



Scottish and Southern
Energy

Power Distribution

Customer Engagement Plan

Underground Cable Overlay Cost Reduction Project

NIA_SSEPD_014

Version and Change Control

Document Owner(s)	Project/Organisation Role
Timoleon Manolopoulos	Project Manager
Avril Vera-Leon	Communications Manager

DISCLAIMER

Neither SSEPD, nor any person acting on its behalf, makes any warranty, express or implied, with respect to the use of any information, method or process disclosed in this document or that such use may not infringe the rights of any third party or assumes any liabilities with respect to the use of, or for damage resulting in any way from the use of, any information, apparatus, method or process disclosed in the document.

No part of this publication may be reproduced, stored in a retrieval system or transmitted, in any form or by any means; electronic, mechanical, photocopying, recording or otherwise, without the written permission of the Future Networks Manager, Scottish and Southern Energy Power Distribution, Inveralmond House, 200 Dunkeld Road, Perth PH1 3AQ. future.networks@sse.com

© Scottish and Southern Energy Power Distribution 2015

Contents

1. Executive Summary.....	4
2. Strategy and Scope	5
3. Customer Communications Strategy	6
4. Vulnerable Customers and Accessibility	9
5. Complaints	9
6. Customer Supply Interruptions.....	10
7. Data Collection and Protection	10
8. Safety	11
9. Supplier Engagement.....	11
10. Knowledge Dissemination Activities.....	11
Appendix A – Glossary	12
Appendix B – Example Letter.....	13

1. Executive Summary

The purpose of this document is to provide information regarding customer engagement and communications for the Underground Cable Overlay Cost Reduction project, led by SSEPD in accordance with the requirements of Ofgem's [Network Innovation Allowance Governance Document](#).

1.1 About the Underground Cable Overlay Cost Reduction project

Underground cable (UGC) overlay is the activity by which network operators replace or reinforce part of the underground electricity network. Traditionally, the underground cable overlay involves open-cut trenches where the new cable is laid and commissioned, and the redundant cable is decommissioned but left in the ground. Open-cut trenches can cause disturbance to local residents and business owners, and it is also costly operation.

The Underground Cable Overlay Cost Reduction project explores the use of novel techniques to extract already installed cables and install new underground asset with reduced need for excavations. This decreases the length of open-cut trenches, reduces the excavation and reinstatement cost of the cable overlay process, retrieves value from the extraction of the redundant asset (copper or aluminum) and minimises the nuisance caused to communities in the vicinity of the work. These new techniques have been trialed at 275kV in Great Britain, but have not been tested at lower voltages. This project will test the new methods at voltages of 11kV and 33kV. In addition to the anticipated reduction in the unit cost of the cable overlay, it is anticipated that the disturbance caused to nearby stakeholders through the novel cable overlay techniques will be reduced compared to the traditional open cut trench approach.

1.2 Our customer engagement plan

The project will not test the UGC overlay methods on a live section of the network, but on a redundant asset that has already been decommissioned. Therefore, the project does not require customer recruitment or installation of equipment in customers' properties for the purpose of the trials. However, the project will require installation of cable either on highways or streets, or on customers' land. There are also no planned customer interruptions. There is a risk of unplanned customer interruptions in the event of accidental damage affecting the live network. However, mitigations are in place to minimise and manage the risk (i.e. staged trials with increased complexity, surveys ahead of undertakings, etc.), and any interruption will be managed in accordance with the Guaranteed Standards.

There may be an impact on customers and businesses in the vicinity of the street works. The potential impact may consist of increased disturbance caused due to the street works (i.e. traffic management) and will be managed as close as possible with the standard 'business as usual practice' of SSEPD.

Whilst customers will not be recruited for the trials, SSEPD will conduct focus groups with a range of stakeholders in order to obtain qualitative feedback on the disturbance caused by the novel cable overlay methods. The main purpose of these focus groups is to understand customer views relating to the impacts of site works on residents and businesses, and how the new cable overlay methods are perceived in comparison to traditional methods. The primary stakeholders will be domestic customers, but it may be identified that representation from local authorities or businesses will be beneficial for the project outcomes.

There may also be a requirement to agree land rights (wayleaves and easements) as part of the project's site selection, although it is anticipated that SSEPD will opt for highway areas to minimise this where practical. Wayleaves or easements may be required in case SSEPD identifies that a suitable circuit is located on a 3rd party's land. In such cases, SSEPD may have to engage with the appropriate landlord(s) in order to utilize its rights under an existing legal agreement or negotiate a new agreement.

Comprehensive details of the project's Customer Communication Strategy can be found on page 6.

1.3 About our data and privacy commitments

All information gathered in this project is covered by the SSE Group's Data Protection Policy and the project specific Data Protection Strategy. It is also subject to the Data Protection Act 1998 and all other relevant and applicable laws. More information regarding our Data Protection Plan for the Underground Cable Overlay Cost Reduction project can be found on page 10, and in the project's dedicated Date Protection Strategy.

2. Strategy and Scope

The project aims to:

- determine whether the identified innovative cable overlay methods can reduce the current cost of cable overlay, through quantitative assessment; and
- determine the extent to which the identified innovative cable overlay methods can reduce disturbance to stakeholders through qualitative information collected from focus groups.

The following activities outline the scope of the project:

- Undertake a 'horizon scanning' exercise aiming to identify and gather information on cable overlay methodologies/ technologies, the environmental factors and circumstances where they could effectively be applied.
- Agree commercial terms and conditions with involved suppliers.
- Gather requirements and select candidate sites for testing the methodologies from two suppliers.
- Submit a customer engagement plan and data protection plan to set out our strategy for potential interactions with:
 - customers affected by wayleaves or easements required in order to use their land;
 - customers affected by street works; and
 - customers taking part in focus groups.
- Undertake surveys in the selected sites in order to baseline costs of traditional open-cut trench methods and innovative methods.
- Implement project trials in two stages, with a decision point determining progress to the second stage based on the performance of the methodologies (assessed individually) until this point and the confidence of coping with the second trial stage.
- During trial Stage 1: apply the identified overlay methods in an environment without many complexities (i.e. limited number of nearby underground network assets). The selected circuits will be of 33kV, 11kV in each case and the newly installed cable will have a wider cross section compared to the cable to be extracted. The length of the cable to be overlaid will be between 50 – 100m, depending on the availability of a suitable circuit.
- During trial Stage 2: apply the identified cable overlay methods in an environment with increased complexity, (i.e. greater number of nearby underground assets). The characteristics of the methods will be similar to those of Stage 1.
- Analyse whether there are financial benefits from the tested cable overlay methods and evaluation of the applicability of the tested cable overlay methods.
- Focus group(s) will be undertaken with a range of stakeholders in order to obtain qualitative information on the disturbance caused by the tested cable overlay methods.

The project will ultimately conclude whether the two new overlay methods merit adoption into business as usual within SSEPD departments. Learning will be shared fully with all interested parties including other distribution network operators.

This document has been created in accordance with the [Network Innovation Allowance Governance Document](#), which mandates that a Customer Engagement Plan be written for projects that have 'any interaction with a Relevant Customer' as defined in the same document. The project may also involve engagement with land and property owners. This Customer Engagement Plan (CEP) relates specifically to communications and interaction with customers, land and property owners and their representatives who may be, who have, or who are, involved in the project only. For clarity, the CEP is related to customers that are affected by the street works of the project, customers that are invited and/ or participated in the focus groups of the project, customers with whom the project have had an interaction in relation to land rights and other customers with whom SSEPD will need to be in contact in order to progress with the delivery of the project.

The CEP incorporates all aspects of customer engagement, including the Customer Communications Strategy relating to management and care of customers affected by the project. The plan includes information on supply interruptions, safety and vulnerable customers, wayleaves and easements.

3. Customer Communications Strategy

The activities which require customer engagement are described below.

3.1 Interaction with landowners regarding wayleaves and easements

3.1.1 Purpose of Interaction

The project will define criteria in order to select sites to test the novel cable overlay techniques. One of the primary criteria will be the fact that the identified circuit will be redundant and not connected to a live network in order not to impact the power supply to customers. A redundant circuit may be located either on a highway, street (managed by street authorities) or on a 3rd party's land (private land). Depending on the location of the circuit, interaction with different stakeholders will take place in respect to land rights, as described below.

3.1.2 Description of Interaction

In case that a selected circuit is on a highway or street that is managed by the street authority, no interaction with customers is anticipated for land rights (i.e. wayleaves/ easements) given that access to the circuit will be discussed with the local street authority (i.e. local council).

In case that a selected circuit is located on a 3rd party's land (private land), SSEPD and/ or SSEPD's contracted companies will interact with the identified landlord(s) and/ or their representatives in respect to land rights. The interaction will include discussion around land rights, commercial payments in respect to the land use, etc.

- Given the fact that an existing redundant underground asset will already exist within the private land, it is anticipated that a legal agreement between SSEPD and the landlord(s) will already be in place. In this case, the interaction with the customer will involve notice and/ or other interaction as defined within the relevant agreement that has been agreed between the parties.
- In case that the legal agreement is no longer in effect because the underground asset has become redundant or an agreement has never been in place, SSEPD and/ or SSEPD's contracted companies will be involved in discussions with the landlord(s) and/ or their representatives in respect to land rights, commonly in the form of wayleaves or easements. Any agreement that will be extended or put in place will last for the duration (as a whole or subset) of the project required in order to effectively undertake the field trials of the novel cable overlay methods. In case it is identified that the agreement needs to be extended post project close down for business as usual purposes, relevant updates satisfying this condition will be done within the legal agreement that will be agreed with the landlord(s).

3.1.3 Payment to Users

It is anticipated that for circuits located on 3rd party land, compensation may be required by the respective landlords(s), either resulting from existing agreements in place or from the formation of a new agreement. Compensation will be provided to landlord(s) in recognition for their disturbance and land use.

3.2 Interaction with customers affected by site works

3.2.1 Purpose of Interaction

Although the project plans not to interrupt the customer supplies, as it will be focused on redundant underground assets, it may cause disturbance to customers and business in the vicinity of the trial due to the street works (traffic, visual, noise, etc.). The project will aim to minimize the disturbance caused to the customers, but is expected that disturbance will be caused and will be managed through the interaction described below.

3.2.2 Description of Interaction

SSEPD will implement the standard 'business as usual' practice followed by the networks upgrade team when they undertake cable overlay. The project intends to use the standard materials and processes of SSEPD, but in cases it is found that there is deviation from the actual trial activities the materials will be updated accordingly.

In case the cable overlay is undertaken on a highway or a street, the following interactions with appropriate stakeholders will take place:

- Prior to the commencement of the works and depending on the selected site, a buffer will be applied in order to identify the stakeholders (customers and businesses) that will be impacted from the street works. Once the stakeholders are identified, appropriate SSEPD representatives will door knock and hand over a letter to them (a sample letter is included in Appendix B), explaining the project and how the customers can communicate with us. The letter will include appropriate contact details (i.e. website, email address, contact number) in case the stakeholders would like to contact SSEPD.
- Continuous engagement with stakeholders will be undertaken both by the SSEPD personnel and the personnel of the contracted companies that will be undertaking the site activities. In all cases, the personnel included in the project will be briefed for the expected interaction with the stakeholders and in most of the cases the SSEPD site supervisor will undertake the lead role in discussions in order to adhere to best practice of SSEPD.
- In regards to the street works, interaction between SSEPD and the customers will be undertaken through the use of signs, potentially traffic lights and other means that aim to reduce disturbance to the customers.
- SSEPD will have to contact the local authorities which manage the selected streets in order to notify them of the works to be undertaken. The local authorities commonly choose to list the proposed street works in the street works websites (such as www.roadworks.org) in order for appropriate stakeholders to be kept informed of proposed projects and progress. SSEPD will notify the appropriate authorities which will decide if they will list the project and its progress in the previously mentioned websites. This presents another avenue that the affected stakeholders can utilize in order to get updates about the project (depending on local authorities populating and maintaining the register).

If the only customer affected by the street works is the landlord of the 3rd party land, the interaction described above will be undertaken only with the landlord. If the cable overlay is undertaken within a 3rd party's land and it is expected that disturbance may be caused to neighbours the previously described interaction will take place with all affected customers.

Post completion of the street works, SSEPD will collect information from the nearby residents with respect to their experience of the works undertaken.

3.1.3 Payment to Users

No payment to stakeholders affected by the street works will take place within the project.

3.3 SSEPD Interaction with stakeholders participating in focus groups

3.3.1 Purpose of focus groups

A key output of the project is the evaluation of stakeholder perception of UGC overlay comparing the two new methods with traditional techniques. In particular, SSEPD would like to understand whether the reduction in open-cut trenching decreases the perception of disturbance amongst stakeholders. If this proves to be the case, then the innovative methods can be adopted by DNOs to improve stakeholder experience with new UGC overlay work.

Within the context of this interaction, SSEPD defines customers, businesses and/or local authorities as stakeholders.

SSEPD will conduct a number of focus groups to gather qualitative feedback from relevant stakeholders regarding UGC overlay works. A number of focus groups will be held throughout the lifecycle of the project. It is anticipated that we will target customers from both rural and urban communities for the groups, but the particular demographics will be further refined based upon thorough consultation with SSEPD stakeholder engagement team. Further to the domestic customers, participation in the focus groups from local authority representatives or business representatives may add value to the

project outcomes. An alternative approach which will be considered by the project would be to engage with business or local authority representatives on individual sessions. The particular design of the focus groups will be designed within the detailed design phase of the project.

3.3.2 Role of project supplier Social Market Research

SSEPD will work with project supplier [Social Market Research Ltd](#) (SMR) to recruit and manage residential customers for the focus groups. SMR is the company's dedicated partner for market research activities, with considerable experience in market research and qualitative and quantitative analysis. SMR will carry out all recruitment and management of activities for the focus groups. In addition to recruitment this includes the following activities:

Arrangement of travel and hospitality: the focus groups will be organised and managed by SMR, to include bookings and management of venues and travel to and from venues. This will be arranged for focus group participants beforehand – participants are not obliged to pay their expenses and claim back.

Development of the discussion guides: SMR will work with the SSEPD project team to develop the focus group format and content. Final sign off of these guides is the responsibility of the SSEPD project manager.

Supply of moderators for the event: SMR will manage and moderate the focus groups. This ensures that the events are run in an impartial, independent way and that all data arising from the events can be used for analysis and reporting. Moderators are trained to maximise input from each participating customer.

Handling and administration of incentive payments: SMR will recommend to SSEPD the level of incentive payments and upon agreement by SSEPD will arrange incentive payments for participating customers.

Analysis and reporting: SMR will collate feedback from the events to provide brief summaries and one overall report which can be used to assess the effectiveness of the two trial methods used in the project. This will include a blend of qualitative and quantitative data. It is anticipated that this report will be used as one of the key learning and dissemination outputs of the project.

3.3.3 Recruiting and managing attendance of focus group participants

Customers will be recruited for focus group participation by SMR using their own practices which includes door knocking. This ensures impartiality and adherence to good practice in recruitment. SMR will be undertaking the recruitment campaign in line with ISO20252 standard and the Market Research Society Code of Conduct.

SMR will assume responsibility for the development of marketing materials, which will need to be approved by the SSEPD project manager ahead of releasing them to the customers. This may include an invitation and a document outlining 'What to Expect'. Both documents will contain SMR contact details and an opt out option, so that potential participants feel informed and may easily contact someone in the event that they change their mind about attendance. These documents will also clearly state the terms and conditions relating to incentive payments.

Personal data will be collected from the recruiters and will be stored securely. Access to the electronic data will be restricted to named individuals. In case a customer opts out after being recruited, their data will continue to be stored unless they request to be destroyed.

SSEPD or its suppliers will not access any customer's premises without customer consent, nor will the premises be visited for the purpose of sales or marketing relating to the project. The project will not impede the implementation of the nationwide smart meter roll-out.

Customers being invited to participate in the project (in all the interactions) will be provided with:

- Background to Underground Cable Overlay Cost Reduction project
- The community/personal benefits of Underground Cable Overlay Cost Reduction project
- Project suppliers and their role in the project
- Overview of the process they can expect to go through; and
- How the data collected as part of Underground Cable Overlay Cost Reduction project will be used

Wherever possible written consent will be obtained from the customers in order to engage in respective activities. In case that this is not possible, verbal consent will be obtained (i.e. consent to provide to SSEPD personnel their names). Such consent will allow us to cover all aspects of the customer engagement.

4. Vulnerable Customers and Accessibility

SSEPD aims to identify any vulnerable customers who wish to participate, or are participating in the project, and provide special arrangements for them where appropriate. The definition of vulnerability used for the purpose of the project is that defined by Ofgem in its [Consumer Vulnerability Strategy 2013](#), which states:

“when a consumer’s personal circumstances and characteristics combine with aspects of the market to create situations where he or she is:

- Significantly less able than a typical consumer to protect or represent his or her interests in the energy market; and/or
- Significantly more likely than a typical consumer to suffer detriment, or that detriment is likely to be more substantial.”

Where a vulnerable customer is identified, the project team or its representatives will offer additional support as required. This may include registration onto the Priority Service Register and an offer of alternative communication arrangements; other measures will be offered on a case by case basis.

SSEPD holds a Priority Services Register so that our business may offer additional services to:

- Customers of pensionable age;
- Customers who are disabled;
- Customers who are dependent on electricity for home medical care;
- Customers who have a chronic illness or short term medical condition;
- Customers with special communication needs; and
- Customers with infants living with them.

Every customer participating in the project will be offered a place on the Priority Services Register if they meet the eligibility criteria listed above. Customers with special accessibility needs due to sight, hearing and speech difficulties will be offered alternative communication arrangements. This may include communications in Braille, large print, audio format or face to face contact. We are happy to respect the wishes of customers who wish to appoint representatives to work with us on their behalf.

5. Complaints

Customers are encouraged to contact SSEPD regarding queries, compliments and complaints. All customers participating in the focus group activities will be advised of SMR and SSEPD contact details, which will include ways to contact us by telephone, email, letter, ~~and~~ social media and in person. If the customer needs to contact someone about the focus group, they will be signposted to SMR.

Other queries not related to the focus group will be signposted to the SSEPD customer service department. All correspondence is managed in accordance with SSEPD’s customer service policies and complaint handling statement. More information about SSEPD’s complaint handling statements can be found on www.ssepd.co.uk/TheComplaintsProcess/.

6. Customer Supply Interruptions

As per the “Guaranteed Standards of Performance for Metered Demand Customers of Electricity Distribution Companies in England, Wales, and Scotland” (May 2014), licensees must follow rules in relation to customer supply interruptions. SSEPD will pay due diligence to the Guaranteed Standards in the event of interruptions to supply. Information regarding our approach to supply interruptions can be found on:

<http://www.ssepd.co.uk/CustomerService/PerformanceStandards/>

The project does not expect to require any planned interruptions.

There is a risk of unplanned supply interruptions in the project, which will be managed through the systems and processes that will be in place. The project will involve staged trials with increasing complexity as the project progresses. This measure will ensure that the methodologies offered by the two suppliers have been tested in a simpler environment ahead of coping with a complex operational environment which will present a greater number of nearby underground asset. Ahead of the commencement of the works, appropriate surveys will take place in order to identify the location of other apparatus and confirm the plans that will have been received by other utilities. Trial holes for identification of underground assets will also be constructed in cases where clarity is needed and particular locations will be pin pointed for increased attention.

7. Data Collection and Protection

SSEPD is committed to the protection of customer data, including sensitive personal data. All activities in the project will comply with the SSE Group’s Data Protection Policy, the Data Protection Act 1998 and all other relevant and applicable laws.

To complement the Customer Engagement Plan, a separate Data Protection Strategy provides comprehensive information on the project’s approach to data security, including the treatment of sensitive personal data. The Data Protection Strategy includes the following key points:

1. Customers will be provided with a verbal or written explanation about the project and on how their data will be used. Data may only be collected after written or verbal consent has been received from participating customers or their representatives.
2. Customer data access is limited to SSEPD and its project suppliers.
3. Customer data may not be used for marketing purposes outwith the project.
4. All customer data used for knowledge dissemination purposes will be anonymised, except where explicit, written consent has been provided by the customer.
5. Data from customers who choose to leave the project will be stored securely until the end of the project then safely destroyed. Information necessary for business as usual (i.e. personal data of customers impacted by the street works undertaken) will be retained within SSEPD databases post project close down. SSEPD shall be entitled to retain such financial information and/or data as is required by the Companies Act 2006 as may be amended or restated from time to time.

8. Safety

Safety is one of SSEPD's core values and takes precedence in all of SSEPD's activities.

All staff and representatives in direct contact with customers will show appropriate identification complete with a photograph, the employee's name and the company name on arrival at a customer property. When making phone calls or visits to a customer with a password, employees will use the password in the manner expected by the customer.

Care will be taken when working on a customer's land to minimise disruption and inconvenience, ensuring the land is left in a state 'as found' as far as is reasonably practical.

Full health and safety checks and risk assessments will be carried out prior to any cable overlay work. Safety checks will be carried out pre- and post- cable overlay work.

9. Supplier Engagement

This project does not require the installation of equipment at customers' premises. All installation tasks which will consist of overlaying cable on the landlord's land will only take place after legal agreement between SSEPD and the landlord is in place. The cable will remain on site post project close out.

10. Knowledge Dissemination Activities

All NIC/NIA-funded projects must capture and share knowledge with other licensees.

Participating stakeholders in the focus groups may be asked at recruitment stage whether they would like to be involved in knowledge dissemination activities such as recorded interviews, and project materials such as posters, brochures, reports and conferences. This type of participation is completely voluntary; customers who prefer not to be involved in this type of activity will not be disadvantaged in any way and may still participate in the project.

Where a customer has indicated that they would like to be involved in this type of activity, a signed consent form must be completed by the customer before SSEPD or its partners may use them. This consent form will clearly outline the types of activity for which consent is sought.

Appendix A – Glossary

Abbreviation	Signifier
Licensee	Company holding a relevant electricity distribution or transmission license
Guaranteed Standard	Guaranteed Standards of Performance for Metered Demand Customers of Electricity Distribution Companies in England, Wales, and Scotland (April 2015)
Ofgem	Office of Gas and Electricity Markets
PSR	Priority Services Register
SEPD	Southern Electric Power Distribution plc
SHEPD	Scottish Hydro Electric Power Distribution plc
SSEPD	Both SHEPD and SEPD

Appendix B – Example Letter



Scottish and Southern Energy
Power Distribution

IMPORTANT INFORMATION about your electricity supply

Network Upgrades are investing in your area

As part of our ongoing commitment to provide a quality service and improve supply reliability, we will be investing in the network in the Scottish and Southern Energy Power Distribution regions.

Major Upgrades to Your Electricity Network:

Works start on: Works finish on:

Scheme name: Job Ref:

How this will affect you

When undertaking work of this type, there is inevitably a certain amount of disruption and we would like to apologise in advance if you are inconvenienced by this. We will do our utmost to keep disruption to a minimum and would be grateful for your co-operation as we go about our daily business.

When work is in progress near your property, it would be helpful if vehicles could be parked in nearby alternative locations.

Committed to giving you a 10/10 service

If you have any concerns about the proposed works, please contact us:

Network Upgrades	023 9227 6747
E-mail address	network.upgrades@sse.com
Live updates on website	ssepdp.co.uk/networkupgrades
In case of emergency	0800 072 7282
Lo-call mobile	0345 072 1905