

Conclusions on Smart DCC's engagement with customers and stakeholders

Date: 2 May 2019

Classification: DCC Public



1 Executive Summary

We have been challenged by our regulator, Ofgem, to rethink and improve our approach to engagement with customers and stakeholders and, in particular, in relation to our cost base.

In December 2018, we went out to consultation to gain a greater understanding of what our industry stakeholders would like to see in terms of more meaningful engagement. The consultation closed on 31 January with responses being received from a range of stakeholders including energy suppliers, distribution networks and trade organisations, as well as other smart metering market participants.

In parallel with the consultation, industry stakeholders made several suggestions as to how we could improve our engagement in their responses to Ofgem's consultation on the draft proposals for the RY2017/18 price control.

This feedback and the responses to the consultation have been invaluable in helping us to shape a new approach to customer engagement.

Key insights from industry stakeholders included:

- DCC runs too many formal consultations customers can't respond to them all;
- DCC needs to close the feedback loop industry stakeholders are unclear about what happens as a result of their engagement;
- There are too many forums, which are resource intensive to engage with and result in duplicate discussions that often involve the wrong people;
- Smaller energy suppliers need more support to engage with DCC including prioritisation of their engagement, simpler and targeted communications and better utilisation of appropriate channels;
- Customers requested improved clarity and consistency of messaging;
- Customers requested greater transparency around and involvement in financial decision making.

Ultimate accountability for the decisions that we make rests with the DCC Board however, we are determined to address the feedback from Ofgem and industry. We have therefore developed a new approach to engagement that will deliver improved transparency for our customers whilst ensuring we continue to deliver our commitments at pace.

This consultation response sets out the tools and processes we will use, which will be underpinned by the following key principles:

- Engagement should be simple, targeted and proportionate.
- Engagement should not slow down or impact delivery.
- We will signal clearly and ahead of time what we will engage on, the channels we'll
 use and provide clear feedback on how engagement with our customers has shaped
 our decision making.



- Customer engagement will be linked to our internal decision-making processes to ensure that customer views are sought and considered throughout the life-cycle of our programmes and projects.
- We will increase transparency in our engagement sharing our evidence base for decisions where competition law, security and commercial sensitivities allow and sharing with customers the feedback we have received.
- Our engagements will fall into one of three categories inform, shape, vote. The
 majority of our engagement will fall into the first two categories. We will publish clear
 criteria for the categorisation of engagement.

In addition, the quality of materials presented at external Governance forums will be enhanced, and we will identify opportunities to streamline our activities and provide greater clarity of where key decisions will be addressed.

Alongside this, we will provide a digital offering to better support targeted engagement through the introduction of a new customer portal. This will provide customers with a single platform for accessing our documents and to improve the traceability of our engagement. Customers will be actively engaged in designing the functionality of the customer portal.



2 Introduction

Through our status as a monopoly, we are duty bound to take account of all the different stakeholder groups which have an interest in our services. The ultimate accountability for decision making in relation to our activities sits with our Board. In addition, our decision making and resulting expenditure is subject to detailed scrutiny by Ofgem.

However, we recognise that our internal decision making remains somewhat opaque to customers and we understand fully the desire for better insight into what drives our costs and evidence of the value we are offering to customers.

Over the last five years, our engagement with our customers has focussed on formal governance forums, technical working groups, bilateral meetings and industry presentations. Our cost forecasting has been subject to scrutiny through our quarterly Finance Update for Customers and, as a regulated business, expenditure is reviewed on an annual basis by Ofgem. We recognise that as less of our activity is mandated by Government and the optionality around what we do increases, we need to increase transparency and improve the way we engage with our customers to inform our decision making.

Given our regulated status, our approach to customer engagement needs to fulfil the following criteria:

- To be effective for all participants recognising the different needs and preferences they will have and so informs a representative, 'all-market' view
- To recognise our licence obligations to facilitate competition and not unduly favour any one stakeholder or group of stakeholders over others

To inform the development of the detail of our approach, in December 2018, we launched an 8-week consultation inviting industry's opinions on how we could improve.

The consultation document was divided into five sections:

- 1. Principles of engagement: proposed some underlying principles that would inform our customer engagement in the future, our roles and responsibilities and those of our customers, and some practical issues for consideration.
- 2. Engagement initiatives: identified the annual business planning cycle and the development of detailed in year business plans as the corner stones for customer engagement going forward.
- 3. Sharing of cost data: we asked for views on the Price Control process and for customers' views on the effectiveness of our quarterly Finance Update for Customers.
- 4. Engagement channels and forums: we sought views on a new online customer portal and Customer Relationship Management (CRM) platform, customers' stance on face-to-face engagement and how we might make more effective use of existing forums.
- Continuous improvement: we sought customers' thoughts on the introduction of formal benchmarking of performance and costs, and on measuring the effectiveness of our engagement.



Our consultation proposals were centred around a set of principles that require our engagement to be comprehensive, inclusive of all our diverse customers, two-way, process-driven, responsive, and open to change. In addition, we also stated that, where possible, we would adapt and re-purpose existing forums before creating new ones.

This document constitutes our consideration of the representations received from customers responding to this consultation and sets out our planned approach to customer engagement in the future:

- Section 3 sets out the feedback received in response to the eight specific questions asked in the written consultation and at the supporting workshops, alongside our response.
- Section 4 sets out our overall conclusions in light of all the evidence we have gathered (from the consultation, Ofgem, wider stakeholder engagement and guidance/instruction from BEIS) and the next steps to implementation.



3 Feedback on the Smart DCC Consultation

In the consultation, we asked industry to consider eight specific questions with a series of supplementary questions focusing on specific elements of our proposals.

In total, 16 organisations responded in writing to the consultation, answering some or all of the questions. The majority of respondents also provided high level comments on our proposed approach to improving engagement. Respondents included large and small energy suppliers, distribution networks and trade organisations, as well as other smart metering market participants.

A high-level overview of the responses against each of the questions is summarised in the section below.

Question 1: We welcome customer views on the principles for Smart DCC's customer engagement proposed in section 2. Are there any other considerations which we should take account of when designing engagement activity?

The proposed principles for Smart DCC's engagement strategy were:

Comprehensive - engagement should cover both mandatory programmes and discretionary activity. Where there are options as to how mandatory work is delivered, we will seek customer opinions to inform decision-making. In respect of all discretionary activity, we should actively consider where engagement would be appropriate, with the default being that engagement will be required.

Inclusive - with awareness of the different needs of our varied customer and stakeholder base.

Re-used – there are already a significant number of industry forums. Attendance and servicing these is resource-intensive for our customers and for Smart DCC. We propose to work with industry to adapt and re-purpose existing forums before creating new governance structures.

Two-way – where our customers and stakeholders are able to initiate engagement with Smart DCC on topics of interest to them.

Process-driven – we propose modifying our project initiation, delivery and change management processes to ensure that listening to and integrating customer views becomes integral.

Responsive - we commit to giving timely, informative feedback on engagement.

Learning – we will learn from experience and our approach will evolve over time.

A total of 15 parties responded to question 1 directly. Overall, there was broad support for the principles; as one respondent said, if delivered well they would lead to an effective working relationship with customers. Respondents welcomed our recognition of the different needs of our customers and the need to target and tailor our communications more effectively; a 'one size fits all' approach is not appropriate, and some respondents voiced concerns that historically we have prioritised the needs of large suppliers.

Another common theme was the need for simple, consistent, transparent communications, and with minimal use of acronyms. Respondents asked to see more detail regarding the costs and benefits of our activities and how these are factored into our decision making. One



respondent distinguished between learning and acting, asking that we close the circle and explain how and why we have decided to act or not act on customers' views.

Two respondents suggested that we aim to lighten the load on our customers by making better use of meetings and arranging a series of sessions in one day rather than spread out over several days. In the same vein, one requested that we make better use of the BEIS Independent Suppliers Forum. The role of Service Managers was also raised, with respondents requesting that information be transmitted via this route.

Question 1. Smart DCC's response

We welcome the broad endorsement of our proposed principles. We agree that engagement should cover both mandatory programmes and discretionary activity where security, commercial sensitivities and competition law allow, and that we should be more transparent around the costs and benefits of the activities that we undertake. We intend to share summary business cases for new activity setting out the options being considered and their costs.

We also understand the need to provide greater clarity to customers about how and why we are seeking their engagement and how we reflect their input in our decision making. We will better align our internal decision-making processes to our customer engagement activities and play back to customers how their input has shaped our recommendations to the Board.

In recognition of our diverse customer base, we will tailor our approach to meet different stakeholder needs, using a variety of communication channels. We will look to use existing forums where they exist, establishing clear criteria for which issues we will take to which forum. We will also communicate ahead of time engagement plans for each area of activity, so our customers can plan their engagement effectively.

As well as improving the way we use the existing forums, we will improve our digital communications and establish a new customer portal, which will provide customers with a single point of entry to DCC, allow us to publish key documents in one place and provide traceability of our engagement.

We also note that most respondents considered bilateral face-to-face engagement an important channel for engagement. We will look to improve the quality of these interactions and be in a position to offer any customer requesting such a meeting a prompt appointment with the relevant DCC staff.

Question 2: We would value any feedback from customers on the proposals as described. We also welcome ideas as to how these could be improved or suggestions of alternative/additional actions we could take.

A total of 13 parties responded to question 2 directly. Among the responses was widespread support for us involving customers in future business planning. There was some confusion over how this would work in the context of the existing forums, with one respondent requesting that communication take place face-to-face where possible and another requesting that a new, senior-level forum be established to discuss smart-related issues.

A theme throughout was transparency; we were asked to present a timetable of proposed engagement and stick to it, with a better governance framework and a proper "gating" mechanism.



Multiple respondents asked that we routinely publish formal cost/benefit models before taking key decisions and increase transparency by regularly updating on progress and benefits realisation.

Question 2: Smart DCC's response

In our original consultation, we set out a three-phase process to reform our business planning process. The key activities have been summarised below. The timeframes for these are different to those in the original consultation document:

- Engagement on DCC's five-year strategy and roadmap of activities, including seeking views on the draft Smart DCC Business and Development Plan – to take place during the spring;
- Publication and engagement on the final Business and Development Plan, including revised priorities and roadmap of activities after taking customer and stakeholder feedback into account – July;
- Engagement on new and existing individual initiatives at key decision points throughout the year;
- Budgeting to develop a detailed two-year view of the necessary financial and other resources required to deliver the priorities and roadmap of activities, based on the final Business and Development Plan and subsequent engagement on individual initiatives – to take place during the autumn.

We propose a process of engagement with all customers which provides substantial opportunities to input into the development of our strategy, priorities and roadmap over the medium term. This will be supported by in-year engagement on individual initiatives.

We will seek views from customers and stakeholders on an annual basis to inform our strategic plan over the coming five years, including through publishing the draft Business and Development Plan for comment.

Feedback on the draft Business and Development Plan 2019/20-2023/24 (<u>published</u> on 12 April 2019), which fulfils our formal licence requirement to produce a development plan, will assist us in shaping our priorities and roadmap of planned activities. It will also assist in identifying new challenges and initiatives that we will need to plan for in the future.

Customers will be able to provide comments on the draft Business and Development Plan in April-May. After taking customer and stakeholder feedback into account we will publish the final Business and Development Plan in July, alongside the Q2 Indicative Charging Statements and Budgets. We will engage with customers on the final plan and on how we have responded to customer and stakeholder feedback.

The final Business and Development Plan will then provide a framework for further engagement throughout the remainder of the year. Subsequent engagement will be much more focused on the specific projects or initiatives which have been laid out, thus meaning that customers will have been involved in the key decisions from endorsing the germ of an idea, through to the detail of its implementation and the associated expenditure.

Engagement on our Business Development Plan will be underpinned by an ongoing process of in-year engagement. For initiatives already planned or in progress, we will engage with customers and stakeholders at key decision points. Where new initiatives or improvements to our service are identified, we will seek customer views in one of three ways:



- **Inform** Engage with industry to ensure transparency of actions and costs, for example where we have inherited existing contracts from Government.
- Shape Outline and seek views on the proposed approach(es), for example areas of potential new activity or activity that impacts customer systems. As well as engaging on the substance of the new activity, we will share summary business cases and seek input from customers into our decision making.
- Vote Activities where there is a clear choice and the decision about how to proceed sits with customers, for example the question of whether we should order additional comms hubs in the event of supply chain disruption as a result of Brexit.

We expect the bulk of our engagement to sit in the first two categories and will publish clear criteria for how we will determine which engagement falls into which category in due course.

We expect that this will result in improved direction setting, as well as a growing confidence amongst customers that we are aligning our activity more closely with their needs.

Question 3: What steps could we take to increase customer engagement in the Price Control process?

A total of 13 parties answered question 3 directly. There was consensus among respondents in calling for greater transparency from us throughout the Price Control process, with one requesting a session in which the Price Control submission was explained clearly, which could be opened up to the relevant trade bodies.

Respondents asked that we share a greater level of detail and more granular data. One respondent questioned whether we had a strategy for efficiency improvement and asked for greater clarity on how and why costs change throughout the delivery of some programmes.

Question 3: Smart DCC's response

We have been open in sharing information on our cost base, both actual and forecast, through our quarterly Finance Update for Customers and through joint events with Ofgem, as part of the Price Control consultation process. Customers have visibility of forecasts up to 3 years ahead and we have been prepared to provide the same level of detail to customers which our Board receives, either through the quarterly presentation or on a bilateral basis.

In addition to existing engagement on our cost base, we will:

- Engage on our Business Development Plan on an annual basis
- Engage in-year on the development of business cases for areas of new activity / changes in activity
- Increase transparency around our cost base by sharing more detailed cost data (see Q4 response below)
- Increasing transparency around any changes in our cost base, why these have arisen and how they will affect the Charging Statement (see Q4 response below)
- Look to improve our Finance Update for Customers and make them more interactive (see Q4 response below)



Question 4: If you have attended a Finance Forum, either online or in person, how could they be improved? What other ways would you like to see actual and forecast cost data shared?

11 customers responded to this question, comprising of six large energy suppliers, one small supplier, two electricity network parties and two trade bodies. The responses were generally supportive and noted that the Finance Update for Customers had improved, particularly through the introduction of the bi-annual face-to-face sessions for Q2 and Q4 of RY2018/19.

The key suggestions for future improvements to the Finance Update for Customers were:

- Increased frequency of face-to-face updates
- · Greater interactivity and dialogue in sessions
- More pre-meeting material shared with customers and further in advance
- Further transparency and detail of cost breakdowns
- Timeliness of DCC delivering on agreed follow-up actions
- Presenting movement in DCC charges to customers and DCC's costs, updating on progress in delivery of cost savings/benefits proposed in previous updates; and breakdowns by Charging Groups.
- Consider holding occasional events outside of London

Question 4: Smart DCC's response

It was pleasing that there was general satisfaction with the Finance Updates, however we do note the preference for face-to-face meetings. Two respondents highlighted that webinars ought to be more interactive.

In March 2018, we conducted an industry survey to gather feedback on our stakeholder engagement on finance matters specifically. This was to understand customers' preferences on the frequency, format and content of our Finance Update for Customers. The majority of the 20 responses we received indicated a preference for either a conference call and accompanying slide pack (30%), or a face-to-face update (30%) on a 3-month frequency (75%). This then informed our approach to the four Finance Updates for Customers during RY2018/19.

In line with the published plan, we hosted the Q1 and Q3 finance sessions by conference call, with materials issued a few days prior; and the Q2 and Q4 sessions as face-to-face updates in our London office. In the case of the Q4 update, we were pleased to deliver the session sooner than proposed in the plan, hosting it in December 2018 rather than January 2019, to seek feedback prior to the publication of the draft Charging Statement RY2019/20 and Q4 Indicative Charging Statement and Indicative Budget.

We will consider the suggestion to increase the frequency of the face-to-face updates going forward, though there is clearly a need to balance the frequency of updates with the demands on our customers' time, particularly given the concern expressed over the number of meetings in general.



We note customers' requests for more interactivity during the Finance Updates. During RY2018/19 we enhanced opportunities for customers to feed in to the sessions by hosting face-to-face updates. For example, we sought customers' views on our approach to risk and contingency and on returning cost savings early.

A few days in advance of the Finance Update for Customers, we provide customers with premeeting material. For commercial reasons, this material cannot include sensitive cost information which could have the potential to undermine any negotiations with prospective and existing service providers. Where possible, such information is shared in the face-to-face sessions, but this inevitably limits the circulation to those able to attend in-person only.

We recognise the value of pre-meeting material being circulated to customers further in advance of the meeting, to enable them to prepare their questions for a constructive dialogue. We will review the timing of this and would welcome any suggestions from customers.

To-date, we have endeavoured to respond to questions raised at the Finance Updates for Customers promptly relative to the complexity of the query and any sensitivities over timing. Following the Q4 Update in December 2018, we responded to all the questions raised by customers at the update, with the response being distributed to attendees in January 2019.

We appreciate the feedback with regards to tracking movement in indicative charges, updates on delivery of benefits and the breakdown of costs by Charging Group. We do not currently discuss the movement of indicative charges or breakdown costs by Charging Group in the Finance Updates but will consider how we can best do this in future.

We will be reviewing our approach to engagement with stakeholders on financial matters shortly and we plan to share this with customers in due course. Although this consultation question was specific to the Finance Updates, the scope of this review will consider our more general finance stakeholder engagement also, such as responding to queries to the Finance mailbox and managing customer bilateral meetings.

We will consider opportunities for more dialogue and welcome customers' specific suggestions on topics they would like to discuss, which can be provided by email to finance@smartdcc.co.uk.

Question 5: What features would customers wish to see incorporated within an online engagement platform?

13 respondents answered question 5 directly. Responses were split regarding the necessity and usefulness of a new online engagement platform. While some welcomed a process by which DCC could better tailor the information sent to users, others were not persuaded that a new system is needed when we have use of our website and SharePoint.

Many respondents felt that we do not make as effective use of SharePoint as we might and that current engagement issues are not related to the tools that we use. One respondent raised a concern that a new secure online platform may discourage engagement from smaller energy suppliers and thereby reduce transparency.

Respondents who supported the introduction of a new system did so for reasons including SharePoint being difficult to navigate and DCC's online presence being complex and inconsistent. There was agreement that an online engagement platform must be easy to use and there must be clarity of the purpose and functionality it will provide, alongside simple and clear processes for doing so.



At the Independent Suppliers forum in December 2018, smaller energy suppliers noted the need for DCC to use technology to support communication and engagement with customers and to make it easier for them to access the information they need and provide their feedback.

Question 5: Smart DCC's response

Consultation feedback has identified the need for a tiered approach to engagement through multiple channels to address our wide range of customers with differing needs.

We are improving our digital offerings to support that engagement. We have a new digital content strategy that aims to deliver transparency and meaningful engagement to build a connected online audience. The strategy will deliver targeted but consistent messages to all stakeholders, using a refreshed website with improved functionality. We are looking at ways to improve our digital tools further, such as the Technical Operations Centre (TOC) and the Self-Service Interface (SSI); and improvements have been made to our website and our utilisation of social media.

To support a more tailored engagement approach, the customer portal and the CRM tool that underpins it, will allow customers the freedom to self-select the information they want from us. An evolved digital engagement facility via the customer portal, will enable surveys, consultations and the real-time management, monitoring and publishing of digital media content. It will support us in delivering the right messages to the right audience.

Most importantly, the portal will facilitate two-way conversation – enabling us to set out clearly which areas of DCC activity we are engaging on, when and where. It will allow us to transparently track and document our engagement with customers, communicate the outcomes of this engagement and provide feedback on how customer input has been reflected in our decision making. encouraging feedback and ensuring there is a feedback loop to our customers.

Question 6: Which forums do you believe would be best suited to engagement on expenditure decisions? How would these forums need to be reconstituted to make them effective for this purpose?

10 respondents answered question 6 directly. They largely shared our concerns over the proliferation of forums and agreed that existing forums should be reviewed, targeted at specific stakeholder groups and consolidated, with clear Terms of Reference set out for each. Two respondents requested better process around sharing the minutes after events, particularly for smaller energy suppliers who do not always have the resources to attend.

Smaller energy suppliers on the whole expressed a preference for Service Managers as the key point of engagement and dissemination of information regarding expenditure decisions. Another respondent requested that we set up a specific forum purely focused on our expenditure, which echoed the call from others for greater transparency and consistency on our cost base.

Question 6: Smart DCC's response

We are required to report to appropriate forums on programme, operational, performance, technical and testing matters. These forums are also used to seek input into the development of new services and approve modifications.



Rather than establish a cost assessment forum, we will look at how we can use existing forums more effectively. Our Regulatory Affairs team continues to work with DCC staff and members of Ofgem, SECAS and BEIS to ensure engagement at these forums is streamlined, direct and offers the transparency needed.

Our priority for formal customer engagement will be the SEC Panel and its various sub-groups. We will look to establish clear criteria for which areas of engagement we will take to each forum and signal well ahead of time which issues will be discussed where. We will also signal more clearly than we have done historically when customer views are being sought and feedback on how we have reflected them in our decision making.

However, in recognition of the feedback from smaller energy suppliers we acknowledge that engagement via SEC governance forums alone is not enough. We will supplement our engagement at the SEC forums with the Independent Supplier Forum, materials published on our online customer portal and via targeted bilaterals through Service Managers to ensure we get a wide range of customer views.

Question 7: What alternative or additional channels of communication would you like us to consider using? Are there any areas on which you would like to engage with us, but don't feel that that forums or online engagement will provide the right environment to do so?

7 respondents answered question 7 directly. Multiple stakeholders agreed that we should focus on improving the way we use existing channels of communication before introducing new ones. This could be done by mapping and clarifying the purpose of the various channels and the membership of the various forums. A number of respondents highlighted the value of engagement via Service Managers and face-to-face bilaterals.

One respondent praised webinars as a useful tool, while another suggested that we use SMS or social media to direct our users to content, deadlines and service notifications. It was also suggested that we make greater use of bodies such as the ENA Commercial Operations Group.

Question 7: Smart DCC's response

We are actively reviewing and updating all our channels of engagement. Updates have commenced on our digital channels including a refreshed website with new functionality and improved insights through our digital tools (TOC & SSI). The introduction of a new customer portal will also allow customers to tailor the information they receive to allow for a better user experience.

We are continuing to improve our bilateral engagement through the Service Management team, offering a range of services to customers to meet their needs, including the production of user guides, key information, webinars, and reports utilising the deeper insights through tools such as the TOC.

We are reviewing the wide range of forums we run to identify synergies with the established governance fora and areas to streamline and improve these activities. We are actively making improvements to our reporting to the established fora to provide clearer, concise information supporting more informed discussion. This reporting is supported once again through the improvements to the digital tools and channels.



In addition to the planned improvements to the tools and channels themselves, we are implementing improved internal governance and controls to ensure that engagement with industry is timely and appropriate, that customer views are considered in our decision making and that customers receive feedback on the outcomes of our decision making and a chance to review progress.

Question 8: We would welcome customers' views on the proposal for the use and sharing of benchmarking. What functions do you believe should be our priority for the application of benchmarking?

10 respondents answered question 8 directly, with strong and varied viewpoints.

Four respondents were supportive of us introducing benchmarking, targeted at areas where improvement is both possible and cost effective. Two highlighted customer and stakeholder engagement as an area where they would like to see benchmarked metrics, with another requesting greater transparency of aspects such as our costs.

While one respondent questioned what we were trying to achieve through this proposal. Others supported the idea so long as clear governance was put in place around decision making and benefits tracking.

Question 8: Smart DCC's response

We welcome the support from customers for the proposal to use benchmarking to assess our services and operations. The aim of benchmarking is to consider our activities in relation to the industry leading practice and identify areas for improvement.

We are planning to conduct 2-3 benchmarking activities and 1-2 audits per year. We will compile a shortlist of proposed benchmarking activities and areas for audit and will ask customers to vote on their preferred options. We will ensure transparency of costs for the benchmarking exercises and audits undertaken. The outcomes of the audits and benchmarking activities and our improvement / efficiency plans will be shared through relevant forums and via the online portal.



4 Smart DCC's conclusions and next steps

We are grateful to all stakeholders who took their time to consider and respond to this consultation. We have taken the consultation responses, wider feedback from our customers and Ofgem's recommendations into consideration as we have developed our new approach to customer engagement.

This section of our consultation response sets out at a high level the new approach that we are proposing to take to customer engagement to inform the Board's decision making. We will run a series of customer workshops within the next 6-8 weeks to discuss the approach in more detail, as well as publishing more detailed documents on elements of the approach online.

To deliver on the principles, set out in the consultation document and endorsed by respondents, we will:

- Run an annual consultation process on our business plan seeking input from customers on our proposed activities for the coming 5 years.
- Where security, competition law and commercial sensitivities allow, we will engage customers, via summary business cases, on the detailed scope of activities in the business plan and on the scope and cost of any new areas of activity that are developed in-year.
- Provide greater transparency of the contents of DCC's annual price control submission to Ofgem
- Incorporate the feedback from our customers into the future development of our quarterly Finance Update for Customers – sharing more granular cost data and ensuring discussions are two way.
- Ensure that customer engagement is fully integrated into our project delivery and internal governance processes to ensure customer feedback is reflected in all our decision making.
- Publish a forward calendar of the areas of DCC's business we plan to engage on and how we plan to take forward that engagement.
- Clarify up front which of the three categories of engagement each activity will fall into and establish clear criteria for how we will decide what falls into each category:
 - o Inform
 - Shape
 - Vote
- Make better use of existing industry forums we will establish clear criteria with SECAS for which areas of DCC activity should be discussed at which SEC forums.
- Supplement engagement at the SEC forums with engagement at wider industry forums and via improved and more targeted bilateral engagement.



- Strengthen the role of DCC Service Managers in highlighting areas where views are sought from customers.
- Enhance our digital and online communications to ensure they are better targeted and tailored to different audiences.
- Build a new customer portal, providing a single source of documents and material for customers to engage with and a single repository of customer views to improve traceability of our engagement.
- Offer industry the opportunity to conduct 1-2 yearly audits and 2-3 benchmarking exercises. Customers will be given the opportunity to vote on and suggest preferred areas of focus from a short list identified by us.

We will publish more detail on the criteria for which activities will be discussed at which SEC Forums, the criteria for the categorisation of our engagement (and details on how customer voting will work) as they are finalised.