

Date	Business Area	Submission Document(s)	ISG Challenge	WWU Response
Sep-23	All	Misc	Sustainability to feature in all sections of the business plan	# Key topics, subtopics and questions used as basis of engagement aligned where appropriate to the Sustainability Strategy. # Commitments developed and mapped to sustainability strategy ambitions and goals. # Sustainability identified as a part of Golden Thread and BP Writer to make sure this is evident in all submissions.
Mar-24	Stakeholder Engagement	Misc	Quantify the strategic business relationships for WWU, looking at top 20 key stakeholders and mapping them against the influences and impacts that they have on the business, society etc... including an overview of the quality, depth and breadth of the relationships.	# Interim list has been compiled and Stakeholders have been mapped/ scored against influence and impacts. Further work required to refine list to top 20. # List has been defined and is being mapped to Stakeholder Justification Papers
Apr-24	Stakeholder Engagement	Misc	Differentiate the remits between the various WWU panels (particularly the Critical Friends Panel) and the ISG	Critical Friends Panel report and draft updated ToR provided. Critical Friends Panel and Citizens Panel are GD2 business plan commitments. Review is every 2 years or end of price control period whichever is sooner.
Apr-24	All	Misc	Demonstrate the benefits to WWU and Customers that WtP could provide and how it could impact the business plan.	Information provided to ISG Chair and Deputy Chair on 24/04/24 along with proposals. Any discussion guide/questions to be shared with ISG for comment. ISG Chair discussing with other ISG Chairs. 20/05/2024: ISG provided comment on WtP proposals and WWU have awarded work to Impact MR.
Apr-24	Customer	Vulnerability Strategy	What do WWU consider 'supporting vulnerable customers through the energy transition' to entail, what conversations are being had with Ofgem, and how can the ISG be included to support this.	# Workstream leads meeting 24/05/2024 to determine areas/ levels of support for customers. # SR has problem statement out on consumer behaviour with aim of developing roadmap to support vulnerable customers. # GDNs have defined Vulnerable Customer and Just Transition together and WWU has drafted Vulnerability Strategy including section outlining intended work for this area.
Jun-24	All	Misc	WWU to highlight what stakeholders have influenced work stream papers sent to ISG to review, and where possible highlight the insight within the documents.	# SJPs will be shared with ISG to outline this. # SJPs for Customer commitments and People commitments shared 13/09/2024.
Sep-24	Innovation	Innovation Strategy	ISG commented that Innovation not related to FoE is largely not covered in the SJP for Innovation.	Other workstream SJPs will pick up engagement feedback on innovation specific to each topic. The innovation strategy links to the individual chapters/ strategy documents.
Sep-24	Innovation	Innovation Strategy	Feedback from consumers and advocacy groups, about innovation not being equitably distributed, is not sufficiently answered in SJP.	This is addressed in the Innovation Strategy, out for review with the ISG as of 15/11/2024.
Sep-24	Environment	EAP	Want to see how opportunities to reduce waste levels will be identified (innovation, partnership working etc..) and what the target percentage is for reduction.	Additional detail added to action plan to address how waste management will be undertaken.
Sep-24	Environment	100-page BP	Is the business preparing for the potential impact of the labour government target to have a zero carbon electricity network by 2030	Environment Manager confirmed pace of preparations are being dictated by policy/ legislation relating to hydrogen but that the business is preparing as much as it can. This is also now explicitly addressed in "Why we need to act in RIIO-GD3"
Sep-24	Environment	EAP	Challenge on ambition for Environment 3 SJP and commitment to reduce carbon emissions ahead of government targets.	Environment Manager provided explanation as to why we were going with an improved ambition from GD2 performance but not our most progressive option; this relates the availability of technology, market conditions and government policy, and Rhodri confirmed GD3 will allow us to remain flexible, react to changes and set us up for transformational change during GD4.
Sep-24	Net Zero	100-page BP	Want to see more of a response to stakeholders feedback, that they want WWU to advocate for hydrogen and better policy.	This has been peppered throughout the 100-page document, but is picked up more in strategy document.

Sep-24 Environment	EAP	Hybrid is not seen as a ULEV. Challenged to maintain a watching brief on commercial EV product offerings as they are developing all the time.	Hybrid conversion factors have now increased because the vehicles don't deliver the emission reduction targets promised. This is something we will thrash out in a workshop with colleagues on 7th Oct and then update GD3 ambitions on hybrid - Environment Manager hopes to see a greater target ambition for less travel and full battery electric.
Sep-24 Environment	EAP	Would like to see case study relating to reducing the impacts of historical gas work sites.	Environment Manager agrees and will look to add.
Sep-24 Environment	EAP	Would like to see reference to future policies and potential impacts during GD3	Environment Manager will add.
Sep-24 Environment	EAP	Want to understand how the business balances short term costs over longer term value and bringing in wider benefits.	Environment Manager will amend wording to cover this point in next version
Sep-24 Environment	EAP	Want more detail on who WWU may work with and the type of projects may be supported/ co-created in relation to their biodiversity commitment.	Environment Manager confirmed this info will be in a later draft.
Sep-24 Environment	EAP	Challenged to publicise WWU environmental targets	Environment Manager confirmed targets will be publicised as part of the business wide ambitions on carbon waste.
Sep-24 Environment	EAP	Want explanations of projects added (E.G. Hy-haul).	Environment Manager confirmed these will be added.
Sep-24 Environment	EAP	Want more detail on how WWU will support businesses to feed in biomethane - just comms or proper partnerships & cost shares etc.	Environment Manager confirmed this will be in final version.
Sep-24 Environment	EAP	Need to address that GD3 will be a flexible plan and may have to be adapted as government may accelerate polices and targets on organisations.	Environment Manager will add more detail to clarify this in document.
Sep-24 People	Workforce Resilience Strategy	Business challenged to demonstrate if affordable childcare could assist with gender balance.	P&E Project Manager provided engagement and research evidence supporting this topic.
Sep-24 Environment	EAP	Challenge on approach to tree planting, specifically comms relating to this activity due to regional perspectives.	Environment Manager has taken this onboard and adjusted plans on tree planting locations and identifying suitable locations.
Sep-24 People	Workforce Resilience Strategy	Business challenged to demonstrate the risk mitigation for the removal of the apprenticeship levy in Wales.	P&E Project Manager provided a response to challenge in People 1 SJP.
Sep-24 People	Workforce Resilience Strategy	Employees have highlighted a nervousness relating regions differing approaches to net zero and the presence of key projects in limited areas. What are WWU doing to address this.	Response provided by P&E Project Manager.
Sep-24 People	Workforce Resilience Strategy	Challenged to demonstrate how the business is responding to employee's feedback, advocating for a holistic approaches that emphasise broader career benefits such as combating climate changes etc...	P&E Project Manager provided response to highlights WWUs Sustainability Strategy being aligned with the businesses priorities and values and that progress against this strategy including initiatives encouraging colleagues to get involved in, are consistently communicated to the business.
Sep-24 Environment	EAP	Challenge on tree planting ambition and whether 60,000 is a stretch target.	Environment Manager confirmed that performance, shared in SJP, that target is based on began with GD2 which ISG agreed would make the GD3 target stretching.
Sep-24 People	Workforce Resilience Strategy	Want clearer information on career progression for employees that reflect their feedback.	P&E Project Manager provided detail on careers progression frameworks, estimated time frames and competencies required.
Oct-24 Net Zero	100-page BP	How is the business addressing stakeholder concerns about unexpected and short-term costs to consumers as WWU work toward net zero?	What we do and deliver in innovation and net zero for GD3 makes up a small proportion of consumer bills and significant investment will not be made until there is more certainty. This approach is backed up by our WtP research.
Oct-24 All	Workforce Resilience Strategy	ISG would like to see more detail in SJPs for clarity, mainly what specific stakeholder groups are providing the feedback.	SJPs have gone through second draft and this information is being added where appropriate.
Oct-24 All	100-page BP	Current version of the 100-page BP lacks defined targets and the group would like to see these added.	Added throughout.
Oct-24 All	100-page BP	Stakeholder acceptance of plans is not given justification or explanation and the ISG would expect to see this in the next draft.	Frequent mentions of our WtP, Stakeholder and acceptability testing and financeability research have been made throughout the BP and strategy documents.

Oct-24 All	100-page BP	Current version of 100-page document does not have adequate cross referencing between sections to give an overall picture. Expect to see this in next draft.	This has been picked up.
Oct-24 All	100-page BP	Challenged to keep the balance of GD2 success and GD3 ambition relatively consistent throughout each section of the 100-page document	This exercise is taking place and business plan writer will be bringing this together.
Oct-24 All	100-page BP	Clarity of the ISGs purpose not clear enough in statement.	The ISG statement has been drafted and signed off by the group on 12/11/2024 and awaits final comments from WWU Exec.
Oct-24 Customer	100-page BP	Challenged to draw more attention to vulnerable consumers being likely to make up increasing proportion of domestic customer base in future and how WWU will need to respond to that.	C&C Lead updated in latest version of doc.
Oct-24 Net Zero	100-page BP	No acknowledgement in document of Labour Governments target to decarbonise UK power systems by 2030, 5-years faster than previous government, and want to see this as likely to have impact on RIIO-GD3 plan.	Referenced in 'Why we need to act in RIIO-GD3' section.
Oct-24 All	100-page BP	Challenged to add more to the 'setting the scene' section on what features, issues and challenges are specific to WWU that are different from the other GDN's, eg political landscape, demographics, housing stock/energy efficiency, vulnerability index, employment rates etc.	Environment Manager will add more detail in Environment section.
Oct-24 All	100-page BP	Add more detailed examples of stakeholder groups that have provided feedback, as opposed to a list of groups engaged and their collective feedback, also their conflicting opinions and what decisions WWU have made.	The Stakeholder Engagement & Decision Log that will be submitted as part of the business plan will largely include this information for each section of the business plan.
Oct-24 All	100-page BP	Want to see more evidence of the golden thread throughout the document	Golden thread is set in CEO section and leads into the three key RIIO-GD3 outcome areas.
Oct-24 All	100-page BP	Challenged to be clearer on the type of hydrogen (blue, green) that will be used in the network, including when blending.	Head of Net Zero provided response.
Oct-24 All	100-page BP	Have not shown how consumer feedback has informed the 'Setting outputs, targets and incentives' section and this needs to be added.	Added to section and throughout plan.
Oct-24 Environment	100-page BP	Challenged to demonstrate the 'how' more in the environmentally friendly network section as the comments in this version feel very broad brush.	This has been answered more so in the EAP that will support the 100-page document.
Oct-24 All	100-page BP	Challenged to demonstrate what parts of the gas network could be repurposed and what associated work could be done during GD3, in the plan.	Repurposing the gas network referenced throughout the 100-page plan with references to specific strategies.
Oct-24 Net Zero	100-page BP	Feedback highlighted in Net Zero 1 SJP from various stakeholder groups identifies the lack of awareness in the general public of low carbon technologies. How WWU plan to address this is not clear from this SJP.	WWU's plan to address this feedback is included in the Customer 1 SJP as it relates to the business proposed commitment to 'Support consumers through the energy transition' and further detail can be found in the Vulnerability Strategy and BP chapters 'Protecting our customers and communities' and 'Supporting Net Zero'.
Oct-24 Customer	100-page BP	Be clearer/ explicitly say that the 'maintaining existing levels of funding' for VCMA means the enhanced levels from GD2 due to the repurposing of FPNES.	This is explicitly mentioned in the plan.
Nov-24 Customer	Vulnerability Strategy	Be clearer on ambition that capabilities are aiming to achieve.	C&C Lead added that the annual review of this strategy will be post final determination and will allow the opportunity to be more specific on vision, spend and outcome.
Nov-24 Environment	100-page BP	Challenged on clarity of ratio of risks in Climate Resilience section.	Removed from final version.
Nov-24 Customer	100-page BP	Want to see reference to WWUs responsibility around culture and behaviour change - Staff & Customers.	We talk about the training of staff and delivery of consistent messages through our staff and VCMA partners in our vulnerability strategy. We have short section in the customer and communities section on a Just UK energy transition but to save space have referred to the vulnerability strategy to expand upon what we will deliver. Hence this is covered off and can be closed.

Nov-24 Supply chain	100-page BP	How might WWUs approach change going in to the future in reference to the use of contractors.	Head of P&E suggest this is for Head of Procurement in the Supply Chain chapter. P&E Project Manager added in additional words to workforce chapter also.
Nov-24 People	100-page BP	Insight into why new apprenticeships are like to be required would be welcome, including if projected numbers are over and above GD2.	Apprentices are part of our recruitment plans, as per previous years, we've allocated a set percentage of forecast turnover to be filled by apprentices. Additional wording added to chapter.
Nov-24 People	100-page BP	Challenged to demonstrate the significance of the loss of 'big players' (Morrisons, Amec etc..) from UK gas distribution market.	Reference in Workforce Resilience strategy and made clearer in 100 pages.
Nov-24 People	100-page BP	Demonstrate development of leadership skills at all levels and succession planning to avoid leavers due to the uncertainty of the GDNs.	Additional content added to chapter.
Nov-24 Net Zero	100-page BP	In section 1.1 - Challenged to address other options to decarbonise network, if hydrogen is not an option.	We talk about biomethane and preparing the business for a range of scenarios including decommissioning.
Nov-24 Customer	Vulnerability Strategy	Proposed RIIO-GD3 commitment to identify and support vulnerable consumers is not explicitly referenced in the Vulnerability strategy, or how this will be achieved.	C&C Lead added that the annual review of this strategy will be post final determination and will allow the opportunity to be more specific on vision, spend and outcome.
Nov-24 Environment	100-page BP	Challenged to increase incentive ambition and only pay mileage on Evs/ only provide Ev pool cars.	Environment Manager stated there is not enough room in the 100-page document but this is picked up in the EAP.
Nov-24 Customer	Vulnerability Strategy	Would like to see a clear vision statement at the front end and labelled as such.	C&C Lead responded that message from Business Services Director upfront sets the scene. Following final determination and when undertaking annual review will consider adding vision statement.
Nov-24 Customer	Vulnerability Strategy	Challenged to provide more analysis around how vulnerability varies across the network, where it is most concentrated and why.	Updated strategy.
Nov-24 Customer	Vulnerability Strategy	Challenged on structure as section do not yet feel formed.	Considered.
Nov-24 All	Misc	Embed stakeholder justification into all parts of the plan	Figures from engagement have been peppered throughout. Stakeholder quotes to be added (20/11/2024).
Nov-24 Supply chain	100-page BP	Mention Scope 3 reduction ambition in supply chain aims	Head of Procurement responded - we don't explicitly state Scope 3 reductions in any of our tender specifications. This would have a big impact - some suppliers may be excluded. Environment Manager added some ambitions will be in the newest version of this document under the 8-highlevel aims. Additionally, there is a table in the EAP including reductions aims.
Nov-24 All	100-page BP	Challenged to consider the impact of preparation for potential decommissioning of part of the network and impact on vulnerable customers, colleague morale, costs and local economies.	Reference to decommissioning throughout 100-page plan with specific mentions in Innovation section to address potential impacts.
Nov-24 All	100-page BP	Specify figures for gas users in WWU region not UK.	Some additional WWU specific info added to this section.
Nov-24 All	100-page BP	Would like WWU to demonstrate key stakeholder mapping in the 100-page document.	Added to main plan in 5 point process and expanded on in later paragraph of this section.
Nov-24 All	100-page BP	in relation to GSOP would like projected GD3 performance compared to actual GD2 performance.	Table added.
Nov-24 All	100-page BP	Challenged to demonstrate if Pathfinder has driven actions from LAEP.	Evidence gathered.
Nov-24 All	100-page BP	Challenged accuracy of statement "Increasing the blend of biomethane and hydrogen into the network will mean that any remaining leaks will have a reduced impact."	Sentence removed from EAP and 100-page document.
Nov-24 Customer	Vulnerability Strategy	Challenged to use more analysis and insight from data sources like ONS, Citizens Advice and Census data to show WWU understand their customers and challenges.	Data included in annex.
Nov-24 Customer	Vulnerability Strategy	Would like to see more insight from engagement carried out to demonstrate plans are aligned to stakeholders expectations.	Included.
Nov-24 Customer	Vulnerability Strategy	Would like to see commitments with targets and some indication of how money is going to be spent, similar to what is stated in the SJPs.	Included in the 100-page BP
Nov-24 Customer	Vulnerability Strategy	Don't think increasing the numbers on the PSR is an end in itself. Better monitoring and reporting of outcome/ benefits of being on the PSR is important and would like to see this addressed in strategy.	C&C Lead picked up and added detail to strategy.

Nov-24 All	100-page BP	Would like to see trend and forecast data relating home heating in WWU patch	This information is included in the 'connecting homes and businesses' section.
Nov-24 All	100-page BP	Would like example of how engagement programme has been effective across an area.	Added in to next version of the document.
Nov-24 All	100-page BP	Demonstrate if mapping of sustainability strategy to UNSDG's is reviewed an updated based on performance. Demonstrate if business specific KPIs have been developed that translate the UNSDGs into actionable steps.	Specific targets are mapped in the Strategy; happy to discuss how we may strengthen this link in future
Nov-24 All	100-page BP	Sight of efficiency gains as a result of digitalisation would be welcome.	Updated.
Nov-24 All	100-page BP	Challenged to demonstrate what is driving growth in workforce, given mains replacement is coming to an end.	Stats and analysis from EU skills, collated from GDN data.
Nov-24 All	100-page BP	Would like indication of costs associated with subscription based services and shift from CAPEX to OPEX spend.	Included.
Nov-24 Innovation	Innovation Strategy	Challenged on innovation research TRL 1& 2.	Innovation Funding Manager confirmed we do a lot of TRL 2-3 & 3-4.
Nov-24 Innovation	Innovation Strategy	Challenged on clarity of innovation outside of BAU reading like it is all about money.	Innovation Funding Manager responded: Adjusted in main text to remove ref to non-financial. It is now implied.
Nov-24 Innovation	Innovation Strategy	Would like a cross reference between specific stakeholder feedback and a planned innovation activity.	Head of Net Zero looking to get example from Pathfinder case study,
Nov-24 Innovation	Innovation Strategy	For balance, it would be good to see mention of research/innovation into potential decommissioning/ repurposing of parts of the network.	Innovation Funding Manager confirmed this is added in the next version of document.
Nov-24 Innovation	Innovation Strategy	Would like to see specific examples of how stakeholder feedback has shaped the WWU Sustainability Strategy.	Innovation Funding Manager has added in a section box outlining this detail in next version.
Nov-24 Innovation	Innovation Strategy	Challenged on risk of double counting numbers between Innovation Strategy and IT & Telecom Strategy.	Innovation Funding Manager responded: Innovation would be in the realms of high ambition IT and will be referenced as an area that has influenced the plan.
Nov-24 Innovation	Innovation Strategy	Additional risk of LAEPs not developed by WWU being inconsistent which could be added to table.	This has been added in latest version of the document.
Nov-24 Innovation	Innovation Strategy	£1.45m equates to 3.8% of overall innovation budget. Given the current energy crisis, does that strike the right balance.	Innovation Funding Manager responded "We've also requested £1.32m to deploy previously proven innovation and we have the VCMA funding which is referenced through the report, will see if we can add some wording to make this clear."
Nov-24 Customer	Vulnerability Strategy	Challenged to add 'GD3 Evolutions' to all actions in table of services to support priority customers, even if this is 'ongoing in GD3'.	All added.
Nov-24 Environment	Climate Resilience Strategy	Demonstrate that informed stakeholder groups are reviewing approach and actions in this strategy as validation.	Environment Manager provided lengthy responded in CRS draft to confirm that the strategy is regularly discussed in specialist forums including relevant stakeholder groups.
Nov-24 Environment	Climate Resilience Strategy	CBAs and EJPs? These need to be explained up front.	Environment Manager confirmed will do and each strategy will have abbreviations pulled out on contents page.
Nov-24 Environment	Climate Resilience Strategy	Would be good to state that you had also looked at these risks (36 climate hazards) from a Stakeholder perspective.	Environment Manager confirmed draft strategy has moved on since ISG review and that Not a requirement of the ARP process. While a good point, I am only reporting what we did for ARP. This is something we can take forward however as part of the Adaptation Plan.
Nov-24 Environment	Climate Resilience Strategy	Challenged on identifying the countries you get supplies from that are deemed more susceptible to weather or political changes within this?	This is something that we can do subsequently - it will be a risk response in the Adaptation Plan
Nov-24 Environment	Climate Resilience Strategy	does Joint bonding by PE fusion need explaining for the less informed reader?	This table is no longer in the latest draft but is in the ARP 4 report which will be appended. The ARP is a technical report not for the lay reader.
Nov-24 Environment	Climate Resilience Strategy	In this document are the biodiversity and tree planting commitments linked, as it feels like the should be.	Environment Manager responded It is a good point not linked in this doc but I am going to make this doc and the EAP agree on this point before submission
Nov-24 Environment	Climate Resilience Strategy	Add in explanations of abbreviations.	Environment Manager confirmed will do and each strategy will have abbreviations pulled out on contents page.
Nov-24 Environment	100-Page BP	Would like to see diagram of the various internal committees across the organisation, reporting into the ESG Board Committee, which risks, opportunities and strategies they manage/ inform across Net Zero, Climate Change, EAP, Sustainability, Innovation.	Environment Manager confirmed this diagram is included in the ARP4 report which will be an appendix to the CRS Strategy.

Nov-24 Environment	Climate Resilience Strategy	Would like to see this address cost effective in the short term against longer term value & add on value to the environments & communities, maybe as a calculation. Is it part of the ongoing decision making = a basic of sustainability = longer term views taken on any spend.	Environment Manager responded "Noted."
Nov-24 Environment	Climate Resilience Strategy	Challenge to define how WWU will support LAEP planning and take forward identified actions.	Environment Manager added that this information was taken from the Net Zero Strategy/ plan and that he will link to this document from the CRS.
Nov-24 Environment	Climate Resilience Strategy	Challenged on 'Strategic Action for GD3' section as despite excellent points raised, surprised not to see impact on vulnerable customers being considered.	See point 7. In the Adaptation Strategy (was not fully explained in this draft but is explained in the latest) we will aim to pull out the links between Vulnerable customers and climate resilience.
Dec-24 All	Decision Log	General challenge to include more GD2 comparison against targets and performance.	Added in sections where space allowed.
Dec-24 Net Zero	Decision Log	Challenged to draw out impact of part or full decommissioning in section.	Additional stakeholder feedback added.
Dec-24 Innovation	Decision Log	Draw out more the balance of protecting vulnerable consumers in this section.	Additional words added and link to Customer section above.
Dec-24 People	Decision Log	Challenged to draw out impact of part or full decommissioning on colleague morale and future recruitment.	Response from Head of P&E provided.
Dec-24 Data & Digitalisation	Decision Log	Challenged on clarity of commitment.	Additional word added to impact column for clarity.
Dec-24 Customer	Decision Log	Challenged to consider commitment/ target for full resolving issues such as appliance repairs given stakeholder feedback.	This is picked up in our VCMA commitment, with part of the allowance being ring fenced for services beyond the meter which include appliance repairs and replacements.
Dec-24 Environment	Decision Log	Would like to see target for reducing emissions.	Due to space in this document, reference to EAP added where targets are outlined.
Dec-24 Cost	Decision Log	Challenged on efficiency target; understand how this target was derived but do believe that you could be more ambitious (0.75%)	Response from Finance Controller added.