Stakeholder Justification Paper – Data	
Output/Commitment Title	
We will safeguard our data against cyber threats and only make it accessible, when safe to do so.	
Detail	Constantly review our network and physical security so any changes we put in place reflect immediate risks. Allow easy access to our data on request from appropriate partners through an open data portal. Also, create a virtual model of our network to help the UK make the best decisions to reach net zero.
Targets (more stretching than GD2?)	Work undertaken in GD2, to build core systems and teams, is to build a foundation for transformational work during GD3.
Strategy Document/ Business Plan Section	Digitalisation Strategy and Action Plan – BP: Supporting net zero – BP: Cyber resilience & physical security – BP: I.T. & telecoms strategy
Cost & Bill Impact	
Proposed Funding	Base TOTEX for core systems and Team (roll over from GD2), NIA UM to develop digital twin, automation of RRP and interfaces to national digital sharing infrastructure.
Benefits & risks	
Summary of benefits	Summary: Reduced costs to support the UK's transition to net zero and enabling tailored support for consumers in vulnerable situations. Direct financial benefits: This investment is more to respond to stakeholder needs, particularly around supporting net zero decisions. There may be some benefits in terms of reduced time to populate RRP which is currently 3 months work for 10 people full time and many others part time. Difficult to quantify until solution is developed Societal benefits: This work is a key enabler to support the decarbonisation of the gas network, by supporting work like Local Area Energy Plans (LAEPs), which will result in lower carbon emissions. Additionally, this will allow for easier access to customers data, particularly those in vulnerable situations, by maximising use of the Priority Service Register (PSR), resulting in better targeted support during our works.
Summary of risks	There are risks with sharing data including security of our network and exposing personal data. These will be mitigated through robust data triage risk assessments and robust cyber security plans. The risk of not delivering this is higher consumer costs and time delays for the UK to reach net zero by uninformed decisions. It would also hinder our ability to support the vulnerable and general consumers through the net zero transition
Stakeholder voice - Golden thread	
Engagement method (what and who)	**Methods:** Online Stakeholder Workshops, Feedback Panels, Online Voting Platform, Facilitated Group Discussions, Surveys and Recollective Feedback, Research and Consultations. **Stakeholders:** Many stakeholders have been engaged on topics related to data and digitalisation. These include Local Authority Representatives, Regulators & Government Bodies, Industry Experts (including professionals from various sectors such as energy, technology, and environmental services), Utility Companies, Academic Institutions (including researchers and academic experts specialising in energy, sustainability, and innovation), Non-Governmental Organisations (NGOs) (including environmental and community-focused organisations providing input on sustainability and social impact), Community

	Groups, Customers (including residential and commercial customers providing feedback on service expectations and financial concerns), Technology Developers (including companies and startups involved in developing innovative technologies for energy efficiency and emission reductions), Automotive Companies, Fuel Suppliers, Policy Makers, Sustainability Consultants, and Critical Friends Panel Members.
Stakeholder Views (what they said, regional differences and how we responded)	**Opinions and Views:** Stakeholders see data and digitalisation as fundamental to advancing environmental sustainability and addressing energy transition challenges. They emphasise the importance of accurate data collection to identify and support vulnerable customers on the PSR, using data analytics to understand customer needs and presenting information in accessible formats. Transparency, accessibility, and timeliness in data provision are crucial, with support for open data and clear reporting using visual infographics. Protecting personal data and ensuring controlled access to sensitive information are key concerns, alongside the need for robust cybersecurity measures. Collaboration among utilities, government bodies, and third-sector organisations is vital, with training for staff on data-driven interventions. As WWU transitions to hydrogen, securing data on hydrogen readiness and supporting vulnerable customers is crucial. Specific initiatives include supporting biodiversity, reducing carbon emissions, and ensuring data security and privacy, with public education and adaptive planning encouraged to address environmental challenges. **Associated Facts:** RRP must be automated during GD3. WWU have to build an interface connecting to a national digital sharing infrastructure that NESO are building under the instruction of the UK government and Ofgem. Additionally, WWU have to build a digital twin of the network to support NESO's national digital twin; this will be done under the NIA UM during GD3. We are also bound to deliver against a number of principles set out in an Ofgem licence condition: 1. Identify the roles of stakeholders of Data Assets. 2. Use common terms within Data Assets, Metadata and supporting information. 3. Describe data accurately using industry standard Metadata. 4. Enable potential Data Users to understand Data Assets by providing supporting information. 5. Make Data Assets discoverable for potential Data Users. 6. Learn and deliver to the needs of current and prospective Data Users. 7. Ensure data quality maintenance and improvement is prioritised by Data User needs. 8. Ensure Data Assets are interoperable with Data Assets from other data and digital services. 9. Protect Data Assets and systems in accordance with Security, Privacy and Resilience (SPaR) best practice. 10. Store, archive and provide access to Data Assets in ways that ensure sustained benefits. 11. Treat all Data Assets, their associated Metadata and Software Scripts used to process Data Assets as Presumed Open.

| | Conflicts: Stakeholders have conflicting opinions on data access, cybersecurity, and data protection. Our Critical Friends Panel and Energy Industry representatives have fed back that they expect WWU to provide transparent and accessible data but are concerned about security risks and potential misuse. Consumers also seek more information on how cyber-attacks could impact gas distribution networks, highlighting a general low awareness of specific cyber threats. Additionally, there are differing views on data interoperability and security, with some advocating for cautious data-sharing practices. These conflicting views highlight the balance WWU must strike between transparency, cybersecurity, cost management, and stakeholder concerns.

Regional Differences: Given the regional differences between local authorities throughout WWU's network, there will be a need for specific, place-based data and digitalisation solutions throughout the development and implementation of LAEPs in order to meet Local Authorities' expectations.

Options Considered: During GD2, WWU shared data through manual processes, limiting the data put out openly. However, feedback across the board is that it's not good enough. Given the feedback above and the stringent requirements from Ofgem, our only option is to consider a transformational ambition for GD3, to evolve the way the business utilises data.

How We Responded: WWU will develop risk assessments, a triage process, and good governance in order to build infrastructure and capability to share data in line with the expectations of our customers and stakeholders as outlined above. We engaged with 1,401 stakeholders, including domestic and business consumers and future bill payers, to consider their acceptability of this commitment. The findings revealed that 94% of domestic consumers and 93% of business consumers accepted this commitment. |
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| **Performance** | |
| GD2 Performance, Benchmarking/ Industry comparison | In GD2 we have been putting in place the building blocks to enable our GD3 plans to be realised. We have invested in significant IT projects to overhaul our major systems and make data digital and easily accessible to those who would benefit from it. We have also formed a new data and analytics department for GD2. This brings together analysts and data experts from around our business with the aim of understanding both internal and external stakeholders' data and analysis needs, and ensuring these needs are supported. We are expanding this team in 2024.
 Since publication of our last strategy we have
 • Gone live with a new website with access to key datasets and a route for external data users to engage

 • Created a LAEP team to support Local Authorities with their data needs and the use of our Pathfinder tool for scenario planning

 • Created a central team to provide a holistic approach to data, reporting and MI, data science and processing data requests

 • Produced and published a data asset log – a log of data assets with owners and controllers

 • Introduced a data triage process

 • Risk assessed key data assets to determine level of data openness |

| | • Assessed millions of data items to provide insight into data quality and feed our data improvement programme

• Built and launched a number of applications through our on-line mapping system to collect better data from the field to further improve asset health assessments and to inform the work on hydrogen conversion

• Centralised a data request tracker to aid our understanding of stakeholder needs

• Introduced improved governance through a Business / IT data & digitalisation steering group

In the remainder of GD2 we will

- Expand our data team further to create a dedicated data governance function. Also including 2 graduates to future proof our team
- Introduce a data lake to create a single data repository to make data better accessible and useable
- Build an open data platform to give easier access to data users external to WWU. This will also enable to gather their stakeholder feedback
- Purchase an analytics platform to expand our data science capability, benefiting internal and external data user with further insight to help improve decision making

All the above will serve us well in GD3 by giving us a robust platform to

- build a digital twin of our network in support of the national digital twin,
- create an interface between our data infrastructure and the UK Data Sharing Infrastructure (DSI)
- develop the above ground assets of the future, employing sensors, data recorders and communication systems to better understand condition and performance, optimising investment and maintenance costs
- explore opportunities to use AI, large language models and machine learning to drive efficiency and support our consumers and the most vulnerable
- – use satellite imagery and movement sensors to improve protection of our assets from third party damage
- invest in methane detection technology and analytics to revolutionise the way we deliver reductions in our business carbon footprint

In summary, GD3 will build on the foundation put in place in GD2 to enable us to deliver for our digital stakeholders and support the net zero transition |

Deliverability & Whole Systems Impact	
Deliverability & viability implications	This is not an area in which we have significant experience within WWU. It is also an area with requirements constantly evolving. We recognise this and have brought in experts from CGI to support us on the journey. They have provided acting data digitalisation and data governance managers in the short term to develop job descriptions and future plans for these roles. As they do this, they are helping us recruit these key roles with an aim of a seamless handover from consultant supporting to business as usual. In addition, we have commissioned them to carry out a data maturity assessment. The outcomes will be a future roadmap to take us from current state to desired position and will also recommend the operational structure we need to best support us in achieving our ambitions in this area. In GD2 we applied for a re-opener to ensure we have financial resources to build an appropriate team and implement systems to support our GD3 plans. Delivery of this is governed by a Digitalisation Committee. There is risk in GD3 due to uncertainty in requirements from significant stakeholders such as NESO, DESNZ and Ofgem. We know high level ambition, but detailed requirements are to be developed. We are mitigating this risk by involvement in industry groups involving all gas and electricity networks, Ofgem, DESNZ and also engaging heavily with NESO to influence and develop the requirements. We are adding 2 members to our net zero engagement team in GD3 to support this.

Triangulation scorecard

Our engagement scoring methodology leverages the information from the HM Treasury's Magenta Book, Quality in Qualitative Evaluation framework and various weighing methodologies used by networks to assess how much impact each piece of evidence should have on their decision-making process.

Each piece of evidence is given a score between 0-2 against a scoring criteria including *Relevance to topic, Level of stakeholder knowledge, Quality of engagement, Rigour of feedback collection* and *Credibility of analysis and interpretation*.

The table below outlines how the evidence used to produce this document scored against each criteria and its overall score. An average and modal score is then provided, which is associated to a grading system that demonstrates the feedback robustness and quality.

	Score					Final Score
Document Name	Relevance to Topic	Level of Stakeholder Knowledge	Quality of Engagement	Rigour of Feedback Collection	Credibility of Analysis and Interpretation	
11920 CR Plus SWIC Cluster Report	0	2	2	2	2	8
20231206 WWU Customer Journey Improvements v1	0	2	2	2	2	8
3564 WWU Customer Business Priorities FV2	1	2	2	2	2	9

3636 WWU Customer Priorities Report_Debrief_v3	1	2	2	2	2	9
CCC - Reducing emissions in Wales	0	2	2	2	2	8
Ceredigion LAEP Draft A	0	2	2	2	2	8
Compact Hybrids - Customer Research - Final	0	2	2	2	2	8
consultation-just-transition-framework	1	2	2	2	2	9
ENA External Stakeholders Insight Report v1.1	1	2	2	2	2	9
Energy Networks Innovation Strategy 2022	2	2	2	2	2	10
Final version WWU - Critical Friends Panel - Feb 2023 - Feedback Report	0	2	2	2	2	8
LCT Tracker results for WWU FV	0	2	2	2	2	8
Neath Port Talbot LAEP Technical Annex - Client V1	0	2	2	2	2	8
Powys LAEP Draft A	0	2	2	2	2	8
Safeguarding the switch to domestic hydrogen WWU Report 1.0	1	2	2	2	2	9
Stakeholder workshop - Actions Responsibilities P2 - PRESENTATION PACK - CCR_bilingual	0	2	2	2	2	8
Stakeholder Workshop - Baseline and setting p_Lewis Garvey	0	2	2	2	2	8
Swansea LAEP Technical Annex - V2 - Client Copy1 - WWU Feedback	0	2	2	2	2	8
Technical Report Cardiff DRAFT 2024_05_24	0	2	2	2	2	8

Technical_Report_Vale of Glamorgan_2024_05_24	0	2	2	2	2	8
VCMA Year 1 Showcase Stakeholder Workshop - Feedback Report	1	2	2	2	2	9
WGP Hydrogen Strategy v2.0 (Summary and Technical Reports) FINAL	0	2	2	2	2	8
Workshop - Actions Responsibilities P2 - PRESENTATION PACK - NW_shared	0	2	2	2	2	8
Workshop 7 Summary - Working with the regulator and Government	2	0	2	2	2	8
WWU - Critical Friends Panel - Feb 2024 - Feedback Report v5	2	2	2	2	2	10
WWU Biodiversity Stakeholder Workshop Feedback Report	0	2	2	2	2	8
WWU Business Panel_full report with appendix	0	2	2	2	2	8
WWU Citizen Panel Full Report_V1	1	2	2	2	2	9
WWU Citizens Panel report Decarbonisation of home heat March 2022 FINAL	0	2	2	2	2	8
WWU Customer Satisfaction_full report	0	2	2	2	2	8
WWU GD3 Business Planning Workshop Feedback Report	1	2	2	2	2	9
WWU LAEP Stakeholder Workshop Feedback Report	1	2	2	2	2	9
WWU qual priorities report FINAL	1	2	2	2	2	9
WWU Safety Stakeholder Workshop Feedback Report	0	2	2	2	2	8

WWU Sustainability Strategy Workshop - Feedback Report	0	2	2	2	2	8
WWU Vulnerability Panel Report_V3_060923	0	2	2	2	2	8
WWU_Improving the CEX research programme_Stage 1_Report of findings_17.01.23	0	2	2	2	2	8
Average Score of Sources						8.38
Mode						8

Score	Grade	Description
0-3	Poor	Feedback should not be used for triangulation as it does not meet the minimum quality standards.
4-6	Average	Feedback could be used for triangulation but possible lacks robustness.
7-8	Good	Feedback meets the standards necessary for credible triangulation.
9-10	Excellent	Feedback meets the best standards of rigour and quality.