

Stakeholder Justification Paper – Asset	
Output/Commitment Title	Maintain a safe and reliable gas network, while upgrading our gas pipes, actively reducing methane emissions to support the UK's environmental targets.
Detail	We will monitor and maintain our gas network to make sure it is safe and reliable and report methane emissions levels every year. We will replace 450km of old metal gas pipes, and quickly address all reported gas leaks.
Targets (more stretching than GD2?)	We plan to reduce methane emissions by 16% in the period by targeting mains and service replacement. This is more ambitious than the 10% target for GD2. We will keep the health and risk of our gas assets at a level broadly similar to GD2. This will ensure we keep gas interruptions to the very low likelihood they are today and keep the public safe. We are not looking to improve asset health as consumer tell us they are happy with the high reliability of our network and do not wish to pay more to improve this
Strategy Document/ Business Plan Section	Network Asset Management Strategy – BP, Asset Strategy – BP, The transmission network BP, The distribution network
Cost & Bill Impact	
Proposed Funding	The bulk of the asset plan will be funded through base with the exception of tier 1 mains and services and two significant high pressure pipeline replacement projects, each totaling over £5m. These will be funded through PCDs to protect consumers and ensure delivery is transparent.
Benefits & risks	
Summary of benefits	Summary: Reduced methane emissions support the UK's environmental targets and customers benefit from a safe and reliable supply of gas.
Summary of risks	Old gas pipes will need more frequent and expensive repairs and methane emissions will reduce more slowly.
Stakeholder voice - Golden thread	
Engagement method (what and who)	Methods: Steering groups, workshops, bi-weekly meetings, emails, one-on-one interviews, interactive workshops, monthly meetings, surveys, virtual workshops, feedback forms, and interactive platforms. Stakeholder: Local Authority Officers and Council Members, Energy Network Operators (Distribution Network Operators - DNOs and Gas Distribution Networks - GDNs), Other Local Government Organizations, Major Energy Users, Community Energy Organizations and Local Bodies Active in Net Zero and Decarbonization, Developers and Housing Associations, Transport Sector Organizations, Transmission Network Operators, Transport Providers, Housing Associations and Growth Deal Organizations, Landowners and National Parks, Further Education Institutions and Public Bodies, National Organizations with Regional Influence (e.g., Transport for Wales), Technical Advisors for LAEP such as Energy Systems Catapult (ESC), the General Public, and Other Businesses.

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

Opinions, views: Stakeholders have a multifaceted view on mains replacement and the resiliency of the gas network. They all broadly support the investment in gas mains replacement, recognizing it as crucial for future-proofing the network, improving reliability, and reducing emissions. Business customers see it as essential for maintaining a safe and reliable network, while general customers appreciate the commitment to replacing old pipes to enhance safety and reduce gas leaks. Many stakeholders also stress the importance of addressing climate resilience and conducting risk assessments to improve network resilience.

Associated facts: Repex programme is due to be complete by 2031 and is HSE mandated.

Conflicts: Some SME and general customers have expressed concerns about the replacement programme and the disruption it can cause, however, this is largely in relation to the way WWU carry out the work as opposed to the programme itself. They emphasised the need for clear communication and need timely updates to minimise the impact to their daily lives and businesses. Despite these concerns, the general sentiment among all stakeholders is supportive of the mains replacement programme, especially when its safety, reliability, and environmental benefits are clearly communicated and justified.

Regional differences: Addressing geographic disparities by ensuring that both urban and rural areas benefit from the replacement program, most stakeholders have indicated the importance of not leaving any region behind, particularly in rural or less economically developed areas. In addition, stakeholders have highlighted working with local authorities to align with Local Area Energy Plans (LAEPs) and other regional development strategies. This collaboration can help identify priority areas based on broader regional energy and sustainability goals. Overall, most stakeholder groups agree that the replacement programme should focus on safety, environmental benefits, economic impact, and community needs rather than specific geographic locations.

Options considered: Considering stakeholders views on the mains replacement programme WWU will continue to engage with customers to maintain, and where possible, improve the high standards of safety and customer service while carrying out work. However, recognizing that the programme is mandated by the HSE, WWU must commit to maintaining our progress to complete the programme by 2031.

How we responded: WWU will commit to replace 440km of old metallic gas main between 2026 – 2031.

Performance

GD2 Performance, Benchmarking/
Industry comparison

Our targeted mains replacement programme will deliver a reduction in methane emissions of 16% in RIIO-GD3, an increase from the 10% targeted in RIIO-GD2.

We are managing the health of an ageing asset population of pressure reduction stations, pipelines and risers on multi occupancy buildings, at broadly similar costs in RIIO-GD3 compared to RIIO-GD2. This is becoming more challenging as assets reach the end of life, but our targeted programme of refurbishment is extending these lives, keeping down capex costs and ensuring we provide a safe and reliable network at lowest whole life cost.

The exception are 2 major pipeline replacements on assets that are end of life and will not be compliant with legislation or safe if we do not intervene. We replaced 13km of pipeline in RIIO-GD2 and plan to replace 50km in RIIO-GD3. This is ambitious with the work requiring significant engagement, permissions and planning to deliver successfully

Deliverability & Whole Systems Impact

Deliverability & viability implications

We have an excellent track record of delivering asset intervention plans. We are one of the only networks forecast to meet our mains replacement targets in RIIO-GD2. This is through good planning and governance. It is also down to our decision to move to an insource delivery model. This has protected us from the volatility in today's contractor market. This will also manage the risk of delivery in RIIO-GD3 as we have direct control and will not be subject to the impacts of the ongoing volatility as contractors seek to move to large investment programmes in water and electricity due to uncertain future of work in gas.

We have already started detailed planning of the asset investment programme for year 1 of RIIO-GD3. This includes detailed workforce and skills modelling and the actual assets in which we plan to replace or refurbishment. This certainty at this early stage significantly reduces delivery risk.

Triangulation scorecard

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

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

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

Document Name	Score					Final Score
	Relevance to Topic	Level of Stakeholder Knowledge	Quality of Engagement	Rigour of Feedback Collection	Credibility of Analysis and Interpretation	
06.03.24- SGN Response to GD Annex PUBLIC_Redacted	2	2	2	2	2	10
WWU qual priorities report FINAL	2	2	2	2	2	10
Cadent RIIO-3 SSMC Response_GD Annex Final	2	2	2	2	2	10

Cadent RIIO-3 SSMC Response_Exec Summary Final	2	2	2	2	2	10
WWU Citizen Panel Full Report_V1	2	2	2	2	2	10
WWU Business Panel_full report with appendix	2	2	2	2	2	10
WWU SSMC response – 6th March	2	2	2	2	2	10
ENA External Stakeholders Insight Report v1.1	1	2	2	2	2	9
Compact Hybrids - Customer Research - Final	1	2	2	2	2	9
PSR-Code-Group-Report-w-exec-summary-FINAL-7.12.23	1	2	2	2	2	9
Energy Networks Innovation Strategy 2022	2	2	2	2	2	10
Workshop 6 Summary - Network investment	2	0	2	2	2	8
Cadent RIIO-3 SSMC Response Overview Document Final	2	2	2	2	2	10
PSR Code Group Report. DRAFT w exec summary 21.11.23	1	2	2	2	2	9
3564 WWU Customer Business Priorities FV2	2	2	2	2	2	10
DAR Ofgem Vulnerability Summit	0	2	2	1	2	7
UK-Hydrogen-Strategy_web	2	2	2	2	2	10
WWU GD3 Business Planning Workshop Feedback Report	2	2	2	2	2	10
ENA Response to Ofgem RIIO-3 Sector Specific Methodology Consultation_Final_06.03.2024	2	2	2	2	2	10
WWU Sustainability Strategy Workshop - Feedback Report	2	2	2	2	2	10
WWU Citizens Panel report Decarbonisation of home heat March 2022 FINAL	1	2	2	2	2	9
06.03.24 - SGN Cover letter Response to Overview Doc PUBLIC	2	2	2	2	2	10

WGP Hydrogen Strategy v2.0 (Summary and Technical Reports) FINAL	2	2	2	2	2	10
Final Version WWU - Critical Friends Panel - Feb 2023 - Feedback Report	1	2	2	2	2	9
WWU Biodiversity Stakeholder Workshop Feedback Report	1	2	2	2	2	9
20240617_LAEPTechnical_Report_Wrexham	2	2	2	2	2	10
WWU LAEP Stakeholder Workshop Feedback Report	2	2	2	2	2	10
WWU - Critical Friends Panel - Feb 2024 - Feedback Report V5	1	2	2	2	2	9
PE21199 Understanding consumers' attitudes to safety measures when using 100_ hydrogen in the home v1.0	1	2	2	2	2	9
Utility-Panel-Research-Presentation_26.10.23	0	2	2	2	2	8
RP-FGS-Monmouthshire Technical Report-070624-DRAFT-ISSUED	2	2	2	2	2	10
Technical_Report_Anglesey_draft issue 14.6.24	2	2	2	2	2	10
VCMA Year 1 Showcase Stakeholder Workshop - Feedback Report	0	2	2	2	2	8
Hype_Cycle_for_Emerg_812275_ndx.pdf	1	2	2	2	1	8
WWU_Improving the CEX research programme_Stage 1_Report of findings_17.01.23	1	2	2	2	2	9
UKRI-141123-Enabling NetZero Plan UK Industrial Cluster Decarbonisation	1	2	2	2	2	9
Citizens Advice Consumer work plan 2023	1	2	2	2	2	9

Digital.utility.co.uk (2024: The year of the LAEP)	2	2	2	2	2	10
consultation-just-transition-framework	1	2	2	2	2	9
11920 CR Plus SWIC Explainer Doc A4 64pp v9	1	2	2	2	2	9
Safeguarding the switch to domestic hydrogen WWU Report 1.0	1	2	2	2	2	9
Powys LAEP Draft A	2	2	2	2	2	10
Workshop 5 Summary - Developing a new role for networks	2	0	2	2	2	8
RP-FGS-Torfaen Technical Report-240520-DRAFT-ISSUED-v2	2	2	2	2	2	10
VCMA Collaborative Report Year 1 21-22	1	2	2	2	2	9
Steve McMahon Letter - 6th March 2024	1	2	2	2	2	9
WWU Customer Satisfaction_full report	2	2	2	2	2	10
National Gas Transmissions NGT Response to Ofgems RIIO-3 Sector Specific Methodology Consultation	2	2	2	2	2	10
Appendix 1 – SSMC Response NGN	2	2	2	2	2	10
Technical_Report - Gwynedd draft issue 07.06.24	2	2	2	2	2	10
Wales West Utilities GD3 Business Plan Commitment Workshop - Report	2	2	2	2	2	10
Neath Port Talbot LAEP Technical Annex - Client V1	2	2	2	2	2	10
Report - CCC - Delivering a reliable decarbonised	2	2	2	2	2	10
Ceredigion LAEP Draft A	2	2	2	2	2	10
Non-Domestic Consumer Research Report V Final for siteNov 2022	1	2	2	2	2	9
Workshop 2 Summary - Futureproofing the networks	0	0	2	2	2	6

Citizens Advice_A flexible future_Extending the benefits of energy flexibility to more households 3 August 2023	2	2	2	2	2	10
VCMA Collaborative Report Year 2 22-23	0	2	2	2	2	8
LAEP_BG_Technical-report_v1.1DRAFT-REVIEW_20240604	2	2	2	2	2	10
Frontier_ENA_Equity investability in RII0-3	1	2	2	2	2	9
Technical_Report_Vale of Glamorgan_2024_05_24	2	2	2	2	2	10
Technical_Report_Caerphilly_v.1(d)	2	2	2	2	2	10
Average Score of Sources						9.39
Mode						10

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