

Stakeholder Justification Paper – Interruptions	
Output/Commitment Title	
Minimise both the number of and length of time gas goes off for consumers.	
Detail	When we plan to turn the gas off to consumers, we will let them know in advance and keep the average time when the gas is off to below 4.5 hours. When consumers' gas goes off unexpectedly, we will keep the average length of time the gas is off to under 10 hours for non-MOB's and 500 hours for MOB's.
Targets (more stretching than GD2?)	RIIO-GD2 target is less than 13 hours for MOB's and non-MOB's combined. RIIO-GD3 targets proposed by WWU less than 10 hours for non-MOB's and less than 500 hours for MOB's.
Strategy Document/ Business Plan Section	BP Protecting our customers and communities
Cost & Bill Impact	
Proposed Funding	Base allowances for cost of operational teams and back-office support ODI-F penalty only for exceeding targets
Benefits & risks	
Summary of benefits	<p>Less disruption to customers during planned work and gas emergencies. Focussing operations and office on getting customers back on gas in all situations.</p> <p>Direct financial benefits: Avoiding penalty under ODI-F. Reduce GS1 payments to customers for every 24-hour period off gas.</p> <p>Societal benefits: Keeping customers safe and warm in their homes. Not making worse any customers with serious health conditions, they are looked after and not drawing on NHS services.</p> <p>By separating MOB's and non-MOB's for all GDN's makes comparison for the non-MOB performance much easier but MOB numbers and type vary in each network and less comparable.</p>
Summary of risks	<p>Consumers could be left without access to heating and cooking facilities for longer.</p> <p>Listed building MOB's require planning permission to install replacement risers which can take up to 4 months to agree with the local authority and get authorisation for the works therefore a small number of listed buildings drive up the average duration of interruptions from around 30 hours to 100's of hours. This is why we are proposing 500 hours in WWU network. We are still committed to looking after customers, compensating them through protracted interruptions.</p>
Stakeholder voice - Golden thread	
Engagement method (what and who)	<p>Method: The majority of the feedback we have gained from stakeholders and customers has been gained from annual priorities research, consisting of surveys, group and individual interviews; however, some evidence has been gained from wider topics around gas interruptions, emergency response times and procedures through workshops, panels, wider research and consultations on Local Area Energy Plans (LAEPs).</p> <p>Stakeholders: We continually engage with a range of stakeholders to manage and meet expectations in relation to our gas supply interruptions, emergency procedures and response times. These stakeholders include charities, vulnerability service providers, fuel poverty charities, local authority representatives, local authority elected members, local authority officers (e.g., climate change teams), emergency services, business groups, business representatives, business owners, utilities, other energy companies, national agencies, and community councils.</p>

Stakeholder Views (what they said, regional differences and how we responded)

Opinions, views: Domestic Customers: highlighted the importance of clear communication regarding planned and unplanned interruptions, including the circumstances and duration of each. They expect real-time updates and estimated response times during emergencies, as well as prompt communication and reassurance from engineers. Customers appreciate receiving information several days in advance for planned interruptions and continuous updates throughout the process. During emergencies, customers expect safety advice, such as ventilating premises, and personal interaction, including engineers knocking on doors to inform residents when the situation is resolved. Some customers felt that the target of limiting unplanned interruptions to an average of 10 hours was too high, especially for vulnerable individuals, and suggested a maximum period without service would be more appropriate.

Business customers prioritise quick completion of pipe replacement work, even at higher costs, to minimise disruption to their operations. Early notification and clear communication about future work are crucial for planning and reducing the impact on business activities. Rising costs and staffing issues make gas a financial concern, with a focus on minimising the financial consequences of extended disruptions. Unplanned interruptions can significantly impact businesses, such as hair salons, leading to loss of earnings, and business owners feel entitled to compensation if the interruption is the fault of the utility company. They also seek prompt and direct communication, especially during emergencies, and expect to speak to an operator immediately to report emergencies and receive immediate responses.

Other Energy Networks are focused on both planned and unplanned interruptions. For planned interruptions, they engage with local planning authorities, residents, and contractors to re-establish gas supply and work closely with councils to minimise disruption to communities. In the case of unplanned interruptions, they face challenges in restoration, which can lead to penalties, and they strive to accelerate the restoration process as quickly as possible. Additionally, there is a suggestion for real-time communication during emergencies, such as making gas engineers trackable while en-route, similar to courier companies.

Stakeholders, including local authorities, emergency services, and government, engaged with WWU's data and digitalisation plans, highlighted that improved data and digitalisation can help reduce gas supply interruptions for WWU customers. By enhancing data interoperability, it becomes easier to monitor and manage the gas network more effectively. This involves using operational, capacity, and demand/supply data to predict and respond to potential issues before they cause interruptions. Additionally, standardising data across utilities can support better planning and response, ensuring consistent and transparent information.

Associated facts: Ofgem prescribe these standards. HSE mandate a working time directive and management of fatigue. We must comply with planning regulations.

Conflicts: Overall, stakeholders emphasise the importance of clear communication, minimising disruption, ensuring safety, and providing support during both planned and unplanned gas interruptions. The only conflicting opinions centre around the target for restoring gas supplies and whether this should be an average or max time target, but the general consensus is on the need for effective communication and minimal disruption.

Regional differences: Largely our stakeholders and customers did not highlight any specific differences in our approach to attending planned and unplanned gas

	<p>interruptions. Some stakeholders and customers did emphasise the importance of improving communication and support for rural customers, particularly vulnerable groups, during gas supply interruptions. They said the compounded vulnerabilities in rural areas, such as poor infrastructure and social isolation, necessitate a more robust and proactive approach from utility providers.</p> <p>Options considered: Ofgem discussions on merits of separating MOB's from non-MOB's for smaller networks such as WWU and NGN. Ofgem have decided to have separate measures for all networks.</p> <p>How we responded: We reviewed our GD2 performance and consulting with ISG and NGN before setting out our proposed targets. We will be presenting these to Ofgem at a bilateral meeting on 29th November 2024.</p> <p>When we plan to turn the gas off to consumers, we will let them know in advance and keep the average time when the gas is off to below 4.5 hours. When consumers' gas goes off unexpectedly, we will keep the average length of time the gas is off to under 10 hours for non-MOB's and 500 hours for MOB's.</p> <p>Our Willingness to Pay research supported this level of ambition. We engaged 1,252 domestic consumers, 153 business consumers, and 100 future bill payers about our proposed GD3 commitments. The results showed that 68% to 74% of domestic participants were willing to pay an additional £8 to £10 on their gas bills to support a higher level of ambition.</p> <p>We also conducted a separate study with 1,401 participants, including domestic and business consumers and future bill payers, to test the acceptability of this commitment. The findings revealed that 93% of domestic consumers and 94% of business consumers accepted this commitment.</p>
<p>Performance</p>	
<p>GD2 Performance, Benchmarking/ Industry comparison</p>	<p>8.5 hours overall against target of 13 hours. Separated MOB's – 75 properties with an average of 31 hours over the first 3 years of RIIO-GD2. However, recent experience of listed MOB's in Bath and Cheltenham resulting in 4 months of delays to re-establish our supplies has driven proposed MOB target. GDN comparison in RIIO-GD2 is difficult to different targets and population of MOB's.</p>
<p>Deliverability</p>	
<p>Deliverability & viability implications</p>	<ul style="list-style-type: none"> • Good track record in RIIO-GD2 • Recent experience of listed MOB's buildings and planning process • We have developed a buy-out process where it is not possible to re-establish gas back to the property • Asset Management have good records of MOB's in our network and have been proactive in risk assessing properties

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.

Document Name	Score					Final Score
	Relevance to Topic	Level of Stakeholder Knowledge	Quality of Engagement	Rigour of Feedback Collection	Credibility of Analysis and Interpretation	
06.03.24- SGN Response to GD Annex PUBLIC_Redacted	1	2	2	2	2	9
20231206 WWU Customer Journey Improvements v1	2	2	2	2	2	10
2305 GDNs full analysis	2	2	2	2	2	10
2305 SCOPE disability CO safety and PSR awareness research 2023 GDNs summary recommendations	2	2	2	2	2	10
3037 LCT Tracker W4 Report WWU FV	0	2	2	2	2	8
3564 WWU Customer Business Priorities FV2	2	2	2	2	2	10
3636 WWU Customer Priorities Report_Debrief_v3	2	2	2	2	2	10
3830_NEA_Fuel-Poverty-Monitor-Report-2022_V2-1	2	2	2	2	2	10
Cadent RIIO-3 SSMC Response_GD Annex Final	1	2	2	2	2	9
CCC - Reducing emissions in Wales	0	2	2	2	2	8
Citizens Advice_A flexible future_Extending the benefits of energy flexibility to more households 3 August 2023	2	2	2	2	2	10
consultation-just-transition-framework	0	2	2	2	2	8
CVS-and-Community-Resilience-Executive-Summary-FINAL	2	2	2	2	2	10

DAR - SR - 220915 - DAR Ofgem Local Energy Institutions Workshop	0	2	2	1	2	7
ENA External Stakeholders Insight Report v1.1	0	2	2	2	2	8
Energy Networks Innovation Strategy 2022	1	2	2	2	2	9
Entry Gas Connection Charging Consultation 24.06.22 published	0	2	2	2	2	8
Experiences-Emotions-and- Ethics_Refreshing-the-customer- priorities-that-underpin-the- UKCSI-bsetpn	2	2	2	2	2	10
Final version WWU - Critical Friends Panel - Feb 2023 - Feedback Report	0	2	2	2	2	8
ICS-UKCSI-Exec- Summary_Jan22_INTERACTIVE- h2d26m	2	2	2	2	2	10
LCP Delta - Online consultation responses summary	0	2	2	2	2	8
Marie Curie Quality Account Report 22-23	2	2	2	2	2	10
McCann Cadent CO research debrief	2	2	2	2	2	10
ms1590 WWU PSR Customer Experience Research Presentation vFINAL	2	2	2	2	2	10
National Gas Transmissions NGT Response to Ofgems R110- 3 Sector Specific Methodology Consultation	1	2	2	2	2	9
NEA Cymru - VCMA DAR	2	2	2	1	2	9
NEA-Report-CO-and-Fuel- Poverty 2	2	2	2	2	2	10
Ofgem-consumer-standards - NEA Response	2	2	2	2	2	10
PE21199 Understanding consumers' attitudes to safety measures when using 100_ hydrogen in the home v1.0	1	2	2	2	2	9
PSR Code Group Report. DRAFT w exec summary 21.11.23	2	2	2	2	2	10
PSR-Code-Group-Report-w- exec-summary-FINAL-7.12.23	2	2	2	2	2	10

Safeguarding the switch to domestic hydrogen WWU Report 1.0	1	2	2	2	2	9
Scope Cost of Living Report	2	2	2	2	2	10
UKRI Culture of Innovation_Full report_Oct 2023_Pdf_version	0	2	2	2	2	8
UKRI-PA-InnovationCultureReport	0	2	2	2	2	8
Utility-Panel-Research-Presentation_26.10.23	2	2	2	2	2	10
VCMA Collaborative Report Year 1 21-22	2	2	2	2	2	10
VCMA Collaborative Report Year 2 22-23	2	2	2	2	2	10
VCMA Year 1 Showcase Stakeholder Workshop - Feedback Report	2	2	2	2	2	10
Workshop 2 Summary - Futureproofing the networks	1	0	2	2	2	7
Workshop 4 Summary - Transforming how networks interact with industry	0	0	2	2	2	6
WWU - Critical Friends Panel - Feb 2024 - Feedback Report v5	0	2	2	2	2	8
WWU Biodiversity Stakeholder Workshop Feedback Report	0	2	2	2	2	8
WWU Business Panel_full report with appendix	1	2	2	2	2	9
WWU Citizen Panel Full Report_V1	1	2	2	2	2	9
WWU Citizens Panel report Decarbonisation of home heat March 2022 FINAL	1	2	2	2	2	9
WWU Customer Satisfaction_full report	2	2	2	2	2	10

WWU Customer Service Trends Secondary Research - Findings report - Final	2	2	2	2	2	10
WWU Employer of Choice Qualitative Follow-up Findings report v1	0	2	2	2	2	8
WWU FW strategy workshop 180721 final	0	2	2	2	2	8
WWU GD3 Business Planning Workshop Feedback Report	2	2	2	2	2	10
WWU LAEP Stakeholder Workshop Feedback Report	0	2	2	2	2	8
WWU qual priorities report FINAL	2	2	2	2	2	10
WWU Safety Stakeholder Workshop Feedback Report	1	2	2	2	2	9
WWU Sustainability Strategy Workshop - Feedback Report	1	2	2	2	2	9
WWU VCMA strategy 2023 Ofgem version June 2023 v5.0	2	2	2	2	2	10
WWU Vulnerability Panel Report_V3_060923	2	2	2	2	2	10
WWU_Improving the CEX research programme_Stage 1_Report of findings_17.01.23	2	2	2	2	2	10
Average score of sources						9.14
Mode						10

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.