Business Plan Commitments

Delivering on our promises to the communities we serve

To 31 March 2025

SP Electricity North West

Our performance against our commitments to you

A message from our Chief Operating Officer (COO):

I am pleased to present the annual Business Plan Commitment report, for the year ended 31 March 2025.

We have now completed the second full year of the delivery of RIIO-ED2, and I am pleased to report that we continue to perform strongly against our business plan commitments. This has been a year of significant change for the business. Our strategy "From Good to Great" has continued to deliver improvement in all areas. Our success this year was endorsed externally by our industry when we won "Utility of the Year" and "Innovator of the Year" awards in December 2024.

Our legitimacy as an enterprise is derived not just from Ofgem, but directly from the employees, customers and communities we serve. This starts with safety and this year we have seen the benefit of further initiatives we have made in this area.

Our primary obligation is to deliver a safe, reliable supply of electricity. Extreme weather this year presented challenges in terms of Customer Interruptions (CIs) and Customer Minutes Lost (CMLs). However, the improvements we have made in the last few years in our storm resilience and response have allowed us to perform much better during Storm Éowyn. This was the largest storm we have experienced since Storm Arwen, and we restored power to 110,000 properties quicker than in Arwen despite there being 15,000 more properties off supply. As part of our customer response efforts, we knocked on over 1,500 doors and proactively contacted 25,000 vulnerable customers to offer our support.

It has continued to be a difficult time for our communities with energy costs remaining at the high level that we have seen over the last few years, which serves to only increase the importance of the service we provide to the most vulnerable and poorest members of our community. We have continued to increase support to customers in vulnerable circumstances, further developing our Take Charge campaign with our strategic partners to support initiatives on fuel poverty and energy efficiency. Our aim to be one of the lowest cost providers has ensured we maintain the support of the largest commercial and public sector organisations in our area.

Our focus on our customers has led to further improvements in our customer satisfaction, resulting in our highest ever score of 92.9% which is a 0.9% improvement on last year's score. The focus on our vulnerable customers is also endorsed through our performance on the new vulnerability incentives (as part of the Customer Satisfaction Fuel Poverty incentive), and our customers have rated our service 94.5%.

We are focused on continually innovating to improve our safety performance so we can remain at the frontier of safety performance in our sector. Unfortunately, we experienced one Lost Time Injury (LTI) in January 2025, prior to this the business delivered 14 months without one.

Innovation is essential to maintain our sector leading network performance and reliability levels, as well as meet the increasing demands on electricity from the decarbonisation of energy, at an affordable cost. We continue to develop and deliver our cutting-edge engineering innovations such as CLASS, Smart Street and LineSIGHT that will keep the network reliable, efficient and safe.

Our network investment delivery programme is now rapidly accelerating. The changes made in 2023/24 have been embedded in this second year of the price control, to enable an enhanced capital delivery and commercial services function, which has been able to deliver a much larger capital programme. Capital delivery will need to continue to increase throughout RIIO-ED2 and into ED3. We will continue to work on improvements to our processes and enhance our collaboration with strategic partners so we can secure the resources and materials needed to deliver these large programmes of work.

We made demonstrable progress in delivering our Cyber Security programme to better protect the network and the business. Last year we achieved basic compliance with the National Information Security cyber assessment framework. This year we made demonstrable progress towards the enhanced framework requirements, strengthening the resilience of the business against multi-vector threats and attacks.

Global energy leader, Iberdrola, acquired an 88% shareholding in Electricity North West in 2025 through it's UK arm, ScottishPower. Prior to the acquisition on 20 March 2025, any integration was prevented. As such, we have produced separate reports for our 2024/25 performance.

We have now re-branded as SP Electricity North West. Iberdrola and ScottishPower are committed to building smarter, greener electricity networks together with the addition of SP Electricity North West.

We are in a very strong place going into the third year of the price control. We have performed at a high standard this year and our frontier performance in our sector has been externally recognised at the Utility Week awards. We are now putting more of our focus into looking forward to ED3 and starting to develop our plans and strategy for the next price control so we can build on our current performance levels and continually improve the service we provide to all our stakeholders.

Stephanie Trubshaw
Chief Operating Officer

Ensuring our Business Plan Commitments continue to reflect stakeholders' needs

We report our Commitments across seven key areas:

- Customer
- Reliability
- Safety
- Net Zero
- Vulnerability
- Resilience
- Environment

There are 46 Commitments to report on for 2024/25

We have made a good start to the delivery of all 46 of these commitments

39/46 commitments are on track to be delivered by the end of ED2

3 commitments are due for completion in 2025/26 (#9 #14 #21)

Our Business Plan Commitments are a way of ensuring that we are accountable for our performance through:

- Demonstrating public commitment to our critical role in enabling a Net Zero economy
- Demonstrating public commitment for investment targeted at high-profile public safety concerns and supporting those customers who are most vulnerable
- Enhancing targets for commitments where additional investment has been made (the outcome of prior stakeholder engagement)
- Updating existing commitments to reflect industry evolution (licence obligation, regulation or legislation) and the resultant changes in Company strategy
- Updating existing commitments to reflect the underlying investment programme being more developed (the related outcome being unchanged)

Our performance

Despite marked heavy storm activity on the operations front, massive investment and change in the cyber and IT functions, we are pleased to report that SP ENW has largely met or surpassed its commitments. We continue to strive to improve our performance and provide the best possible service as our customers' needs and their views always come first.

Safety

We operate in a high hazard industry and the safety of our people and customers, and the protection of the environment, will always remain key priorities. During the year, we have strengthened the team leadership with key appointments enhancing our capabilities in this area. The safety of our employees, delivery partners and the public from the inherent risks of electrical assets is assured through our ongoing asset investment programme and the associated asset risk management policies which define the programme scope.

We finished the year ended 31 March 2025 with a lost time injury frequency rate of 0.011 (2024: 0.023) having had one LTI (2024: two). This low incident rate reflects the sustained improvement since we embarked on a company-wide initiative to create an enhanced safety culture.

During the year ended 31 March 2025 we continued to invest to reduce further risks associated with link box failures and with rising and lateral mains in multi occupancy properties, such as blocks of flats.

Network reliability and resilience

Our customers and stakeholders continue to feed back that our fundamental role is to keep power flowing through the network, reliably. This becomes ever more important as customer dependence upon electricity continues to grow as we move to a low carbon future.

Reliability performance this year has been challenged by a higher-than-normal volume of weather-related faults resulting in increased volumes of interruptions.

In 2024/25, there were seven named storms in total (2024: 13) and Storm Éowyn was the largest storm to impact our region in the last ten years. Through learnings from prior years, storm response improvements have been made to significantly bolster preparation protocols and responses. This has delivered some best-ever SP ENW responses during these events.

Overall, average number of interruptions per 100 customers (CIs) was 26.07 (2024: 26.21). This outperforms the Ofgem target of 29.74 and represents our second-best performance. The average number of minutes for which customers were without supply during the year (CMLs) to 31 March 2025 was 27.09 (this is slightly higher than the Ofgem target of 26.87). We outperformed the Ofgem unplanned interruptions target but the acceleration of proactive work for our capital programme meant we had more planned interruptions.

Despite the challenging weather impacts, there have been further improvements in the number of customers restored by automation on both the high voltage (HV) and low voltage (LV) networks. This performance has been driven through a combination of investment in automation and network resilience, as well as improvements in proactive operational response. Areas of reliability performance to highlight include the adoption and integration of Smart Meter notification into our business process to identify customers' loss of supply: a substantial increase in fitting of LV Monitoring, LV Reclosers and pre-emptive fault resolution.

Most customers enjoy excellent levels of reliability, but we recognise that there is variability in the level of service, with a small minority experiencing a level of service significantly worse than average, usually due to their location or localised network issues. We continue to invest in schemes that aim to reduce, in the long-term, the numbers of worst served customers ("WSC").

Customer service

Customers in vulnerable circumstances, especially those who are at more detriment during a power cut remain a priority focus. We are committed to supporting these customers when they need us and continue to find new avenues of raising awareness of the Priority Service Register (PSR) and encouraging registration to our PSR. Through partnerships and engagement our reach has increased this year to 95.7% (935,509 households).

In 2024/25 we continued to support community and local energy schemes across the North West with our Powering our Communities Fund and launched Take Charge, a scheme to help those in fuel poverty with debt advice and provide support to those at risk of being left behind in the energy transition.

Our overall customer satisfaction score at the end of March 2025 has seen a 0.9% increase compared to last year at 92.9% (2024: 92.0%) and we were ranked fourth place out of the fourteen licence areas league table, and remained the second ranked Distribution Network Operator (DNO) Group.

A roadmap of key actions focused around reducing customer effort, simplification and owning what we do are developed from customer feedback and root causes analysis.

Net Zero

The Net Zero transition will result in increased network demands by 2050, driven by both renewable generation connections and electric vehicles and heat pumps demands. Our business plan sets out a clear vision around Net Zero and how we will ensure that the network is not a barrier to connecting electric vehicles or other low carbon technologies (LCTs). We measure our performance by two measures; time to quote and time to connect. In both of these we continue to meet or exceed the targets we set ourselves in our customer commitments.

In line with this commitment, in 2024/25 our Active Network Management system (ANM) went live providing real-time management of network constraints. This has allowed us to dynamically optimise generation export limits, releasing capacity and facilitating more renewable connections without the need for immediate reinforcement.

Cost efficiency

In 2024/25 affordability and cost efficiency remains a key focus area. We continue to work hard to deliver our obligations efficiently, including a particular focus on the use of innovation, to keep customer bills as low as possible, which at £124 compares favourably to an average DNO customer bill impact of £142.

Innovation is essential to maintain our sector leading network performance and reliability levels, and to meet the increasing demands on electricity from the decarbonisation of energy, at an affordable cost.

We continue to develop and deliver our cutting-edge engineering innovations such as CLASS, Smart Street and LineSIGHT that will keep the network reliable, efficient and safe.

Sustainability

Our "Leading the North West to zero carbon plan" sets out our target as a 3% reduction year on year to decrease our emissions, in line with our Science-based target ("SBTi"), to become zero carbon by 2038.

Our business carbon footprint (excluding losses) for the year was 17,882 tCO_2e, which is an increase of 28% from the previous year (2024: 13,999 tCO_2e). This increase was due to our transition to a validated SBTi that expanded the emissions reported on. This increase was due to our transition to a different reporting criteria based on the SBTi requirements for clearer and more consistent reporting on carbon emissions on a corporate basis. If this methodology was used for our 2023/24 business carbon footprint our 2024/25 performance would equate to a 3% reduction on the prior year.

During the year, we continued to implement energy efficiency measures, through the refurbishment of our buildings, and the replacement of fleet vehicles and company cars with more efficient vehicles. To reduce our carbon footprint with respect to operational transport, we are developing a carbon reduction road map to maximise the benefit of electric vehicle (EV) options for our liveried fleet.

We have improved our inspection methodology for asset inspections which has resulted in us reporting an increase in fugitive emissions (SF_6 losses from our network) from the prior year to 1,460 tCO_2e (2024: 663 tCO_2e).

Ensuring our business commitments continue to reflect stakeholder needs

Our stakeholder engagement programme is embedded in our business activities and adapts to meet ours and our stakeholder requirements. At the start of RIIO-ED2 we refreshed the stakeholder engagement panel structure, enshrining the Ofgem requirement for enduring customer and stakeholder input in decision making.

This year we have taken the opportunity to check in with our panel members to ensure that the structure was working. Over 150 stakeholder groups regularly give their time and experience to our advisory panels and more than 70% told us that participating in the panel benefited their organisation and the stakeholders they represent. However, they did suggest a duplication between two of the panels and suggested that we merge the Stakeholder Insight advisory panel into our others. We now have six independently chaired panels (Economic Growth, Customers in Vulnerable Circumstances – partnership and strategic, Environment and Sustainability, Distribution System Operation (DSO) and Digital Futures), which are all attended by a member of our Leadership Team. The panels meet quarterly, are comprised of regional experts and representatives of significant stakeholder groups and provide a role as critical friend helping to track progress against the business plan commitments.

Our panel structure now allows the stakeholder advisory panels to focus on the delivery of our ED2 Business Plan whilst the newly created Independent Stakeholder Group (ISG) will meet the requirements of the ED3 Business Planning process and continue to ensure enduring customer and stakeholder input with the support of our panels.

In conclusion

Overall, we have continued to make good progress against our business plan commitments. 39/46 commitments are on track to meet the ED2 targets, six are behind schedule and we have missed one annual target. We are striving to bring these commitments back on track. We encourage our stakeholders to hold us to account to our challenging existing targets in a transparent manner.

Performance snapshot 2024/25

Our network

Number of customers 2.4m

Overhead lines	Underground cables	Submarine cables
12,389 km	47,324 km	23km

Total network length 59,736 km

TOTEX

*The price base for all £ values is 2020/21

£342 m	£344 m	99%
Total expenditure*	RIIO-ED2 (ED2) allowance*	of allowance (before adjustment for expenditure profile)

£124 Our part of a typical annual household bill

The typical annual household bill in current prices, and using a consumption value of 2,900kWh, is £142.

How we're performing

Reliability

CI	CML
29.5	41.5
Unplanned Customer interruptions (Including exceptional events)	Unplanned Customer minutes lost (Including exceptional events)
24.3	23.1
Unplanned Customer interruptions (Excluding exceptional events)	Unplanned Customer minutes lost (Excluding exceptional events)

Connections

Time to quote	Time to connect
2 Days	19 Days

No. of completed connections 10,307

Our customer commitments

Customer satisfaction	Customer Vulnerability score*
92.9%	94.5%
Major Connections Customer Satisfaction*	DSO Stakeholder Survey Score
87.1%	8.9/10
	Panel Assessment Score
	6.7/10

*For full reports please use link below:

www.enwl.co.uk/about-us/engaging-with-our-stakeholders/stakeholder-engagement-publications/

Operating responsibilities

Safety

Licensee safety performance and compliance with Health and Safety Executive (HSE) legislation

Lost time injuries	Lost time injury frequency rate
1	0.011*

*Number of lost time injuries per 100,000 hours worked

Community Outreach

£84k awarded to community energy projects www.enwl.co.uk

Carbon emmisions	Undergrounding for visual amenity
17,882 tCO_2e	0.4km

https://www.enwl.co.uk/about-us/regulatory-information/environment-report/

Our performance in 2024/25

On track | Behind schedule | Missed target

Safety	#1	Make electricity safer in high rise buildings	P12
	#2	Deliver safety campaigns	P12
	#3	Increase safety and STEM education	P13
	#4	Improve overhead line safety	P13
	#5	Keep rural transformers safe	P14
	#6	Enhance security at major sites	P14
	#7	Improve the safety of underground cable pits	P15
	#8	Safety check on cut-outs	P15
	#9	Comply with legislation on PCBs	P16
Customer	#10	Make it easier for customers to contact us	P18
	#11	Provide additional support to businesses during power cuts	P18
	#12	Improve the speed and quality of our responses to customers	P19
	#13	Provide faster quotes and completion for new domestic connections	P19
	#14	Reduce the time it takes to complete emergency roadworks	P20
	#15	Increase community focused engagement	P20
	#16	Maintain high levels of competition in the Northwest	P21
	#17	Extend Smart Street to a further 250,000 households in our region	P21
Reliability	#18	Reduce the number of power cuts	P22
	#19	Reduce the duration of power cuts	P22
	#20	Improve performance for worst-served customers (WSC)	P23
	#21	Measure and report short power cuts	P23
Vulnerability	#22	Increase collaboration with other utilities	P24
	#23	Increase investment in referral work	P24
	#24	Expand our priority services register	P25
	#25	Create an innovation fund	P25
	#26	Support customers in fuel poverty	P26
	#27	Develop a new customer advisory panel	P26
	#28	Conduct home welfare visits for vulnerable customers during long-duration power cuts	P29
	#29	Introduce all-colleague training for vulnerable circumstances and mental wellbeing	P29
Resilience	#30	Improve flood protection	P30
	#31	Plant 10,000 trees every year	P30
	#32	Increase cyber resilience	P31
	#33	Maintain resilience in a changing climate	P31
	#34	Improve network health	P32
	#35	Improve telecommunications resilience	P32
	#36	Invest in electricity system restoration readiness	P33
Environment	#37	Reduce carbon footprint	P34
	#38	Reduce oil lost from cables	P34
	#39	Undergrounding overhead lines	P35
	#40	Reduce losses	P35
	#41	Reduce potent emissions	P36
	#42	Create wildlife havens	P36
Net Zero	#43	Help customers connect low carbon technologies	P38
	#44	Remove constraints for renewables	P38
	#45	Establish a new annual community energy fund	P39
	#46	Unloop customers' power supplies	P39

Our performance in 2024/25

#1. Safer electricity in high rise buildings

We will install electrical monitoring systems in 234 high rise buildings considered at high risk of an electrical fire.

Background

Often building owners do not realise that they may be responsible for the electrical network in buildings, and this lack of clarity on ownership can cause issues with maintenance.

Until responsibilities are formalised, we take responsibility and act and assess the condition of cables and fit circuit breakers and monitor communal electrical cables at high-risk properties 24/7. Formal agreements mean that we can more easily gain access to the properties to thoroughly inspect the electricity infrastructure, install monitoring devices, and renew their internal wiring where required.

Our monitoring equipment enables us to identify where faults are developing which may indicate a risk of an electrical fire.

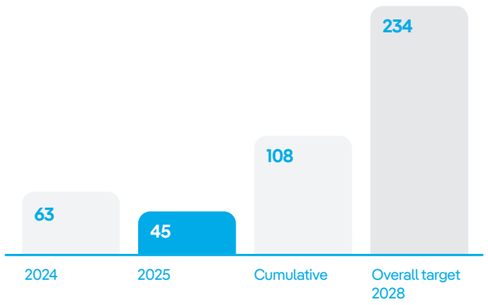
We will expand our programme to cover 234 buildings which are considered high-risk during ED2. We will also continue our programme of rewiring buildings where inspections and monitoring indicate a potential safety risk.

Measurement	Target	Completion date
Number of electrical monitoring systems installed	234 buildings	2028

Performance

In ED1 we installed 51 innovative vacuum circuit breakers (Weezaps) in the highest risk high rise blocks. In 2023/24 and 2024/25 we have continued this safety programme and installed 108 more electrical monitoring systems.

The programme is 46% complete and is ahead of the run rate required to meet the 234 target at the end of the price control in 2028.



#2. Deliver safety campaigns

We'll continue to participate in industry-wide safety awareness campaigns.

Background

We already collaborate in shared awareness campaigns with the other distribution network operators, coordinated through the Energy Networks Association, our representative national body. We will enhance these national campaigns by taking the lead in developing more regionally focused campaigns, in conjunction with other utility operators (e.g. water and gas) in the Northwest.

Joined-up messaging will make it easier for customers to access important safety information. We will increase public awareness of the dangers of electricity and behavioral changes that could save lives.

Measurement	Target	Completion date
Safety awareness campaigns delivered	Leading regionally utility safety campaigns	2028

Performance

We have built upon the regionally targeted communications on a range of safety issues with a specific focus on public safety near our assets put in place last year.

We have used the channels to distribute safety and wellbeing messages during the storms in Autumn/Winter 2024. We have leveraged our external stakeholder panels to help guide our messaging and maximise news outlets in the Northwest to push our wider safety messaging for the public. We also target our workforce in the Northwest with safety campaigns. Our campaign, Drive safe, Arrive safe has reduced our vehicular incidents by 25% in the period.

We have continued to improve our safety culture with the 'Phone 50' approach with our Executive Leaders talking directly to colleagues on safety focused themes. We continue to support educational campaigns; we delivered 75 switched on workshops highlighting the dangers of electricity amongst primary school children. SP ENW chair the national Underground Services Avoidance Group – a group which includes HSE representation together with asset owners and those who routinely excavate around underground services.

#3. Increase safety and STEM education

We'll work with schools to expand our safety and STEM education programmes.

Background

We will work with schools to expand our safety and science technology, engineering and maths (STEM) education programmes. This will include delivering curriculum-linked educational material and awareness campaigns in person and online, to promote skills and opportunities in the electricity industry and ensure customers take precautions when working with or near electrical equipment to significantly reduce the risk of injury in our community.

Our educational work will include other key topics such as decarbonisation and sustainability, STEM skills and careers, targeting schools, college and university students and promote diversity and inclusivity.

We will continue to evolve our primary key stage two (KS2) offering and significantly scale up what we offer to secondary schools and colleges linking to our recruitment and inclusion in our people strategy.

We will review the ongoing effectiveness of the programme that will see increased engagement in safety issues and STEM among young people, changing behaviour and saving lives and increase awareness and interest amongst a diverse future workforce.

Measurement	Target	Completion date
Delivery of curriculum-linked educational material and awareness campaigns	Wider safety education and STEM focused on secondary schools	2028

Performance

Considerable progress was made in 2024/25 to increase safety and STEM education, as our refreshed primary and new secondary school programmes were fully rolled out by our external providers during the year. Both programmes have been received exceptionally positively by teachers and pupils alike.

The primary sessions, delivered by STEMFirst, are classroom-based, focusing on hands-on circuit building (supporting the KS2 curriculum) but also providing key learning opportunities around electrical safety and STEM careers. Over 2,000 primary school pupils were reached by our education programme during 2024/25.

The secondary programme, delivered by Science Made Simple, takes the form of interactive science 'shows' to whole year groups, covering similar themes in an age-appropriate way. During 2024/25, our programme reached 6,210 pupils in 14 schools.

Additionally, we retained an active presence at STEM festivals, with 20 colleagues volunteering to support our stand and workshops at the three-day UCLan Science Festival and an interactive stand delivered at the Northwest Sustainability Learners Conference in Blackburn to share key messages around electricity, electrical safety, careers and Net Zero.

#4. Improve overhead line safety

We'll deploy our new LineSIGHT technology to install sensors on sections of overhead lines to detect any dangerous low-hanging lines.

Background

Faults on rural networks can sometimes cause overhead power lines to hang low whilst remaining live, which also creates a public safety hazard. This can be a particular issue during storm events with multiple occurrences.

Innovative technology developed by SP Electricity North West enables the detection of damaged equipment earlier and help us to pinpoint the location of faults, enabling more efficient despatch of repair crews.

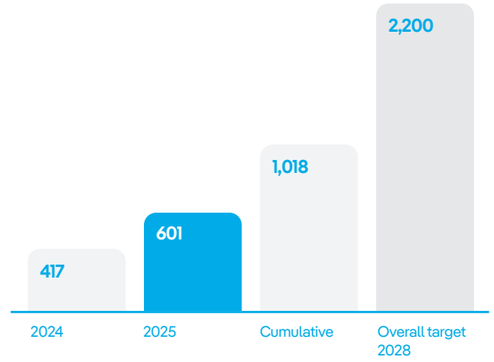
Customers will benefit from the faster removal of safety hazards caused by network faults as well as reduced likelihood of power cuts. The system will also allow us to identify issues more quickly in storm situations where we can have many faults to deal with.

Measurement	Target	Completion date
Earlier detection of damaged overhead lines and reduced likelihood of power cuts	Install 2,200 LineSIGHT units across across the overhead line network	2028

Performance

In 2024/25, 601 LineSIGHT units were installed for a total of 1,018 in ED2 to date and 46% of the full target of 2,200.

We continue to prioritise the delivery of this programme and forecast its early completion against our 2028 target.



#5. Keep rural transformers safe

We'll replace small rural substations in exposed parts of the network.

Background

We have 220 small ground mounted substations in rural settings which do not have modern standards of protection, meaning that fault restoration can be a lengthy process. Many of the substations are now reaching the end of their design life and their condition is starting to deteriorate.

We will progressively replace all of these substations with safer equipment, with 50% replaced by 2028 and the remainder by 2033.

The prioritisation of the replacement will be based on the condition of the equipment.

Measurement	Target	Completion date
Substations replaced	Replace 110 rural transformers	2028

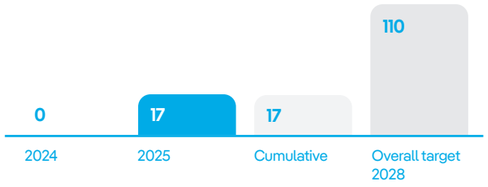
Performance

The Borrowdale transformer replacement programme, initiated in ED2, required the design and approval of a new pad-mounted solution.

Progress in the first two years was slower than anticipated due to delays in securing consents from the National Trust and private landowners, as well as time needed for type testing of the new units.

With the approved solution now in place and a revised engagement strategy that initiates landowner discussions much earlier, we are confident in our ability to accelerate delivery over the remaining three years.

In 2024/25 we replaced 17 of the transformers and our new approach supports a stepped-up delivery profile and provides a clear basis for confidence in achieving the overall target of 110 replacements.



#6. Enhance security at major sites

We continue maintaining and installing enhanced security at our critical sites.

Background

We have an obligation to maintain the security of our sites and prevent trespassing which might cause major power cuts and safety risks.

We install additional measures at our most critical sites in response to their level of risk. We will continue this programme in ED2, maintaining existing preventative measures and installing new ones where the risk level changes.

We will also continue to meet requirements set out by the Centre for the Protection of National Infrastructure.

Measurement	Target	Completion date
Safe and secure sites	Maintain security programme	2028

Performance

So far in ED2, we have installed new or expanded security measures at three major sites.

We have a Security Working Group that regularly meet to assess the security situation across our substations and identify sites that require security enhancement.

SP Electricity North West

#7. Improve the safety of underground cable pits

We will complete a programme to inspect all cable pits on our network and take action where required to improve safety.

Background

Link boxes are underground cabinets where low voltage cables come together and can be connected or disconnected. They can pose a risk to the public because a fault on the network can very occasionally blow their cover off.

There were a number of such cases nationally during ED1. Many of these are located in pavements causing a safety risk.

Our ED1 programme either maintained, replaced or fitted a 'blast bag' to these link boxes, depending on their location and risk. In ED2, we have a similar programme to remove cable pits which are access points for cables, sometimes located in roadways. These pits are often in poor condition and are not used any more so, during ED2, we will complete our programme to fill in these pits with a blast absorbing material to mitigate any impact if a fault does occur.

Measurement	Target	Completion date
All cable pits inspected and action taken	Intervene on entire cable pit population to improve safety	2028

Performance

The majority of cable pits have now had an initial inspection and 59 pits were filled in 2024/25.

In 2025/26 we will revisit and inspect pits which couldn't be accessed on the initial survey.

#8. Safety checks on cut-outs

We will carry out proactive safety checks on cut-outs.

Background

A cut-out is a piece of electrical equipment that forms the link between our electricity cable and the internal wiring in customers' properties.

In RIIO-ED2, the smart meter rollout programme is continuing at pace. As part of this, each cut-out is safety checked and replaced if there is an issue identified with it.

Although some early smart meters will be being replaced by 2028, to ensure the cut-outs remain safe, we will need to start our own periodic inspections in ED2 and ensure we act on any issues found. This will be a proactive programme driven by analysis of the smart meter installs, the associated defect data and property demographics.

Measurement	Target	Completion date
Proactive safety checks carried out	Initiate regular cut-out safety programme	2028

Performance

Due to delays in the smart meter programme roll-out, the majority of our cut-out replacement volumes continue to be prioritised based on notifications from meter operators fitting new smart meters.

Recent research into key failure modes highlights that these are overload, physical damage or water ingress rather than age. We continue to review options for a future proactive inspection regime for cut-outs.

#9. Comply with legislation on PCBs

We will dispose of all PCB contaminated equipment.

Background

Polychlorinated Biphenyls (PCBs) are a group of artificially manufactured organic chemicals that have long been recognised as posing a threat to the environment due to their toxicity, persistence and tendency to be absorbed by living organisms. PCBs were used in electrical equipment such as transformers as an alternative insulating fluid where fire resistance properties were required. Although we never knowingly used PCBs, some contamination of our equipment occurred during the manufacturing process.

The use of PCBs has been banned since the 1980s and we recognise that any PCBs still remaining in existing equipment pose an environmental threat. New legislation requires all PCB-contaminated equipment to be disposed of or decontaminated of PCBs by 31 December 2025.

All transformers (and some other network assets) manufactured before 1987 are assumed to be potentially PCB-contaminated (unless proven otherwise via testing) and are registered annually with the Environment Agency.

We are working to either test or statistically determine the PCB content of all this apparatus and dispose of all those items that are confirmed as PCB contaminated by 31 December 2025. All PCB-contaminated equipment will be sent to authorised treatment facilities where the oil will be recovered and the metal components, principally scrap steel and copper, sent for recycling.

Measurement	Target	Completion date
PCB contaminated equipment disposals	Elimination of PCB contamination risk from out network equipment	31 December 2025

Performance

In 2023/24 550 equipment disposals were completed.

In 2024/25 516 equipment disposals were completed as well as over 6,000 oil tests.

We have 1,759 units left on our network which will be completed by December 2025.

#10. Make it easier for customers to contact us

We will continue work on self-service functionality in ED2 to further improve our offering to customers.

Background

Customers can currently contact us via phone, our website, social media, email and post but they have told us that they want new ways to contact us. Due to the urgency of some contacts, and so as not to disadvantage any customers, we must focus on taking phone calls.

We will set a realistic target to improve our customer satisfaction for ease of contact to 9 out of 10. We already use multiple languages and work with external agencies to provide translation services. We will continue to work on self serve functionality in ED2 to continuously improve our offer to customers. The advantages of this approach mean that people can contact us when it suits them, rather than waiting for specific working hours of certain teams. It also frees up the phones for people who do not easily have another option.

Measurement	Target	Completion date
Improve customer satisfaction for ease of contact to 9 out of 10	Increase in self-service functionality	2028

Performance

A number of actions have been delivered following feedback from customer focus groups in relation to Unplanned Interruptions:

- March 2024 – For multiple interruptions we have enhanced the IVR and messaging elements in order to provide customers with an upfront acknowledgement should their property be impacted by Multiple Interruptions.
- May 2024 – Our fault summary messages allow the customer to receive a complete picture of their fault status.
- September 2024 - HV messaging proactively contacts customers to advise them that they are involved in a HV fault.
- December 2024 - Repeat message allows customers to select an option to hear the message again.

This resulted in a score of 9/10 for 2024/25. Actions continue in to 2025/26 following customer feedback and root causes analysis.

#11. Provide additional support for businesses during power cuts

We'll improve our services to provide additional support to businesses during power outages.

Background

Businesses can sometimes take a financial, and even a reputational hit due to the impact of power cuts. It can also be more disruptive without the latest information to help make decisions on whether to continue or send people home for the day.

To give businesses additional support during power outages (either planned or unplanned) we will continue our innovative Business Priority Services Register – like the PSR for our domestic customers.

Businesses signing up to this free service will receive a range of support, such as 30 days' notice of any planned power cuts. We will also offer advice on how they can obtain generators, and we'll proactively contact them during unplanned power cuts to keep them up to date and help them plan.

Measurement	Target	Completion date
Businesses signing up to Business Priority Service Register	Continue to grow the Business Priority Service Register	On-going

Performance

We continue to manage and update our register for business customers. So far, 13,045 businesses have signed up.

The Business Priority Register ensures that we have the right contact information for them and identify them as a business so we can provide more notice when a planned power cut occurs.

Additionally, we have an information leaflet that we share and is accessible on our website that provides lots of information about supporting businesses to become more resilient in a power cut.

We have plans in place this year to expand how we contact business customers in terms of proactively contacting customers through our connections business as well as reaching out to customers who we have email addresses for.

SP Electricity North West

#12. Improve the speed and quality of our responses to customers

We will increase the size of our customer team to answer enquiries more quickly.

Background

In 2020/21 we were pleased to achieve 90.6% overall customer satisfaction, and we aim to maintain this level through RIIO-ED2, despite the likely significant increase in customer contacts and rising expectations.

We receive around 400,000 telephone calls from customers each year and this continues to grow.

We will increase the size of our customer team to answer enquiries more quickly. This will also support resolving a minimum of 80% of complaints made within 24 hours. Where we receive complaints we do root-cause analysis to drive how we prevent complaints or improve the process, and we will continue this during ED2.

One of our roles is to connect new domestic or commercial properties to our electricity network, or change the location or size of existing services, so that customers get the power they need. Customers will benefit from an easier connections process which is responsive to their needs, from initial application through to works being completed. We will achieve this by being responsive to customer feedback, including the development of AI technology and an improved website to make it easier for customers to track their project.

Measurement	Target	Completion date
Customer satisfaction score	At least 90% customer satisfaction despite increasing demands and expectations	On-going

Performance

In 2024/25 Customer Satisfaction delivered another all-time high performance since the measures were introduced in 2015, achieving 92.9% (0.9% increase compared to 2023/24).

All three areas of Connections outperformed with an Overall Connections score of 93.9% ranking third, Connections Quotations 94.5% ranking second, and Connections Delivery achieving 92%. General Enquires outperformed the target achieving 94.2% and ranked seventh.

The improvement resulted with an improved ranking of fourth place compared to fifth in 2023/24 out of the fourteen licence areas league table, and remaining the second DNO group out of six.

#13. Provide faster quotes and completion for new domestic connections

We will beat Ofgem's standard for the time it takes us to quote and connect new Domestic connections customers.

Background

We will beat Ofgem's standard for the time it takes us to quote and connect new Domestic connections customers. We will also increase customer satisfaction to nine out of 10 through continuous improvement looking at the processes and systems we use to streamline and develop improvements.

Measurement	Target	Completion date
Time to quote Time to connect	Exceed Ofgem targets	On-going

Performance

We have had another good year against our Ofgem targets, we again exceeded all of the targets for both Time to Quote and Time to Connect measures.

For **LVSSA** connections our time to quote was 1.64 days and our time to connect was 19.20 against respective Ofgem targets of 3.26 and 28.54.

For **LVSSB** connections we achieved a time to quote of 5.06 and a time to connect of 16.66, again above the Ofgem targets of 5.47 and 35.44.

Customer satisfaction also outperformed targets for both quotes and delivery, achieving a combined score of 93.5% against a target of 93.4%.

#14. Reduce the time it takes to complete emergency roadworks

We will work more flexibly in ED2 to reduce the average time taken to finish emergency repairs in the highway or pavement.

Background

Emergency roadworks are required if our underground cables are damaged. Roadworks can cause disruption to local communities and commuters through extended travel time, loss of trade to businesses, noise, and air pollution.

Local authorities have asked that utility companies work collaboratively to identify opportunities for delivering roadworks in a more coordinated manner, to minimise congestion. Our customers were also supportive for reducing the time to complete roadworks.

In response, we will work more flexibly in ED2 to reduce the average time taken to finish emergency repairs in the highway or pavement. This will be measured from the time of repairs commencing to the site being tidied up and restored to its previous condition.

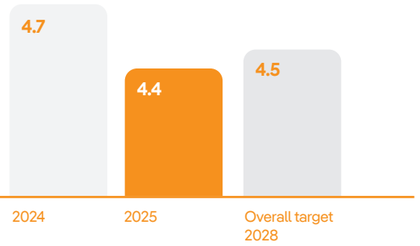
We have agreed a new incentive mechanism with Ofgem that only pays out if we successfully achieve it (and penalise us if we do not).

Measurement	Target	Completion date
Average time taken to finish emergency repairs from commencement to site tidying on highways and pavements	4.5 days	2026

Performance

Average End-to-End Restoration Time for unplanned emergency street works for 2024/25 was 4.4 days.

This is a significant improvement from the previous year's performance at 4.7 days and below the present commitment of 4.5.



#15. Increase community focused engagement

We will introduce a more local community-focused approach to engagement and communications about work and services in our region.

Background

We will recruit and train a specialist team to collaborate with local communities to engage about Electricity Northwest's current and future activities in local areas.

A recent example of this is engagement with a community in Golborne, Greater Manchester, which had suffered multiple power cuts in a short period of time. Community feedback resulted in us planning, scheduling and carrying out repairs in Golborne within two weeks. We wrote to 2,000 customers to keep them informed, engaged with the local MP and arranged for an online Q&A with customers on Facebook.

Customers will gain more tailored information and support over key issues that are affecting them through this approach.

Measurement	Target	Completion date
A more local community focused approach to engagement and communications in place	Community engagement team improving access to information on network issues	2028

Performance

This year we have engaged with more communities around network resilience following the successful Storm Arwen re-opener application and as part of our submission for further network investment in areas of significant low carbon technology growth.

Cross business teams met with local leaders and communities to inform them of the investment plans and share details of improvements to systems and processes.

We have also held more localised community meetings following incidents with large scale impact (for example: significant flooding in Wigan) to understand the customer experience and share our learnings.

A dedicated external communications lead is now in place to deliver on our commitment, covering both planned work and post fault support.

#16. Maintain high levels of competition in connections in the Northwest

We will maintain high levels of competition in connections in ED2 as the best way of providing choice and value to customers.

Background

Connection customers tell us that the best thing we can do to deliver value to them through efficient prices and high quality service is to maintain a competitive environment for connections providers in our area.

We are the most successful network operator in demonstrating that there is active competition in our area. Ofgem conducted competition tests where new connections work was categorised into 11 market segments. Two of these were 'excluded' market segments which covered small connections (up to four premises) and where competition was expected to be less likely to develop; for these customers other mechanisms (e.g. customer satisfaction survey and time to connect incentive) are in place to ensure they receive good service.

Measurement	Target	Completion date
Value to customer	Continue to enable competition	On-going

Performance

We continue to be the leading DNO in demonstrating active competition, having successfully passed eight out of nine market segments in Ofgem's Competition in Connections review. This accounts for about 98% of connection activities in the Northwest. We also support competition by measuring customer satisfaction of the services we provide. This year, we achieved 89.8% satisfaction and ranked fourth across all the DNO's.

#17. Extend Smart Street technology

We will extend Smart Street to a further 250,000 households in our region.

Background

Smart Street is our award-winning initiative to reduce customers' electricity usage and bills by managing the voltage on the local network. By using technology at our substations to subtly alter the amount of electricity flowing to homes, we can reduce consumption and save customers' money, without affecting their usage behaviour in any way.

Smart Street has been proven to reduce customers' energy consumption by up to 8% – equivalent to a £60 reduction in annual energy bills.

In ED2, we will extend Smart Street to a further 250,000 households in our region, through a £78m investment programme. We will target the deployment of this technology to areas where there are higher populations of customers in fuel poverty. This technology also increases the available capacity of the network and therefore we will also target the deployment where we expect clusters of low carbon technologies such as solar panels and heat pumps so that more costly network upgrades can be avoided.

While the technology can only be applied to underground networks the cost to serve customers on underground networks is much lower than the cost on overhead lines. We already have in our plan significant investment earmarked to improve the overhead line network such as tree management, worst-served customer programme and the rollout of our LineSIGHT technology.

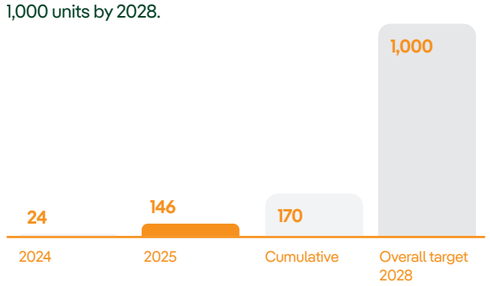
Measurement	Target	Completion date
No. of transformers installed	1,000 transformers	2028

Performance

In 2024/25 we installed 146 Smart Street transformers, giving us a total of 170 transformers so far in ED2.

We continue to align these Smart Street transformer replacements with other interventions planned for a particular site in order to avoid further planned interruptions for our customers and ensuring efficient delivery.

We continue to expect to deliver the whole programme of 1,000 units by 2028.



#18. Reduce the number of power cuts

We will reduce the number of interruptions experienced by customers on average by a further 20% from their levels in the 2021-2023 period.

Background

The frequency of power cuts is measured through the number of interruptions a customer experiences on average.

We commit to reduce the number of interruptions experienced by customers on average by a further 20% from their levels in the 2021-2023 period. This will reduce the average from around once every four years to once every five years.

We will reduce the number of customers affected by each fault on the network by installing new automated control equipment.

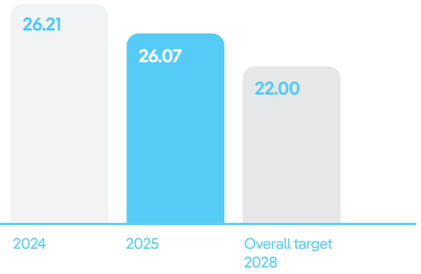
Measurement	Target	Completion date
Customer Interruptions	Reduce frequency of power cuts by 20% from 2021-23 levels	2028

Performance

In 2024/25 we achieved our second best ever customer interruption performance of 26.07. This is an improvement from our 2023/24 result of 26.21 and represents a 6% improvement on 2021-2023 average level of 27.7.

The plan to reduce the impacts of weather related faults is to create a new preparation method to have additional resource available to respond in time of high rain fall and heat. Our preparation for fast winds is currently considered appropriate.

Higher voltage fault impacts have also increased over the past two years and we are introducing tighter outage protocols and more risk mitigation activities to reduce future impacts.



#19. Reduce the duration of power cuts

We commit to reduce the duration of power cuts by 20% from the levels in 2021-2023 in the RIIO-ED2 period.

Background

The overall time that customers are without electricity is expressed using the Customer Minutes Lost term.

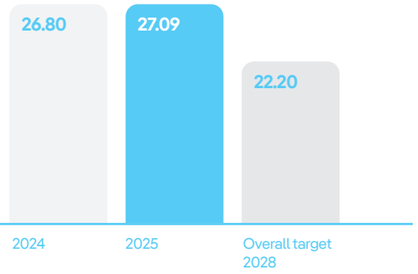
We commit to reduce this by 20% from the levels in 2021-2023 in the RIIO-ED2 period. This will reduce the average time without electricity in a year from around 25 minutes to 20 minutes.

We will do this by rolling out new innovative technology to identify faults and their location faster and training more engineers to be able to respond quickly to these faults.

Measurement	Target	Completion date
Customer Minutes Lost	Reduce time off supply by 20% from 2021-23 levels	2028

Performance

In 2024/25 we had an average customer minutes lost of 27.09 for the year. This is a 2% improvement on our 2021-2023 average level of 27.5. Average supply interruption duration (ASID) underperformance has impacted our CML performance, the plan to improve this area is to use CHIME locate to improve our response time to faults. There are also plans to upskill our work force such that there are more HV authorised people to respond to faults we will do this through finding new ways to accelerate training times. There will be ASID improvements that will be delivered by the rollout of Linesight.



#20. Improve performance for worst-served customers

We'll work to ensure none of our customers are classified as 'worst-served'.

Background

Our customers and stakeholders want us to improve the levels of service we provide to customers in more exposed parts of our network.

In response, we will deliver a targeted programme of enhancements to improve the reliability of the poorest performing parts of the network. This will be based on using Ofgem's new definition of a 'worst-served customer' which are customers experiencing twelve or more faults at HV and above over three years, with a minimum of two in each year. We have assessed all the areas which would have qualified under this new measure since 2016 and have designed proposed measures for each of them.

We were the only DNO to commit to achieving no worst-served customers in ED1 and we are continuing to aim for this in line with the new broader stretching definition by the end of ED2.

Measurement	Target	Completion date
Number of customers qualifying as worst-served	No WSC	2028

Performance

The number of customers meeting the Ofgem definition of 'worst-served' increased by 24 in the year ended 31 March 2025 to 930 (2024: 906).

We continue to focus on our ambition to have no customers meeting the Ofgem definition by 2028. To achieve this, we are delivering a major proactive investment programme, delivering substantive and sustained improvements in performance to 27 previously qualified circuits.

Alongside this, we continue with our tactical intervention programme, which seeks to address any newly emerging WSC performance issues.

#21. Measure and report short power cuts

We'll include short power cuts in our reporting.

Background

Very short power interruptions, (lasting less than three minutes) are not currently included in our performance reporting as they have traditionally caused less disruption and their exclusion encourages the use of remote control and automation on the network to restore interruptions quickly.

As the country becomes more reliant on electricity, we recognise the increasing impact of any power cut, regardless of the length.

We will work with other network operators to develop a reporting framework for these short interruptions to help us establish new ways of monitoring and ultimately, addressing them.

Measurement	Target	Completion date
Short Duration Interruptions (SDI's)	Increased accuracy and consistency across DNOs of short power cut reporting	2026

Performance

In 2024/25 a fully embedded automated process is in place to capture SDIs on the NMS control system.

The number of SDIs reported has increased significantly since the introduction of NMS; this is due to more automation being installed on the network and also improved SDI reporting processes.

#22. Increase collaboration with other utilities

We'll collaborate more closely with other utility providers to provide improved services to customers in vulnerable circumstances.

Background

To achieve this we will jointly fund new research projects and partnerships that improve support services, share awareness campaigns (e.g. safety) and share data to keep our Priority Services Register as up to date as possible.

This joined-up-approach is more efficient because it prevents the need for utility providers to always communicate separately with customers. In ED1 there was a new collaboration between Age Concern, Electricity Northwest, United Utilities and Cadent Gas alongside Preston North End Community and Education Trust, in a joint effort to reach and support older people in Lancashire.

Customers will benefit from a more efficient and cost-effective service with improved support for customers in vulnerable circumstances across the Northwest.

Measurement	Target	Completion date
A more efficient and cost-effective service with improved support for customers in vulnerable circumstances	Enhanced coordination with utility providers to support customers in vulnerable circumstances	2028

Performance

We continue to work closely with other utility providers, both in our area and across the UK.

Our data share process with United Utilities in now well established and we are leading on the technical approach to incorporating an automated solution for WD0225 (automated data flow to allow sharing of PSR data between energy and water companies).

We are also leading and funding an initiative, started with United Utilities and Cadent, with GMCA and other partners to understand and embed a collaborative support network for peace time response.

Further work has also been contributed to the National Pharmacies campaign alongside other UK DNOs.

#23. Increase investment in referral work

We'll grow our referral network.

Background

We will increase our investment into referral networks to £350k per year to enable trusted partner organisations to provide customers in vulnerable circumstances with the support they need.

Funded partnerships allow us to refer customers in vulnerable circumstances to organisations (e.g. Citizens Advice) that are trusted by local communities and provide extra support. This can include energy efficiency advice, free first-time central heating, grants to insulate or upgrade a customer's heating system and volunteers making regular contact with lonely or isolated people.

Customers will benefit from health and wellbeing benefits associated with connecting customers to support services when they need them most.

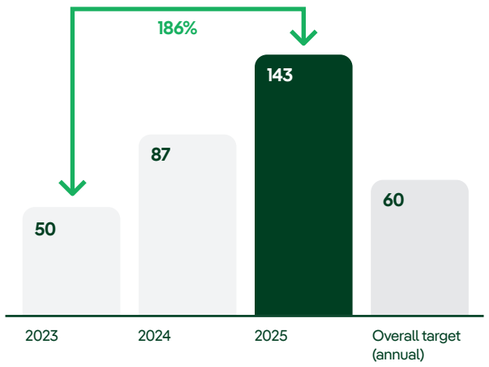
Measurement	Target	Completion date
Size of referral network	20% increase in referral network	On-going

Performance

During 2023/24 we increased the number of active partners who we work with from 50 to 87.

In 2024/25 we have increased this number further, from 87 to 143.

Together we have supported over 145,000 individuals. Examples of partnerships new for this year include East Lancashire maternity services, Hospice at home, Manchester Care and Repair and Hidden Treasure Trust.



#24. Expand our Priority Services Register

We will increase membership of the PSR to a minimum of 60% of those eligible.

Background

We will ensure membership of the PSR is a minimum of 60% of those eligible for registration, targeting areas of the Northwest that have the greatest number of customers in vulnerable circumstances.

The PSR is a free support service to customers who need extra help during a power cut, either over the phone or face-to-face.

We will continue to develop and expand our PSR and the services we offer to those on it including support available during power cuts. We will enhance the service provided to members through making contact more frequently to check everything is okay, arranging visits from Customer Welfare Officers for those who need extra help, providing tips to prepare and stay safe during power cuts and developing new support services.

Customers will benefit from increased resilience and health and wellbeing benefits associated with reducing the stress and anxiety that can be caused by a loss of power.

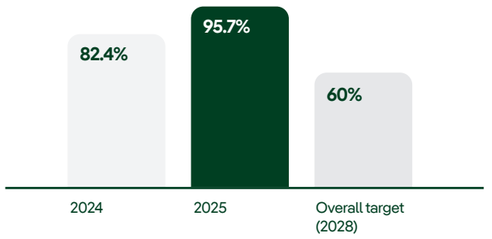
Measurement	Target	Completion date
Percentage of those eligible for PSR with membership	At least 60% of those eligible to be registered	2028

Performance

In the year ended 31 March 2025 we continued to promote awareness of our free Extra Care service (the name of our PSR) and increase accessibility to it, including collaboration with funded and non-funded partners.

Further embedding our ethos of supporting our customers and keeping them safe when they need us, led to an increase of registrants on our Extra Care service this year from 82.4% to 95.7% of those eligible in the region.

We have over 900,000 households on our register.



#25. Create an innovation fund

We will introduce a new £150k annual fund to work with expert partners to develop solutions to barriers of taking-up of low carbon technologies.

Background

One of the risks of a rapid path to decarbonisation is that customers with lower incomes and fewer opportunities will get left behind, as more affluent customers take up new technologies and reap the benefits. This could widen social and economic gaps further, creating an even more unequal society. To help prevent this imbalance, we will introduce a new £150k annual fund to work with expert partners to develop new solutions to address barriers to the take-up of low carbon technologies.

Key barriers to these technologies include their cost and the need for greater education and support to understand them. This fund is a specific new idea brought by one of our stakeholders as a suggestion on how we could increase engagement and communication with key groups. We are looking for new developments to trial and learn from. The investment level will support our learning and if we find something that works and want to develop further, we would make a business case to develop it. The annual fund will drive innovative solutions to ensure that everyone, including the most vulnerable, can benefit from a future energy system that is both smart and fair and ensures that no customer gets left behind.

Measurement	Target	Completion date
£150k annual fund made available	New solutions to address barriers to the take-up of low carbon technologies	On-going

Performance

In 2024/25, £127k of our innovation fund was utilised and financed works such as the fifth wave of a broader DNO community, independently facilitated, bi-annual low carbon technology (LCT) tracker. This initiative has reached over 4,000 households and tracks understanding, perceptions and LCT adoption rates.

Our research has helped inform our low carbon transition advisory service (Take Charge - Go Low offering). The fund is also being utilised to learn directly from customers and individual conversations and events are being leveraged to understand what is needed to support those at risk of being left behind.

#26. Support customers in fuel poverty

We will work more closely with trusted organisations to understand fuel poverty and deliver support services, investing £1.5m per year to support 250,000 fuel poor customers by 2028.

Background

At the start of ED2 the Northwest has had 12.1% of households (approx, 250k customers) who were in fuel poverty, which is when people cannot afford to keep adequately warm at a reasonable cost, given their income. These households are in more vulnerable circumstances than most when power cuts occur because they don't have surplus income to cope during the power cut (for example getting a hot meal).

Working alongside local agencies we will provide a more integrated range of support services investing £1.5m per year to reach all 250,000 fuel poor customers by 2028. Energy efficiency advice, grants and debt management support will help recipients financially, but also build their confidence and knowledge. Wellbeing and other health challenges will also be supported through a referral scheme which will make it easier for customers to get the help they need.

Measurement	Target	Completion date
Number of customers reached	Actively support 25,000 and provide advice to a further 25,000 customers each year	2028

Performance

This initiative continues to be successful, directly supporting 25,146 customers in 2024/25. Social value of fuel poverty services delivered (NPV*) of £10.2m.

The campaign itself has raised awareness with 92,218 (including giving advice to a further 25,000 customers) people through digital engagement and has afforded nearly 200 million opportunities to see or hear our message.

Our convening power has enabled a multi-agency approach to ensure satisfaction with this service delivered is as comprehensive as possible and that customers receive all the support that is available.

Cross referrals between participating organisations further enhance this. Customer satisfaction with this service was 94.8% at the close of 2024/25.

*Net Present Value, is the discounted sum of future cash flows, whether positive or negative, minus any initial investment

#27. Develop a new customer advisory panel

We will establish new representative customer advisory panels to include direct input to our plans from members of the public.

Background

A customer advisory panel is a group of customers that come together to review our business plans and provide feedback on our performance.

When developing our ED2 business plan, we established a new deliberative customer panel which has proved hugely insightful and beneficial. We want to capitalise on this investment and learning and introduce a new customer advisory panel to provide ongoing feedback on our strategy to support customers in vulnerable circumstances.

To ensure the panel is representative it will include a diverse range of customers that truly reflects the wide range of people that live in the Northwest. Part of the panel's remit will be to provide feedback on our plans for ensuring customers understand changes in the energy sector through videos, community sessions, education in schools and referral networks.

The outcome will be a strengthening of consumers' voices in business decision-making, influencing investment, future policy and customer benefits.

Measurement	Target	Completion date
Customer Advisory panels in place throughout ED2	Panel creation, membership and governance	On-going

Performance

The Voice of the Customer panel is firmly in place with 1,500 customers and colleagues registered. Further enhancements continue to embed and we have been running multiple focus groups with specific customer demographics to provide more tailored research.

The Customer Oversight Panel is also now established, providing valuable insight and critical friend assessment to future strategy challenges.

#28. Conduct home welfare visits for vulnerable customers during long-duration power cuts

We will proactively offer welfare visits to vulnerable customers without power for twelve or more hours.

Background

We will continue to offer timed appointments to customers who are having work completed at their property, or to those who require a welfare visit but we proactively offer visits to customers on our Priority Services Register who are experiencing power cuts over 12 hours.

Connections and cut-out work which is predominantly in someone's house are always appointment based. Planned welfare visits are arranged through discussion with customers and have either a timed appointment or, if support on the way, timed expectations.

Around 200 PSR customers experience power cuts over 12 hours each year. Visits will be made by a Customer Welfare Officer to explain what is happening, provide reassurance and tailored support.

Measurement	Target	Completion date
Welfare visits and referrals	Proactively offer welfare visits to all electricity customers in vulnerable circumstances who are without power for 12+ hours	On-going

Performance

The customer support vehicle is now in place and our agents are carrying out home visits to offer face to face support to customers. The vehicle is equipped with key materials such as facilities to keep medicine cold and installed technology means that agents can access systems to give real time progress updates when on site.

This initiative is still in its trial stage and learnings are being captured to inform evaluation development criteria.

#29. Introduce all-colleague training for vulnerable circumstances and mental wellbeing

We will implement a broad, tiered, and targeted training programme to ensure education and awareness of vulnerability is aligned to all staff roles and responsibilities, to recognise and reduce the impact of vulnerabilities.

Background

We will introduce new all-staff training on new and emerging mental wellbeing, linking the impacts of changing circumstances (i.e. power failures).

We will embrace diversity and inclusion, enabling our colleagues to have a better understanding of these areas including where an individual's circumstances require us to make additional considerations in our daily activities.

We will amplify our current training structure to provide a regular training programme for all roles, to provide insight and awareness for colleagues to better support our customers. The training will cover circumstances such as digital exclusion, rural isolation and regional economic impact.

The outcome will be an enhanced service provided by our colleagues through better awareness and understanding of the impacts of vulnerability and ability to recognise and reduce impacts through our daily activities. The training will also continue to build our mental wellbeing strategy, empowering our colleagues to understand vulnerable circumstances that can affect everyone.

Measurement	Target	Completion date
New vulnerability and mental health training programme	100% of colleagues trained in vulnerability and mental health	2028

Performance

Training to recognise and act on any customer circumstances that could cause detriment is rolled out annually to all our colleagues.

Further training for identified cohorts has also been delivered, for example Dementia training for apprentices and front-line colleagues.

#30. Improve flood protection

We will improve flood defences in our highest voltage substations serving more than 10,000 customers.

Background

The effects of climate change have led to some dramatic weather patterns in recent years, which have had an adverse impact on our network and our customers. For example, in 2015, Storm Desmond caused flooding at Lancaster's major substation, cutting power to more than 60,000 customers.

We invested £6m to raise key equipment at the substation three metres above the ground, to keep them safe if the site flooded again.

In ED2, we will build on the work completed to date, by improving flood defences to our highest voltage substations serving more than 10,000 customers, in line with the recommendations of the National Flood Resilience Review and also addressing sites newly identified as at risk based on the latest Environment Agency flooding data.

This programme will increase flood protection to 15 existing substations and install defences at 21 newly identified as at risk serving 345,000 customers at a forecast cost of £3.6m. Its completion means that all of our major substations will be protected to at least 1/100-year flood risk, including assumptions on future climate change impacts.

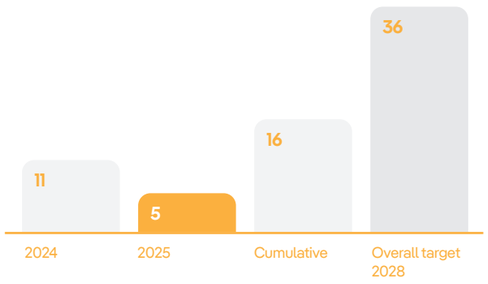
Measurement	Target	Completion date
Number of sites protected	Protect 21 new sites and 15 existing sites from the risk of a 100 year flood	2028

Performance

In 2024/25 we completed flood mitigation works at five sites.

Five sites have been identified as not requiring remediation work resulting in 20 sites remaining to complete.

Mitigation works at the remaining 20 sites are within our capital delivery plan and we on track to complete them in ED2.



#31. Plant 10,000 trees every year

We will plant 10,000 trees in our region every year of ED2.

Background

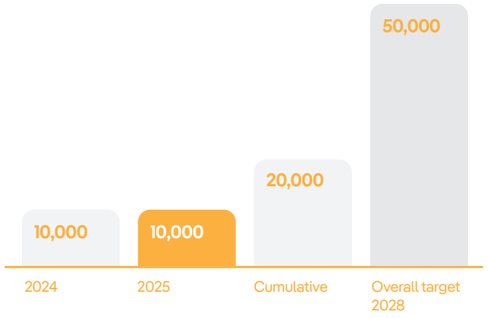
Trees or branches falling onto power lines can cause power cuts and damage. To mitigate these impacts, we (together with the other network operators and bodies such as local authorities and highways agencies) will need to start proactively cutting some trees before they pose a danger. While most trees are pruned or coppiced by our skilled arborists, some trees do need to be fully cut down.

During ED2 we may have to manage a significant number of trees a year so to offset this impact we are working with partners to plant 10,000 trees in our region every year of ED2.

Measurement	Target	Completion date
Number of trees planted	Plant 10,000 trees each year	On-going

Performance

In 2023/24 we planted 10,000 trees on our land holdings in Carlisle. In 2024/25 we planted another 10,000 trees at land holdings in Preston and Blackburn.



SP Electricity North West

#32. Increase cyber resilience

We will focus on enhancing our current cyber security capability.

Background

As electricity networks become increasingly data enabled, it is more important than ever that the data networks that support them are resilient to external threats.

The government introduced the Network and Information Systems (NIS) Regulations 2018 to increase the overall cyber security and cyber resilience of Operators of Essential Services (OES) such as ourselves.

We rely on cyber security to protect our customers' data and provide excellent customer service, to ensure efficient working practices within our workplace, to protect the reliability of our network against unauthorised access, to protect the network now and in future as we move to more actively managed systems, to keep costs low for customers and to ensure the safety of our customers, employees, and contractors.

To develop our cyber strategy, we completed a self-assessment using the Cyber Assessment Framework (CAF) which informed our medium-term cyber security improvement plan. This sets out the steps we plan to take in ED2 and beyond to comply with the regulations and exceed them.

Measurement	Target	Completion date
Compliance with the Network and Information systems regulations and our cyber resilience plan	Comply with requirements of Network & Information Systems Regulations	2028

Performance

We are actively delivering the required tooling, processes and people to meet the requirements of the Enhanced Profile (EP) of Network and Information Systems (NIS) compliance by the regulatory deadline. We have secured third party expertise to accelerate delivery and show demonstrable progress towards EP by the end of 2025.

We have enhanced our Target Operating Model and restructured our teams, reviewed our processes to align with industry standards and best practices to strengthen our cyber security resilience.

This is the area of our focus and continuous investment across the business.

#33. Maintain resilience in a changing climate

We will continue to improve the resilience of our network in case of extreme events.

Background

We face many challenges in ensuring that we continue to deliver leading reliability standards in the face of changing climate patterns. These actions are typically described as 'adaptation' to climate change, as distinct from the measures being taken to mitigate or restrict the level of climate change.

In ED2, we will complete our third Climate Change Adaptation report to Defra, setting out what we consider are the key medium and long-term impacts of climate change on the network. The previous assessment set out that the key risks related to the forecast increased frequency and severity of extreme events and so our plan is focused on continuing to improve the resilience of the network in this regard.

Our measures described on flooding and tree-cutting show the increased work we will undertake to improve resilience in a changing climate.

Measurement	Target	Completion date
Achievement of Climate Change Resilience Strategy	Implement Climate Change Resilience Strategy	2028

Performance

Following the Government and Ofgem reports into Storm Arwen we have updated internal practices to ensure that all members of staff have a role during severe weather events, ensuring that we have improved response in our contact centre and that we are able to contact all vulnerable customers. We have also continued to implement our programme of flood defence improvements.

To improve our network resilience we applied for additional funding under the Storm Arwen Reopener Condition of our Licence. In December 2024 it was confirmed that we had been allowed £40m to improve resilience for some of those customers who regularly suffer interruptions in storms and to develop models to identify the priority areas for further work. We were the only company to be allowed all requested funding under this reopener process.

We continue to work with colleagues in the Energy Networks Association's Climate Change Resilience Group (ENA CCRG) to develop a suitable set of Climate Resilience Metrics and Indicators (CRMI) which will help to inform the assessment of resilience projects in the RIIO-ED3 period. Also, in December 2024 we submitted our Fourth Climate Change Adaptation Report to Defra.

We continue to be active members of all ENA Resilience Working Groups and Local Resilience Forums (LRF) to ensure that we develop a co-ordinated approach in dealing with other network companies and with our stakeholders.

#34. Improve network health

We will undertake a targeted and efficient programme of asset renewal.

Background

The electricity network is a complex system comprising overhead lines, underground cables, substations, transformers and switchgear. Much of this equipment is long-lived. In fact, some of our underground cables are over a century old. Over time, these assets can degrade and become increasingly prone to failure, causing power cuts.

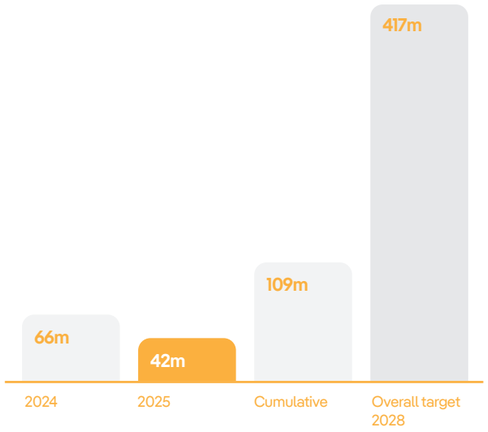
The largest part of our investment programme is devoted to the replacement and refurbishment of existing equipment. We measure the overall health and risk on the network using an industry standard approach. We will undertake a targeted and efficient programme of asset renewal which maintains the overall condition of the network.

Measurement	Target	Completion date
Risk Points	416.6m risk points	2028

Performance

In 2024/25,delivered 42m risk points, 10% of our target through our programme of targeted replacement and refurbishment activities.

In ED2, we have now delivered 109m risk points, 26% of our target and are still on plan to complete the full programme of work over ED2 despite being slightly behind our planned position at the end of year 2 due to the prioritisation of other programmes.



#35. Improve telecommunications resilience

We will improve the resilience of equipment that enables us to monitor and manage the electricity network remotely.

Background

Customers benefit from faster restoration of power during faults due to automated responses and remote control of the network. Controlling the electricity network is dependent on being able to communicate with the equipment remotely.

We will improve the resilience of equipment that enables us to monitor and manage the electricity network remotely from our central control room. We own and operate a private communications and data network to do this. We will invest more in this network to increase its resilience against physical, virtual and weather-related threats.

Measurement	Target	Completion date
Improved resilience against physical, virtual and weather-related threats.	Enhanced communication infrastructure resilience	2028

Performance

We continue to invest in our private telecommunications network to improve the reliability and performance of our systems. This work includes the replacement of aged copper pilot cables and fibre networks.

We have also replaced all legacy 1.4GHz radio systems with new higher capacity and more resilient and secure radio technology.

Our Telecommunications transmission equipment is also going through a technology refresh, with the new technology providing high capacity and secure solutions for major site interconnectivity.

#36. Invest in Electricity System restoration readiness

We will comply with the new Electricity System Restoration standards.

Background

Electricity System Restoration refers to the process of restarting the network following a national shutdown.

Our network is currently compliant to the standards for restoration set by government but these have recently been reviewed to enable faster and more widespread restoration in these circumstances.

We commit to delivering against these new standards. This will lead to increased costs for managing our control room operation but improving standards will give reassurance to customers that there is a robust emergency recovery process in place.

Measurement	Target	Completion date
Standards for restoration by government	Compliance with the new electricity systems	2028

Performance

Following Ofgem's approval in early 2024 of the changes to industry technical codes associated with the ESR standard, we have been working with the National Energy System Operator (NESO) and the other DNOs on developing our plans for the implementation of the new requirements ahead of December 2026 when the ESO's new obligations are due to come into force.

We attend the ESO's ESR steering group which aims to provide greater clarity on the specific requirements for DNOs in respect of ESR obligations and compliance.

#37. Reduce carbon footprint

We'll continue to reduce our carbon footprint.

Background

We will continue to work to reduce our own business carbon footprint – a move that our stakeholders and customers strongly support.

In ED1, we reduced carbon emissions by 42%, compared to 2015 levels. We achieved this through a range of initiatives, such as better monitoring of heating in our buildings and installing LED lighting at all our sites.

In ED2, we will continue to lead by example, by accelerating the pace of our own decarbonisation programme, in an effort to become a carbon neutral business by 2038.

We will progressively replace vehicles with electric equivalents and convert our buildings to be much more energy efficient. We plan to make one of our depots zero carbon for each year of ED2. We will replace our current vehicles with electric equivalents when they become cost neutral or cost beneficial over their lifecycle. We anticipate that this will lead to our vehicle fleet being 29% electric by 2028.

Measurement	Target	Completion date
Replacement of vehicles with electric equivalents. Conversion of select buildings to be more energy efficient.	Five new carbon neutral sites. Reduce carbon footprint to 15,313 tCO_2e. Over 25% of vehicle fleet electrified.	2028

Performance

We continue to make strong progress against our Environmental Action Plan commitments for ED2.

To support our science-based target commitment of a 63% reduction on our scope 1, 2 and 3 emissions we exceeded our trajectory target in 2024/25 of 18,615 tCO_2e by achieving a total of 17,882 tCO_2e.

In addition to the one depot completed last year, one more site was converted to Net Zero and there is a strategy for a further three Net Zero depots by 2028.

We continue to focus on our four-core pillar approach for transition to a more sustainable fleet. We currently have 194 EVs which equates to 18.5% of our fleet. Our vehicle decarbonisation strategy will be further supported by telematics installation in 2025/26 to allow us to understand which liveried vehicles can be more readily transitioned to an EV/PHEV equivalent.

#38. Reduce leakage from oil-filled cables

We will reduce leaks from the few bio-oil-insulated electricity cables that remain on our network.

Background

In ED1 we had 44,000km of underground cable; 380km of these (0.9%) were of an older construction that contain oil for insulation. These older cables can sometimes leak when they are damaged, seals deteriorate or ground conditions change. We have been progressively removing this type of cable from our network over a number of years.

In ED2, we plan to continue with this programme prioritising the highest risk cables and also carefully managing those lengths that do remain using new tracing technologies to ensure that we can identify and fix leaks as soon as they occur. These measures will enable us to minimise the leakage from these cables and we have set an annual leakage target of less than 25,000 litres, representing a 17% reduction on the targets we set for the end of ED1.

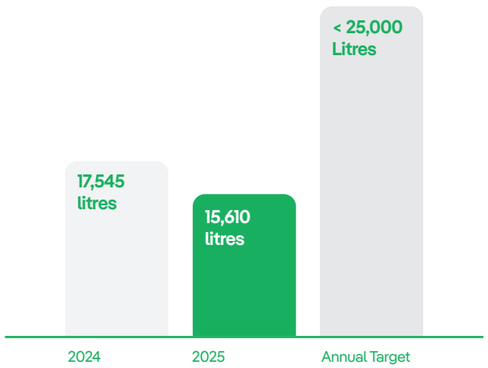
Measurement	Target	Completion date
Litres lost	<25,000 litres/ annum	2028

Performance

In 2023/24 our cable oil leakage was 17,545 litres which was significantly better than the target leakage of below 25,000 litres per annum by 2028.

We improved on this result in 2024/25 with a leakage rate of 15,610 litres.

Our long-term asset replacement strategy is on track to continue to remove and replace oil filled cables from our network.



#39. Undergrounding overhead lines

We will remove overhead lines in National Parks and Areas of Outstanding Natural Beauty.

Background

Since 2005 we have been working with partners such as the Lake District and Peak District National Park Authorities to remove overhead power lines and replace them with underground cables in National Parks and Areas of Outstanding Natural Beauty (AONBs) in our region. Overhead lines in these locations can be deemed to be visually intrusive and detract from the landscape.

In ED2 we will continue our programme working closely with National Parks, AONBs and other key stakeholders to replace 7-8km of overhead lines each year with underground cables in locations identified by our partners of being of particular visual impact. We will work with experts where appropriate, including archaeologists, the Environment Agency and local councils to minimise other environmental impacts and ensure the work is handled sensitively.

Measurement	Target	Completion date
Completed Under-grounding requests from stakeholders	Maintain our programme of improving visual amenity	2028

Performance

In 2023/24, we undergrounded 3.3km of overhead lines and in 2024/25, a further 0.4km of overhead lines were undergrounded in the National Parks and National Landscapes in our region.

The line length undergrounded in ED2 is significantly influenced by engagement with key stakeholders which determines the individual schemes that are chosen for their environmental benefit rather than pure length of line to be undergrounded.

#40. Reduce losses from network

We will reduce the amount of electricity lost in the distribution process.

Background

A small amount of electricity is lost in the process of distributing it to customers, due to it being converted into other forms of energy, e.g. transformers getting warm. This is wasteful in terms of carbon emissions and the cost to bill payers for electricity they never get to use.

To reduce these losses in ED2, we will upsize cables and equipment to lower loss equivalents when we are undertaking work for other purposes and also proactively replace the highest loss equipment on our network, even if the equipment does not require replacement for any other reason. This proactive investment will save around eight Gigawatt hours of electricity (GWh) by 2028 – enough electricity to power around 2,760 homes for a year.

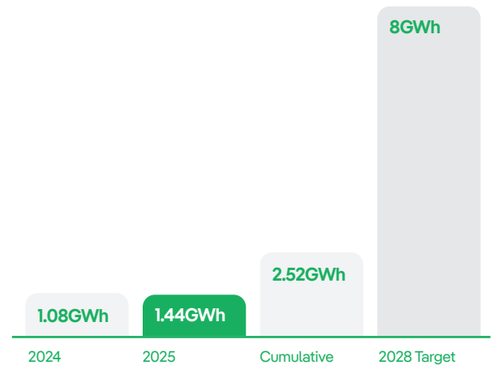
Measurement	Target	Completion date
Losses in GWh	Reduce network losses by 8GWh by the end of ED2	2028

Performance

During 2024/25 we replaced 63 distribution transformers, which will result in additional 1.44 GWh annual loss reduction.

To date in ED2 we have replaced a total of 109 distribution transformers equating to a 2.52GWh loss reduction.

We remain on course to reduce our network losses by 8GWh by the end of 2028.



#41. Reduce potent emissions

We will maintain a leakage rate of less that 0.3% of our total inventory.

Background

Sulphur Hexafluoride (SF_6) is used throughout the industry as an effective electrical insulator and is in some of our equipment but is a potent greenhouse gas if leaks occur. A small amount of our total SF_6 is lost via leakage each year.

There are currently few viable alternatives to using SF_6 so we will proactively manage our equipment to minimise leaks, replace old equipment if its condition deteriorates, and also work with industry to stimulate the development of alternatives. As we switch over to installing SF_6 -free equipment, we expect the costs to increase in the short term, until the widespread availability of alternatives.

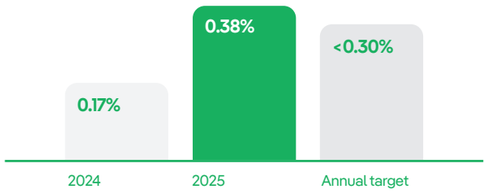
Measurement	Target	Completion date
% of SF_6 lost per year	<0.3% SF_6 leakage per year	2028

Performance

In 2023/24 we made improvements with managing and reducing losses of SF_6 from our network. Our SF_6 emitted was 0.17% of our total bank of SF_6 on the network.

Our 2024/25 performance of 62.12kg and 0.38%, is an increase due to an improved inspection methodology for asset inspections. We have now identified an issue with some of our smaller, pole-mounted re-closing equipment which is insulated with SF6 and accounts for 36% of our 2024/25 SF6 losses. This was not identified in our planning for ED2 as part of our service inventory and related targets.

We are trialling a new SF_6 -free unit to be deployed on our network to help reduce our total SF_6 bank and we have a working group that is tracking performance and also able to escalate risks/opportunities to our executive team. We will report the impact of pole-mounted re-closing equipment separately to track how it is impacting our progress towards the 2028 target.



#42. Making our sites wildlife havens

We will expand our programme of transforming substation sites into wildlife havens.

Background

In 2019/20 we transformed 9 of our substation sites into low-maintenance, self-pollinating spaces following a suggestion from one of our grounds workers. Not only do they benefit the local area but they can also reduce the amount of maintenance needed by Electricity North West. Unlike a site with grass that needs regular trimming and weeding, a site filled with self-pollinating wildflowers does not need regular visits. In addition, these sites are in the heart of local communities and many have been taken on to be maintained in partnership with local groups.

We will expand this programme in ED2 to create and support other green spaces and biodiversity schemes, including tree planting schemes where appropriate.

Measurement	Target	Completion date
Number of sites Enhanced for biodiversity	100 sites enhanced	2028

Performance

In 2023/24 we analysed over 65 hectares of our total estate and targeted 100 sites for biodiversity enhancement. We are now actively managing those identified 100 sites and biodiversity management work began in September 2023 including mowing cycles to allow plant species to flower and set seed.

To help with data collection and monitoring we developed a field reporting application that will allow notable plant and animal species to be captured throughout ED2.

#43. Help customers connect low carbon technologies

We will provide the right capacity for low carbon technologies in the right place at the right time.

Background

Demand for electricity is likely to increase significantly from its current levels over the next decade, as the transport and heat sectors become increasingly electrified.

Although there are likely to be some offsetting reductions from energy efficiency improvements and changes in industrial demand, we nevertheless need to plan for a large overall increase in consumption. At the same time, we expect to see an increase in the connection of renewable generation to our network – another big change which also has implications for our network investment plans.

Whilst substantial investment is needed to increase our network's capacity we also need to consider the affordability to consumers. We need to take a more strategic approach – by providing the right capacity in the right place at the right time, and by making the existing network work harder.

Measurement	Target	Completion date
Meeting increased consumption demands	Ensure capacity is provided in the right place at the right time as demand increases	2028

Performance

In 2024/25, we continued to deliver against our commitment to support customers in adopting low carbon technologies (LCTs), ensuring network capacity is available where and when it's needed.

Accelerating our investments: In ED2 to date we have invested on load-related activities to meet accelerating demand for LCT connections, particularly in areas of high uptake. Through reinforcement of our primary and secondary networks, we have created over 180MW of new capacity, enabling the connection of electric vehicles, heat pumps, and other LCTs

Facilitation of LCT Adoption: We unlooped a further 1,765 properties in the year, removing shared service constraints and facilitating easier access for customers to connect LCTs at home.

Strategic, Data Driven Investment: Our investments are guided by data-driven forecasts and customer engagement, ensuring capacity is delivered in the right locations and aligned with connection demand. These actions demonstrate our ongoing commitment to enabling decarbonisation and supporting the transition to a smarter, more flexible electricity network.

#44. Remove constraints for renewables

We'll help renewable electricity generation connect to the network, such as solar and wind power.

Background

At the moment, certain parts of our network (e.g. city centres) are restricted in the amount of renewable generation that can connect because of the characteristics of some of the equipment installed there. If we don't support this, far less renewable generation will be able to connect in the Northwest.

We will ease restrictions on DG connections where there is clear evidence of strong connections demand. By helping connect more renewable electricity generation we will enable the reduction of carbon emissions and help tackle climate change.

Measurement	Target	Completion date
Connections of renewable electricity generation	Remove constraints for renewable generation connection	2028

Performance

In 2024/25, we continued to remove barriers to renewable generation connections by deploying innovative solutions that accelerate access, support economic growth, and enable decarbonisation:

Accelerated Connections Through Flexibility - We enabled renewable generators to connect up to six years earlier than traditional reinforcement would allow, using Flexible Connection agreements. This approach has significantly reduced connection lead times and supported faster deployment of clean energy projects.

Active Network Management (ANM) Unlocking Capacity - Our ANM system went live in 2024/25, providing real-time management of network constraints. This has allowed us to dynamically optimise generation export limits, releasing over 2GW of capacity and facilitating more renewable connections without the need for immediate reinforcement.

Economic Growth Enabled by Smarter Networks - By reducing reinforcement costs and unlocking capacity through technical limits and smart optimisation, we've supported regional investment and job creation in the low carbon sector. 2024/25 alone delivered £29.1m in net benefits.

Decarbonisation Through Scalable Solutions - Our flexible and ANM-enabled connections are helping to integrate more distributed renewable generation, directly supporting local and national decarbonisation targets. These solutions are scalable and form a key part of our ED3 strategy.

#45. Establish a new annual community energy fund

We will offer a £100k fund per year to support community energy projects.

Background

Community energy projects are citizen-led schemes to reduce, generate or purchase energy. Examples include neighbourhood-led solar or hydro projects.

In ED1 we offered a £75k fund per year to support these projects and helped six such projects last year. These projects enable local, renewable electricity to be generated and connected to the network, as well as increasing awareness about energy efficiency and local action. The more power that is saved or connected locally means the lower the cost of the distribution of that power, saving money and emissions.

In ED2, we have increased this fund to match demand from £75k to £100k for each year of the price control period. This will enable more projects to go ahead, while allowing for growth in the sector in our region. It will also enable ongoing benefits measurement based on projects delivered, which could support justification for increasing the funding level further in ED3.

Alongside the funding, we will provide a free, dedicated support service to help guide community groups in the development of their projects, applications for funding and the connection of their projects to our network.

Measurement	Target	Completion date
Spending on community energy project schemes	£500k over ED2 period	2028

Performance

The community energy fund was open for application from May-July 2024. Following an assessment process six projects have been awarded a share of £83,658. The successful organisations are Cumbria Action for Sustainability; Greystoke and District Sports Association; Solway Rural Energy Hub; Groundwork Greater Manchester; Deeplish Community Centre Association; and Longford Scouts.

The projects will deliver their outputs next financial year and are forecast to deliver a range of outputs including the creation of one community energy group, four low carbon technologies installs, annual savings of nearly 100 tCO_2e, support to 250 households and engagement activities to nearly 4k people.

#46. Unloop customers' power supplies

We will unloop the electricity services to properties installing low carbon technologies.

Background

A looped service describes a situation where two or more households are connected to the electricity main with the same service cable. Hundreds of thousands of homes were historically connected to the power network in this way over the years to save the costs of connecting each individual property to the mains cable. However, this historic practice of sharing a service cable restricts the number of additional devices a household can connect to. This can prevent adoption of new technologies such as electric vehicle chargers – a change unforeseen when the original connections were made.

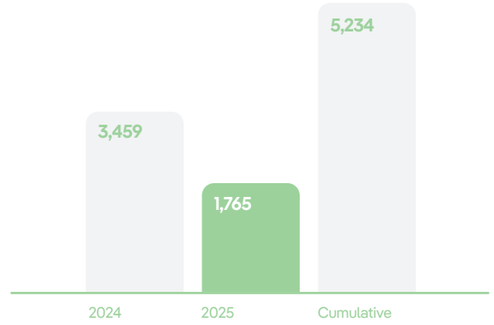
In ED2, we will unloop the electricity services to properties installing low carbon technologies such as electric vehicle chargers, putting in new cables to connect individual properties to the mains. We will do this when we are notified about electric vehicle charger connections or where customers want to connect heat pumps.

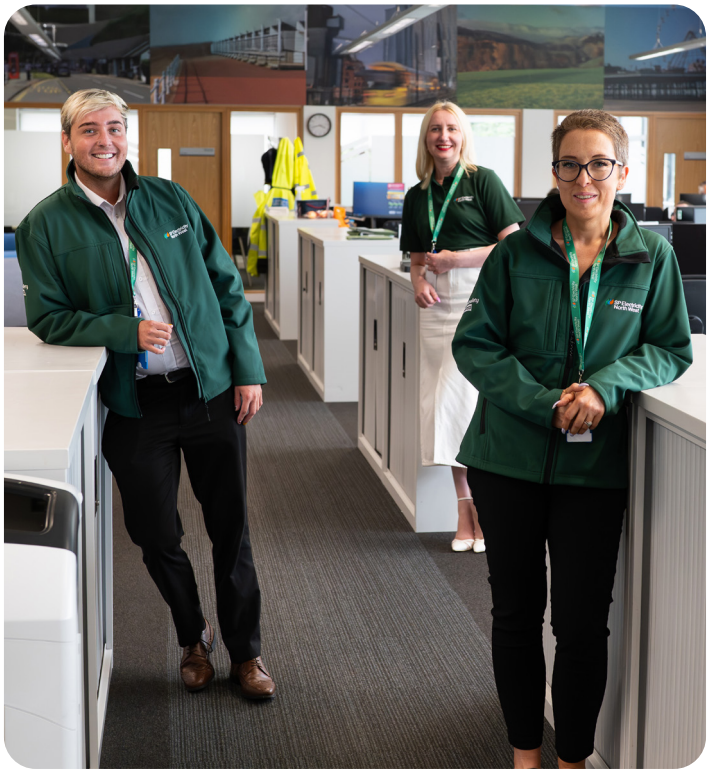
This will be the start of an ongoing programme to eventually remove all looped services in the Northwest.

Measurement	Target	Completion date
Number of services unlooped	Unloop services to properties adopting low carbon technologies	2028

Performance

In 2024/25 we unlooped 1,765 properties. In addition, we are looking at a process of "proactive" un-looping to focus permeative works on targeted areas of the network and are running three trials this year (2025/26) which should see us un-loop a further 1,600 properties.





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