ED3 VULNERABILITY STRATEGY

ED3-S06

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1. EXECUTIVE SUMMARY

OUR PLAN

SSEN Distribution **requests** [redacted] **in ED3 allowances, complemented by** [redacted] **of SSEN shareholder funding**, to extend practical support **before, during and after power cuts** and **improve** access **to services mitigating the impact of** fuel poverty and amplifying benefits of low carbon technologies for those suffering from fuel poverty. Our [redacted] programme combines direct network-customer services with specialist partnerships across our northern Scotland (SHEPD) and central southern England (SEPD) regions. Our role is to provide tailored power cut support and enable access to advice, funding and suitable technologies—not to guarantee grant availability or technology installation.

This strategy sets out how we will support customers in vulnerable situations during ED3. It builds on the improvements delivered in RIIO-ED2 and responds directly to insight from customers, stakeholders and partners. The strategy also demonstrates how we will deliver targeted, evidence-led and measurable support for customers who are most likely to experience harm during power cuts, severe weather events, fuel poverty or the low carbon transition.

Alongside our bill smoothing proposal, our activities set out across this, and our (ED3-S07) Targeted Customer Storm Support Strategy provides a comprehensive package of support to consumers across the network regions we serve at a time when household budgets are under pressure. As a responsible network operator, it is clear to us we have an important role to play to support those customers who need us most.

WHAT CUSTOMERS AND STAKEHOLDERS TOLD US

Customers and stakeholders have reinforced the need for support that is trusted, practical and tailored. Key priorities include increasing PSR awareness and confidence; improving the accuracy, security and transparency of customer data; providing more personalised services; addressing vulnerability "behind the meter" in settings such as park homes and sheltered accommodation; improving preparedness before, during and after storms; tackling fuel poverty; and ensuring customers in vulnerable situations are not excluded from the benefits of the low carbon transition. They also highlighted barriers that must be addressed, including digital exclusion, concerns about data privacy and scams, and the risk that communication channels fail during power cuts.

INVESTMENT REQUIRED AND SUPPORTING EVIDENCE

Fuel poverty and low carbon transition partnerships ([redacted]) and PSR services ([redacted]) account for [redacted] of the [redacted] allowance request. The remaining [redacted] is to fund provision of specific support measures to enhance our response to power disruption via batteries, power cut preparedness and targeted community support.

Investment	Licence Area	ED3 funding	Components and outputs	BPDT reference*
Fuel poverty / low carbon transition	SHEPD	[redacted]	DNO-level and local partnerships: benefits checks, tariff reviews, efficiency advice and technology access–purchase–use support for at least 240,000 households by 2033.	M4 – Vulnerability Deliverables
	SEPD	[redacted]		
PSR services	SHEPD	[redacted]	Awareness, registration, record refresh, accessible communications, training and tailored standards for every PSR category by 2030.	M4 – Vulnerability Deliverables
	SEPD	[redacted]		
Personal batteries	SHEPD	[redacted]	A further 10,000 medically or mobility-dependent households: a	

Investment	Licence Area	ED3 funding	Components and outputs	BPDT reference*
	SEPD	[redacted]	50% extension of the ED2 programme's stated scope.	M4 – Vulnerability Deliverables
Hidden customers / communities	SHEPD	[redacted]	Contact all known park homes and sheltered accommodation with Local Authorities and partners; in-person resilience planning for at least 100 at-risk communities.	M4 – Vulnerability Deliverables
	SEPD	[redacted]		
Power cut preparedness	SHEPD	[redacted]	Enhanced Personal Resilience Plans for 500,000 customers by 2033 and a further 10,000 tailored power cut packs, doubling ED2 reach.	M4 – Vulnerability Deliverables
	SEPD	[redacted]		
Powering Communities	SHEPD	[redacted] shareholder-funded	Annual funding rises 50%, from £500,000 to £750,000, for community resilience, technology accessibility and environmental schemes.	M4 – Vulnerability Deliverables
	SEPD	[redacted] shareholder-funded		

WHY INTERVENTION IS REQUIRED

Across our two primary support areas, need for intervention is clear.

Our fuel poverty and low carbon transition support ([redacted]) funds a step-change in both scale and scope for ED3. We are able to respond to significant and geographically concentrated fuel poverty (and stakeholder calls for greater ambition) by supporting at least 240,000 households, while broadening the intervention from individual fuel-poverty measures into an end-to-end pathway covering crisis support, affordability, energy efficiency and access to low-carbon technologies. The investment enables us to combine scalable DNO-wide provision with targeted, trusted local delivery so that customers in vulnerable circumstances are not excluded from the benefits of the low-carbon transition.

Our PSR services intervention ([redacted]) is required to close the remaining gap between eligibility and registration while improving the quality and relevance of support provided to registered customers. Around 282,000 eligible households are currently not registered, with a particularly significant gap in our southern region, with stakeholder evidence identifying blockers for greater PSR effectiveness, such as limited PSR understanding, concerns about data trust and demand for more personalised services. Our proposed ED3 investment combines targeted awareness and registration activity with systematic data cleansing, accessible communications, colleague capability and tailored service standards for every PSR category. This is intended to deliver at least 90% eligible-customer reach by 2030 while ensuring PSR data remains accurate and customers receive support that reflects their circumstances, particularly when they are most vulnerable during power cuts.

OUR ED2 TRACK RECORD

Across ED2 we significantly improved our response to provisions to manage the impact of vulnerability. We have established six local partnerships, developed PSR data-cleansing processes and rolled out Personal Resilience Plans. We launched a battery programme with a scope of 20,000 households; recipients reported improved ability to cope during power cuts. Targeted local initiatives such as Home & Well, with Citizens Advice Hampshire, has supported more than 10,000 people leaving hospital through integrated energy, financial and wellbeing referrals.

DELIVERABILITY OF OUR ED3 PLAN

For ED3, we have developed an ambitious set of outputs our customers will benefit from:

- Increased PSR registration, with a commitment to reach at least 90% of eligible customers by 2030 and maintain that level for the remainder of ED3.
- Tailored PSR service standards for every PSR category, supported by accessible communications, refreshed customer journeys and regular data updates.
- Improved identification and support for customers in park homes, sheltered accommodation and communities most exposed to power cut risk.
- Fuel poverty and low carbon transition support for at least 240,000 households by 2033, helping reduce affordability pressures and improve access to trusted advice, funding and practical support.
- Enhanced Personal Resilience Plans for 500,000 customers and power cut packs for a further 10,000 PSR customers, helping households prepare for and respond to power cuts.
- Expansion of our personal battery programme to support a further 10,000 medically or mobility dependent households, improving confidence and resilience during power cuts.
- Enhanced shareholder-funded support for community resilience and low carbon technology access through the Powering Communities fund.

ACCOUNTABILITY AND VALUE FOR CUSTOMERS

Our work in ED3 will ensure customers will receive support matched to their PSR category, practical power cut preparedness and clearer referrals for additional support. Benefits checks and tariff reviews can improve disposable income; efficiency advice and suitable technologies can reduce energy waste and bills. Local Authorities and community organisations gain coordinated resilience plans and referral routes. Quarterly partner reviews, annual data submissions and customer-outcome monitoring will track delivery, alongside a PSR satisfaction target of 9.5/10.

ONGOING IMPROVEMENT THROUGH ED3

The strategy is designed to remain agile as customer needs, technology, funding and climate-related risks evolve. We will regularly review service standards, customer journeys, partner performance and storm responses, using evidence from customers, stakeholders and delivery partners to refine our approach. By embedding collaboration into delivery, assurance and continuous improvement, we will ensure our ED3 vulnerability strategy remains targeted, inclusive, proportionate and demonstrably beneficial for customers and communities throughout the period.

OUR ED3 COMMITMENTS SUPPORTED BY THIS STRATEGY

	ED3 Commitment	Metric
Ensuring a responsible and sustainable business		
We will increase our support for customers when they need us most	**We will strengthen support for vulnerable customers by tripling fuel poverty support and expanding our industry-leading battery programme to reach a further 10,000 households, extending eligibility to include those with complex medical needs, like medical beds, who need additional support during a power cut by the end of ED3**	Enhance our shareholder financed community fund, increasing funding by 50% to [redacted] per annum to support LCT accessibility initiatives, and physical environmental and resilience schemes.
		Support a further 30% more households with enhanced our Personal Resilience Plans which will be issued to 500,000 customers by 2033. We will also double support to a further 10,000 PSR customers with power cut packs. Both targets are based on an ED2 baseline.
		Work with Local Authorities and partners to identify and contact all known residential park homes and sheltered accommodation in our licence areas to proactively offer access to PSR and resilience planning. We will enhance this through in-person resilience planning for a minimum of 100 communities most at risk of power cuts.

	ED3 Commitment	Metric
		Providing a minimum of 240,000 households with fuel poverty and/or access to adopt LCTs by 2033, thereby tripling our fuel poverty support in ED3, compared to an ED2 baseline
		Extend our industry leading battery programme by 50% to support a further 10,000 households, expanding eligibility criteria beyond life preserving medical equipment and to include homes which use medical hoists and medical beds.

2. OUR RESEARCH AND STAKEHOLDER ENGAGEMENT

STAKEHOLDER ENGAGEMENT

In the development of our Vulnerability Strategy, we have engaged broadly with stakeholders from across all stakeholder groups as set out in our (ED3-BP01) Business Plan Main Document, including customers, consumers, partners and enablers, policy makers and influencers, other supply chain, wider industry and supply chain, communities and local decision makers.

Table 2.1: Stakeholder engagement

Policy Area	Stakeholder Groups	Summary Feedback	Impact on Business Plan
Enabling equal access to LCTs — affordability and advice	Charities, Consumer Groups, Partners, Community Energy Groups, Housing Associations, Local Authorities, Installers, Customers in Vulnerable Circumstances, Energy Efficiency Specialists, Future Consumers	**Needs and barriers**: Stakeholders identified confusion about LCT options, low confidence, concern about disruption, digital exclusion and high upfront costs, with costs disproportionately greater in rural and off-gas areas. **Stakeholder expectations**: Stakeholders want clearer advice, trusted support, practical in-home guidance, access to funding and coordinated partner pathways so customers in vulnerable circumstances are not excluded from the low carbon transition. **Evidence source**: LCT and Fuel Poverty Think Tank; partner feedback.	**Plan response**: The ED3 strategy positions SSEN as an LCT enabler for customers in vulnerable circumstances, using the Access-Purchase-Use model to support customers from advice and funding through to installation and efficient use. **Output / metric link**: Fuel poverty and low carbon transition: minimum 240,000 households supported by 2033 **Customer outcome**: Customers in vulnerable circumstances can access clearer, more practical support to reduce bills, improve home energy performance and participate in the low carbon transition.
Prioritisation, supporting economic growth and leaving no community behind	Domestic Customers, SMEs, Local Authorities, Community Energy Groups, Housing Associations, Vulnerable Customer Representatives	**Needs and barriers**: Customers expect SSEN to give back to the communities it serves, protect vulnerable people and support community-level benefits. Stakeholders highlighted the importance of early investment where this can reduce bills, improve resilience and support local economic opportunity.	**Plan response**: The business plan includes a Community Benefit Fund and a prioritisation approach that considers socio-demographic factors alongside network performance.

Policy Area	Stakeholder Groups	Summary Feedback	Impact on Business Plan
		Stakeholder expectations: Stakeholders want investment prioritisation to reflect socio-demographic need as well as network requirements, ensuring that no community is left behind. **Evidence source**: Customer and stakeholder engagement on social impact priorities.	**Output / metric link**: Powering Communities: £750,000 p.a. shareholder-funded community support; 100 communities receiving in-person resilience planning. **Customer outcome**: Communities affected by network investment can access targeted support, with benefits focused on areas of demonstrable need.
Customer satisfaction, complaints and expectations	Charities, Consumer Groups, Customers in Vulnerable Circumstances, DNOs, GDNs, Inclusive Service Panel, Partners, Domestic Customers, Future Consumers	**Needs and barriers**: Supporting customers in vulnerable circumstances was ranked as a high customer priority. Stakeholders highlighted the need for accessible, meaningful services, better PSR awareness, trusted local intermediaries and accurate customer data. **Stakeholder expectations**: Stakeholders want SSEN to improve recognition, trust and clarity of messaging, while ensuring digital tools enhance rather than replace human support. **Evidence source**: Consumer priorities research; Inclusive Service Panel; Customer Service and AI Think Tank; partner feedback.	**Plan response**: ED3 includes a PSR customer satisfaction target of 9.5/10, service design based on customer journeys, improved marketing campaigns, Community Toolkits and vulnerability training for colleagues. **Output / metric link**: PSR reach and tailored service standards: minimum 90% eligible-customer reach and service standards for every PSR category by 2030. **Customer outcome**: PSR customers receive clearer, more trusted and more tailored support, improving satisfaction and confidence in available services.
Support for vulnerable customers during power cuts and Priority Services Register	Charities, Consumer Groups, Customers in Vulnerable Circumstances, DNOs, GDNs, Community Councils, Community Interest Groups, Inclusive Service Panel, Citizens Advice, National Energy	**Needs and barriers**: Stakeholders consistently called for tailored, service-based support for PSR customers during power cuts, with clear minimum standards for each PSR category. Digital exclusion, remote communities and medically dependent customers were highlighted as priority concerns. **Stakeholder expectations**: Stakeholders want proactive communications, advance notice where	**Plan response**: ED3 introduces minimum service standards for every PSR category, customer journeys for each PSR level, enhanced Personal Resilience Plans, battery support and power cut packs. **Output / metric link**: PSR reach and tailored service standards; 500,000 enhanced Personal Resilience Plans and 10,000 power cut packs; personal batteries for a further 10,000 households.

Policy Area	Stakeholder Groups	Summary Feedback	Impact on Business Plan
	Action, Healthcare, Local Authorities, Partners	possible, better support during power cuts and clearer explanation of PSR benefits. Evidence source: Service Based PSR Think Tank; Citizens Advice Lights Out report; Inclusive Service Panel; partner feedback.	**Customer outcome**: Customers in vulnerable circumstances receive more personalised, consistent and proactive support before, during and after power cuts.
Fuel Poverty	Charities, Consumer Groups, Citizens Advice, National Energy Action, Partners, Local Authorities, Community Energy Groups, Housing Associations, Customers in Vulnerable Circumstances, Energy Efficiency Specialists	**Needs and barriers**: Partners reported rising demand and increasing complexity, with customers facing energy price rises, debt pressure and reduced national funding support. Rural, off-gas and fuel-poor customers face additional barriers linked to cost, confidence, digital exclusion and housing condition. Stakeholders want us to be ambitious in our approach to supporting households in fuel poverty but recognised our role as an enabler to support. **Stakeholder expectations**: Stakeholders want clearer messaging, follow-up funding, community-based access routes and joined-up support that recognises immediate crisis needs as well as longer-term resilience. 82% supported our measures, 67% thought they would provide value to communities but only 35% thought they were ambitious enough. **Evidence source**: LCT and Fuel Poverty Think Tank; Citizens Advice recommendations; partner roundtables.	**Plan response**: ED3 introduces a refreshed multi-tier Partnership Framework, creating pathways from crisis support through to fuel poverty assistance, energy efficiency and LCT enablement. Support includes income maximisation, benefits checks, tariff reviews, energy efficiency advice and energy efficiency packs. Metric revised from supporting 75,000 households to a minimum of 240,000 households. (based on stakeholder feedback and us developing an improved understanding of fuel poverty across our licence areas) **Output / metric link**: Fuel poverty and low carbon transition support: minimum 240,000 households supported by 2033. **Customer outcome**: More households receive targeted support to reduce financial pressure, improve energy efficiency and build longer-term resilience.
Digitally excluded customers	Charities, Consumer Groups, Customers in Vulnerable Circumstances, Future Consumers, Inclusive Service Panel, Partners,	**Needs and barriers**: Digital exclusion emerged as a cross-cutting barrier, particularly for older customers, lower-income households, remote communities and customers with lower digital confidence. Stakeholders also identified the risk of customers losing communications during power cuts.	**Plan response**: ED3 commits to inclusive service design, non-digital campaign formats, Community Toolkits, phone and in-person support routes, Customer Liaison Officers and innovation projects such as VERIFY to identify customers not yet registered on the PSR.

Policy Area	Stakeholder Groups	Summary Feedback	Impact on Business Plan
	Community Councils, Community Interest Groups, Local Authorities	**Stakeholder expectations**: Stakeholders want SSEN to retain offline and human support routes, provide accessible information and avoid designing services that assume digital access. **Evidence source**: Service Based PSR Think Tank; Future Consumer engagement; LCT Think Tank; partner feedback.	**Output / metric link**: PSR reach and tailored service standards; 500,000 enhanced Personal Resilience Plans and 10,000 power cut packs. **Customer outcome**: Customers who are not digitally enabled can still access support, advice and communications in ways that meet their needs.
Customer and Social Value Innovation	Charities, Consumer Groups, Customers in Vulnerable Circumstances, DNOs, GDNs, Community Councils, Community Interest Groups, Domestic and SME Customers, Future Consumers, Health Workers, Local Energy Advisors, Installers, Local Authorities	**Needs and barriers**: Stakeholders highlighted the need for better vulnerability data, stronger cross-utility collaboration, improved trust in data use and more resilient communication methods during power cuts. There was support for moving towards a more universal and joined-up approach to identifying customers in vulnerable circumstances. **Stakeholder expectations**: Stakeholders want innovation to translate into practical improvements in customer identification, targeting, data sharing and inclusive communication. **Evidence source**: Consumer research; innovation portfolio; stakeholder engagement on PSR and digital exclusion.	**Plan response**: ED3 builds on innovation projects including VERIFY, VIVID, VFES and the Vulnerability Visualisation Tool to improve vulnerability mapping, targeting and secure data sharing. Findings from innovation and consumer research are integrated into business plan priorities. **Output / metric link**: Cross-cutting enabler across PSR, fuel poverty/LCT and community resilience outputs. **Customer outcome**: Customer support becomes more targeted, evidence-led and responsive to changing needs, improving reach and reducing the risk that customers in vulnerable circumstances are missed.

USING CUSTOMER PERSONAS TO EVIDENCE NEED AND STRENGTHEN DELIVERY

We have used customer personas as part of our evidence-led approach to designing the ED3 Vulnerability Strategy. The personas help us test how different customers may experience vulnerability in practice and ensure our commitments respond to a range of real-life circumstances, rather than assuming a single standard service offer will meet all customer needs.

HOW PERSONAS HAVE SHAPED OUR ED3 COMMITMENTS

By mapping customer journeys against these personas, we have identified barriers, risks and support needs that have directly informed our ED3 outputs. Personas representing customers who rely on electricity for medical equipment have shaped our focus on PSR growth, enhanced resilience planning and the expansion of our personal battery programme. Personas representing older customers and customers with lower digital confidence reinforced the need for accessible, multi-channel communications, including non-digital routes to support. Customers with communication needs or language barriers informed our outputs on inclusive communications and accessible services, while personas reflecting financial vulnerability strengthened our approach to signposting, referrals and partnership-based support. Personas representing remote and rural communities also informed our focus on local authority collaboration, community resilience planning and targeted place-based support.

BENEFITS OF THIS APPROACH

This approach strengthens the link between customer insight, service design and measurable outcomes. For customers, it means support is more relevant to their circumstances, easier to access through trusted channels and available at the point it is most needed. It also helps us identify customers who may otherwise be missed, including those hidden “behind the meter”, those less likely to engage through digital channels, and those whose vulnerability is temporary, changing or not immediately visible. Additionally, the use of personas provides a clear line of sight between evidence of customer need, the design of our outputs and the outcomes we expect to deliver in ED3.

3. VULNERABILITY WITHIN OUR REGIONS

Supporting customers in vulnerable circumstances begins with truly understanding our customers and the communities we serve.

Vulnerability is influenced not only by a customer's circumstances, but also by where they live, the services available to them and their ability to access support when they need it. Across our licence areas in the north of Scotland and central southern England, customers live in some of GB's most diverse environments, from remote island communities and sparsely populated rural areas to coastal towns and major urban centres. Our understanding is informed by data, customer and stakeholder insight and the expertise of trusted partners, helping us identify where needs exist, how they are evolving and what support can deliver the greatest benefit.

What is Vulnerability?

- Health conditions or disability
- Financial hardship
- Poor housing conditions
- Age or caring responsibilities
- Geography and access to services

Power cuts and severe weather can increase risks and make it more difficult for customers to access the support they need.

Understanding Need

Priority Services Register (PSR)

1.56 million
households estimated eligible

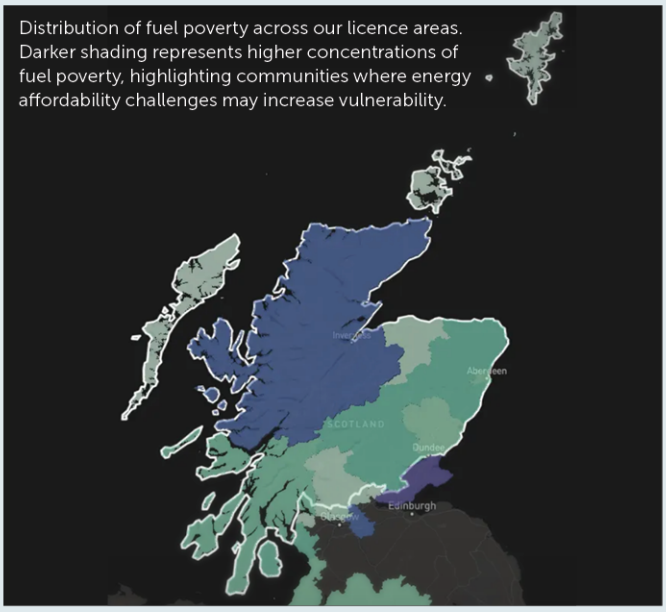
1.27 million
households registered

81.9%
overall PSR reach

VULNERABILITY ACROSS OUR REGIONS

FUEL POVERTY CONCENTRATIONS ACROSS SSEN LICENCE AREAS.

SHEPD - North of Scotland

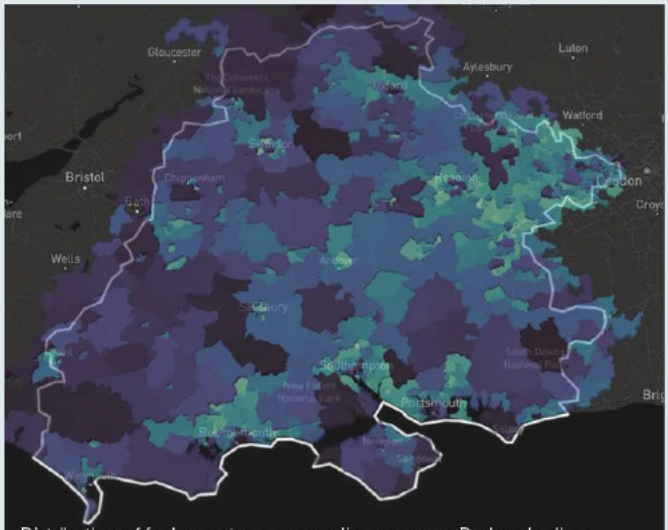


Key Characteristics:

- Remote island and rural communities
- Higher fuel poverty levels
- Greater reliance on alternative heating fuels
- Longer travel times to services
- Greater exposure to severe weather impacts
- Increased geographic isolation

What the map shows[6]:
Fuel poverty is concentrated across many of the remote and rural communities served by SHEPD, particularly across the Highlands and parts of Argyll & Bute, with some of the highest rates also found in Orkney, Shetland and Na h-Eileanan Siar.

SEPD - Central Southern England



Distribution of fuel poverty across our licence areas. Darker shading represents higher concentrations of fuel poverty, highlighting communities where energy affordability challenges may increase vulnerability.

Key Characteristics:

- Larger volume of customers experiencing vulnerability
- Urban, coastal and rural deprivation hotspots
- Housing affordability pressures
- Health inequalities
- Significant PSR growth opportunity
- Increased heat risk

What the map shows[6]:
Fuel poverty is present across coastal, rural and urban communities throughout the SEPD licence area, with higher concentrations visible across parts of Dorset, Wiltshire, Hampshire and the Isle of Wight.

Heading

Licence Area	Estimated Eligibility	PSR (April 2026)	PSR Reach
SHEPD	275,881	252,661	91.6%
SEPD	1,283,506	1,024,756	79.8%
Total	**1,559,387**	**1,277,417**	**81.9%**

Why Place Matters

Where a customer lives can significantly influence how vulnerability is experienced. While needs vary across our regions, common challenges including fuel poverty, health inequalities, social isolation and access to essential services affect customers in both licence areas. Understanding local context helps us tailor support to customers' needs and circumstances.

Fuel Poverty & Energy Affordability

SHEPD (Scotland)

- 28.7% average rate of fuel poverty
- 14.0% households in extreme fuel poverty
- 26.6% off mains gas

SEPD (Central Southern England)

- 11.0% fuel poverty (LILEE measure)

Definitions differ between Scotland and England and should not be directly compared.

Health & Vulnerability

Health and disability are among the most significant factors associated with vulnerability and energy affordability challenges. **Nearly 70% of customers seeking energy advice** through Citizens Advice Scotland had a long-term health condition or disability, while nationally **an estimated 3.6 million disabled people were living in fuel poverty in England**, demonstrating the strong relationship between health and energy vulnerability .

Our strategy

Our ED3 Vulnerability Strategy is informed by an understanding that vulnerability is experienced differently across communities. Through data, insight and targeted support, we will continue to provide equitable support to the customers and communities who need it most.

4. OUR ED3 COMMITMENT, OUTPUTS AND DELIVERABLES

For ED3, we continue to operate under the premise that we will support our customers when they need us most. One of our 12 ED3 core commitments is focused on managing customer vulnerabilities across the regions we serve:

We will strengthen support for vulnerable customers by tripling fuel poverty support and expanding our industry-leading battery programme to reach a further 10,000 households, extending eligibility to include those with mobility challenges who need additional support during a power cut by the end of ED3.

As a DNO, we play a critical role in helping to deliver better outcomes for customers in vulnerable circumstances in our licence areas. We identify and support customers who may need additional assistance, ensuring they can access the services and support available to them. We provide direct support during power cuts and severe weather events, ensuring we coordinate effective responses for customers and communities. This is an area of leadership for us, and we are continuing to build on the enhancements we made in RIIO-ED2. Beyond this, we use our data, insight, expertise and partnerships to help address wider vulnerability challenges such as fuel poverty and the low carbon transition, ensuring customers in vulnerable circumstances in our areas receive the support they need.

Our strategy is built around the following four primary areas of focus, helping to ensure we continue to deliver value and service in line with our customers' needs in a robust way:

1. Priority Service Register (PSR) reach and support
2. Social value - Fuel poverty and low carbon transition
3. Support during a storm or interruption
4. Medically dependent on supply

TRADE-OFFS MADE TO MAXIMISE IMPACT OF OUR SUPPORT

In designing our strategy, we've made a number of deliberate choices in how we design and target support across ED3. These choices reflect our focus to maximise impact and while ensuring the support we do provide remains inclusive and accessible for a broad needs demographic.

Our vulnerability strategy contains several substantive choices:

- We provide targeted rather than universal support, using PSR, network-risk, geographic and socio-economic data to prioritise customers/communities with greatest need;
- We have developed tailored rather than standardised vulnerability support, including service standards by PSR category and customer-specific resilience support;
- Building on our experiences, we've developed a blended partnership model, combining one scalable DNO-level partner with local partnerships and community collaborators rather than relying principally on large national providers. This model allows us to balance reach and scale with depth, local tailoring, partner capacity, and appropriate governance;
- Our support is set up to be multi-channel rather than digital-first delivery, retaining telephone, in-person and non-digital communications;
- We are proposing phased and targeted LCT support, recognising LCTs will not be affordable or appropriate for every customer; and
- We have developed a differentiated offer different, including varying battery sizes and targeted eligibility rather than a uniform offer, balancing individual need and value for money.

WHY THESE AREAS MATTER

Priority Service Register (PSR) reach and support

- We currently estimate that 1.6m of households in our licence areas are PSR eligible, with 1,277,417[1] households currently registered. This does not include residents of sheltered housing and park homes who are often hidden "behind the meter". Only 43% of respondents in the "UK Public Survey of Risk, Perception, Resilience and Preparedness (2025) by Defra were aware of the PSR. Whilst the level of awareness at our ED3 Stakeholder Workshop in March 2026 showed an improved awareness (71.1%), only 43.7% classified themselves as either somewhat or very knowledgeable about the PSR. Ofgem's ED3 Business Plan Guidance identifies maximising eligible PSR registrations as a core objective, reinforcing the need for targeted promotion, trusted referral routes and robust data stewardship. Additionally, attendees at our PSR Think Tank told us rising concerns over data fraud is a barrier to PSR uptake.
- Not all customers require or value the same forms of support, and regional differences across our licence areas demonstrate that customer needs can vary significantly. Stakeholders told us that the perception of receiving unnecessary services can act as a barrier to registration, particularly where customers feel available support does not reflect their individual needs. Customers increasingly want the flexibility to opt in or out of specific services, enabling a more tailored and customer-centred experience and having a personalised approach to vulnerability support is needed to ensure customers receive services that are relevant to their circumstances.
- Trust and data quality remain fundamental to the effectiveness of the PSR. Ensuring customer information is accurate, current and reflective of changing circumstances, whilst poor data quality risks customers missing out on the support they need. Customers and stakeholders told us they want greater transparency around how their data is collected, maintained, protected and, where appropriate, shared to improve outcomes. Building confidence in the quality and stewardship of customer data is therefore essential to maintaining an effective and trusted PSR.

Social value - Fuel poverty and low carbon transition

- As fuel poverty continues to deepen, there is a growing need to better understand the challenges faced by vulnerable households and to innovate alongside partners to provide meaningful and accessible support. At the same time, access to Low Carbon Technologies (LCTs) remains unequal, with many customers facing barriers to awareness, purchase and successful use. Stakeholder evidence from Energy Systems Catapult highlights that customers, particularly those in vulnerable circumstances, often struggle to identify who they can trust and are confused by the roles of DNOs, suppliers, councils, advice organisations and installers. Some customers can experience a significant digital disconnect, particularly older, rural and fuel-poor groups, resulting in missed opportunities to access support schemes and participate in the transition to a low-carbon energy system. Detailed mapping has identified concentrations of fuel poverty across our licence areas including Orkney Islands (51%), Shetland Islands (40%), Dundee City (38%), well above that national average rate of 28%.
- In England and Wales, the average rate of fuel poverty is 10%. Hotspots within SEPD licence area include Wiltshire, Dorset and the Isle of Wight. These insights are helping shape future partnership priorities and geographical targeting to regions where fuel poverty levels exceed regional averages.
- The LCT and Fuel Poverty Think Tank identified key barriers including confusion, low confidence, disruption, digital exclusion and disproportionate costs, particularly for homes in rural and off gas grid locations. Finally, partners attending a roundtable emphasised that crisis-driven clients prioritise immediate financial support over longer-term behaviour change, requiring a tiered approach.

Support during a storm or interruption

- Customer resilience remains a key challenge, particularly as severe weather events become more frequent and disruptive. Many customers require greater support, education and practical advice to prepare for, and build confidence in managing through. power cuts Both customers and stakeholders told us they want more information and guidance on how to prepare in advance of storms and power cuts, highlighting a need for improved preparedness support and communication.

[1] March 2026

- Effective community resilience requires locally tailored support that reflects the unique needs of different communities, particularly those in remote and rural areas. Greater investment in community resilience centres, local schemes and trusted delivery partners is needed to strengthen preparedness and response during major incidents. Stakeholders told us that national approaches do not always recognise local circumstances, increasing the risk of inappropriate decisions or resource allocation. They also highlighted growing concerns that digital and mobile communication failures, which are often more prevalent in remote communities, could prevent customers in vulnerable circumstances from accessing the support they need during prolonged power cuts.

Medically dependent on electricity supply

- During ED2 we launched an industry first programme to provide battery back up to 20,000 households who rely on electrically powered medical equipment to preserve life or are disproportionally impacted by power cuts. Feedback from customers who received the batteries was overwhelmingly positive with them citing an increased ability to cope in a power cut as a key outcome. There is clear scope to go further with over 64,400 registered on our PSR having noted they have some form of medical dependence on electricity.

OUR COMMITMENT, METRICS AND OUTPUTS

Based on the challenges identified above, our strategy supports our core ED3 commitment "We will increase our support for customers when they need us most" and is underpinned by 4 metrics and 2 outputs.

The metrics used to support this commitment are set out in Table 4.1: ED3 outputs and metricsTable 4.1.

Table 4.1: ED3 outputs and metrics

Detail	Type
We will increase our PSR registrations by 40% from ED2, reaching a minimum of 90% of eligible customers by 2030. We will also introduce tailored PSR support through set service standards for every PSR category by 2030. Available to all eligible consumers throughout the ED3 period.	Output
We will work with Local Authorities and partners to identify and contact all known residential park homes and sheltered accommodation in our licences areas to proactively offer access to PSR and resilience planning. We will enhance this through in-person resilience planning for a minimum of 100 communities most at risk of power cuts.	Metric
We will provide a minimum of 240,000 households with fuel poverty and/or access to adopt LCTs by 2033, thereby tripling our fuel poverty support in ED3, compared to an ED2 baseline.	Metric
Support a further 30% more households with enhanced Personal Resilience Plans which will be issued to 500,000 customers by 2033. We will also double support to a further 10,000 PSR customers with power cut packs. Both targets are based on an ED2 baseline.	Output
We will extend our industry-leading battery programme by 50% to support a further 10,000 households, expanding eligibility criteria beyond life preserving medical equipment and to include homes which use medical hoists and medical beds.	Metric
We will enhance our shareholder financed community fund, increasing funding by 50% to £750,000 per annum to support LCT accessibility initiatives, and physical environmental and resilience schemes.	Metric

Table 4.2 **PROVIDES OUR FORECAST FOR EACH YEAR OF ED3, SHOWING HOW WE WILL MEET OUR OUTPUTS:**

Table 4.2: Delivery and phasing

Output metric	2028	2029	2030	2031	2032	ED3 Outturn
PSR Reach – Combined	88%	90%	>90%	>90%	>90%	>90%
PSR Reach – SHEPD	>90%	>90%	>90%	>90%	>90%	>90%
PSR Reach – SEPD	87%	89%	>90%	>90%	>90%	>90%
BMCS	9.2	9.25	9.3	9.4	9.5	9.5
Reach	30%	70%	100%			100%
Communities Resilience Plans		25	25	25	25	100
Households supported	37,920	48,000	51,360	51,360	51,360	240,000
Power Cut Packs	2,000	2,000	2,000	2,000	2,000	10,000
Personal Resilience Plans	100,000	100,000	100,000	100,000	100,000	500,000
Batteries	2,000	2,000	2,000	2,000	2,000	10,000
Funding provided to communities	£750,000	£750,000	£750,000	£750,000	£750,000	£3.75m

BENEFITS AND SOCIAL VALUE

Measuring the impact of providing support for Fuel Poverty and Low Carbon Transition cannot be done through the numbers of households alone. Using Social Return on Investment (SROI), a framework to measure and value the wider social, environment and economic outcomes created by a programme, to assess how effective this support would be ensured our strategy will drive value for customers who are in financial difficulty or at risk of being left behind. All outputs were assessed against the SROI rulebook, updated across August – October 2026 for ED3.

Table 4.3 details the projected, cumulative Net Present Value and SROI across our proposed Fuel Poverty support.

Table 4.3: NPV and SROI for Fuel Poverty support

Output metric	2028	2029	2030	2031	2032	ED3 Outturn
Net Present Value	£3.57m	£15.95m	£38.2m	£70.23m	£111.45m	£111.45m
SROI	£0.65	£1.30	£1.99	£2.71	£3.46	£3.46

Table 4.4 details the projected, cumulative Net Present Value and SROI across our proposed Low Carbon Transition support.

Table 4.4: NPV and SROI for LCT Support

Output metric	2028	2029	2030	2031	2032	ED3 Outturn
Net Present Value	£0.83m	£2.49m	£4.99m	£8.3m	£12.38m	£12.38m
SROI	£0.76	£1.01	£1.30	£1.60	£1.92	£1.92

5. HOW WE WILL DELIVER OUR OUTPUTS AND DELIVERABLES

OUR APPROACH

We will deliver our ED3 vulnerability metrics and outputs through an evidence-led model that combines data, innovation, partnerships, inclusive access and clear performance assurance. This approach is designed to ensure support is targeted to customers and communities with greatest need, while remaining flexible as vulnerability, weather risk, digital access and low carbon transition challenges evolve.

SMART USE OF DATA

Our ability to target support has evolved significantly throughout previous price controls. Initially, support was informed primarily by PSR data and vulnerability indicators. Looking to ED3, this becomes a much more sophisticated data-led model that combines network data, publicly available data, customer mapping and partner insights to identify both the customers and communities most likely to require support. We are increasingly using geographic and socio-economic analysis to identify priority areas for intervention. Current analysis indicates that around 28.7% of households within SHEPD licence areas and 10% of households within SEPD licence areas are experiencing fuel poverty, however mapping has identified concentrations of fuel poverty within rural areas such as Sutherland, Ross and Cromarty, Inverness-shire, Wiltshire, Dorset and the Isle of Wight, alongside urban areas including Dundee, Southampton and Reading. These insights are helping shape future partnership priorities and geographical targeting to regions where fuel poverty levels exceed regional averages.

INNOVATION

Innovation comes in many forms, from ideas such as the creation of PSRScotland.co.uk and thePSR.com in ED1, both of which were concepts generated through internal channels and delivered through collaborative working, to large scale projects funded through the Strategic Innovations Fund (SIF) and Network Innovation Allowance (NIA).

A key evolution for ED3 is the deployment of innovation projects utilising data and insights into business as usual to improve customer identification and targeting, for example:

- VERIFY[2] (Vulnerability Evaluation for Resilience Investment and Flexibility) builds on SSEN's Vulnerability Future Energy Scenarios and VIVID (Vulnerability Identification Via Informative Data) work and uses data and advanced analytics to help electricity networks better understand the differing needs of local communities, enabling fairer and more targeted investment and support as the transition to a low-carbon energy system progresses.

[2] https://ssen-innovation.co.uk/sif/sif-verify/

- Open Maps provides enhanced vulnerability heat mapping capabilities that enable identification of communities where targeted local partnerships would deliver the greatest benefit.
- Equal LCT uses data-driven analysis to identify areas where coordinated low carbon technology and energy efficiency interventions could reduce bills whilst supporting network outcomes.

Together, customer mapping, PSR data, network risk information, publicly available socio-economic data and innovation outputs will allow us to identify unmet need, prioritise interventions and evidence where support is delivering the greatest customer benefit.

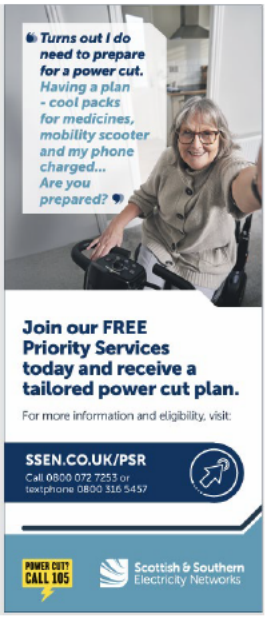
ENGAGING OUR SUPPLY CHAIN AND PROCUREMENT PARTNERS

We will use structured procurement and partner selection processes to secure the capability required to deliver our ED3 commitments. This will include battery provision, power cut packs, and GB-wide and licence-area partnership support. Procurement will assess quality, value for money, deliverability, customer experience and alignment with our (ED3-S05) Delivery Strategy. Where relevant, specifications will reflect learning from ED2 customer feedback and operational delivery.

DELIVERING OUR OUTPUTS

The following section explains how each ED3 metric and output will be delivered, governed and evidenced.

Output	We will increase our PSR registrations by 40% from ED2, reaching a minimum of 90% of eligible customers by 2030. We will also introduce tailored PSR support through set service standards for every PSR category by 2030.
Focus Area	Priority Service Register (PSR) reach and support



We have set this as an ambitious target on the basis of projections of how many of our customers would be eligible to be on the PSR, reflecting regional variations across our SEPD and SHEPD regions in attracting eligible customers onto the PSR register, recognising a certain percentage of customers preferring to remain off the register despite eligibility, and the rates of sign-up we have observed in ED2 thus far.

We will increase PSR reach through targeted awareness campaigns, trusted referral routes, improved data quality and strengthened colleague capability. Campaigns will be informed by customer mapping, PSR eligibility analysis, previous campaign performance, stakeholder insight and partner intelligence. Activity will be weighted towards areas and customer groups where eligibility gaps are greatest, including higher focus in SEPD where current registration levels are lower. On that basis, spend for our 2025/26 campaign was weighted 75% SEPD and 25% SHEPD.

Campaigns will use a mix of digital and non-digital channels, including social media, out-of-home, trade press, door drops and radio, ensuring customers who are digitally excluded are not overlooked. VERIFY will strengthen our ability to identify customers who are less digitally enabled and help improve future targeting.

We will also improve customer data held by us by continuing ED2 data cleansing processes, fully refreshing PSR records every 24 months and increasing automation in data-sharing processes to reduce manual handling and associated risk. This will ensure customers are less likely to miss critical support during power cuts.

Figure 5.1 illustrates the projected PSR growth across the SEPD and SHEPD licence areas during Years 1 to 5 of ED3 with estimated eligibility and our current PSR registrations[3].

[3] March 2026

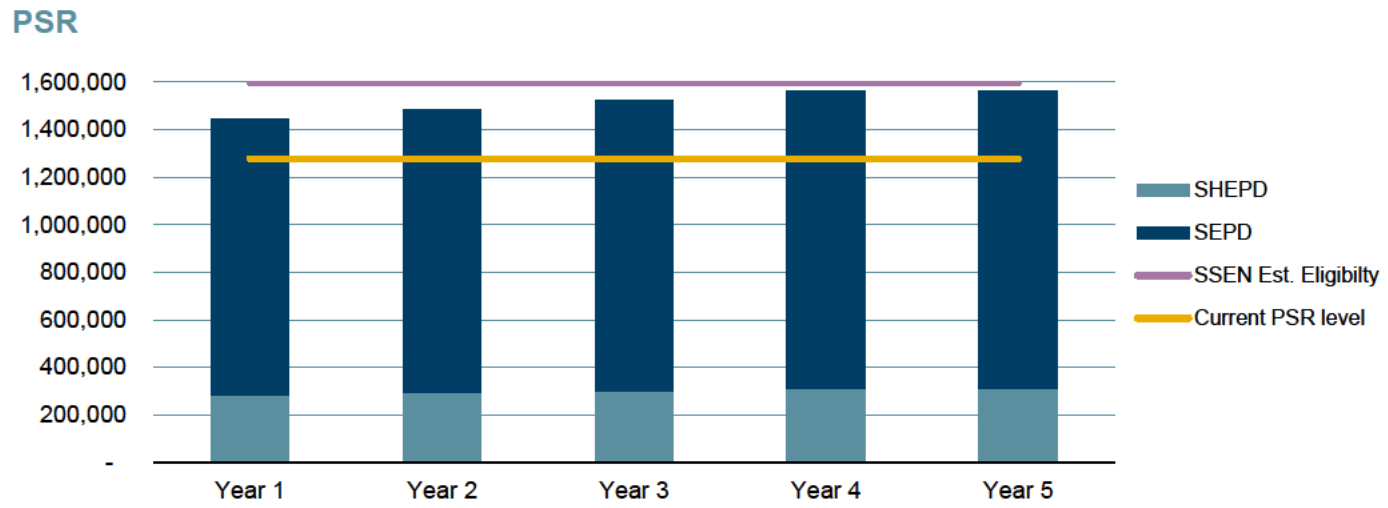


Figure 5.1: Projected PSR growth

To ensure we are improving the service we are providing to our PSR customers throughout ED3, we will introduce tailored service standards for each PSR category. Whilst these standards are unique to SSEN Distribution, they will be socialised through the Customer Service and Vulnerability Working Group (CSVWG) which is attended by all DNO peers. This will allow for challenge, sharing of insights, and potential harmonisation in the future.

Working with partners to develop standards that meet the needs of each PSR category, ensuring we deliver and can be held to account. This level of commitment to our vulnerable customers will ensure our training and our delivery are of a high standard.

The introduction of these service standards will improve satisfaction for PSR customers across ED3. Customer journeys will be created for each PSR level, with transition support in place to ensure we are responding to customer feedback through a continuous improvement programme. These standards will be introduced across the first two years of ED3, allowing us to further engage with customers, test their effectiveness and embed them into our customer service journeys. We will align these standards with our internal capability and undertake a full review of all customer service training, providing tailored vulnerability training and support for all front-line colleagues and specialised training for our Priority Services team. Feedback from customers will be used to shape the updated customer service training to ensure the quality of customer service provided to PSR customers continues to improve in ED3.

As part of our (ED3-S07) Targeted Customer Storm Support Strategy, we detail the work we will undertake in ED3 to enhance, and improve the consistency of, service provisions and outcomes for customers, including those on PSR, who are impacted by named storms.

Alongside the PSR Service standards, we will

- **Maintain accurate and secure customer data**: We will continue to protect customer information and take reasonable steps to ensure PSR records remain accurate, complete and up to date. We will provide customers with regular opportunities to review and update their information, including through an “every contact counts” approach, and will promote multiple channels through which updates can be made.
- **Communicate through accessible and preferred channels**: We will continue to communicate with PSR customers in the format and channel that best meets their needs. This includes offering accessible communication options and recording customer preferences to support effective engagement before, during and after a power cut.
- **Connect customers to specialist support**: Where appropriate, we will signpost and refer customers to trusted partner organisations that can provide additional support, including advice on fuel poverty, Low Carbon Technologies, energy efficiency, health and wellbeing, financial assistance and wider resilience services. Support will be offered through local, regional and national partners and may be available through in-person, telephone and digital services.

Metric	We will work with Local Authorities and partners to identify and contact all known residential park homes and sheltered accommodation in our licences areas to proactively offer access to PSR and resilience planning. We will enhance this through in-person resilience planning for a minimum of 100 communities most at risk of power cuts.
Focus Area	Priority Service Register (PSR) reach and support

This metric has been developed based on our experience with and understanding of existing resilience activities across communities we serve in our SEPD and SHEPD regions. Universal contact ensures no identifiable higher-risk accommodation across our licence area is included going forward. In determining our ambition for ED3, we've overlayed an assessment of the degree of self-sufficiency of existing resilience groups with an assessment of local authority readiness and willingness for cooperation on community resilience. This data, complemented by our experience in ED2 and historic storm performance has led us to determine a minimum intervention threshold for ED3 of 100 communities.

Supporting at least 100 communities replaces application-led funding with proactive, data-led support, prioritising rural, island and previously unsupported communities through tailored plans, hubs, training, equipment and exercises. Selection balances interruption risk, vulnerability and readiness; a smaller programme would limit reach, while a larger one risks delivery without suitable partners, premises or sustainable operating models.

In ED3, we will work with Local Authorities and specialist partners to identify relevant site, helping us to understand the scale of need, and offer PSR access and resilience planning support. Initially we will write to all identified sites, with details of the PSR and including the community toolkit to allow for sharing of information within that community.

Following this mass communication, we will then prioritise communities most exposed to power cut risk, fuel poverty, poor access to services and severe weather impacts and offer in-person resilience planning, which will be delivered for at least 100 communities, creating practical local plans that improve preparedness before power cuts occur.

Metric	We will provide a minimum of 240,000 households with fuel poverty and/or access to adopt LCTs by 2033, thereby tripling our fuel poverty support in ED3, compared to an ED2 baseline.
Focus Area	Social value - Fuel poverty and low carbon transition

Our ED3 ambition was set in response to evidence of significant and geographically concentrated fuel poverty, increasing complexity of customer need, and direct stakeholder feedback to drive ambition in this area. Our 240,000-household target, broken down to support 200,000 households in fuel poverty and 40,000 households accessing Low Carbon Technology, is enabled by a broader end-to-end support offer and a new partnership model designed to combine scalable DNO-wide provision with targeted local delivery. 240,000 triples our ED2 delivery and reflects the scale that partners and delivery channels can credibly reach while maintaining evidenced outcomes. A lower target would not respond adequately to affordability and transition needs; a higher one risks prioritising contact volumes over meaningful attributable benefit.

Our support offer for customers in fuel poverty has expanded considerably through RIIO-ED2 and will continue to broaden in ED3. The focus has shifted from delivering individual interventions towards creating an end-to-end support journey that addresses both immediate vulnerability and longer-term resilience. Following a review of our support offered in the second year of ED2, we have extended the scope of many of our services offered, in addition to expanding the reach, through increased volumes of services or specific items. Our proposals for ED3 expand on this further, continuing to provide services that deliver positive customer outcomes while increasing the number of customers we will target with these offerings through to 2033. Going beyond the traditional fuel poverty support, we will also increase support for customers to participate in the low carbon transition.

Within our proposed ED3 plan, SSEN's role is to act as an enabler of the low-carbon transition for customers in vulnerable circumstances, helping customers access support, funding and trusted advice while recognising that wider barriers such as housing conditions, affordability and national policy sit beyond our direct control. Our proposed level of support extends beyond helping customers access grants or funding and includes a focus on removing practical barriers and ensuring customers in vulnerable circumstances are not left behind as the energy system evolves. In ED3, delivery of support will be enhanced to include the Access-Purchase-Use (APU) model, meaning customers will be offered guidance on suitable technologies, support during the installation journey and practical advice on using technologies effectively to maximise bill savings and consumer benefits.

WORKING IN PARTNERSHIP

Responding to stakeholders calls for clearer messaging, better follow-up funding, and a holistic partnership approach our partnership model has evolved over ED2, from relying predominantly on large-scale providers towards a structured multi-tier partnership framework that balances national capability with local delivery. Our ED3 partnership framework will balance national reach with local delivery and will allow us to provide both the breadth and depth of support customers require. It will comprise of:

1. **An overarching DNO-level partner** operating across both licence areas, providing scalable fuel poverty, energy efficiency and low carbon transition support.
2. **Local partnerships** in areas identified through customer mapping as having elevated vulnerability, fuel poverty, poor access to services or specific local resilience needs.
3. **Community energy organisations and local collaborators** providing outreach, engagement, trusted referral routes and local intelligence.

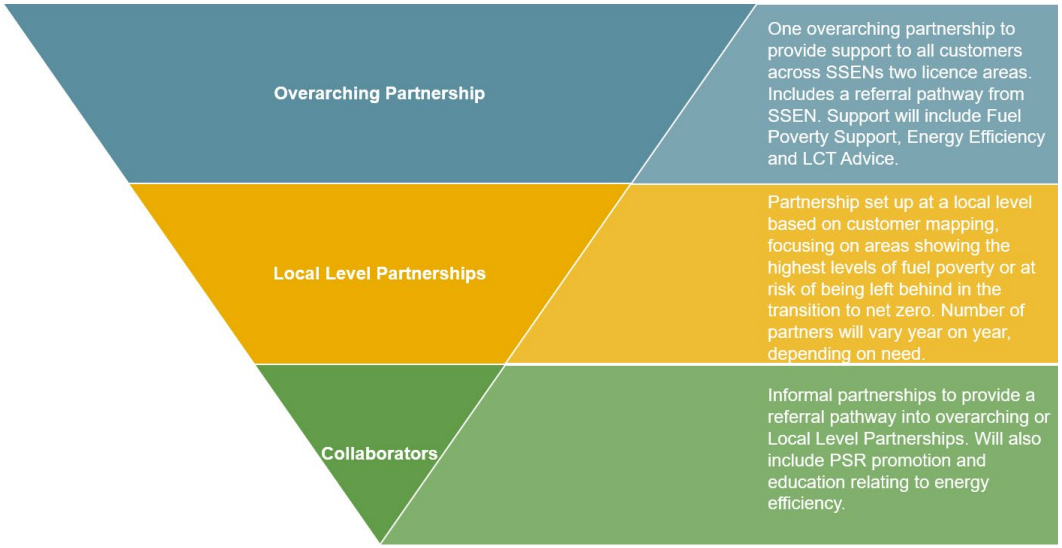


Figure 5.2: Our ED3 Partnership Approach

This framework creates a clear customer pathway from crisis support through to fuel poverty advice, energy efficiency measures and low carbon transition support, reducing fragmentation and improving accountability for outcomes.

The overarching DNO-level partner will provide consistent, scalable support across both licence areas, ensuring customers have a clear route to fuel poverty, energy efficiency and low carbon transition advice. Local partnerships and trusted collaborators will then provide more targeted, place-based support in communities where customer mapping identifies higher levels of need or specific barriers to access.

This blended model allows us to reach a larger number of customers while also providing more intensive, tailored support where circumstances are more complex. For customers, this means earlier access to trusted advice, clearer referral pathways, less duplication across services, and support that is better matched to their needs — helping improve affordability, home comfort, resilience and confidence in the low carbon transition.

OVERARCHING DNO LEVEL PARTNERSHIP

The partner will provide consistent, scalable support across both licence areas, creating a clear route for customers from initial identification through to practical help. Support will include fuel poverty advice, tariff reviews, income maximisation, benefits checks and behavioural energy efficiency guidance. It will also include low carbon transition support, including advice on suitable technologies, access to funding, installation support and post-installation guidance so customers can use new technologies effectively and maximise potential bill savings.

The partner will identify customers who may benefit from support using SSEN referral pathways, the customer mapping tool and their own data and insight. This will help ensure support is targeted to customers and communities with the

greatest need, reduce duplication across services and give customers a more joined-up experience. For customers, this means earlier access to trusted advice, clearer routes to practical help, and support that can improve affordability, home comfort, resilience and ability to participate in the low carbon transition where appropriate.

LOCAL LEVEL PARTNERSHIPS

We will establish local partnerships, enabling customers to access advice through trusted local routes, in areas where customer mapping identifies elevated customer need, including fuel poverty, digital exclusion, poor access to services, rurality or specific barriers to low carbon technology adoption. Working with community energy groups and local advisers across both licence areas, these partnerships will provide targeted, place-based support that complements the scalable services delivered through our overarching DNO-level partner.

Local partners will use their community knowledge, trusted relationships and understanding of customer behaviours to tailor support to local circumstances. This will be particularly important in rural and remote areas, such as the Scottish Highlands, Wiltshire and Dorset, and in diverse urban communities, such as Dundee and West London, where customer needs, access routes and barriers to engagement differ.

This approach will help customers access support through trusted local channels, receive advice that reflects their circumstances, and benefit from practical interventions that can improve affordability, home comfort, resilience and confidence in the low carbon transition. We will review the number, location and scope of local partnerships throughout ED3 using evidence on customer need, delivery performance, partner capacity and customer outcomes, ensuring the model remains targeted, proportionate and focused on areas where local delivery provides greatest value.

The number and location of local level partnerships will be regularly reviewed to ensure changing requirements and performance are considered. For context, in ED2, we have 6 local level partnerships. Whilst this is likely to increase in ED3, we must continue to balance quality outcomes for customers, the ability of partners to deliver and the ability to robustly govern the partnerships.

COLLABORATORS

We will continue to work with trusted local collaborators, including Fire and Rescue services, Local Authorities, community groups, warm hubs and cool hubs, to identify customers and communities who may benefit from additional fuel poverty, energy efficiency or low carbon transition support. These organisations often have established relationships with households who may not otherwise engage directly with SSEN, making them an important route for reaching customers with higher levels of need.

Collaborators will be able to refer customers into SSEN or our partner network, creating a clearer pathway to practical support, advice and onward services. This will help customers access support earlier; reduce duplication across local services and ensure assistance is better tailored to their circumstances. Through outreach events and community-based engagement, we will also increase awareness of available support in accessible, trusted settings, helping more customers improve resilience, reduce energy costs where possible and participate more confidently in the low carbon transition.

TYPES OF SUPPORT PROVIDED

Our partnership framework will provide a clear pathway of support across four stages: fuel crisis support, fuel poverty support, energy efficiency support and low carbon transition support. This means customers can access the right support at the right time — from immediate help where they are at risk of self-disconnection, through to practical advice on managing energy use, improving home efficiency and adopting low carbon technologies where suitable.

We recognise that low carbon technologies will not be affordable, appropriate or deliverable for every customer at the same point in time. Our approach therefore ensures customers can benefit from practical, proportionate support at each stage of their journey, helping them reduce energy costs where possible, improve comfort and resilience in their homes, and participate in the low carbon transition when it is right for their circumstances.

Level One: Fuel Crisis Support	Level Two: Fuel Poverty Support	Level Three: Energy Efficiency	Level Four: Low Carbon Technology Delivery
• Providing crisis support for customers who need immediate intervention, including with accessing emergency funding to pay for energy billing or signposting to mental health support	• Providing support with tariff reviews, benefits checking, income maximisation, debt advice • Sign posting to additional services outwith fuel poverty support	• Providing Energy Efficiency advice, including behavioural advice to reduce energy consumption and 'fabric first' support to increase the energy rating of the property	• Enabling access to LCT grants, loans and funding. Provision of, or access to, guidance what LCT is best for the customer. • This will also include advice on post installation use (likely advice delivered by a third party)

To maximise reach and accessibility, we will work with partners to promote fuel poverty, energy efficiency and low carbon transition support through both digital and non-digital channels. Customers will be able to access support in the way that best meets their needs, including by phone, online and in person. We will also signpost this support through our annual PSR awareness campaigns, helping customers in vulnerable circumstances understand what help is available and how to access it.

All delivery partners will have access to energy efficiency packs, with up to 10,000 provided during ED3. Packs will include practical measures such as draught excluder tape, radiator reflectors and LED lightbulbs, with contents tailored to individual customer need. This will help customers take immediate, low-cost steps to improve home comfort, reduce energy waste and lower bills where possible.

The graph below illustrates the projected growth in the number of households supported through fuel poverty interventions, energy efficiency advice, and referrals across the SEPD and SHEPD licence areas during Years 1 to 5 of ED3. We will identify these customers through a combination of referrals through our existing engagement channels, customers who approach one of our delivery partners directly, and customer mapping such as Verify and data we have access to through our delivery partners.

Figure 5.3 below illustrates the projected number of households supported through fuel poverty intervention in ED3.

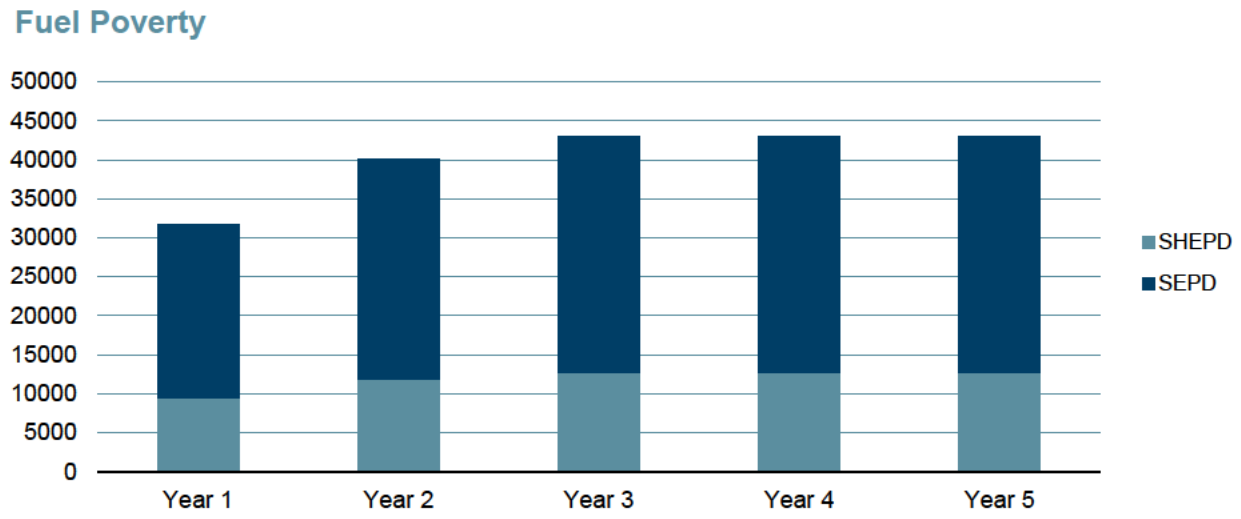


Figure 5.3: Fuel poverty support in ED3

In ED3, we will take a phased and targeted approach to low carbon transition support so that customers in vulnerable circumstances receive advice and assistance that reflects their circumstances, readiness and ability to act. This will help ensure support is focused where it can deliver the greatest benefit, including for customers facing affordability, confidence, housing condition or digital access barriers.

Community Energy Groups will play a key role in providing trusted, local advice to help customers understand suitable low carbon technologies, access available support and use new technologies effectively. This will help customers reduce energy costs where possible, improve comfort and resilience in their homes, and participate more confidently in the transition to a low carbon energy system.

Figure 5.4 below illustrates the projected growth in the number of households receiving low carbon transition advice, support and referrals across the SEPD and SHEPD licence areas during Years 1 to 5 of ED3.

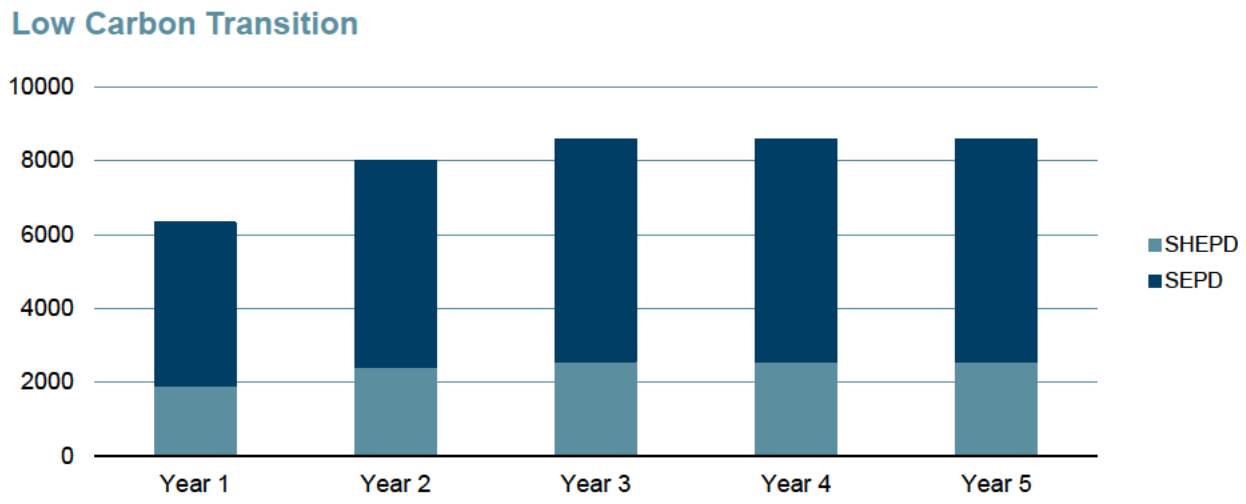


Figure 5.4: LCT support in ED3

CONTINUOUS IMPROVEMENT AND PERFORMANCE MANAGEMENT

Alongside expanding and diversifying partnerships, ED3 introduces a stronger emphasis on performance management and evidence of outcomes. We have recently refreshed our Internal Customer Vulnerability Partnership Framework Policy, including clarification of effective partnership management. Performance management will be underpinned by:

- Data-led identification of intervention areas.
- Regular reviews of partner performance.
- Annual submission of data, and quarterly reviews
- Monitoring of customer outcomes and satisfaction.
- Ongoing refinement of partnership portfolios based on effectiveness.
- Social Value reviews
- Annual strategy reviews and partner engagement activities.

Partnerships will be reviewed regularly against delivery performance, customer outcomes, strategic fit and funding availability. Where performance falls below expectations, we will agree improvement actions with partners. Where a partnership no longer delivers sufficient customer value or strategic alignment, we will amend, replace or close it in a managed way.

CASE STUDY: DEPTH AND BREADTH OF SUPPORT

Mrs D contacted one of our partners for support, initially requesting help with damp and mould in her home. After speaking with an energy advisor, it was identified more support could be provided. Over a period of 7 months, our partner spoke with Mrs D multiple times, providing support with water schemes, benefits and mental health support as Mrs D had recently lost their partner. During the conversations with Mrs D, her water bill was reduced with an estimated saving of £432 per year. As a result of the benefits checks, Mrs D now receives Attendance Allowance (£5,741 per annum), Pension Credit (equivalent to £5,052 annually) and Severe Disability (£4,311 per annum) payments, increasing her annual income by over £15,000.

SUPPORTING WARM AND COOL HUBS

To further support our customers and communities, and promote our services, including fuel poverty referrals, we will support community spaces acting as warm and cool hubs across our licence area, with a minimum of 600 hubs supported through our partnership with Warm Welcome.

Building on the Personal Resilience Plans' resource developed during ED2, we will further enhance the provision of tailored advice and guidance to meet customers' individual needs and circumstances. This will include targeted seasonal preparedness information to help customers increase their resilience to winter and summer weather-related risks, alongside practical advice and support before, during and after storm events and prolonged power cuts.

Output	We will support a further 30% of households with enhanced Personal Resilience Plans which will be issued to 500,000 customers by 2033. We will also double support to a further 10,000 PSR customers with power cut packs. Both targets are based on an ED2 baseline.
Focus Area	Support during a storm or interruption Priority Service Register (PSR) reach and support

We will issue enhanced Personal Resilience Plans (PRP) to 500,000 customers by 2033, helping customers understand the practical steps they can take before, during and after a power cut. The plans will be refreshed using internal and external expertise, customer feedback and service design insight to ensure the advice is clear, practical and tailored to different customer circumstances.

We think this target is ambitious as it builds our experience in outperforming our ED2 target (we have achieved ~500,000 plans in ED2 Y3 against an ED2 target of 374,000) while recognising that the population for whom a PRP is valuable is finite. In setting this target we have remained realistic about the number of households we expect to reasonably recruit into the programme during ED3. The targets scale proven support - 30% more plans and twice as many packs compared to ED2 - while focusing physical support on those with greatest need. A lower target would leave known resilience gaps; higher volumes should depend on evidence of benefit and must not turn personalised plans into a volume exercise.

Customers will be able to access their plan online, by post or by telephone, ensuring those who are digitally excluded are not disadvantaged. We will issue plans to new PSR customers and to existing PSR customers following data refresh activity, maximising reach and ensuring advice remains relevant as customer circumstances change.

The enhanced plans will include seasonal preparedness guidance (including advice for extreme heat), practical advice for prolonged power cuts, and information on the support available where telephone or digital communications are unavailable. This will help customers feel more prepared, reduce uncertainty during power cuts and support safer, more resilient households.

Customers will be identified in the following ways: at the point of registration for PSR; during the PSR data cleanse process; and when customers inform us of a change of circumstances which would require a new PRP to be issued.

ENHANCED PERSONAL RESILIENCE PLANS:

We will issue enhanced Personal Resilience Plans to 500,000 customers by 2033, helping customers understand the practical steps they can take before, during and after a power cut. The plans will be refreshed using internal and external expertise, customer feedback and service design insight to ensure the advice is clear, practical and tailored to different customer circumstances.

Customers will be able to access their plan online, by post or by telephone, ensuring those who are digitally excluded are not disadvantaged. We will issue plans to new PSR customers and to existing PSR customers following data refresh activity, maximising reach and ensuring advice remains relevant as customer circumstances change.

The enhanced plans will include seasonal preparedness guidance (including advice for extreme heat), practical advice for prolonged power cuts, and information on the support available where telephone or digital communications are unavailable. This will help customers feel more prepared, reduce uncertainty during power cuts and support safer, more resilient households.

Customers will be identified in the following ways: at the point of registration for PSR; during the PSR data cleanse process; and when customers inform us of a change of circumstances which would require a new PRP to be issued.

POWER CUT PACKS:



We will provide power cut packs to 10,000 PSR customers during ED3, targeted to those whose circumstances mean they are more likely to need practical support during a power cut. Packs will include items such as portable charging devices, emergency lighting and seasonal resilience items to help customers stay safe, informed and comfortable during power cuts.

The contents of each pack will be tailored to individual customers' needs. This means customers will receive practical support that reflects their circumstances, rather than a generic offer. Where appropriate, packs may also include medicine cool bags to help customers keep refrigerated medication safe during power cuts, reducing anxiety and supporting continuity of care.

Through these provisions, customers will have a higher level of preparedness, ensuring they can stay informed, safe and comfortable during power cuts.

Eligible customers will be identified through detailed analysis of network performance which identifies customers on worst served circuits. This data will be overlayed with PSR data to highlight those with the greatest need.

Metric	We will extend our industry-leading personal battery programme by 50% to support a further 10,000 households, expanding eligibility criteria beyond life preserving medical equipment and to include homes which use medical hoists and medical beds.
Focus Area	Priority Service Register (PSR) reach and support Medically dependent on supply

We propose to extend the programme to a further 10,000 households in ED3, representing a 50% expansion of the ED2 programme. This builds on positive customer outcomes in ED2 and responds to significant remaining need, with more than 64,400 PSR customers identifying some form of medical dependence on electricity. In ED3 we will broaden eligibility to include customers with mobility needs and use our Customer Eligibility Index, combining PSR needs, location and fault history, to target provision towards customers who will benefit most. Delivery of around 2,000 batteries annually provides a **consistent service profile, reduces supplier stop-start risk and allows the programme to benefit from technology improvements** over ED3.

We think this is ambitious as our target of 10,000 reflects the identified need among medically dependent customers affected by power cuts, balancing targeted resilience support with affordability. We've determined this target on the basis of customers, stakeholders and statutory bodies (Citizens Advice) having responded very positively to our ED2 battery programme and strongly supporting its continuation in ED3.

To ensure we are able to deliver this output, we will complete procurement for the personal battery programme before the start of ED3, enabling continuity from ED2 and supporting a controlled mobilisation of suppliers. We will update our Customer Eligibility Index (the index identifies which customers are eligible for batteries based on their location, PSR needs codes and fault history) to ensure batteries are targeted to customers with the greatest need.

We will offer a range of battery sizes to better reflect individual customer requirements and improve value for money. Eligible customers will discuss their circumstances with our teams so we can identify the most appropriate solution, including post-delivery support where needed. Delivery will be phased at approximately 2,000 batteries per year, providing a consistent service profile, reducing supplier stop-start risk and allowing the programme to benefit from technology improvements over the ED3 period.

The provision of these batteries will ensure these customers have greater confidence and resilience during a power cut.

We have agreed with other DNOs to investigate a joint tender process when procuring batteries before the start of ED3, to appoint multiple battery providers to ensure customers receive the right battery for their needs.

Metric	We will enhance our shareholder financed community fund, increasing funding by 50% to £750,000 per annum to support LCT accessibility initiatives, and physical environmental and resilience schemes.
Focus Area	Social value - Fuel poverty and low carbon transition

We will increase annual shareholder funding for the Powering Communities fund by 50%, from £500,000 to £750,000 per year. A 50% increase materially expands support to meet greater ED3 community needs, while remaining proportionate to evidenced demand and avoiding any impact on customer bills. Lower could constrain worthwhile schemes. We think greater levels of funding are not justified without evidence of additional fundable demand and incremental impact.

This will support community-led projects that improve resilience, enable affordable access to low carbon technologies and deliver wider environmental benefits in areas of higher vulnerability, fuel poverty or network-related impact. Given our impact across ED2 through our community fund, and the explicit DNO role in ED3 to support communities affected by network investments for LCT uptake, we have decided to increase our fund size by 50% annually.

The fund will remain open to not-for-profit community organisations and will be targeted where it can deliver measurable customer and community benefit. Prioritisation will include communities affected by poor network performance, severe weather and flooding risk, and, new for ED3, areas impacted by low voltage network investment needed to support the uptake of low carbon technologies (in line with our DNO Role in LCT Rollout annex).

The fund will be administered by the SSE Group Community Funding team and opened for applications each spring for a minimum of three months. Applications will be assessed against published criteria, with final funding decisions made annually by an independent panel. Funding will generally be allocated across licence areas in line with customer numbers, while retaining flexibility to reflect application quality, local need and the expected customer and community outcomes.

We will review the assessment criteria annually, drawing on learning from previous funding rounds, recipient feedback and stakeholder input. Where material changes are proposed, we will consult relevant stakeholders before implementation.

6. HOW WE COLLABORATE WITH OTHERS

Supporting customers in vulnerable circumstances requires a coordinated approach across sectors. Customers often interact with multiple essential service providers, including electricity, gas, water, telecommunications, healthcare, housing and third-sector organisations. Many of the challenges faced by customers, including fuel poverty, resilience, digital exclusion and access to the benefits of the low carbon transition, cut across organisational boundaries. Stakeholders consistently highlighted the importance of partnership working, trusted local relationships and joined-up support to improve outcomes for customers in vulnerable circumstances.

In ED3, we will build on successful collaborations established during previous price controls and continue to identify opportunities where collaboration can improve customer outcomes, increase efficiency, share best practice and maximise social value. Collaboration priorities will continue to be informed by customers, partners, consumer groups and representatives, ensuring the consumer voice remains embedded in the design, delivery and evaluation of collaborative initiatives.

GROWING AND IMPROVING THE PRIORITY SERVICES REGISTER

Collaboration enables us to reach customers who may never engage directly with their electricity network operator whilst supporting a more joined-up customer experience across utility sectors. During ED3, we will work with electricity, gas, water and telecommunications providers to increase awareness and uptake of the Priority Services Register (PSR) through shared resources, including thepsr.co.uk and psrscotland.com, coordinated campaigns, improved referral pathways and enhanced data quality.

We will also explore opportunities for cross-sector data sharing and improved data quality to better identify eligible customers and ensure support reaches those most in need.

CASE STUDY: HOME & WELL

https://citahants.org/home-and-well/

The Home & Well programme, a multi-organisation partnership with Citizens Advice Hampshire, has supported more than 10,000 individuals leaving a hospital setting through integrated energy, financial and wellbeing support, demonstrating the value of partnership working and joined-up referral pathways. Similarly, Game Energy, delivered through a partnership involving SGN and the Scottish Professional Football League Trust, uses trusted community venues and football clubs to engage customers who may not access traditional support services. Since the start of ED2, the programme has created over £1.1m in social value across Hampshire.

INNOVATION, INCLUSION AND DATA SHARING

During ED3, we will continue to collaborate on research, innovation and accessible communication solutions to improve resilience, inclusion and customer experience. One such example is the “Keeping Comms Open” innovation project, intended to develop a smart-UPS (Uninterruptable Power Supply). This will support customers in areas with poor mobile signal or connectivity that may have difficulty in contacting us during a power cut and will be impacted by the Public Switched Telephone Network (PSTN) switch off due for completion by 31st January 2027.

Building on initiatives such as Policy in Practice, VERIFY, VIVID, and collaboration with Local Authorities and Health and Social Care Partnerships, we will improve customer identification, strengthen data quality and explore secure data-sharing approaches that help organisations better understand vulnerability and target support effectively. We will build on existing cross-sector collaboration through forums such as the Customer Service Vulnerability Working Group (CSVWG) and explore opportunities to host regular roundtables with utilities networks and organisations to share best practice, case studies and lessons learned. These forums will help identify opportunities for greater alignment, innovation and collaboration in supporting vulnerable customers before, during and after severe weather events.

CASE STUDY: RETHINKING COMMUNICATION FOR DIGITAL EXCLUSION

Working together creates opportunities to share expertise, reduce duplication and develop resources that improve customer outcomes across sectors. We will continue to collaborate with utilities, local authorities and community partners to develop shared resources, resilience guidance, awareness campaigns and training materials.

This includes opportunities to build on successful initiatives through enhanced Community Toolkits, accessible communication resources, seasonal preparedness campaigns and shared resilience information.

SHARED RESOURCES, RESILIENCE AND BEST PRACTICE

Working together creates opportunities to share expertise, reduce duplication and develop resources that improve customer outcomes across sectors. We will continue to collaborate with utilities, local authorities and community partners to develop shared resources, resilience guidance, awareness campaigns and training materials.

This includes opportunities to build on successful initiatives through enhanced Community Toolkits, accessible communication resources, seasonal preparedness campaigns and shared resilience information.

CASE STUDY: CARE MANAGEMENT SECTOR COLLABORATION

Working with National Grid Electricity Distribution, UK Power Networks, Northern Powergrid, SP Energy Networks and Electricity North West, we engaged over 2,000 care sector professionals and identified a need for greater resilience planning and awareness of support available during power cuts. This collaboration led to the development of the shared Business Resilience Guide on thePSR.co.uk, providing practical guidance for organisations supporting vulnerable people.

ED3 COLLABORATION DELIVERABLES

Through increased collaboration, we will share our learnings and learn from others. This will enable us to further increase awareness of support services, improve resilience, maximise social value and ensure customers in vulnerable circumstances receive more coordinated and effective support.

Our collaborations in ED3 will include, but not be limited to, the following:

Area	ED3 Activity
PSR awareness	Deliver at least 2 collaborative PSR campaigns annually using shared assets including thepsr.co.uk and psrscotland.com. *This includes partners from all DNOs, GDNs and Scottish Water.*
Community engagement	Deliver at least 5 collaborative engagement activities annually
Best practice	Participate in at least 3 cross-sector collaboration forums annually
Shared resources	Develop or enhance at least 2 shared customer-facing resources.
Research and innovation	Support at least 3 collaborative research or innovation projects
Inclusive communications	Deliver at least 1 collaborative initiative per year focused on accessibility and inclusive communication
Social value	Ensure all major collaborative initiatives contribute to fuel poverty reduction, resilience or an inclusive low carbon transition
Collaboration within industry and beyond	We will continue to be active members of the ENAs Customer Service and Vulnerability Working Group (CSVWG). This group consists of all DNOs who meet monthly. Through this we have the potential to influence the delivery of consistency around standards, language and resources, making it easier for customers to engage.
Colleague engagement	Attend a minimum of two industry events annually to share and learn best practice, as well as identify potential collaborations from others within, and beyond our industry.

7. HOW OUR STRATEGY AND APPROACH COULD EVOLVE OVER THE ED3 PERIOD

Vulnerability is dynamic and can affect any customer at any time. Customer needs may change during ED3 in response to severe weather, financial pressures, changes in government funding, new technologies and developments in communications. Our strategy is therefore designed to remain responsive throughout ED3, whilst maintaining clear accountability for the outcomes and commitments we have made.

We will use customer and partner insight, performance data, research stakeholder feedback and wider economic, social and technological trends to identify emerging risks and changes in customer need. We will monitor:

- Changes in the nature, scale and location of vulnerability across our licence areas;
- The frequency and impact of severe weather and other significant events;
- Changes to fuel poverty, energy efficiency and LCT funding;
- Developments in communications and technology;
- New evidence about the needs of customers who are medically dependent on electricity, digitally excluded or not registered on the PSR.

We will regularly review our services, customer journeys and partnership to ensure they remain effective, accessible and targeted appropriately. Where change is needed, we may adapt how support is prioritised, the services offered, our delivery channels or our partnership arrangements. The following examples show how we can adapt our strategy to evolving customer needs.

CHANGING CUSTOMER NEEDS

Our approach recognises that vulnerability extends beyond the PSR, including financial vulnerability, digital accessibility and transient or temporary vulnerability. We will use updated customer and partner insight to refine where and how support is provided. This could include how we prioritise areas for fuel poverty support, adapting the format of the support that we provide or updating how we allocate batteries and resilience support. Through the phased introduction of our PSR service standards over the first two years of ED3, we will continually assess the effectiveness of these standards against customer needs, with each service standard being subject to a full review every two years as a minimum. With the expected increase in works required to our network, especially in unlooping customer service cables, this approach will ensure we are evolving to meet the changing needs of our customers.

SEVERE WEATHER AND SIGNIFICANT EVENTS

Our experience from Storm Arwen and subsequent storms told us that any customers situation may become vulnerable during a prolonged power cut. We have committed in our (ED3-S07) Targeted Customer Storm Support Strategy to hold a lessons learned review after every named storm. We recognise other extreme weather events can impact our customers and commit to review our response after every significant weather event, including heat waves, with a review of customer journeys carried out annually.

The findings will be used to improve preparedness, communications and customer support before, during and after significant events, including where changing weather patterns create new or increased risks.

CHANGES TO FUNDING

Changes to UK-wide or local authority level funding for fuel poverty, energy efficiency or LCTs could affect the support provided through our partners. We will review our overarching partnership at least every two years and local partnerships annually, considering changes in funding, customer need, delivery performance and outcomes.

Where funding changes create gaps in provision, we will work with partners to consider alternative referral routes, delivery arrangements or forms of support while maintaining our commitment to support at least 240,000 customers in ED3.

TECHNOLOGY AND COMMUNICATIONS

Responding to new or emerging technologies, including in fault restoration, customer support, or advances in medical technology, could result in changing how we deliver our strategy. New technologies can bring new opportunities to better serve customers in a more cost-effective way, removing barriers and empowering our teams to get improved support to customers more efficiently. We will assess new approaches against customer benefit, cost and deliverability before incorporating them into our delivery model.

Communication changes, such as the PSTN switch off, may affect how customer contact us and receive updates during power cuts. We will use customer journey reviews and learning from innovation to adapt communication channels and ensure that customers, including those that are digitally excluded or have limited connectivity can continue to access support.

8. OUR FUNDING REQUEST

To meet our commitment to **Support when customers need us most**, we have requested allowances of [redacted], with an additional [redacted] of shareholder funding to support communities across our licence areas.

This funding includes the provision of batteries to customers medically dependent on supply, resilience items and personal resilience plans for Priority Service customers alongside improving our services to customers. This funding will cover support during faults, including those during extreme (non-storm related) weather events such as extreme heat or snow events.

To ensure we are supporting households in fuel poverty and / or wanting to transition to low carbon technology, we have requested funding to enhance our partnership programme to reach more households in fuel poverty, updating our existing data sets to identify households who need support.

Table 8.1: ED3 funding

Ref	Licence Area	2028	2029	2030	2031	2032	ED3 Total	BPDT
PSR Services	SHEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	M4 – Vulnerability Deliverables
	SEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
Hidden customers/ communities	SHEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	M4 – Vulnerability Deliverables
	SEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
Fuel poverty / low carbon transition	SHEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	M4 – Vulnerability Deliverables
	SEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
Power cut preparedness	SHEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	M4 – Vulnerability Deliverables
	SEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
Personal batteries	SHEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	M4 – Vulnerability Deliverables
	SEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
Powering Communities (shareholder-funded)	SHEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	M4 – Vulnerability Deliverables
	SEPD	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
Total (ex-shareholder funding)		[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	M4 – Vulnerability Deliverables

**Shareholder funded.*

The costs for PSR Services principally comprise PSR awareness and registration activities, customer data cleansing and a refresh of more than 1.27 million customer records. In addition, this includes the development of tailored service standards and customer journeys, accessible communications and training.