

Annex 31: RIIO ED2 Stakeholder Engagement Strategy

This strategy sets out how we will ensure we continue to engage with customers, consumers and stakeholders to inform our business activities throughout RIIO-ED2 (2023-28)

December 2021

About Electricity North West

Electricity North West Limited is one of 14 electricity distribution network operators (DNOs) in Great Britain. We are responsible for maintaining and upgrading 56,000km of network and nearly 500 major substations across the region. We supply electricity to the diverse communities in the North West of England which extends from Macclesfield all the way up to Carlisle.

We are regulated by the Office of Gas and Electricity Markets (Ofgem) who provide DNOs with the license to operate and decide what's fair for us to charge our customers for each price control period.

Our current price control began in 2015 and runs to 2023 and is known as RII0-ED1 (Revenue = Incentives + Innovation + Outputs, Electricity Distribution 1). Our next price control RII0-ED2, which is the subject of this plan, will run from 2023-28 and is referred to hereafter as ED2.

Work is already underway to set the framework for RII0-2 that applies to all energy network companies (i.e. gas and electricity distribution). The framework will determine what RII0 ED2, which begins on 1st April 2023, looks like.

The period which the RII0-2 price control covers will see significant change in the way electricity is generated, consumed and stored, driving innovation across the whole energy system both now and into the future.

Contents

About Electricity North West	2
1. Welcome	4
2. Our track record and lessons from ED1 (2015-2023)	5
2.1 Triangulation	8
2.2 Customer segmentation	9
2.3 Customers, consumers and stakeholders	10
2.4 Stakeholder satisfaction research.....	12
2.5 Consultations	12
3. Approach for 2023-2028	13
3.1 Strategic and proportionate.....	14
3.1.1 Senior level buy-in.....	19
3.2 Robust, high quality and based on best practice	19
3.3 Inclusive	21
3.4 Material and responsive	22
3.4.1 Delivering outcomes that customers are willing to pay for.....	24
3.5 Transparent, measured and monitored.....	25
4 Engagement Commitments	27

1. Welcome

In delivering our customer and stakeholder engagement to inform our business plans for ED2 (2023-2028), we have significantly developed and expanded our engagement capability and delivery.

This level of engagement alongside increased scrutiny from our expert and demanding Customer Engagement Group has proved invaluable in our preparations. We want to make sure that we consolidate those learnings and continue to deliver for our customers and stakeholders throughout the ED2 price control period.

The energy landscape is changing rapidly to meet the demands of decarbonisation and, without taking into account customers' and stakeholders' views, we will not be able to deliver and balance what they need. We also recognise our role in enabling everyone to contribute and engage in the energy and digital transformation by identifying hard to reach groups and helping them engage, including building up their knowledge or providing support where necessary to ensure that seldom heard voices are incorporated.

The aim of this strategy is to set out our engagement approach from 2023-2028, while recognising the need to be agile to respond to changing needs and that some activities can and should be implemented sooner to provide most benefit.

Our approach for the engagement to develop our business plans was robust, high quality, iterative and informed by stakeholder feedback. The plan was designed with enhanced engagement which gave customers a strong voice across various platforms, was agile and enabled continuous improvement. We used learnings from past engagement to inform new engagement, using formal triangulation (refer to section 2.1) to review, manage trade-offs and plan next steps.

The impact of the coronavirus pandemic also meant that we embraced new ways of engaging our stakeholders and feedback suggests that stakeholders want some of the digital formats to be retained. So, while this document aims to set out our approach, we expect that our approach will develop and improve with continued input and engagement from our customers and stakeholders and take into account changing requirements, preferences and advances in engagement practices as we go through the ED2 period.

Our new strategy aims to retain and build on our existing approach and continue to deliver effective, flexible and responsive customer and stakeholder engagement. It outlines to our stakeholders the approach we will take to incorporate their views into our business activities, and the governance that will ensure that we remain in-touch and accountable to our stakeholders.

Paul Bircham

Regulation and Communications Director

Electricity North West

2. Our track record and lessons from ED1 (2015-2023)

We have conducted stakeholder engagement since the business formed in 2007. In 2012, we added significant rigour via a new strategy based on the global standard for good quality engagement AA1000 Accountability Principles (updated 2018) and AA1000 Stakeholder Engagement Standard (2015)¹ developing our first formal internal and external stakeholder panels. Our first assurance against the standard was in 2013 as part of our ED1 engagement programme and we have been on a journey of continuous improvement since. Updated further in recent years our strategy informs decisions and improvement plans and is aligned to the development of Accountabilities AA1000 Stakeholder Engagement Standard (SES) and includes **inclusivity, materiality, responsiveness and impact** (Figure 1).



Figure 1: AA1000 Stakeholder Engagement Accountability Principles (APS)

Our stakeholder engagement strategy and approach has also been continuously evolving and improving, based on the four strategic goals at the heart of our ED1 business plan: **reliability; affordability; sustainability; and excellent customer services**, which ensure that we cater for the needs of vulnerable customers. Alongside focused engagement, we developed four director-led stakeholder advisory panels aligned to our business plan objectives which provided scrutiny of our performance and valuable expert guidance to our leadership team and strategic decision making.

Our advisory panels have evolved throughout ED1 and, based on panel member feedback, we consolidated our approach to the sustainability and consumer vulnerability (strategic and delivery partner) advisory panels, introduced independent chairs and an overarching Chief Executive Panel which provides direct stakeholder input to our leadership team.

Our panels have been critical to the implementation of our business plan in ED1, helping to shape our approach to fuel poverty, transition to net zero and distribution system operator, business activities such as diversity and inclusion, digitalisation and data strategy and more recently societal issues relating to Covid-19 and Brexit. Our approach to panel delivery has been flexible ensuring that

¹ <https://www.accountability.org/standards>

our stakeholders have been able to continue to effectively engage with us and provide valuable input, despite social distancing and digital working due to the pandemic.

Stakeholder engagement is embedded in our Purpose and Principles (Figure 2). Working together is core to our Purpose – engaging with others and acting on what we hear is vital. All colleagues are empowered to seek and act on engagement. Stakeholder engagement is reported and centrally recorded for monitoring by our management team.



Figure 2: Our Purpose and Principles

Built around the Accountability standards AA1000APS and AA1000SES, our engagement approach was strategically structured to support key strategic themes and stakeholder outcomes and has evolved throughout the ED1 period to ensure that planning for the future was clearly included (Figure 3).



Figure 3: Our strategic alignment of stakeholder outcomes

Throughout the ED1 period, our stakeholder engagement approach and strategy has been regularly challenged by external benchmarks. Annual assessment and feedback from Accountability has been

included in the Stakeholder Engagement and Consumer Vulnerability Reports² submitted to Ofgem. Feedback has also been received from Business in the Community Responsible Business Tracker³ (previously Index) and other ESG indices.

The stakeholder outcomes were identified as part of a series of materiality exercises, designed to establish what issues were most material or relevant to stakeholders. This process was repeated every two years as part of our open access annual stakeholder workshops. This highlighted that areas like health and safety and data management were initially identified by stakeholders as low priority. However, upon further discussion,⁴ it was revealed that these are taken ‘as a given’ and it was assumed that as a regulated business we operate in a safe manner. The exercises ensured that we continued to focus on issues important to our stakeholders and delivered outcomes that they prioritise and value. It also gave insight into new material issues or those that were becoming more or less important. During ED1, we specifically saw and recognised the rise of decarbonisation and the transition to net zero, leading us to add new commitments and develop and implement our Leading the North West to net zero carbon plan⁵.

Having identified these areas and the priorities in our business plan commitments, we undertook stakeholder mapping based on AA1000 APS including people who are affected by our organisations operations, people who are likely to influence our organisations performance and people who we have legal, financial and operational responsibilities to (Figure 4).

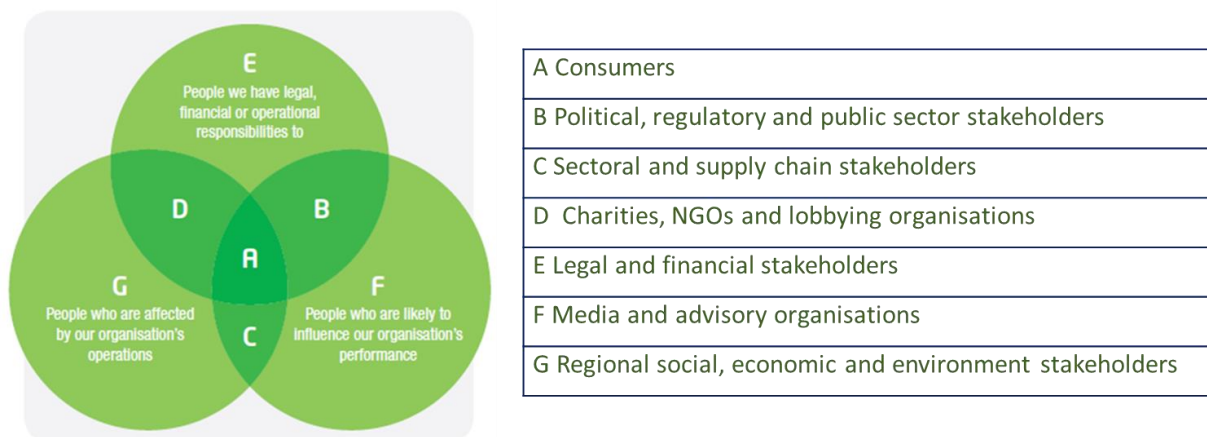


Figure 4: Stakeholder mapping based on AA1000 APS

This ensured we reached appropriate topic specific stakeholders, by appropriate channels and mapped them to the appropriate engagement and collaboration method: strategic, consultative and informing. We identified 50 subgroups of stakeholders and this has been regularly reviewed and updated throughout the ED1 period.

In addition to our director-led stakeholder advisory panels, informed by stakeholder feedback, we have enhanced our strategic engagement with annual sub-regional open access workshops to reflect the diversity of our operating region. We also introduced topic specific stakeholder engagement channels including: connections, community and local energy, data and digitalisation, flexibility services, innovation and decarbonisation. We reinforced our engagement strategy through

² <https://www.enwl.co.uk/about-us/engaging-with-our-stakeholders/stakeholder-engagement-publications/>

³ <https://www.bitc.org.uk/the-responsible-business-tracker/>

⁴ https://www.enwl.co.uk/globalassets/stakeholder-engagement/documents/regional-documents-20182019/2018_aug_feedback-report-final.pdf

⁵ <https://www.enwl.co.uk/go-net-zero/>

collaboration with local and national government representatives, this has been particularly important in the area of decarbonisation as regional targets and ambitions have evolved.

This engagement was supported by a suite of complementary communication approaches, including bilateral meetings, interviews, webinars and workshops, events, newsletters consultation and research. However, in 2019, the impact of the coronavirus pandemic meant we quickly transitioned from face to face events. We developed and embraced new digital methods of engaging our stakeholders and capturing feedback from our panels including the development of online polling and breakout room discussion. Our 2019 stakeholder survey and feedback from our advisory panels suggested that stakeholders want some of the digital formats to be retained in future engagement and we will remain agile and to stakeholder preferences.

In ED1, our stakeholder engagement activity was reported annually to the regulator, Ofgem, via the Stakeholder Engagement and Consumer Vulnerability Reports, which are published on our website www.enwl.co.uk.⁶

We recognised that our overarching consumer engagement strategy was less well developed in the early years of ED1, as a business-as-usual activity. While we carried out regular customer surveys and focus groups, these tended to be customer service focused or specific to innovation research. Our identification of this gap resulted in a step-change in 2019, when we increased our focus and resourcing to ensure customer voices were engaged and heard in the development of our ED2 business plan. These are summarised below, but further detail can be found in annex 30 Stakeholder and customer research approach.

2.1 Triangulation

In 2019 (within ED1), we began to develop our engagement programme for our ED2 business plan. Our first step was to review everything we knew to date. A process known as triangulation.

Triangulation is not about validating current or emerging thinking but deepening and widening understanding by capturing different dimensions of the same phenomenon so that new insights can be found to improve the overall quality of organisational decision making.

Triangulation is a process which enables us to interpret a range of different inputs to our plans. It involves effectively 'stopping time' and identifying what has been learned during a specific period, revealing gaps in existing knowledge. It reflects on how information has been processed and informs what further steps are required.

We have conducted a less formal version of triangulation as part of our business-as-usual review of stakeholder feedback throughout ED1, reviewing comments and views from our various panels and other engagement channels to find appropriate ways forward. However, we recognised that we would need to add a further level of rigour and expertise in this process for our business plan.

In July 2019, we carried out best practice visits to leading water and gas companies which highlighted that formal triangulation could be a valuable technique for understanding and applying insights gained from all stakeholder and customer engagement activity. We therefore appointed

⁶ <https://www.enwl.co.uk/about-us/engaging-with-our-stakeholders/>

utilities research experts, Impact Market Research, to deliver an initial triangulation report to provide a starting point for our business plan engagement. This focussed on three key areas:

1. Horizon scanning - to understand policy and regulatory developments and best practice in stakeholder engagement;
2. Review of research and engagement undertaken by the company; and
3. Operational data – to review everyday customer engagement with the company.

The insights captured in the RIIO-ED1 triangulation report⁷, include but were not limited to, a gap analysis, and its recommendations have informed the development of our ED2 plan.

Impact Market Research challenged us to formalise processes that bring together the wide range of insights from across the business, encompassing an expansive range of content, including meeting notes, customer service information and engagement feedback from formal stakeholder engagement events. Seeing the value of this initial phase of pre-engagement triangulation, we brought the expertise in-house as we continued to develop our plan.

The value of triangulation arises from it being a continuous part of a process, to both check back and look forward, identifying themes and patterns as well as gaps or conflicts that require further engagement.

By dividing up our business plan engagement strategy into six distinct stages (Figure 5), we set out to perform triangulation after each. This allowed us to continuously adapt and improve our programme as it progressed, adding nuance and detail to our engagement, to deliver richer outcomes.

Figure 5: Our six-stage ED2 engagement process



2.2 Customer segmentation

In addition to triangulation, customer segmentation was another area that we knew would add value, having explored best-practice methods with water networks and other organisations. Consumer segmentation is well established in commercial marketing settings, and we recognised that it as a method that could add value in our engagement programmes too.

⁷ <https://www.enwl.co.uk/globalassets/stakeholder-engagement/documents/ed2-stakeholder-documents/riio-ed2-stakeholder-engagement-triangulation-report.pdf>

As previously stated in Figure 4, we already map and segment our stakeholders into groups based on their industry, level of influence, topics of interest etc to ensure inclusivity (one of the fundamentals of the AA1000APS approach). However, this was the first time we had carried out a comparable exercise to segment key consumer groups.

We already understood the consumers' journeys through our existing customer satisfaction research and this ensured we had appropriate demographic representation on any research we carried out. However, we recognised there were gaps in our understanding of our customers' attitudes and behaviours, the prevalence of these in our region and variations by sub-region. By carrying out our own segmentation exercise, we were able to establish seven distinct groups of customers which give us a richer insight into who they are and how we can best engage with them.

Segmentation allows us to:

- Ensure we are engaging representative samples of consumers
- Understand different consumer groups and tailor engagement to them
- Analyse results of research by consumer segment to identify patterns, in order to help us develop appropriate solutions.

Further details and our detailed approach to customer, consumer and stakeholder research for the ED2 business plan is set out in section 9 of the business plan with more detail in annex 30.

2.3 Customers, consumers and stakeholders

We identified that while we carried out customer service research and stakeholder engagement, we had a gap in customer and consumer engagement. Rather than engaging about customer service levels or asking focus groups for specific input about a particular scheme, communication channel or innovation project, we needed to broaden out our research and develop a programme to provide a stronger voice and influence in our decision making. To achieve this, we recognised that it was important to make the distinction between these distinct groups. We used the following definitions:

- **Stakeholders** as an individual or organisation that are affected by us, influence our performance or we have a legal, financial or operational responsibility to
- **Customers** as those who pay electricity bills
- **Consumers** as those who use electricity - including young people and future customers

This distinction is important as it influences how we ask questions, who we ask them of and how we interpret the results of engagement. This is particularly relevant when decisions impact bills and willingness to pay.

Young people for example are unlikely to be customers; however, they use our services and are therefore electricity consumers, and will likely be our future customers. As such, it is right that we started more robust engagement with this important group. A 15-year-old in our region when we started our engagement on our ED2 plan in 2019 will be 23 by the time ED2 ends in 2028. This means they may have been bill-paying customers for a number of years showing that the decisions we make now will affect them for years to come. Initial engagement showed their enthusiasm for environmental improvements, including net zero, and for supporting people in vulnerable circumstances.

We were one of the first distribution network operators (DNOs) to appoint a chair of our new independent Customer Engagement Group (CEG) for ED2 and announced the members of our

group⁸ in May 2019. This gave us a head start and the group's first meetings coincided with the development of our strategy for our business plan engagement. This enabled the CEG to input on our plans before we put them into action.

We specifically chose a challenging group of individual experts⁹ who have added significant input, and value to our engagement and development of our business plan.

As part of the development of the CEG, we appointed independent stakeholder representatives to chair our stakeholder advisory panels¹⁰. We recognise the value that this has added to the process and the independent chair positions will be retained in ED2.

During ED1 and the ED2 business planning process, our advisory panels have provided valuable stakeholder input, representing customer and consumer views and addressing material strategic issues such as decarbonisation and climate change impacts, fuel poverty, our support and services for customers in vulnerable circumstances. However, we recognised the opportunity to complement this with qualitative and quantitative feedback from customers.

We heard from more than 18,500 customers, consumers and stakeholders as part of our six-stage ED2 business plan engagement programme (Figure 5).

We established early channels for our ED2 engagement including an online community. This was supplemented by an informed deliberative panel of 40 representative customers who were provided with appropriate information, to educate them about Electricity North West's role, responsibilities and key challenges. This enabled them to engage, debate and inform our thinking and our priorities.

The business plan development has also been challenged by willingness to pay research to ensure that stakeholders and customers not only agreed that we were focusing on the correct future priorities, but also that they were willing to pay for these investments. The feedback from this research has been shared and challenged by our independent Customer Engagement Group (CEG).

We have also engaged with the independent RIIO-2 Consumer Challenge Group through briefings and presentations and Q&As to inform them of our process and plans. Draft plans were scrutinised and challenged by them in May 2021. In July 2021, our draft business plan and appendices were made available for wider stakeholder engagement. More information about this engagement can be found in annex 30.

We also decided to explicitly acknowledge that not all engagement is equal. The results of a quick poll on social media for example cannot be given the same weight and credence as a detailed formal quantitative study. Our new quality assurance process provides us with a mechanism to assess and express how robust each piece of engagement was and therefore, how much weight it should have in our triangulation process. As part of this assessment we determine the materiality of evidence collected using three key tools:

1. A quality assessment framework: taking into consideration aspects such as how robust, representative and accurate our findings are and their external validity

⁸ <https://www.enwl.co.uk/about-us/news/latest-news-and-views/2019/electricity-north-west-confirms-appointments-to-customer-engagement-group/>

⁹ <https://www.enwl.co.uk/about-us/engaging-with-our-stakeholders/ceg/>

¹⁰ <https://www.enwl.co.uk/about-us/engaging-with-our-stakeholders/our-advisory-panels/>

2. A set of principles for trading-off divergent views: guidelines for determining which evidence, if any, to place more importance on when stakeholders' views are different
3. A quantitative data weighting: used to appropriately reflect customers' and wider stakeholders' views in our decision making

Our approach places a different weight on customers' and stakeholders' views. Ultimately our customers will pay for any improvements, therefore it is appropriate that they need the biggest say. We then consider the customer groups themselves, which can and should be divided into domestic and business customers. We use a proxy, which combines the volume of these customers connected to our network and their electricity consumption to fairly represent them.

Segment	Weight
Household	51%
Business	29%
Stakeholder	20%

When carrying out quantitative work, we have given the following standard weighting to these three groups:

Segment	Weight
Household	45%
Business	25%
Stakeholder	30%

For some areas, that require more detailed background information and where we want to make sure we incorporate enough stakeholder expertise, we have created a bespoke weighting. This illustration shows the weighting applied for the topics of safety, resilience and net zero, where feedback from stakeholders who are experts in these fields has a greater influence in our decision making.

More information on this can be found in our Stakeholder and customer research approach in annex 30.

2.4 Stakeholder satisfaction research

We launched our first ever stakeholder satisfaction survey in December 2020, engaging over 200 participants and achieving excellent representation across our mapped stakeholder community. The survey measured overall satisfaction, attitudes towards the relationship held, future engagement preferences and improvement areas. The results indicated a strong correlation between the frequency of engagement, stakeholders' familiarity with our business and overall mean satisfaction (81%).

Satisfaction levels were 10% higher on average among advisory panel representatives where relationships are mature. This research told us that our engagement is *inclusive, meaningful* and *mutually beneficial*. Due to COVID-19, all stakeholder engagement has been migrated online and become more frequent. Our stakeholders have indicated they would like to continue with this model in the future, with only 3% indicating they wished to engage less often. The survey will help to inform our ED1 activity and influence our ED2 strategy.

2.5 Consultations

In ED1 and during the development of the business plan, we have developed an extensive approach to consultation. We developed customer and stakeholder research techniques, detailed above, but also increased engagement around adhoc consultations for customers and stakeholders to support

developing strategies, such as digitalisation and smart meter data use. To accommodate the increase in consultations, we developed an engagement hub on our website¹¹ which provide open and transparent access to any current consultations and details of past ones.

3. Approach for 2023-2028

We recognise that engagement isn't just for price controls and business plan development, it is an important and integral part of sustainable business management. We have embedded stakeholder engagement within our business and are committed to continuous improvement, building on our learning and achievements in ED1.

We acknowledge the value of the additional channels that have been established in the development of this business plan and we are keen to maintain a high level of engagement throughout the ED2 price control period. This will reduce the potential risk of peaks and troughs in engagement. We will continue to embrace the new digital ways of working that have been implemented and refined in recent years, developing a hybrid approach as necessary, to meet customer and stakeholder needs. We will also regularly review our approach and look to include additional engagement channels and support to ensure that a broad and representative range of voices, including customers and consumers, the hard-to-reach and seldom-heard, continue to influence our activities and outcomes.

In developing this customer and stakeholder engagement strategy, we reviewed the feedback previously received on our approach by Ofgem through the ED1 Stakeholder Engagement and Consumer Vulnerability Incentive. We also took account of the Accountability assurance for that report, our stakeholder satisfaction survey and other stakeholder feedback and the direct input from a customer deliberative panel and stakeholder advisory panels. The draft strategy was then reviewed by our independent Customer Engagement Group, shared with our advisory panels and made available for consultation as part of our early draft business plan consultation in May 2021 and again in July 2021.

We are making three bold, ambitious headline commitments in our ED2 business plan based on what our customers and stakeholders have told us they want:

Headline commitment #1: Net Zero:

We will drive the transition towards local net zero targets, through distribution system operation, following a path to making our own operations net zero by 2038

Headline commitment #2: Network:

We will remain one of the world's most reliable networks, reducing the number of power cuts and the average time people are without power by 20%

Headline commitment #3: Customer:

We will deliver at least a 9/10 level of customer service and provide additional support to electricity users in vulnerable circumstances and fuel poverty

¹¹ <https://www.enwl.co.uk/about-us/engaging-with-our-stakeholders/engagement-hub/>

Our engagement aims to deliver the outcomes our stakeholders, customers and consumers prioritise and value. Specifically, we engage to better serve them by understanding their current and future needs and expectations, identify opportunities to continuously improve our services, manage uncertainty and risk and return greater value to our customers. We aim to better serve the diverse region and its various network users, both domestic and industrial, rural and urban, and endeavour to reach individual and representative stakeholders and customers, including those that are harder to reach and seldom heard, by understanding their current and future needs and expectations. This helps us to identify opportunities to continuously improve our services, manage uncertainty and risk and deliver greater value to our customers. The electricity network and how customers interact with it are also undergoing rapid change with the increased adoption of low carbon technologies and increased flexibility in managing network demand. All of this will change stakeholder engagement opportunities, expectations and the type of stakeholders that we will need to work with.

To ensure that customers and stakeholder continue to influence our decision making, hold us to account and challenge us as we deliver these commitments, our customer and stakeholder engagement strategy will be:

- **strategic and proportionate:** strategically delivered by senior leaders and embedded across the organisation through robust internal governance and reporting structures to influence business decision making. Our approach will reflect the differing geography and make-up of the region and will ensure that we are held to account by regular and effective stakeholder engagement; we will recognise the challenge of delivering stretching regional environmental ambitions on net zero whilst keeping bills low and ensuring that no-one is left behind in the net zero transition;
- **robust, high quality and based on best practice:** approach based on externally recognised standards, such as Accountability AA1000 SES and AA1000 AP, and built on effective engagement initiatives from ED1 and emerging best practice trends. Formal triangulation will inform decision making by bringing together regular customer and stakeholder engagement outputs along with external insight;
- **inclusive:** using a data-led approach to identify customers, consumers and stakeholders including those that are hard-to reach and seldom-heard;
- **material and responsive:** using regular materiality and priorities engagement with customers and stakeholders to identify and respond to changing needs around material issues including decarbonisation ambition, vulnerability and network reliability. Creating and responding to stakeholder and customer feedback appropriately through a variety of two-way engagement channels;
- **transparent and measured:** we will measure and evidence our customer and stakeholder engagement performance and use regular internal and open external reporting to demonstrate impact to deliver better outcomes for stakeholders and customers.

Our engagement commitments and measures are detailed in section 4.

3.1 Strategic and proportionate

Our strategy will be based on the commitments and strategic goals identified in the ED2 business plan ensuring that we deliver against our three key strategic themes Net Zero, Network and Customer. We will ensure stakeholder challenge and accountability with appropriate stakeholder channels and engagement.

Our guiding principles of the engagement strategy (Figure 6) will continue to be linked to our core Purpose and Principles (Figure 2) and support the ‘wants and needs’ of our stakeholders and customers which will be kept under review through materiality and research detailed in section 3.4.

Stakeholder engagement principles					
We're switched on		We're adaptable		We take pride	
Stakeholder engagement informs our business decision-making	We engage with a wide range of stakeholders to capture the views of the customers and communities we serve	We understand our stakeholders' preferences and engage with them in line with their preferred channel	We continually grow our understanding and adapt our business as a result of listening to the experiences of our stakeholders	Our feedback to stakeholders is transparent on the issues they've raised and they hold us to account	Everyone is empowered to act on what they learn

Figure 6: Stakeholder engagement principles

Our strategy will be to engage to deliver better outcomes for our stakeholders and customers. This will ensure that as an organisation we can deliver the needs of the business plan, including:

- **Enhance our understanding:** stakeholder and customer engagement (including dialogue, research and insight) increases our understanding of our operating environment and of our stakeholders' and customers' wants, needs and priorities, now and for the future. Better understanding provides more credibility to our ED2 business plans commitments and ensures our planned outcomes are aligned to future needs.
- **Respond to change:** what stakeholders and customers need from the energy sector is rapidly transforming. Strong engagement is identifying those changes which are material to our business, now and for the future, helping us to respond appropriately to them.
- **Manage risk:** from incidents to major economic changes, having strong, effective relationships in place means that we can respond better as circumstances change. Our risk approach is aligned to the company's strategic risk management approach and includes reference to the company's classification of risk through our strategic risk register. As the outcome of our ED2 settlement could have a significant impact on our business and our customers, engagement is also a useful risk mitigation tool for risks associated with delivering a robust, ambitious and stakeholder-driven ED2 business plan.
- **Freedom to operate:** working closely with local communities, for example, when we're undertaking disruptive work increases understanding for all sides and enables us to complete work more efficiently.

The customer and stakeholder engagement strategy will not operate in isolation but will align to and support other strategies within the business plan including (but not limited to) Electricity users in Vulnerable Circumstances strategy, Distribution System Operator Strategy, Environment Action Plan, Workforce Resilience, Innovation Strategy and our Digital and Digitalisation Strategies which all incorporate significant embedded customer and stakeholder engagement.

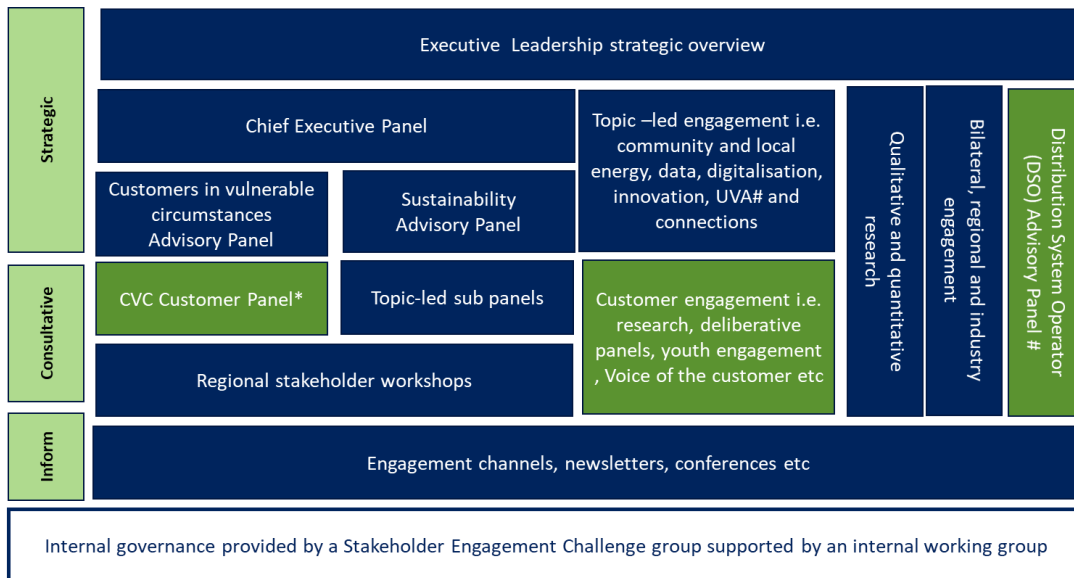
Our established internal governance (Figure 7) will ensure that that stakeholder engagement across the business is co-ordinated and cross business engagement informs business decisions and improvement plans. It also continuously evolves in line with external benchmarks, stakeholder

priorities and feedback and best practice. The strategy will continue to be aligned to the Accountability AA1000 Accountability Principles (2018) and AA1000 Stakeholder Engagement Standard (2015) and will be regularly measured against them (or equivalent) and reported and scrutinised by the governance approach.



Figure 7: Stakeholder engagement governance and senior involvement

Our established advisory panel and engagement approach (Figure 8) allows us to take a topic-led and materiality-based approach to engagement and allows connectivity between the various strategies within the business plan. In ED2, we will retain and enhance our existing stakeholder panel structure ensuring that our panels hold us accountable to key strategies within the business plan.



Key: Enhancements • CVC – Customers in vulnerable circumstances panel part of Electricity Users in Vulnerable Circumstance's Strategy
 • *Undergrounding for visual amenity
 • # Included in other Strategy documents

Figure 8: Stakeholder and customer engagement channels

This joined up approach will enable us to discuss the right strategic issues with stakeholders via the appropriate channel in a managed way and enables our expert stakeholder panels to focus attention appropriately, but not exclusively. It may be appropriate, for example, for the customer panels to consider aspects of sustainability and DSO Stakeholder Panel to ensure 'no one is left behind' and vulnerability issues are adequately considered.

This strategic approach will also ensure that we continue to get stakeholder oversight of our business plan commitments. The customers in vulnerable circumstances (CVC) advisory panel will continue to provide advice, guidance and oversight of the Electricity users in Vulnerable Circumstances strategy and the sustainability panel will do the same for the Environment Action Plan along with other priorities including community and local energy strategy. We will continue to engage with our connections expert panel in line with our Major connections customers strategy, despite changes in ED2 to the connections regulatory reporting and incentive mechanism.

Building on our approach in ED1, we will create new panels as appropriate to support our business strategies including the creation of an addition Customer Panel to support the Electricity users in Vulnerable Circumstances strategy with direct customer feedback, an Innovation Panel to support our Innovation Strategy and our new DSO Stakeholder Panel.

The new independent DSO Stakeholder Panel will, on behalf of the DSO stakeholder community, work with the organisation to help shape the DSO transition. The purpose of the proposed DSO Stakeholder Panel is to provide independent oversight, challenge, review and guidance on our DSO transition. We will use the engagement with the Panel to better inform both the ongoing delivery of the DSO Transition plan and the development of the forward DSO strategy and activities. We intend to establish the DSO Stakeholder Panel in winter 2022 in readiness to start their new duties in ED2. Further information on the DSO Stakeholder Panel is contained in annex 2 – DSO Transition Plan.

Our panel approach, along with other established stakeholder engagement groups will ensure that there is clear structured stakeholder involvement in our six strategic scorecards to measure the delivery of our plan, ensuring that we have a stakeholder process to hold us to account.

STRATEGY	STAKEHOLDER ACCOUNTABILITY
Distribution System Operator	<i>NEW</i> DSO Stakeholder Panel
Customers in vulnerable circumstances strategy	Customer in vulnerable circumstances stakeholder advisory panels (deliver and strategic) <i>NEW</i> Customer panel
Environment Action Plan (incl net zero)	Sustainability stakeholder advisory panel
Connections	Connections Expert panel
Diversity and inclusion	Chief executive stakeholder advisory panel
Whole systems	Regional stakeholder groups working together including <ul style="list-style-type: none"> • Utilities Together (north west utilities) • Whole Transport Plans (i.e. CTIP) • Whole Energy Systems (Decarbonisation Pathways with Cadent Gas) • Local Area Energy plans (with GMCA)

In ED1, we recognised and changed our approach to support the diverse regional differences across Cumbria, Lancashire and Greater Manchester (and other adjoining regions) and their particular social challenges and priorities and demands on the electricity network as they implement differing ambitious plans to accelerate decarbonisation targets and economic regeneration whilst keeping bills low and ensuring that no-one is left behind. Our strategy will therefore continue to reflect the differing strategic requirements of the region and key stakeholders.

Our approach will continue to be agile and allow us to remain inclusive and respond to changing material issues. This may include the acceleration of digitalisation; the changing demands on the electricity network from distribution system operator, net zero and decarbonisation ambitions throughout ED2; and economic and social uncertainty exacerbated as a result of the Covid pandemic.

Using gap analysis, we will track engagement against our stakeholder mapping and pre-defined top tier stakeholder list, ensuring that we do not simply settle for engagement that comes our way. Based on our stakeholder engagement principles (Figure 6), we will proactively ensure that the stakeholders we have identified are engaged effectively and we support them to engage with us so that neither side misses an opportunity to share information.

In addition to our established advisory panel approach we have developed throughout ED1, we recognise that some stakeholders have a complex relationship with the business and interact with us across many subjects. We have developed an effective approach to account management for these strategic relationships through managed bilateral meetings which will be developed and enhanced in ED2. This relationship management approach allows priority to be given to the most material issue for the stakeholder whilst recognising the interconnectivity and opportunities from alignment to other strategies and prevents siloed engagement. Figure 8 recognises the flexibility to create topic led sub panels and topic led engagement, such as around DSO, electric vehicle, digital, digitalisation, undergrounding for visual amenity and connection strategies as required which may all require engagement with specific or informed stakeholders.

The benefit of greater engagement with customers as a stakeholder group in developing the business plan has complemented our existing customer service research and advisory panel. We will therefore retain customer engagement research and create a customer in vulnerable circumstances panel in line with our Electricity users in Vulnerable Circumstances Strategy.

Our engagement will not be restricted to panels and research but, as detailed in Figure 8, we will expand on our ED1 channels including bilateral meetings, interviews, webinars and workshops, events, newsletters consultation and research and incorporate digital formats as requested by our stakeholders.

When new material issues are identified, we will work with stakeholders to strategically consider these subjects and working via the internal governance channels with colleagues across the business identify alignment with any existing strategies and incorporate, adapt or develop appropriate engagement channels.

We will do this by explicitly ensuring we:

- Run materiality exercises every two years
- Engage with relevant stakeholders based on relevant topics, seeking out new relationships as appropriate
- Ask all stakeholders which topics they want to engage on
- Conduct regular stakeholder mapping to ensure alignment to material topics
- Develop and flex our advisory panel approach to reflect material issues, aligned to key strategies and scorecards
- Develop further bilateral stakeholder relationships with key stakeholders with multiple material issues
- Develop our communication channels and help stakeholders engage if they are struggling to do so

- Coordinate and report engagement and material issues through internal governance channels

3.1.1 Senior level buy-in

Customer and stakeholder engagement is at the heart of our Purpose, business planning and decision making. Our executive and senior managers are directly involved in customer and stakeholder engagement and, in ED2, will continue to champion and lead stakeholder advisory panels and engagement activities.

We have an established Chief Executive Advisory Panel and other stakeholder advisory panels and engagement channels (section 3.1) which are embedded in the organisation and will continue to have executive level involvement and support.

As part of our internal governance process (Figure 7), our stakeholder challenge group is executive led and has cross business senior management involvement.

Our customer and stakeholder engagement approach is embedded across the organisation and evidenced in many other strategies within the ED2 business plan. Senior leaders and all colleagues are empowered to proactively seek, act on and record engagement. We actively participate in external stakeholder engagement groups and encourage collaboration across all levels of the organisation and stakeholder groups.

Regular reporting and triangulation will continue to ensure that our Executive Leadership Team and board are informed of wider engagement activities to inform business decision making. Our Board will continue to be invited to observe our engagement activities.

We will:

- Maintain quarterly triangulation of research and stakeholder insights to inform the executive leadership and decision making
- Retain and develop our advisory panel structure and continue to have executive and senior level buy in
- Ensure our stakeholder engagement, including advisory panels, continues to be supported by executive led internal governance and feeds directly into our triangulation insights and business planning through executive reporting and active involvement.
- Provide monthly reporting to the executive and regular board updates on stakeholder engagement, insight
- Continue to be proactive and empowered at all levels within the organisation, including our CEO and executive leadership team leading by example through two-way strategic engagement. An example is our attendance on regional infrastructure boards and our own CEO advisory panel.

3.2 Robust, high quality and based on best practice

In ED2, we will build on the robust, high quality engagement strategy we have embedded in ED1 (Figure 9) and incorporate the expanded engagement capability and delivery of customer and stakeholder engagement used to inform our business plans for ED2.

We will continue to implement and develop a stakeholder strategy based on recognised best practice. As well as following the Accountability AA1000APS and AA1000SES,¹² we will look at best practice from within and outside our industry. This is a key part of our ongoing triangulation to ensure that we do not miss opportunities and information benefiting other sectors.

Engagement channels will be further embedded in ED2 to maximise the opportunities identified during the ED2 business plan process including retention of youth, customer and deliberative panel engagement (Figure 8). In line with regulatory changes and best practice, we will also enhance the use of impact measurement including willingness to pay, social return on investment and cost benefit analysis to inform strategic decision making.

Our stakeholder advisory panels evolved throughout ED1 to provide robust and high-quality expert advice and insight. We also benefitted from an increase in consultation with our advisory panels and wider stakeholders on strategy development and engagement around project implementation. This is expected to continue as the ED2 plans are implemented.

Triangulation was valuable during our business plan development as a way of articulating differing points of view to aid decision-making. We will maintain regular triangulation throughout ED2, ensuring that we are explicitly identifying and incorporating a range of inputs and data to improve our planning and focus. Triangulation, as a strategic management tool, will help ensure that our ongoing engagement is relevant and targeted as well as being robust and proportionate, in addition to helping identify and fill gaps.



Figure 9: Our Stakeholder engagement strategy aligned to Accountability AA1000SES engagement framework

We will:

- Maintain our strategic approach following the principles of AA1000APS and AA1000SES, or equivalent (Figure 9).
- Enhance impact benefit measurement and customer research

¹² [AccountAbility](#)

- Develop an appropriate programme and channels of engagement that recognises and responds to the insight provided by stakeholders, customers, consumers and future customers
- Develop advisory panels and consultation with stakeholders (as appropriate) to inform our strategies and developing plans
- Maintain quarterly triangulation of research and stakeholder insights to inform best practice and executive leadership and decision making
- Take a dynamic approach to updating our stakeholder network and proactively look for opportunities to enhance and grow it based on material topics of interest and engagement with a broad and inclusive range of customers and stakeholders across the diverse region

3.3 Inclusive

We serve a diverse population of stakeholders across the North West who are impacted by our activities and have varying engagement interests, power and time to influence our services. Our ambition is to involve the widest possible range of stakeholders, customers and consumers, including those who are harder-to-reach or seldom-heard. Our definition of these three groups is provided in section 2.3. For the purpose of our engagement strategy, we have defined hard-to-reach as:

- **Hard to reach** as individual customers, stakeholders or groups who our business impacts in some way, and for whom the lack of engagement could be to their or our detriment. Lack of engagement could be through limited capacity, awareness or appetite, or a belief that their participation will not make a difference.

We strategically identify customers and stakeholders based on the recognised standard AA1000APS (Figure 4) and adapt our programme to recognise the regional differences from Cumbria to Greater Manchester. We will ensure appropriate and proportionate representation and use a variety of data sources, channels and triangulation to inform our engagement. Based on this approach, our ED1 stakeholder mapping indicated that our stakeholder community is currently split into 50 segments which cut across our geographically diverse region. We will continue to undertake regular stakeholder mapping and keep under review the representative stakeholder segments.

In ED2, we will build on the robust, high quality engagement strategy and consultation approach we embedded in ED1 and regularly reflect on participation against our stakeholder mapping to ensure inclusivity, balanced engagement and undertake gap analysis. We will further evolve our programme enhancing engagement with customers and youth groups (future customers) along with our regional stakeholder and topic specific approach, particularly around DSO and net zero. We recognised the value of individual customer engagement and the deliberative panels introduced as part of the ED2 business plan development and will retain them to ensure inclusivity. Further details of our ED1 engagement can be found in section 2 and the Stakeholder and customer research approach (annex 30).

As part of stakeholder mapping, we recognise that we need to continually scan for groups that are seldom-heard or under represented. We will continue to work with our partners, particularly in relation to vulnerability, DSO and net zero, to identify groups that may be missed, improve our services and take extra steps to ensure we understand their needs, wishes and remove barriers to engagement.

The Social Data Mapping Tool developed in ED1 helps inform our business prioritisation and approach to customers in vulnerable circumstances. Used alongside stakeholder engagement, it can

also help to identify customer and stakeholder engagement opportunities including those regions with high levels of customers vulnerable circumstances, future customers and those who are hard to reach. In ED2, our vulnerability engagement fund will also particularly look to research and carry out trials to increase accessibility to our services and net zero. Further details can be found in our Electricity users in Vulnerable Circumstances strategy.

Our approach will remain agile and flexible enabling us to respond to changing the needs and priorities of our customers and stakeholders and create channels of engagement to respond accordingly and reflect the needs of this business plan and other accompanying strategies.

We will ensure inclusivity by:

- Undertaking regular stakeholder mapping exercises and prioritise stakeholder groups and topics with a clear rationale ensuring engagement with a broad and inclusive range of stakeholders
- Regular review of our stakeholder database, proactively seeking new stakeholders as appropriate
- Retaining our customer research and the deliberative panels to ensure customer, consumer and stakeholder voices continue to be heard
- Maintaining and developing, as appropriate, our stakeholder advisory panels and working with partners to ensure appropriate representation
- Taking a dynamic approach to updating our network and proactively looking for opportunities to enhance it based on engagement gaps and material topics of interest
- Identifying opportunities and reducing barriers to engage with new and hard to reach stakeholders and those representing electricity users in vulnerable circumstances
- Developing suitable channels of communication to help stakeholders struggling to engage or who want to engage more (as identified by our stakeholder research)
- Developing further our approach to stakeholders including regional and local government engagement
- Carrying out regular stakeholder satisfaction surveys to inform our strategy and develop our approach
- Building on the qualitative and quantitative research included in our business planning process
- Developing our focus on youth engagement as an important future customer audience
- Maintaining and developing an appropriate range of communication channels to encourage engagement including in person, online and develop appropriate materials in a range of different formats such as website translation tool and support to enable digital inclusion
- Working with partners and existing stakeholders to reach seldom-heard voices
- Developing a Customer Panel and vulnerability engagement fund (as part of the Electricity users in Vulnerable Circumstances strategy). The focus will be on engagement and research to meet the needs of those vulnerable to loss of supply, being in or at risk of fuel poverty and being left behind in net zero transition.
- Retaining qualitative and quantitative research with a range of customer segments

3.4 Material and responsive

Following the AA1000APS, we always strategically work to ensure that all our engagement is material. We will continue to align our engagement to issues that are material to delivering our Purpose and strategic priorities and those that are important to stakeholders and customers.

Rather than focusing on general materiality, we will collaborate and target engagement on the topics that are relevant and meaningful to our customers and stakeholders and we will develop our approach to ensure individual stakeholders are being specifically engaged on the key topics that are of most interest to them. Our advisory panel structure, bilateral meetings, stakeholder research and triangulation will help us retain awareness of material issues and allow us to engage on material matters using appropriate channels (Figure 8). This interconnected approach ensures that our Executive Leadership Team has strategic oversight of material issues through regular internal governance and reporting processes (section 3.1) and alignment to other strategies in ED2.

In a changing environment, it is important to continuously engage with our stakeholders to understand their shifting priorities so that we can achieve our Purpose. Throughout ED1 and as part of the business plan process, we have regularly undertaken materiality exercises with stakeholders. Our stakeholder panels will also continue to provide insight into material issues and membership will be regularly reviewed to ensure appropriate representation and challenge.

We recognise that our strategy must reflect the changing demands on local electricity networks particularly associated with net zero ambitions and DSO and that priorities in the business plan could change and evolve over the period of ED2. We recognise that our different geographic regions are adopting accelerated timescales to national net zero targets and we will adopt an agile approach to support and engage on this and any new issues that may emerge and adjust our programme accordingly in response. We will regularly review our strategic priorities with our stakeholders and be transparent in sharing progress against our business plan commitments in ED2. In common with our ED1 approach, we will ensure customer and stakeholder engagement helps us shape and agree any new or changed business commitments.

Additionally, we recognise that our electricity network does not operate in isolation and we must collaborate with government, our regulator's stakeholders, experts and industry partners to deliver joint initiatives and share best practice. This is particularly relevant in our innovation, DSO, data and digitalisation strategies, but will also be relevant across future decarbonisation, climate change, data and economic recovery initiatives and the work we do with the Electricity Networks Association¹³.

In ED1, increasing data about the network has been shared with partners and stakeholders including social data mapping, used to inform our Electricity users in Vulnerable Circumstances strategy, distribution future energy scenarios (DFES),¹⁴ decarbonisation pathways¹⁵ and 'go Net Zero' case studies and guides¹⁶. We will retain this approach to responding appropriately to stakeholder requests for additional information. Following challenge from Ofgem's SECV panel and our consumer vulnerability panel, funding for fuel poverty and vulnerable customer partnerships has also increased in ED1 and is reflected in the Electricity users in Vulnerable Circumstances strategy.

We have also been responsive to customers' and stakeholders' preferences for meeting frequency and format, including the use of online platforms and more frequent engagement as a result of the Covid pandemic, and an increased focus on regional and cross sectoral strategic priorities such as local, whole system energy and infrastructure planning. In ED2, we will retain a dynamic approach,

¹³ <https://www.energynetworks.org/>

¹⁴ www.enwl.co.uk/site-search/?q=DFES

¹⁵ www.enwl.co.uk/go-net-zero/you-and-your-business/decarbonisation-pathways/

¹⁶ www.enwl.co.uk/go-net-zero/ways-to-go-net-zero/

which seeks continuous feedback from stakeholders across a wide range of material issues in open, two-way channels that our internal reporting and governance structures can act on quickly

The stakeholder satisfaction survey (section 2.5) has helped us to further engage with stakeholders and understand and respond to wider priorities and feedback about our approach. Additionally, we will maintain and develop an appropriate suite of channels to engage externally with a representative balance of stakeholders and customers and keep those less engaged informed (Figure 8).

Stakeholder feedback is embedded across the business and in ED2 we will continue to maintain and develop an appropriate variety of engagement channels (Figure 8) to receive and respond to customer and stakeholder feedback and insight. We will use a range of tools to identify opportunities and determine actions, map stakeholders, re-visit goals, and plan the next steps for future engagement.

We will do this by:

- Ensuring our approach is aligned to best practice and our guiding principles
- Retaining and developing the channels that worked well throughout ED1, enhancing and embedding the channels that worked well in the creation of our ED2 business plan
- Being agile and incorporating appropriate new channels of engagement as identified by our strategic approach, research, our stakeholders or by best practice
- Regularly asking stakeholders about their priorities, to ensure we understand which topics are material and they want to engage on
- Retaining independent chairs for our Customers in Vulnerable Circumstances Advisory Panel and our Sustainability Advisory Panel and regularly review membership to ensure appropriate representation and inclusivity
- Retaining the regular stakeholder satisfaction survey to inform our strategy and approach
- Developing our engagement hub
- Collaborating with stakeholders, utility representatives and associations to identify and respond to relevant emerging issues
- Using triangulation from a variety of data sources, i.e. from customer service information' meeting reports and minutes, the results of formal qualitative, quantitative and willingness to pay research
- Continuing to obtain valuable and strategic input from our colleagues, advisory panels, regional engagement workshops with stakeholders and bilateral engagement

3.4.1 Delivering outcomes that customers are willing to pay for

The ED2 business plan has been developed using extensive customer and stakeholder research including willingness to pay research. Using willingness to pay data and social return on investment (SROI) during ED1, we were able to calculate the wider societal benefit of some of our projects and initiatives. This helped to inform wider business decision making to ensure best value for customers. We will continue to measure and report against key outcomes, which will include measuring SROI. We will incorporate this, as necessary, alongside cost benefit analysis (CBA) models to demonstrate that business decisions are informed by rigorous, result focussed stakeholder priorities. We will check back with customers and stakeholders to ensure the outputs meet stakeholder-driven objectives and expectations.

We recognise that this increased activity and focus on stakeholder and customer engagement will require additional resource which has been forecasted within the costs associated with running an efficient company. We remain mindful of customer affordability and balancing that with the

stakeholder priority of raising awareness highlighted as part of our engagement programme (Figure 8). We will strive for maximum return on our investments in engagement and will collaborate, where possible to achieve best value.

Our stakeholder satisfaction survey in 2019/20 indicated that, for those who had less engagement with us, nearly 50% wanted more across a variety of channels.

We also specifically asked our deliberative panel about ongoing engagement in March 2021 and almost all were keen for the panels to continue, and further engagement to take place. They told us that they had learned a lot from the process and would welcome further engagement.

To deliver outcomes that customers are willing to pay for, we will:

- Measure the impact and outcomes of our activity
- Use our stakeholder mapping and research to identify and engage better and more frequently with customers and stakeholders who want to do so
- Ensure that customers and stakeholders are consulted and willing to pay for new commitments.

3.5 Transparent, measured and monitored

Stakeholders can only hold us to account and inform our approach if we provide open, transparent and timely information.

We are committed to maintaining regular and open reporting on our stakeholder engagement approach, irrespective of regulatory requirements and will retain and develop internal reporting and governance structures to facilitate this. Our engagement commitments and measures detailed in section 4 include voluntary annual reporting

We will continue to annually publish our process and progress against our key engagement commitments, outlined in section 4. Other information such as events, reports and consultations will be available on our website.

Through open and transparent engagement, our panels provided extensive support in the delivery of our ED1 activities and development of the ED2 business plan and many of the accompanying strategies. The independent chair approach adopted in ED1 to our panels will be retained to ensure continued transparent information exchange. We will retain, and develop as necessary, this channel of engagement throughout ED2. We will also continue to develop our sub-regional annual stakeholder events, which are publicly advertised and promoted to all stakeholders, irrespective of previous engagement.

As part of our ongoing engagement strategy, we will engage on material subjects and provide feedback to customers and stakeholders to inform them of our decisions and why we have made them. The development of the engagement hub (section 2.5) enables us to consult on strategy development, share findings and respond to feedback in a transparent way, which we will continue to develop in ED2.

We will retain a regular stakeholder satisfaction survey to help inform our approach, identify areas for improvement and ensure that we are meeting the needs for our stakeholders. We will aim to maintain the satisfaction levels achieved as a result of the greater engagement involved in developing the business plan throughout the five-year ED2 price control period.

We will do this by

- Producing a voluntary annual stakeholder engagement report, publishing our progress against key commitments and openly report stakeholder engagement outcomes
- Maintaining quarterly triangulation of research and stakeholder insights to inform the executive leadership and decision making
- Continue to benchmark and improve our performance (i.e. Accountability Health Check / Business in the Community – or similar)
- Develop appropriate channels of communication and engagement that recognise and respond to the insights provided by stakeholders, customers, consumers and future customers
- Maintain channels to keep those less engaged informed
- Maintain and update our website and engagement hub
- Retain our stakeholder engagement satisfaction survey and aim to maintain an average mean satisfaction above 80% across the five years of the price control

4 Engagement Commitments

Our ED2 customer and stakeholder engagement commitments demonstrate that we have embedded engagement within our business and are committed to continuous improvement. They incorporate effective business as usual ED1 engagement initiatives and build on our learning and achievements in ED1 and throughout the development of the business plan.

Commitment	Detail	Measure
1. Ongoing triangulation	We will continue, as business as usual, the quarterly triangulation initiated in ED1 throughout ED2.	We will publish summaries of our triangulation reports which will feed into our annual stakeholder report (Engagement Commitment 9 – see below) and share these with our Executive Team and Board.
2. New Customer Relationship Management (CRM) system for stakeholder engagement	We will invest in a new customer relationship management tool to enable more efficient cross business interactions with stakeholders and recording of data.	New CRM system in place and being used by business by 2023 and report engagement in the annual stakeholder report. We will identify and measure meaningful engagement with priority stakeholders.
3. Stakeholder and customer advisory panels	We will retain and develop our successful ED1 stakeholder advisory panel approach, creating a new panel for DSO, customers in vulnerable circumstances and other topic specific panels as necessary. We will retain independent chairs for our sustainability and customers in vulnerable circumstances panels. We will run sub-regional open access stakeholder workshops each year to ensure that we continue to engage appropriately and gather regional differences and new voices.	We will deliver at least quarterly panels for sustainability and customers in vulnerable circumstances and twice-yearly CEO panels. We will measure panel member satisfaction and report in the annual stakeholder report. Target of 90% satisfaction with stakeholder panel members. Regional workshops and other public access events will be promoted on the website.
4. Stakeholder identification	We will undertake a stakeholder mapping exercise every two year to ensure we capture changes in our customer and stakeholder population.	Updates to be included in our annual stakeholder report.
5. Customer research (including deliberative panel and other groups)	We will run regular qualitative and quantitative customer research, focusing not just on customer service, but other key areas of our business to ensure customers continue to inform our activities and priorities.	We will engage with statistically robust and representative sample of at least 2,000 customers a year through targeted research programmes, to inform our ongoing activities and priorities. Results will

	We will continue to run our customer deliberative panel, with at least 30 representative members of the public who will meet every quarter to help inform our activities and provide insight.	be included in annual stakeholder report. Results of discussions included in annual stakeholder report. Target of 80% satisfaction with the customer panel from members.
6. Regular stakeholder satisfaction research	We will run our stakeholder satisfaction survey every two years and aim to increase satisfaction year on year.	We will survey a statistically robust and representative sample of at least 200 stakeholders and aim to maintain an average 80% satisfaction across ED2 and aim to achieve a stretch target of 83%.
7. Customer and stakeholder materiality exercises	We will conduct materiality exercises with both customers and stakeholders, every two years.	Results reported in our annual stakeholder report.
8. Engagement with hard-to-reach groups (including youth engagement)	We will identify and reach harder-to-reach groups, including, but not limited to, continued youth engagement across the region. We will work with partners to identify and connect with seldom heard voices.	Results reported in our annual stakeholder report.
9. Voluntary annual stakeholder report	We will report annually on our progress against these commitments and openly report stakeholder outcomes.	Publication of annual report.
10. External stakeholder engagement benchmark improvement	We will benchmark and improve our stakeholder engagement throughout ED2.	Improve our Accountability* health check score year on year and aim to reach 67% (maturity) by the end of ED2 from our 2021 baseline of 61%.
11. Engagement on net zero	We will engage our business and domestic customers, in line with our strategy, to help them understand what actions they need to take on net zero, why they are important to them, and the support available to help them take action.	Results reported in our annual stakeholder report.

*or equivalent