the LV Network, facilitates the creation and operation of new models and markets, drives maximum value from the data we master in combination with new external datasets, and enables a collaborative approach to energy data sharing with external parties.</p> <p>In order to achieve this we will look at new technology to capture and analyse the data, this will include IoT, edge computing, mobility solutions, machine learning, AI, big data platforms and data analytic tools. We will collaborate with Ofgem, the ENA and other external organisations through the sharing and exchange of data, proactively evolving our data strategy in line with the requirements of external stakeholders.</p>	<p>We have launched the Data Landing Page.</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 on a Strategy for a Modern Digitalised Energy System.</p>
<p>DS9</p> <p><i>We will protect the security of our customers and operations by meeting best practice cyber security standards for businesses and critical national infrastructure.</i></p>	<p>DS9.1</p> <p>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. We will coordinate our IT and OT related cyber-security activities to ensure robust protection of our electrical networks.</p>	<p>The methodology and frameworks on which our plan will be based has been agreed.</p>