



# Annex A18.01 Information Provision Engagement Report December 2019

As a part of the NGGT Business Plan Submission

**nationalgrid**

## EXECUTIVE SUMMARY

The information we provide delivers value to consumers by supporting the efficient functioning of the gas market. This facilitates market competition by:

- allowing market participants to make informed commercial decisions
- enabling the efficient physical operation of the network.
- allowing connected parties to optimise their activities based on network conditions.

The scope for this engagement on Information Provision includes operational data and decision making in the time horizon from week ahead through to after the operational day. It excludes any medium to long-term information.

We have a range of legislative obligations from the Gas Transporter License and Uniform Network Code (UNC) associated with Information Provision. We engaged on this topic as stakeholders have informed us they highly value the operational data and market information we provide and that they would like to see changes in the service we offer. In addition to the targeted engagement we have also utilised existing feedback on potential improvements to this output, some of which is already work in progress.

We targeted specific stakeholder segments based on their high level of interest, influence and impact (including shippers, traders, terminal and storage operators from the customer- shippers and customer- connected segments). We planned and implemented a range of engagement methods targeting these stakeholders, including specific events, one-to-one meetings, phone conversations and webinars. A challenge we face today is not understanding enough about the 'why' stakeholders want / value our operational data, therefore a key feature of our engagement has been to understand about our stakeholders processes first, followed by the specifics of which data items or the features of the output they value. This has enabled us to consider different solutions that meet their needs which in some cases will enable National Grid to deliver optimal outcomes.

We faced various challenges in obtaining insight from stakeholders as attendance at some events was low due to stakeholders not expressing an interest in the topic or not fully understanding what Information Provision encompasses. An example of this is in late June when we held our regular Operational Forum at our Warwick office in the morning, followed by an interactive RIIO T2 engagement session in the afternoon. Despite us communicating this to all attendees up to 2 months in advance, we had over 40 attendees for the morning with only 7 staying for the afternoon. Those that stayed were from the larger stakeholder organisations. Anecdotally we are told this is due to larger organisations having a greater ability to free up team members to attend these sessions. This assumption is something we are keen to test in the coming months as we address how we glean feedback from smaller stakeholders.

Insights to date are that there is a universal demand for more accurate and consistent data in all categories. In addition, the desire for more data is driven by two key factors; from an operator

perspective, to optimise the physical operation of their own assets by having a greater understanding of the likely pressure and gas composition; and from a commercial perspective, to allow the most efficient trading decisions to be taken.

Provision of raw data is not necessarily going to meet these needs for all parties; smaller shippers may be unable to dedicate the further resources required to process and interpret the data, and so further exploration of options in this area is essential before reaching an agreed way forward.

As noted, much of the feedback we have received is consistent with what we have already been receiving through our existing operational engagements. The result of this is that some of the areas that are being fed back are already being worked on and will continue to be in line with customer prioritisation. An example of this is the publication of a week ahead pressure forecast from late August onwards. We will continue to align our current improvements with those suggested for RIIO-2 timescales.

The next steps are to formulate an engagement plan to obtain insight from a wider range of stakeholders, particularly smaller companies in the targeted segment. This will enable us to gain a broader understanding of the overall requirements from our customer base and enable us to gain insight into IS costed options that fulfil stakeholder requirements, the scope for an Information Provision incentive and the sense of customers' willingness to pay for a premium service. This will also ensure we do not focus on changes to services that may benefit larger customers to the detriment of smaller ones.

This is version 2 of the engagement log, updated to include new insight generated since October 2018 and to address challenges raised through discussion at the Stakeholder Group meeting, SG3. Any new text is coloured purple.

This is version 3 of the engagement log, updated to include new insight generated since July 2019. Any new text is coloured blue.

## CONTENTS

<i>Executive Summary</i> .....	1
<i>Questions to Stakeholder Group</i> .....	3
<b>1. PRE-ENGAGEMENT</b> .....	4
1.1 What is the topic and why is it being engaged on? .....	4
1.2 what are the desired outcomes for this engagement? .....	10
1.3 What is the engagement approach? .....	11
<b>2. POST-ENGAGEMENT</b> .....	16
2.1 What were the engagement outcomes and how has this influenCed options? .....	16
2.2 What were the initial National Grid conclusions .....	24
2.3 Triangulation of stakeholder engagement outputs .....	25
<b>3. STAKEHOLDER GROUP CHALLENGE &amp; REVIEW</b> .....	26
3.1.What points of clarification and interest were raised? .....	26
3.2 What was the outcome of the Stakeholder Group challenge and review? .....	27
<b>4. CONCLUSIONS</b> .....	30
4.1 What impact has this feedback had on the business plan? .....	30
<b>5. DOCUMENT CHANGE CONTROL</b> .....	30
<b>6. Appendices</b> .....	32
Appendix 6.1 – Summary of Information Provided .....	32
Appendix 6.2 – Feedback volumes by question asked .....	33
Appendix 6.3 – Engagement Approach Spectrum .....	33
Appendix 6.4 - Engagement principles checklist .....	34
Appendix 6.5 - Decision Making framework checklist .....	34
Appendix 6.6 – ONLINE COLLABORATION FORUM FEEDBACK .....	35

## QUESTIONS TO STAKEHOLDER GROUP

### Pre Engagement

- *Sufficient information provided to stakeholders on which to provide input?*
- *Information presented in an unbiased way?*
- *Is rationale for engagement approach appropriate?*
- *Are the options/questions presented clear and unbiased?*

### Post Engagement

- *Was the engagement undertaken robust and effective?*
- *Have we demonstrated engaging targeted stakeholders?*
- *Were the outcomes of the engagement clear?*
- *Are the conclusions drawn from the engagement robust?*
- *Do you agree with the conclusions drawn from the engagement?*

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## 1. PRE-ENGAGEMENT

### 1.1 WHAT IS THE TOPIC AND WHY IS IT BEING ENGAGED ON?

- I. What is the subject: background and all information (evidence) required to understand what is being engaged on; link to outputs (or incentives)*

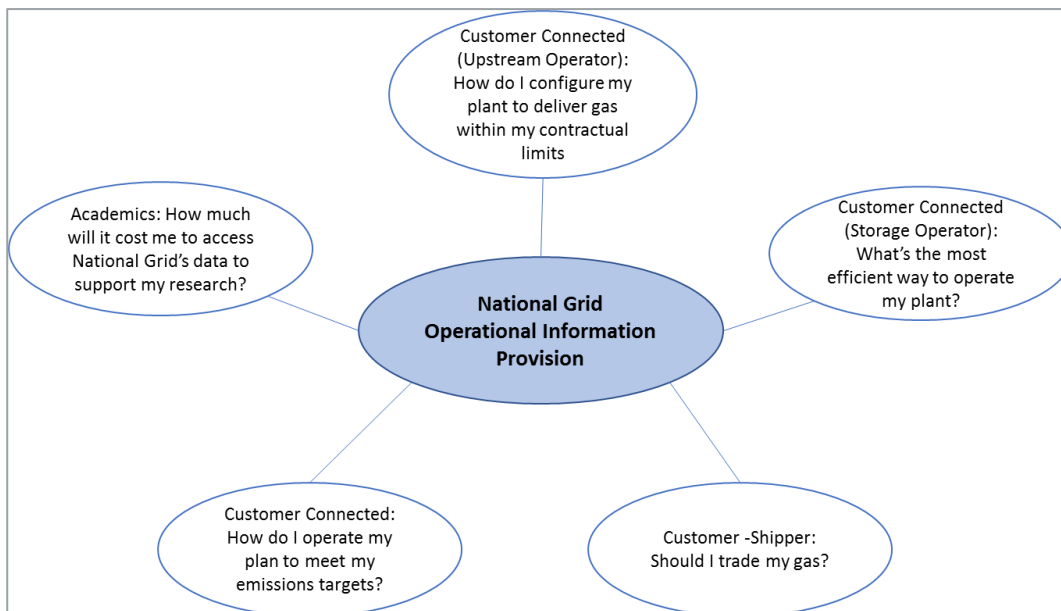
The scope for information provision has the potential to be wide ranging both in terms of the timescales and scope. We have defined the scope to include the operational data and decision making in the time horizon week ahead through to after the operational day. This therefore excludes from the scope any medium to long-term information for example season ahead outlooks or ten-year statements. These documents have been excluded from scope as they have their own engagement processes that run alongside the operational processes.

National Grid Gas Transmission has a range of legislative obligations from the Gas Transporter License and Uniform Network Code (UNC) associated with the facilitation of market operation and enabling optimal physical operation of the networks through provision of timely and accurate data and information to our customers and stakeholders. These obligations are currently met by providing a platform where data and information is readily available to all industry stakeholders.

Examples of data information provided on this platform include:

- Flow of gas onto the National Transmission System (NTS)
- Total amount of gas taken off the NTS
- Automated Notification Service (ANS) messages – informs shippers and other users of operational issues, requirements and events

This information allows market participants to make informed commercial decisions and enables the facilitation of an efficient market; the diagram below gives examples of the types of stakeholders and the decisions they make informed by the information we provide:



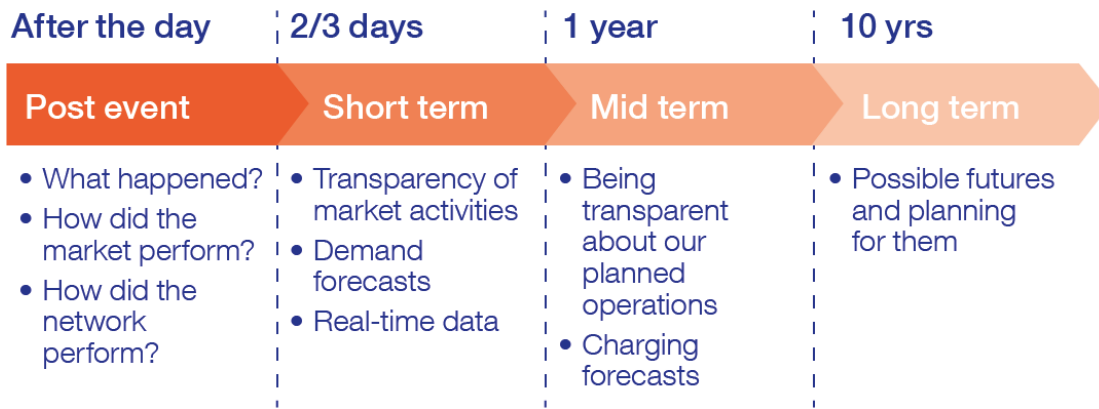
As the energy market we operate in continues to change, the importance of information provision is going to increase and develop. New and evolving gas flow patterns and commercial drivers will impact our stakeholders’ ability to balance supply and demand and will therefore alter their expectations and requirements with regards to the information and data that we provide. To meet our regulatory and legislative obligations and deliver the outputs our stakeholders require, consideration must be given to this changing operating landscape.

As part of our stakeholder engagement on this topic for RIIO T2, we want to establish the value of the information services we provide to stakeholders and whether there is industry appetite for enhancements to these information services.

Advances in these areas offer the potential to increase value and drive improvements in the levels of customer and stakeholder satisfaction. Our information provision activities are currently funded through a combination of full-time equivalent (FTE) Opex and IS Capex and Opex which covers any enhancement to our IS systems.

*II. Where are we today/what do we deliver today, and what do we currently understand from stakeholders on future development*

Our key operational activities associated with the information provision priority are summarised in the figure below.



The primary driver for the creation of network information is for our own planning processes and much of this information analysis is undertaken to order to effectively operate the gas transmission system including support for investment decisions, operational decisions and performance. However, it is often ultimately published as information for the wider industry.

We provide information that covers a broad range of areas and timescales. Long-term insights show how the network could evolve in future and our associated planning processes. These insights also provide transparency of the investment decisions we are making. Our medium-term information informs the energy industry and provides visibility of how market participants could use the system and the cost of doing so. Short-term ‘on-day’ and ‘after-the-day’ information supports efficiency in the capacity and energy markets. It does this by providing fair and timely access to operational and market information.

We provide a range of information including market and operational data both internally and externally through a combination of reports, activities and events. Please see Appendix 1 for a summarised list of this information.

We utilise a number of different IS systems to deliver this information. Two key systems in scope of the overall RIIO T2 engagement are:

- **Market Information Provision Initiative (MIPI)** - system for providing access to NTS information such as supply and demand
- **Gemini\*** - system that enables gas shippers to carry out gas nominations, energy balancing and exit capacity bookings

\* note the Gemini system is in scope of the Future Balancing and Capacity engagement log.

There are further systems which are out of scope due to the nature of them being a communication flow based on data from the MIPI system. These are:

- **Regulation on Wholesale Energy Market Integrity and Transparency (REMIT)** - UK platform that enables UK participants to meet European Union (EU) REMIT obligations. REMIT helps to prevent market abuse (insider trading) and market manipulation

- **EU Transparency Platform** – the European Network of Transmission System Operators for Gas (ENTSOG) established a central platform where all TSOs are to make their relevant data publicly available

As part of our business as usual engagement, stakeholders, and in particular customers, have told us they value the information we provide and see the data we supply as crucial in managing their commercial processes. In terms of future improvements to the service we provide, stakeholders have expressed a desire for more information and are interested in the following:

- Improvements in data quality
- Gas quality information
- Pressure forecasts
- Ability to extract the data they want, when they want it

Many of these items are consistent with existing feedback and as such are being combined to form one consistent view of current and future requirements, some of which are currently being implemented. An example of this is the week ahead pressure forecast launched in late August. It is worth noting that some of these are also being progressed formally, with gas quality for example having been subject to a more formal consultation and open industry engagement from us as National Grid, but also the wider industry through an IGEM working group.

*III. What existing insight has been drawn upon; BAU engagement, satisfaction survey insight, FES horizon scanning; output from listen phase*

To understand what our stakeholders want from us in terms of information provision we make use of the following sources of insight:

- Data and information systems feedback via email - users of systems such as MIPI can report issues with the platform or provide general feedback by sending emails to the Operational Liaison team.
- Liaison Meetings
- Operational Forums
- Customer and stakeholder satisfactions scores and comments

*IV. The link to the stakeholder priorities and the scale/materiality of the topics*

Information Provision links most directly to the following stakeholder priorities:

- I want all the information I need to run my business, and to understand what you do and why

But is also relevant to:

- I want you to facilitate the whole energy system of the future
- I want to move gas on and off the Transmission system where and when I want
- I want to connect to the Transmission system



The operational data and market information we provide deliver three key things:

- Enables industry stakeholders to make informed commercial decisions
- Reduces market uncertainty
- Ensures equal access to information and facilitates competition

Throughout our engagement, customers have indicated that Information Provision is one of the most important outputs that we deliver, and as the gas industry continues to change and there is greater uncertainty in the gas market, the importance of Information Provision is going to increase. An example of this increased uncertainty was the Gas Deficit Warning which took place during the extreme cold weather event on the 1<sup>st</sup> March. The high demand resulted in National Grid issuing a notice to the market that we would like more gas to be made available to ensure the safe and reliable operation of the NTS. Stakeholders were particularly interested in information and analysis on operational factors that led to the warning taking place.

*"We use the data to see the gas deficit on relevant days." - [REDACTED]*

#### *V. Flag interactions with other topics*

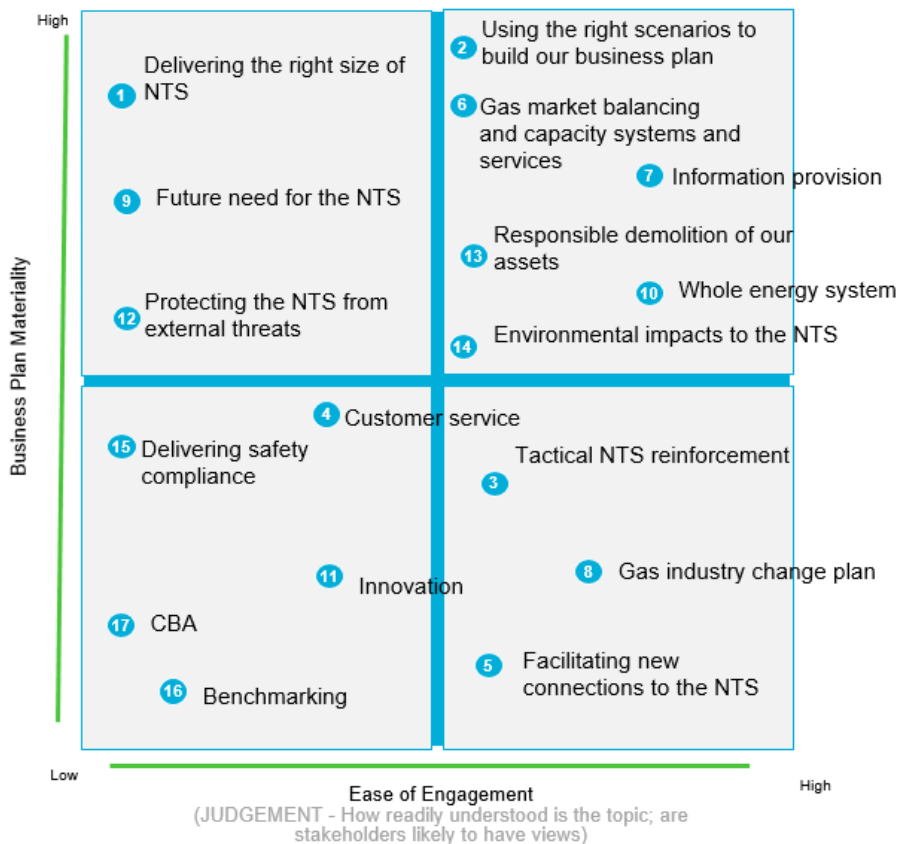
Information Provision is linked to the following two RIIO T2 topics that are also mapped under the stakeholder priority *'I want all the information I need to run my business, and to understand what you do and why'*:

- Future Balancing and Capacity Systems and Services - the future services and associated systems National Grid is obligated to deliver to enable users to book network capacity and balance their portfolios.
- Gas Industry Change Plan – which is designed to inform the level of change the industry anticipates.

Information Provision is also linked to GSO IS Direct Investments - the TOTEX costs for any proposed IS solutions will be mapped to both the Information Provision and GSO IS Direct Investments.

#### *VI. Topic prioritisation: materiality vs ease of engagement*

Information Provision has been identified a significant topic which stakeholders are keen to engage with and express their opinions. At Stakeholder Group meeting 2 it was classified as having a high materiality and ease of engagement and therefore deemed relevant for discussion at the Stakeholder Group, as demonstrated by the following matrix:



VII. The industry drivers for this topic

The main drivers for this topic are based on providing stakeholder value, delivering customer service and ensuring compliance with our legal obligations:

1. Customers require the provision of operational data and market information to be highly reliable and consistent and accurate
2. Consumer value is derived from information driving efficient market operation and competition between industry players
3. Compliance with Gas Transport License Obligations – Special Conditions 8F, UNC Section V 5.9.1 – Operational and Market Data and System Management Principles Statement obligations

The increasing uncertainty and changing nature of the gas industry, means more information could be required for our customers and stakeholders to manage their own business process and to make the right decisions. However, there is a cost associated with providing information and therefore it is essential that we explore the underlying needs of our stakeholders in order to understand how best we can deliver them.

*VIII. Establish boundaries of disclosure for engagement – what is shared, what is not shared, and what is shared after the engagement.*

It has been agreed that outputs from workshops and events and feedback shared in group discussions will be shared, however, to respect the confidentiality of individual stakeholders we will not be sharing any feedback obtained during 1-2-1 sessions with other stakeholders. This may include financial materiality of value of data.

## 1.2 WHAT ARE THE DESIRED OUTCOMES FOR THIS ENGAGEMENT?

*I. What are the gaps in existing insight you wish to fill from this engagement? (Stakeholders not previously engaged or no existing insight exists)*

Engagement conducted through business as usual (BAU) activities during this RIIO T1 period has been useful in helping us to gain a better insight and identify further gaps in our knowledge. However, as we move from the consult phase into the involve phase on the engagement spectrum (see Appendix 3), the main areas we are now looking to obtain further information on are to:

- Validated view of how stakeholders use information to run their businesses to enable us to provide an improved service
- Understanding of what information stakeholders require, why they want the information and how they want it delivered
- Sense of customers' willingness to pay for services

*II. What are the desired outcomes from this engagement and what are the measures of success?*

The key outcomes we are aiming to achieve from this engagement are to:

- Obtain a wide range of perspectives across all types of customers i.e. large and small, current and future
- Understand stakeholders' needs for information provision which can be turned into options upon which we engage and agree resultant preference with willingness to pay considered
- Prioritise the investments we make in our systems to ensure we deliver value to our stakeholders

The success of this engagement will be measured by the following criteria:

- Positive validation of stakeholder views during playback sessions
- Stakeholder Group and Ofgem positively endorse approach taken to engagement and acknowledge questions asked and approach taken to respond
- Clear alignment of information provision with other areas of the Gas Transmission business plan submission

*III. What are the questions being asked from engagement? Have they been reviewed to be clear and unbiased?*

In order to achieve the desired outcomes a selection of questions for stakeholders have been formulated. The main questions we are looking to answer as part of the co-create phase are listed

below along with their associated ‘sub-questions’. These sub questions cover more detailed aspects of the co-create questions. The ‘other questions’ don’t specifically align to the co-create questions but are useful in helping to formulate costed options during the second phase of this engagement.

Co-create Questions	Sub-Questions	Other Questions
<b>How the information provided is used in your business? Understanding this will enable us to best prepare options for consideration</b>	<ul style="list-style-type: none"> <li>○ What operational processes do you run that are dependent on National Grid data / information / insight?</li> <li>○ When you use information provided by National Grid, what processes are dependent on National Grid's data?</li> </ul>	<ul style="list-style-type: none"> <li>○ Are there any data information / knowledge areas we don't currently provide that you would value? What aspect / characteristic of that would you value?</li> <li>○ Is there anything that you would like to see available?</li> <li>○ Is the frequency of the data high enough?</li> <li>○ Is Transparency an issue for you?</li> </ul>
<b>What are the data items that you value? This includes information on decisions / actions taken by National Grid</b>	<ul style="list-style-type: none"> <li>○ What is your insight on the operational data we provide?</li> <li>○ When you use information provided by National Grid, what data do you value the most and why?</li> <li>○ Do you have more emphasis on before or after the day data?</li> <li>○ What data do you predominantly use/what for?</li> <li>○ Do you use historical data?</li> </ul>	
<b>How would you prefer to have access to / receive this data?</b>	<ul style="list-style-type: none"> <li>○ Do you process the API data?</li> <li>○ How do you process data?</li> <li>○ Would you prefer a ‘push’ system to notify of data updates rather than pulling from MIPI?</li> <li>○ Would you like to have one system for MIPI + GEMINI?</li> </ul>	
<b>What is your willingness to pay, either for data itself or for the provision of system / processes that can adapt to your needs at pace?</b>		

### 1.3 WHAT IS THE ENGAGEMENT APPROACH?

*1. Approach to engagement (and why have you chosen this approach) is it: inform, open conversations,*

Our RIIO T2 engagement specific to this topic started in May 2018. We engaged through webinars that were specific to the different customer segments (customers-shippers and customers-connected), 1-2-1 meetings and regional event, and we concluded with a joint stakeholder webinar to playback the feedback we’d received to date. The outcome from this initial engagement helped to validate our understanding of how stakeholders use our information to run their businesses.

Our second phase of engagement built upon this, asking open questions and discussing options with stakeholders. We again, held specific webinars for the relevant customer segments and held one joint webinar to playback their views. We also used the June Operational forum to share the feedback on proposed options.

It was particularly important for us to understand how the information provided might be used within a customer business and the processes that the data feeds into rather than simply acted on a ‘wish list’, to avoid developing solutions that are not genuinely adding value to customers or consumers.

*II. Engagement activities (ongoing engagement, bespoke engagement, other sources) and sources from which decision will be made*

The following table describes the engagement activities scheduled to take place from May 2018:

Type of Engagement Activity	Stakeholder Segment	Planned Event	Planned Date
<b>Liaison Meetings*</b>	Customers-connected (Terminal Operators)	[REDACTED]	10 <sup>th</sup> May 11 <sup>th</sup> June 11 <sup>th</sup> June 12 <sup>th</sup> June 23 <sup>rd</sup> July 26 <sup>th</sup> July
<b>RIIO T2 Stakeholder Regional Events</b>	Customers-connected Customers-shippers	Needs of the Network (St Fergus)	3 <sup>rd</sup> July
	(Terminal Operators, Traders, Shippers, Storage Operators)	Needs of the Network (London)	9 <sup>th</sup> July
		Needs of the Network (Bacton)	12 <sup>th</sup> July
		Needs of the Network (Chester)	17 <sup>th</sup> July
<b>Stakeholder 1-2-1s</b>	Customers-connected Customers-shippers	Reached out to 131 shippers to enquire as to whether they want a 1-2-1 and through which channel i.e. phone conversation, face to face or email survey	5 <sup>th</sup> Sept
	(Shippers and Power stations, Energy UK)	Energy UK	
<b>Webinars</b>	Customers-connected Customers-shippers  (Terminal Operators, Traders, Shippers, Storage Operators)	Shaping the Gas Transmission System of the Future: working with you to build our business plans	23 <sup>rd</sup> May
<b>Operational Forum</b>	Customers-connected Customers-shippers	Customer Listening Session	28 <sup>th</sup> June
	(Shippers, Storage Operators)		

\*Business as usual engagement

In terms of the stakeholder 1-2-1 meetings, we focused on the shipper stakeholder group and identified 131 shipper organisations. We took the approach of splitting the shippers into three groups:

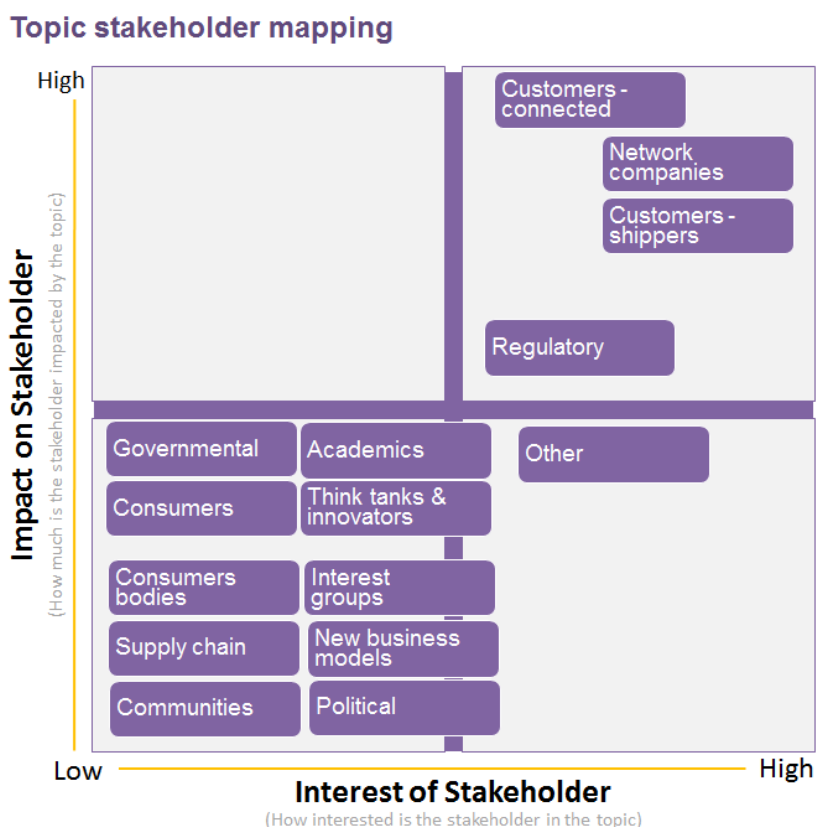
- Shippers with multiple subsidiaries
- Shippers who have paid us in the last year ('active shippers')
- Shippers who haven't paid us in the last year ('inactive shippers')

We targeted all the larger organisations with multiple subsidiaries and then a quarter of the other two categories. In terms of deciding which shipper should form part of that portion targeted, we used our customer intelligence database to identify those shippers who we have previously had contact with.

Although the uptake on one to one meetings has been minimal, at the current time there are some possible outstanding one to one meetings due to the holiday period in the shipper organisations delaying the engagement. However, even with that consideration, it is the smaller shipper organisations who we have had significantly less input from to date.

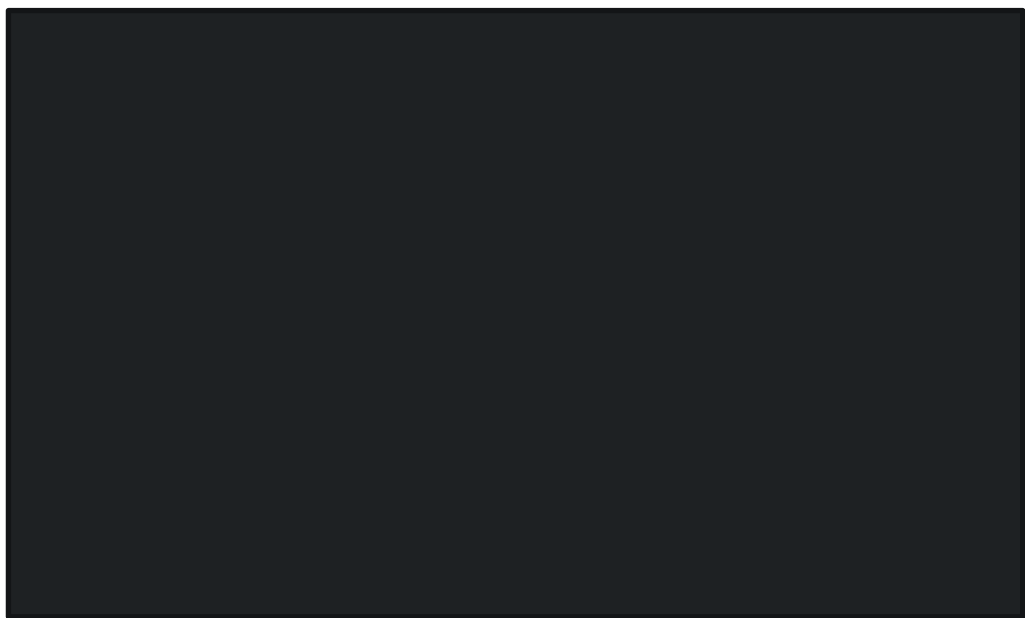
*III. Stakeholder mapping – who are key stakeholders, which segment (and why, including impact and interest of topic on stakeholder)*

The key stakeholders for this topic are displayed in the 'Manage closely' segment of the matrix below. They are characterised as having high influence/impact and interest. It is primarily the shippers and site operator segments who have been the focus of the engagement on this topic.



As part of the engagement interactions, we asked stakeholders to rate themselves between 1 and 5 where 1 is not impacted at all and 5 is impacted a great deal. The responses for the

individuals within their respective organisations are shown in the table below, with those belonging to the original high priority mapping highlighted in orange. There were multiple individuals from a number of organisations participating.



Stakeholder Segment	Description	Organisations
Regulatory	Energy and safety regulators	Ofgem
Customers- shippers	Buy gas from producers	Active and inactive shippers
Customers- connected	Terminal, storage and interconnector operators, power stations	Terminals, storage and interconnector operators, power stations
Network Companies	Other regulated energy network companies	Gas Distribution Networks
Governmental	Civil service and committees	BEIS
Interest Groups	Groups representing special interests	Energy Networks Association
Other	Stakeholders not defined in other segments	[Redacted]

The following table highlights why these stakeholders are key and their specific interest areas:

Stakeholder	Why they are Key	Interest Area
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<p><b>Customers-shippers</b></p> <ul style="list-style-type: none"> <li>○ <b>Shippers</b></li> </ul>	<ul style="list-style-type: none"> <li>○ One of main users of the information we provide, key to the running of their business.</li> <li>○ Ability to balance portfolio / make money</li> </ul>	<p>Real time information and forecasts – supply and demands in particular</p>
<p><b>Customers-connected Network Companies</b></p> <ul style="list-style-type: none"> <li>○ <b>Power stations</b></li> <li>○ <b>Storage sites</b></li> <li>○ <b>DNs</b></li> <li>○ <b>Terminals</b></li> <li>○ <b>Industrial direct connects</b></li> <li>○ <b>Interconnectors</b></li> </ul>	<ul style="list-style-type: none"> <li>○ Ability to manage operations and make strategic decisions on investment</li> <li>○ Ability to manage operations and make strategic decisions on investment</li> <li>○ Ability to manage operations</li> <li>○ Ability to manage operations</li> <li>○ Ability to manage operations make strategic decisions on investment</li> <li>○ Ability to manage operations</li> </ul>	<p>Real time information and forecasts – supply and demands. Also in some areas, long term planning statements e.g. GTYS and GFOP</p>
<p><b>Regulatory</b></p> <ul style="list-style-type: none"> <li>○ <b>Ofgem</b></li> </ul>	<ul style="list-style-type: none"> <li>○ Compliance with licence, meeting customer needs, responding to feedback, meeting EU regulations</li> </ul>	<p>All data and publications that meet compliance requirements</p>

\*Business as usual engagement

*IV. How has any feedback from Frontier been incorporated?*

We engaged with Frontier Economics to test our planned engagement ahead of engaging with stakeholders to support us in reaching the desired outcomes. Frontier Economics provided the following feedback on our planned questions and engagement:

**How to get at stakeholder priorities/whether to raise willingness to pay with stakeholders**

Frontier stated that our planned structure for the session is likely to generate a lot of ideas from stakeholders, on what data they use, how they use it but we may be less successful at eliciting information on priorities and the urgency with which changes should be made, and the ambition to gather insight on willingness to pay may prove too much.

We subsequently avoided asking the willingness to pay question and focused more on which types of data stakeholders are most interested in.

**Avoiding hearing only from the loudest voice**



Frontier mentioned that with the table format there is a risk that one particularly noisy/aggressive participant dominates the table and may lead debate in the direction they like, regardless of whether this is representative. This leads to a disproportionate weighting in terms of feedback.

In response, we used independent facilitators to obtain balanced opinions across all stakeholders in the carefully facilitated sessions.

**Structuring the groups**

Frontier stated there is also a concern around one kind of stakeholder group dominating proceedings (e.g. if lots of shippers show up and dominate the room).

To resolve this, we mixed up the stakeholder groups on each table and used facilitators to encourage balanced participation amongst each group.

**2. POST-ENGAGEMENT**

**2.1 WHAT WERE THE ENGAGEMENT OUTCOMES AND HOW HAS THIS INFLUENCED OPTIONS?**

- 1. *Stakeholders involved – all impacted stakeholders have been engaged (planned vs actual). What did they score themselves on impact, interest or knowledge?*

The actual engagement that has taken place has been fairly well aligned with the planned schedule.

Type of Engagement Activity	Stakeholder	Completed Event	Date
<b>*Liaison Meeting</b>	Customers-connected Customers-shippers	[REDACTED]	10 <sup>th</sup> May 11 <sup>th</sup> June 11 <sup>th</sup> June 12 <sup>th</sup> June
	Terminal Operators	[REDACTED]	23 <sup>rd</sup> July 26 <sup>th</sup> July
<b>RIIOT2 Stakeholder Regional Event</b>	Customers-connected Customers-shippers	Needs of the Network (St Fergus)	3 <sup>rd</sup> July
	(Terminal Operators, Traders, Shippers, Storage Operators)	Needs of the Network (London)	9 <sup>th</sup> July
		Needs of the Network (Bacton)	12 <sup>th</sup> July
<b>Stakeholder 1-2-1</b>	Customers-shippers	[REDACTED]	6 <sup>th</sup> July
		[REDACTED]	3 <sup>rd</sup> August
		[REDACTED]	16 <sup>th</sup> August
<b>Webinar</b>	Customers-connected Customers-shippers  (Terminal Operators, Traders, Shippers, Storage Operators)	Shaping the Gas Transmission System of the Future: working with you to build our business plans	23 <sup>rd</sup> May
<b>Operational Forum</b>	Customers-connected Customers-shippers	Customer Listening Session	28 <sup>th</sup> June

	(Shippers, Storage Operators)		
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\*Business as usual engagement

II. Was the engagement channel effective and what channels were used?

The engagement channels that were particularly effective were the liaison meetings and the stakeholder one to ones. We didn't run sessions on Information Provision at some of the regional events, for example at Chester, as some groups of stakeholders had a lack of awareness or interest in the topic. Stakeholders were offered a session on the topic but did not want it. At the Operational Forum Customer Listening Session only seven out of forty-one attendees stayed to participate in the session. In general, the questions we asked and the responses received provided information in a qualitative way that was sufficient for us to gain insights into stakeholder opinions. It was also noted however that different responses were received from different members within one organisation (i.e. discussions with IS representatives highlighted different issues from the strategy team).

Where customers had indicated a lack of knowledge as a barrier to engaging effectively, we conducted a webinar on MIPI (how it works and what's available) to help improve knowledge in this area.

III. What were the outcomes?

IV. Overview of responses (must provide as deep dive if required)

We received feedback from the following stakeholder segments – customer-shippers and customers-connected. This includes traders, storage operators and terminal operators. This is insufficient to draw firm conclusions; however the summary of feedback is as follows:

Stakeholders	Feedback (No. of stakeholders who mentioned)	Key Quotes
Customer-shippers (Shippers)	<p>Want data items such as gas demand flows on a real-time frequency in order to better make risk based commercial decisions (3)</p> <p>Interest in pressure forecast data in order to gain insights into network conditions (2)</p> <p>Obtain data more quickly and pull data from systems at a rate of their choosing, preferably with the data being in a raw format as opposed to pre-aggregated reports. This is to gain a commercial advantage over competitors (2)</p> <p>An improvement to the overall quality of existing data on MIPI to ensure decisions are made based on the correct data points(2)</p> <p>A need for more gas quality parameter data (regional and national) on a monthly frequency as there is a general industry concern</p>	<p><i>"All data on Prevailing view should be correct you should have an incentive around data quality."</i></p> <p><i>"I use MIPI to understand the system status. I typically start with prevailing view to get an overview, and then would go into the reports for more detail from this. Look mainly at supply/demand/opening and closing linepack. This then feeds into decisions for the trading team."</i></p> <p><i>"Some data is held on Xoserve systems and some on NG systems. Will be better to have more consistency across systems or have it all in one place."</i></p>

	<p>that gas quality standards are declining and so being able to identify gas quality parameters at different parts of the network would be useful (1)</p> <p>There is a lack of descriptions for data items and there is a need for a more comprehensive data dictionary (1)</p> <p>There are inconsistencies between totals and the components that feed the totals leading to gaps in analysis processes (1)</p> <p>More consistency across the Xoserve and MIPI systems. Both in the displays and meaning of data items, with some feedback calling for a single system (1)</p> <p>Concern that when a Terminal Flow Advice (TFA) notification is issued, shippers at certain sites could have a significant advantage when they learn of these ahead of others (1)</p> <p>They want our systems to be made easier to use and navigate. With customisable preferences for displaying information. They mentioned drilling down to find specific information in the data explorer is difficult. And the layout of MIPI could be improved with clearer titles (1)</p> <p>Day ahead nominations are not always published at 15:00 meaning repeatable processes are affected (1)</p> <p>Actual and forecast supply and demand differences would be useful for checking data quality (1)</p> <p>Interest in a blend service to increase trading opportunities (1)</p>	
<p>Customer-shippers (Traders)</p>	<p>Improvement to the overall quality of existing data on MIPI (2)</p> <p>Systems to be made easier to use and navigate with customisable preferences for displaying information (2)</p> <p>Obtain data more quickly (2)</p> <p>Preference for a system which is always online but appreciate that outages to MIPI are required at certain times. They want these outages to be planned and communicated well ahead of time (1)</p>	<p><i>“We’re operating completely blind”</i></p> <p><i>“We use Gemini and Prevailing view and find the supply and demand data useful.”</i></p> <p><i>“Utilise MIPI, real-time flow data, nominations data, very good data, very complete, some points have been excluded.”</i></p> <p><i>“Building up of picture of supply and demand patterns. How quickly you are going to balance.</i></p>

	<p>They want an agreed contingency data set and arrangements for provision of this data in the event of MIPI being unavailable. This will mitigate uncertainty on their business processes (1)</p> <p>A concern that when a Terminal Flow Advice (TFA) notification is issued, shippers at certain sites could have a significant advantage when they learn of these ahead of others (1)</p> <p>More transparency around the balancing actions taken by National Grid. With both within day and after day commentary on the rationale behind our actions being sought. They want more in-depth analysis clearly explaining our decision making to allow them to build an understanding of why we do what we do (1)</p> <p>Interested in reinstating RSS feeds for operational news/updates (1)</p> <p>Interested in pressure forecast data to better forecast constraints(1)</p> <p>Preference for data items such as gas demand flows on a real-time frequency in order to better inform trading decisions(1)</p>	<p><i>Commercial balance.”</i></p> <p><i>“We use APIs, and have lots of internal systems which pull up to date information.”</i></p>
<p>Customers-Connected (Storage Operators)</p>	<p>Interested in pressure forecast data. The storage operator mentioned that this data is useful in helping them to manage their use of compressors to minimise the cost of getting gas on and off the network (1)</p> <p>Desire to obtain data more quickly. They want to be able to pull data from systems at a rate of their choosing, preferably with the data being in a raw format as opposed to pre-aggregated reports (1)</p> <p>Want an improvement to the overall quality of existing data on MIPI (1)</p>	
<p>Customers-Connected (Terminal Operators)</p>	<p>Systems to be made easier to use and navigate with customisable preferences for displaying information. They mentioned that drilling down to find specific information in the data explorer is difficult. And the layout of MIPI could be improved with clearer titles (1)</p>	<p><i>“It is easier to consult the prevailing view website than to contact dispatchers within the producer’s company.”</i></p> <p><i>“The data is very useful for working out the chain of events</i></p>

	Interest in a blending service (4)	<p><i>that has led to a particular supply pattern.”</i></p> <p><i>“Prevailing view is often used to find out why the producer is being ‘backed out’ of supply.”</i></p> <p><i>“There should be information on blending for those who want to put gas of a different spec in to the network.”</i></p>
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Our summary from this engagement is that these stakeholders have shared and reinforced (where existing) the requirement for the following additional data with the justification being as noted above:

- Information and data at a greater frequency – preferably as near real time as possible
- The ability to pull data from our systems, less interested in having data pushed
- Use of Application Programming Interfaces (APIs) to manipulate raw data
- More consistency and accuracy of data
- More pressure and gas quality data
- More in-depth analysis and transparency around National Grid balancing actions

We have already taken some steps to make improvements to our service; for example on the 16<sup>th</sup> August, we launched an industry-wide pressure forecast service that provides expected pressures at Terminal Entry Points.

This feedback covers the two stakeholder segments we originally identified to target for “manage closely” for engagement. These stakeholders also represent larger players within the industry. It was noted that in general the larger shippers will have the resources to develop APIs and more automated process to extract and manipulate the information provided. Smaller customers may not have the capacity or capability to do this internally and are therefore more dependent on the format of the data being published. To obtain a more complete insight into stakeholders’ opinions we will need to do further engagement, covering:

- More of the stakeholder groups targeted and
- Medium/small sized businesses.

**Update – June 2019**

In order to progress the engagement on this topic, we decided to make increased use of our RIIO 1 engagement interactions, rather than initiate additional events. As part of our current business activities we have a project to drive improvements to information provision before the end of RIIO 1. As well as a [consultation](#), we set up an industry led working group, as well as launching an [on-line collaboration platform](#) to create transparent dialogue with our stakeholders and utilise them to inform the requirements for any improvements. To-date we have ~150 customers registered on the collaboration platform who have actively contributed to the debate on what improvements have been made. The invaluable insight this has also enabled us to seek is the explicit link to consumer

value which customers have started to share with us in terms of the ‘why’ they need the data. The slides below give an overview of the activity to date and the detailed feedback is in appendix 6.6.

## Gas Operational Data Community – putting stakeholders at the heart of decision making

Following a successful trial in January, we have now launched our enduring solution for an Operational Data Community\*. This sits alongside our core system for providing operational information. Key principles are:

- The user interface is simple and accessible
- Stakeholder feedback is placed at the heart of decision making for improvements
- We will look to understand ‘why’ just as much as the ‘what’
- Stakeholders can engage wherever, whenever in the topic



National Grid \* <https://datacommunity.nationalgridgas.com/>

## Proving the concept – what we learnt during the trial (1)

1 Its all in the numbers....

250 stakeholders registered; 7 of which we've never engaged with before

6 prioritised data items for publication; ~ 200 votes

3 new prototype data items already available

**Insight**

Providing a platform to engage enables us to reach out to a wide variety of stakeholders and engage with them on their terms.

Our T2 proposals include both the platform to sustain this capability as well as the resources within the business to maintain the dialogue. Flexibility in our core architecture is also key to sustaining this.

2 Voting

The results are:

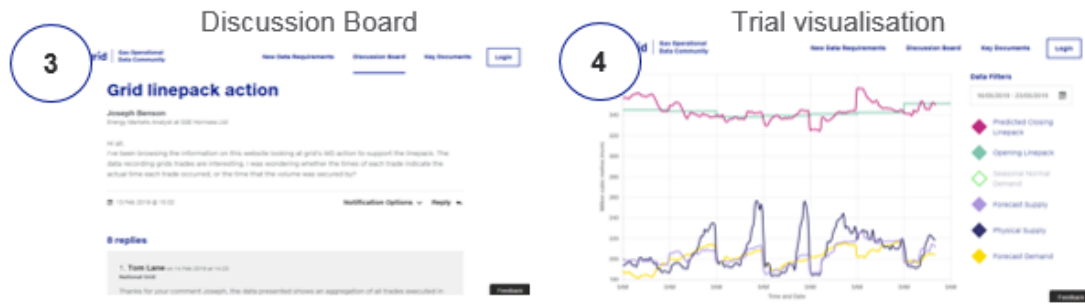
Requirement	Votes for	Votes against
Uninterruptible Demand	11	0
Gas in Demand	0	0
Market Price Caps	0	1
Trading Data	4	0
Site Health	0	0
Flow	0	0

**Insight**

Not only do we know WHAT data matters, we also asked WHY, with a particular emphasis on the impact it will have on consumer value.

This insight has enabled us to prioritise based on stakeholder and consumer value which we now have evidenced as opportunity. Our T2 proposals include capability that can flex according to the value case.

## Proving the concept – what we learnt during the trial (2)



**Insight**

*Providing a platform to engage enables us to do so in a way, and at a time that matters to stakeholders of all sizes.*

*This further reinforces the need to ensure we have the capacity to support the dialogue as required.*

**Insight**

*We have the opportunity to present data in a much more modern and accessible way. These screens are self-configurable which is ideal for smaller companies with smaller resource pools.*

*This requirement requires high levels of flexibility and integration with our source systems to enable, which then form part of our T2 proposals.*

### Update – October 2019

Additional insight on the ‘information provision’ topic was collected from the Major Energy Users Survey. This is summarised in the table below:

	Usage of data	Desired type of data provided	Awareness	Demand data
<b>New information</b>	Less than 10 of the 26 stakeholders surveyed use the data for their business activities. Some do not find it useful. Others are not aware of the type of data published.	Customers indicated the need for finer data, more historic information and gas composition information. Some also pointed out that it would be useful to be alerted about potential service interruptions.	Not all stakeholders were aware of the data provided by National Grid. Only 12 of the 26 respondents indicated that they are aware of the data provided.	Most customers use the day ahead and the D2-5 data, though one group of stakeholders felt the D1 was more important.
<b>Stakeholder source</b>	Major energy users, Customer (Shippers)	Major energy users	Major energy users, Customer (exit), Customer (shipper), Government	Customers- entry and exit
<b>Trade-offs between priorities (affordability, reliability, environment)</b>	No trade-offs were explicitly made.			
<b>Source document</b>	Major energy users survey			Ops forum

<p><b>Robustness</b></p>	<p>This survey was valid and relevant. However, it is not clear whether it was representative, given the relatively small sample.</p> <p>Out of 60 surveyed organisations, only 26 answered at least one question on information provision. It remains unclear whether the organisations that did not provide any answers are not aware of the data or do not find it useful.</p>		<p>Valid and relevant, but not necessarily representative</p>
<p><b>Relation to existing stakeholder evidence in BP</b></p>	<p>Reinforces the acknowledgment that data is useful for some businesses and that they would like to see more data being shared.</p>	<p>Consistent with the July Business Plan, there is a general call for greater data granularity.</p>	<p>New contextual information</p>
<p><b>Changes to the BP conclusions and proposed actions</b></p>	<p>No changes.</p>	<p>No changes.</p>	<p>Reported low awareness paired with general low rate of response may indicate the need to better inform stakeholders about NGGT's data.</p> <p>Customer views in this area could be noted.</p>

*V. How were the outcomes measured and what evidence do you have? Quantitative and qualitative.*

The stakeholder feedback from all the engagement activities (RIIO T2 and existing) was collated and we ran an internal feedback grouping session on the 8<sup>th</sup> August. During this session we aligned all feedback to who it was received from, along with understanding against which question we had what feedback. See 'Appendix 2 – Feedback volumes by question asked' for the summary of the feedback we have against each question asked.

All feedback was cross referenced with our live project to drive improvements in Operational Information provision in RIIO T1 timescales. The output from this session will be used to inform both the live project and the build of the RIIO T2 business plan proposals.

It should be noted that we are publishing a discussion paper in mid – late September to highlight to the industry our thinking for the current RIIO-T1 project, along with gaining feedback on the prioritisation of scope items to deliver during T1 timescales. The conclusions from this discussion paper will be used to further inform the RIIO T2 plan build.

*VI. Does it meet the needs of targeted stakeholders?*

*VII. Articulation of options plan or process presented (benefits/limitations/ timing)?*



The main benefit of the feedback analysis approach is that the scoring enables quick identification of high interest areas however it is not possible to determine how strongly a particularly stakeholder feels about an area.

*VIII. How have you considered impact on safety in options?*

All transparency and data sharing requirements are intended to remain as-is, and we will continue to meet our safety related obligations related to information provision.

*IX. How have you considered impact on customer in options?*

This topic is driven directly by customer requirements, in particular they have direct input into the support of the development of APIs, improvements to the data dictionary and linking queries to data originators. By understanding our customer needs better and delivering this during RIIO-T1 and RIIO T2 we will enhance our customer service proposition.

*X. How have you considered innovation in options e.g. innovative approaches to engagement or innovation projects?*

We will be considering a number of innovative options in delivery of the solution. As we understand requirements more, we will work with our IS colleague to ensure that any solutions are innovative and take advantage of technology where appropriate.

## 2.2 WHAT WERE THE INITIAL NATIONAL GRID CONCLUSIONS

- I. Was there clear agreement on the outcomes from stakeholders? This outcome will directly inform our conclusions*
- II. If there was disagreement on the outcome across which stakeholder groups?*
- III. Have we drawn conclusions by placing greatest weighting on the views of those stakeholder most impacted?*
- IV. Was the outcome inconclusive?*
- V. Will further engagement activities be required to reach a conclusive outcome?*

Overall there was broad agreement across the feedback received during this initial phase of engagement. Our views have been gathered from the customer-shippers and customer-connected segments and the outcomes from these specific group of stakeholders showed us that they prioritise similar aspects of the service we provide and are looking for similar improvements in the service. However, to obtain a more conclusive outcome a wider range of stakeholders will need to be engaged. This will include targeting smaller stakeholders. Future engagement will enable us to gain insight into the following gaps:

- IS costed options that fulfil stakeholder requirements
- Scope for an Information Provision incentive
- Sense of customers' willingness to pay for a premium service

Following this initial phase of engagement we acknowledge further work is required to ensure robust evidence of outcomes. We have engaged with an agency who is an expert in

qualitative and quantitative validation research to support this. They will identify gaps in our stakeholder landscape; utilise evidence based research; ensure proportional weighting amongst stakeholders to report current insights; design with us any additional engagement to ensure sufficient stakeholder coverage; and ensure these insights correctly shape our business plan. This work will also help meet the clear expectations placed on us from our Stakeholder Group.

As we have gone on to develop our options, we have defined three core categories which will underpin the proposals in our RIIO-2 business plan.

#### Baseline - output

A Business Capability to provide information to the market which includes people to work the process, development and maintenance of processes, and the delivery and maintenance of a platform to provide the info to the market. This also includes the provision of a collaboration platform to continue the enhancement of our customer engagement in the development and prioritisation of enhancements in the way we provide operational information and provide a platform to provide visualisation of data journeys and a tool for aiding transparency of NG operational and commercial balancing decisions.

#### Baseline – additional services

This is additional insight and modelling that is a specific costed service whereby National Grid undertakes modelling or insight on behalf of a customer. An example could be analysing gas quality forecasts for different parts of the network or enhanced pressure forecasting service. In doing this we would need to be completely clear what we could and couldn't offer from a 'fair and equitable' basis. Also considered here is the more frequent utilisation of data e.g. charging users who pull data at defined frequencies or volumes.

#### Variable

A different charging approach for information provision was also considered i.e. fully socialised vs a 'pay as you use' approach. However, the recommendation would be to maintain the status quo with all users paying equally for the data provision. The main driver for this being that the costs associated with separating this out are marginal compared to the full bill impact, and therefore the complexity and rigour (including a charge recovery process) would not be reflective of the benefit.

## 2.3 TRIANGULATION OF STAKEHOLDER ENGAGEMENT OUTPUTS

In September 2019, Frontier Economics undertook a study to draw out the robust messages from stakeholder research based on a systematic triangulation of evidence. Stakeholder views have been collected from a wide range of sources. Each source can provide insights, but also has limitations. By triangulating multiple strands of evidence, the aim is to derive robust conclusions on stakeholders' views from a holistic assessment of the entirety of the evidence. Their results are presented in the form of answers to five questions:

#### **“What new evidence is there on stakeholder views?”**

Stakeholders did not comment directly on the acceptability of NGGT's proposals in this area. The new evidence confirms that the data provided by NGGT is useful in some major energy users' day-to-day operations. Some stakeholders would like data to be provided with greater frequency or

more detailed information. The survey suggests that not all major energy users are aware of NGGT’s data provision.

**Is there a consensus?**

A variety of views were collected from the stakeholders consulted.

**How does this compare to the findings described in the July Business Plan?**

The findings are broadly aligned with proposals in the July Business Plan.

**Based on this new evidence what changes to the Business Plan conclusions and proposed actions are justified?**

Given the relatively low degree of awareness about NGGT’s data provision, NGGT could consider options to improve their communication with stakeholders about information provision.

**How have trade-offs been made in reaching these conclusions?**

Given the data is useful for some customers and energy industry participants, there is a good case for NGGT to continue providing it. However, the data is not useful to all those surveyed. To maximise the benefit of this provision, it may make sense to NGGT ensure relevant stakeholders are aware of what is offered.”

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**3. STAKEHOLDER GROUP CHALLENGE & REVIEW**

**3.1.WHAT POINTS OF CLARIFICATION AND INTEREST WERE RAISED?**

National Grid circulated version 1 of this engagement log in advance of the Stakeholder Group meeting on the 19<sup>th</sup> September 2018. Pre-meeting calls were held to collect feedback on the log and any points of clarification which are captured below.

Topic specific <u>feedback</u> and <u>points of clarification</u>		
Pre-meeting calls	Feedback	National Grid Response
██████████	<p>Focus on the link to consumers – describe and evidence how this work impacts/ benefits consumers.</p> <p>There are more and more shippers and suppliers active in the market – therefore should the system become easier and simpler to use for smaller parties or should it be geared towards larger players (who might in fact be acting on behalf of small companies who don’t have trading teams). Link to a more competitive market - is it better for consumers to encourage smaller players to directly engage themselves and how does this translate into smearing of costs vs cost reflective pricing</p>	N/A

### 3.2 WHAT WAS THE OUTCOME OF THE STAKEHOLDER GROUP CHALLENGE AND REVIEW?

- I. Capture all questions and challenges raised by Stakeholder Group
- II. Capture agreement/disagreement
- III. Executive summary for RIIO Challenge Group

At the Stakeholder Group meeting held on 2<sup>nd</sup> October National Grid presented a short overview of the topic of information provision including how the costs are reflected in the overall consumer bill. The Stakeholder Group asked questions around the use of the existing operational forum (who attends, what’s the current level of engagement) and the future framework for information provision and whether this is likely to include mandated requirements plus other extra services. The members also discussed the issue of engaging with smaller stakeholders and mentioned using different methods of engagement for these smaller companies. It was also suggested that the use of third party intermediaries and existing forums to help gather insight from smaller parties would be useful. The Stakeholder Group discussed the cost effectiveness of continuing with engagement which is not producing the necessary insight – i.e. defining a ‘stop’ point. Fifteen formal challenges were agreed and incorporated in the challenge log. There was one action which was closed at the next Stakeholder Group meeting.

Topic specific challenges from Stakeholder Group discussion. Meeting SG-03 02/10/2018		
ID	Challenge	National Grid Response
40	Demonstrate that high impact stakeholders have been self-defined and not just by National Grid	Additional information on the impact scores stakeholders assigned themselves provided on page 14.
41	Articulate cyber security impact	There is no specific interaction in the business plan between the proposals in the ‘information provision’ chapter and those within ‘external threats’. Any new systems must meet current standards for cyber security hence no additional funding is required elsewhere in the business plan proposals. However, any new data requirements extracted from our core IT systems would require full alignment with CNI requirements. Any additional cost of interfacing into the CNI systems would be accounted for the assessment of providing that new data.
42	Articulate core service (minimum expected) and what is value adding	<p>The information we provide supports the efficient functioning of the gas market by allowing market participants to make informed commercial decisions and allows connected parties to optimise their activities based on network conditions.</p> <p>We provide data, information, knowledge and insight and over a range of time horizons (from within day to 30 years +) and the provision of this information is defined within a number of regulations and license obligations. However, we also provide transparency in the operational &amp; commercial decisions we make. This is supplementary to the service of providing data sets and is a valued addition for the industry to understand National Grid’s actions. This is an added layer of circumstances and context for the industry to utilise to assess market reactions in the future. Further information on our baseline and additional options is provided on option on page 23.</p>

<p>43</p>	<p>How did we frame questions to ensure that stakeholders were responding appropriately</p>	<p>Primarily, the appropriate framing of our questions has been driven through our learning process with Frontier Economics. We engaged with Frontier Economics to test our planned engagement ahead of engaging with stakeholders. There were several areas where we changed our approach, the framing and format of the questions including:</p> <ul style="list-style-type: none"> <li>• Willingness to Pay was initially considered to inform our proposals on Information Provision. However, following the development of our specific consumer engagement strategy and discussion with the third party delivering the Willingness to Pay work, Information Provision did not fit within the boundaries of the Willingness to Pay scope and question structure.</li> <li>• We therefore continued to focus on the type of data stakeholders are most interested in and on the insight the engagement will generate.</li> <li>• Use of independent facilitators and mixed up stakeholder groups to obtain balanced opinions and participation across all stakeholders in the carefully facilitated sessions.</li> </ul>
<p>44</p>	<p>Articulate and deliver consistent strategy for hard to reach stakeholders</p>	<p>We continued to try to engage smaller shippers within our Future Balancing and Capacity topic [challenge #58] - we undertook a range of direct engagement methods – direct telephone calls, LinkedIn message and online contact forms. We also tried to make use of other contacts into small shipper organisations through the RIIO 2 Stakeholder Group. These attempts were not successful and then we looked to use Xoserve to access these smaller organisations. Through their ongoing relationships with smaller shippers, Xoserve’s Customer Advocate contacted a range of smaller shipper organisations through emails out to their distribution lists. They also had bilateral discussions with the ambition of holding a joint National Grid /Xoserve workshop in February. Due to data protection restrictions, we could not directly see the parties Xoserve were engaging with (i.e. we were blind copied into the various email invitations). In spite of these efforts, only two shippers registered for that workshop (one of whom was a large shipper organisation) and so the workshop was not viable.</p> <p>For this particular topic, we determined that the customer segment was key to developing proposals and therefore continued our engagement making use of our RIIO 1 interactions and the development of the online community described in detail on page 21.</p> <p>Our consumer engagement is being undertaken through a dedicated strategy (including Willingness to Pay).</p>
<p>45</p>	<p>Some stakeholder groups are missing (consumer, Xoserve, small, other forums)</p>	
<p>46</p>	<p>Articulate further pull/push requirements from different stakeholder groups</p>	<p>We have continued our stakeholder engagement activities by making further use of our RIIO 1 engagement interactions. In particular, the Gas Operational Data Community, with over 150 users through an online platform <a href="#">here</a> . Although primarily set up to inform our RIIO 1 information provision activities the insight also been used to inform our RIIO 2 business plan proposals. Insight from our large customers is available in appendix 6.6 and</p>

		shows how directly our proposals work to deliver clear customer outcomes.
47	Make clear the link in EL the link between running the physical network and the information provided	We have provided additional information on the link between operations and information on page 6. However it is important to note, that there is information on the network operation domain which is commercially sensitive so not all data is in the public domain.
48	Provide more quantitative data to explain the background of the topic (stats on usage etc)	MIPI system is the primary means by which our customers interface with our operational data. MIPI as a system sustains multiple hits per day (circa 2m average) due to volumes of API pulls. This is attributed to customers looking for competitive advantage over their competitors. The scale of interaction with MIPI was verified at the stakeholder events held.
49	Start with recommendation and articulate evidence based to reach this	Whilst we understand the recommendation for the structure of the proposals, for the purposes of consistency we have continued to use the engagement log format. For our deep dive papers and business plan chapters we have looked to follow a different approach.
50	Draw out consumer outcomes more	Our information provision activities provide value for consumers by primarily by ensuring that the gas market runs smoothly. It also promotes competition in the wholesale market – allowing participants to plan, prepare and operate effectively. This is described through the Golden Thread diagram for this chapter.
51	Explore best practice/attitude to open source data across other sectors and build into conclusions	We have not fully explored options for open source data in relation to information provision. We are however aware of a number of externally driven milestones such as the work being carried out by the operational data task force being sponsored by the energy systems catapult. Examples of proposals from this work include distribution networks suggesting NGGT should publish data for them. Whilst the scope of this is not built into the baseline of our RIIO 2 proposals, as a result of the work at the energy systems catapult, we do have an ambition to have open data where possible.
53	Clarify next steps on this topic	Following the October version of this engagement log, we decided to spilt the consumer engagement from with the customer segments. We have undertaken to generate further insight from the business as usual collaboration portal. We have subsequently developed our baseline and additional options which will form the costed proposals in our business plan submission.
54	Focus is on commercial information-when will we engage with other SHs (e.g. Gov) on what they value?	The scope of this topic is the commercial and operational information relating to the network. However, academics and interest groups have a wider interest in this information which may lead to value for future consumers. Stakeholders with this longer term perspective are also encouraged on our online community and the value they place on the data is also valid.

		Our wider reporting requirements will be picked up with the 'efficient and affordable' chapter.
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## 4. CONCLUSIONS

### 4.1 WHAT IMPACT HAS THIS FEEDBACK HAD ON THE BUSINESS PLAN?

- *What changes have been made to the RIIO-T2 business plan as a result of direct feedback from the Stakeholder Group? (be explicit about outputs)*
- *What changes have been made to future approach to engagement, other business processes, etc. as a result of feedback from Stakeholder Group?*

Our proposals for investing in people and IT infrastructure to improve the data provision capabilities are underpinned by three key points:

- Improving provision of data, restricting access only in instances of security, privacy, legal or consumer risks and listening to the different stakeholders on a continuous basis.
- Improving accuracy and consistency of information
- Providing more transparency around National Grid operational performance.

We see that balancing the different stakeholder views by fixing upfront the allowances for information provision activities and openly managing the allocation of funds to deliver value.

The direct influence of feedback from the stakeholder group is presented in the table below:

How feedback from the stakeholder group impacted National Grid and the RIIO-T2 business plan?	
Stakeholder Group feedback	Impact on RIIO-T2 Business Plan (Outputs)
-	-
Stakeholder Group feedback	Impact on National Grid Business / Processes
Articulate further pull/push requirements from different stakeholder groups	Define a clear ask from the operational data community that can link directly to our business plan proposals

### 4.2 BUSINESS PLAN OUTPUTS ALIGNED TO STAKEHOLDER ENGAGEMENT OUTCOMES.

The golden thread diagram is embedded in the standalone file and illustrates how the business plan outputs align to the stakeholder engagement outcomes.

## 5. DOCUMENT CHANGE CONTROL

Version Number	Date Updated	Updated by	Comments
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1	October 2018	Tamsin Kashap	SG3
2	May 2019	Tamsin Kashap	SG8
3	September 2019	Tamsin Kashap	October submission



## 6. APPENDICES

### APPENDIX 6.1 – SUMMARY OF INFORMATION PROVIDED

The following table provides a summary of the information we currently provide internally and externally, the **bold** items are within the scope of the Information Provision topic engagement. Where not in scope of engagement, these are either covered by their own business as usual engagement or separately targeted RIIO T2:

REPORTS	ACTIVITIES	EVENTS
<ul style="list-style-type: none"> <li>○ <a href="#"><u>Gas Ten Year Statement (GTYS)</u></a></li> <li>○ <a href="#"><u>Gas Future Operability Planning (GFOP)</u></a></li> <li>○ <a href="#"><u>Future of Gas document</u></a></li> <li>○ <a href="#"><u>Future Energy Scenarios</u></a></li> <li>○ <a href="#"><u>Summer Outlook</u></a></li> <li>○ <a href="#"><u>Winter Outlook</u></a></li> <li>○ Winter Consultation</li> <li>○ Maintenance Plans</li> <li>○ Maintenance Notices</li> <li>○ Incentives Reporting</li> </ul>	<ul style="list-style-type: none"> <li>○ <b>Demand Forecasting</b></li> <li>○ <b>Linepack calculation / linepack swings</b></li> <li>○ <b>Reporting system entry real time flows</b></li> <li>○ <b>Management of Data</b></li> <li>○ <b>Management of Systems</b></li> <li>○ Network Analysis</li> <li>○ Regulatory Reporting Pack (RRP) Data Preparation and Submission</li> <li>○ Capacity Auctions</li> <li>○ Charging Tariffs</li> </ul>	<ul style="list-style-type: none"> <li>○ Webinars</li> <li>○ SO/DN Forum</li> <li>○ Operational Forum - Forum for UK gas market participants to discuss NTS operations</li> <li>○ Liaison Meetings - annual meetings with NTS customers and stakeholders</li> </ul>

APPENDIX 6.2 – FEEDBACK VOLUMES BY QUESTION ASKED

Question asked	No of comments
Are there any data information / knowledge areas we don't currently provide that you would value? What aspect / characteristic of that would you value?	30
Out of all the services we provide, which aspects could we improve to make your processes more efficient or deliver more value to your business?	34
Over the past five years what have you valued and why?	6
Should we have measures against each stakeholder priority?	3
What are your insights on our operational data?	20
What data do you predominantly use/what for?	2
What is your insight on the operational data we provide?	61
What operational processes do you run that are dependent on National Grid data / information / insight?	19
What would you like National Grid to improve?	10
What's important to you under each of our stakeholder priorities that we should be measured against?	31
When you use information provided by National Grid what data do you value the most and why?	5
When you use information provided by National Grid what decisions are dependent on National Grid's data?	5
When you use information provided by National Grid what processes are dependent on National Grid's data?	6
When you use information provided by National Grid which systems utilise this data?	4
Would you like to have one system for MIPI + GEMINI?	1
Would you prefer a 'push' system to notify of data updates rather than pulling from MIPI?	5
<b>Grand Total</b>	<b>242</b>

APPENDIX 6.3 – ENGAGEMENT APPROACH SPECTRUM

Approach to engagement – spectrum

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
<b>STAKEHOLDER ENGAGEMENT GOAL</b>	To provide stakeholders with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions	To obtain stakeholder feedback on analysis, alternatives and/or decisions	To obtain public feedback on analysis, alternatives and/or decisions	To partner with stakeholders in each aspect of the decision including development of alternatives and the identification of the preferred solution	To place final decision making in the hands of the stakeholder
<b>PROMISE TO THE STAKEHOLDER</b>	We will: <ul style="list-style-type: none"> <li>keep you informed</li> </ul>	We will: <ul style="list-style-type: none"> <li>Keep you informed</li> <li>Listen to and acknowledge concerns and aspirations</li> <li>Provide feedback on how you have influenced our decision</li> <li>Seek feedback on drafts and proposals</li> </ul>	We will: <ul style="list-style-type: none"> <li>Work with you to ensure that your concerns and aspirations are directly reflected in alternatives developed</li> <li>Provide feedback on how you have influenced our decisions</li> </ul>	We will: <ul style="list-style-type: none"> <li>Work together with you to formulate solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible</li> </ul>	We will: <ul style="list-style-type: none"> <li>Implement what you decide</li> </ul>

Adapted from the International Association of Public Participation – Public Participation Spectrum, 2007

APPENDIX 6.4 - ENGAGEMENT PRINCIPLES CHECKLIST

1	Define and map your stakeholders - anyone who believes they are affected by your decisions. Recognising the different threads of the public interest – stakeholders, customers, consumers, citizens, communities (geographical and interest)	
2	Be clear what you want to achieve with “engagement” – have clear policy objectives and measures of impact; (incl. where you most need to engage)	
3	Understand the “spectrum of participation” and difference between each part of that spectrum: inform, consult, involve, collaborate, empower	
4	Engage early in the process, review and improve throughout	
5	Leadership – effective stakeholder engagement must be led from the top of the organisation	
6	Commitment – to listen to stakeholders’ views and act on or respond to them	
7	Objectivity – an open approach to obtaining stakeholders’ views and to interpreting them. Seek to understand views on a range of topics and on all aspects of the business plan, rather than pre-determining their priorities or seeking to endorse your own priorities	
8	Transparency – to build stakeholder trust and show that you take their views seriously (incl. how we’ve considered views, weighted and managed trade-offs)	
9	Be inclusive: work with stakeholder groups to gather the fullest range of interests. Understand and balance the differences between different segments. Understand and balance the differences between existing and future stakeholders	
10	Be aware that those who often participate i.e. the “usual suspects” are not always representative	
11	Be accessible to all (e.g. in consideration of the tasks, timelines, contact person, tech., locations, challenges of communication, etc.)	
12	Use targeted approaches to tailor engagement to suit the knowledge and awareness of different groups	
13	An ongoing process that is embedded across the business – not just a stand-alone business planning/price control review exercise.	
14	Evidence based – use a full range of available sources of info to identify priorities, views and challenges (e.g. operational insight, bespoke research,	
15	Gather evidence through a range of methodologies and tools including willingness to pay, qualitative research, surveys, complaints intelligence, market data	
16	Be responsive – seek to adopt a flexible process to engagement, responding to the information revealed as the process progresses	
17	Demonstrate impact of engagement – ensure that the engagement design process plans for and allows evaluation of success	
18	Innovation – trying new and innovative ways of engaging	

APPENDIX 6.5 - DECISION MAKING FRAMEWORK CHECKLIST

PLAN AND PREPARE	IMPLEMENT & REVIEW	ACT
Clear scope and outcomes defined <input checked="" type="checkbox"/>	Triangulate diverse views <input type="checkbox"/>	Use conclusions to build business plan <input type="checkbox"/>
Information sources identified <input checked="" type="checkbox"/>	Share outcomes and conclusions <input type="checkbox"/>	
Unbiased material produced <input checked="" type="checkbox"/>	Evidence to justify conclusions <input type="checkbox"/>	
Tailored to our diverse stakeholders; targeting those most impacted <input checked="" type="checkbox"/>	Undertake further engagement where required <input checked="" type="checkbox"/>	

Options consistent with our checklist <input checked="" type="checkbox"/>	Articulate where trade offs or no action taken and why <input type="checkbox"/>	
Ensure inclusivity of views <input checked="" type="checkbox"/>		

APPENDIX 6.6 – ONLINE COLLABORATION FORUM FEEDBACK

Detailed stakeholder feedback to date from the online collaboration site.

Organisation	Topic	Comment
SSE	Day in brief	<p>(1) Demand data provide insight into how grid coped with these days and helps us to better predict how it will manage future events thereby managing our storage assets more effectively</p> <p>(2) Without the data it is hard to predict how future events will play out.</p> <p>(3) Up to date we have been using our own modelling with our own data instead.</p> <p>(4) Our desired granularity for day in brief is just comments with graphs if necessary to highlight points.</p> <p>(5) Frequency only necessary if there is a particular interesting day.</p>
	Alerting system	<p>REMIT or other market alerts have a big impact on trading so it is vital to have this information as events occur.</p> <p>If the industry does not have the data the market reaction and the price increases can financially impact customer.</p> <p>Currently we have to monitor multiple websites for REMIT alerts and we use the Bloomberg system.</p>
EON	Day in brief	<p>A day in brief helps determine other impacts from UIG variability.</p> <p>It impacts end consumer not currently having this information as it is harder to improve models. This increases wholesale costs volatility which has a direct feed to end consumers.</p> <p>Without the data at the moment we make assumptions on whether we should model the impacts or not.</p> <p>We would really though appreciate increasing day/day in brief granularity at an LDZ level. We would want this information as soon as possible.</p>
	Instantaneous demand	<p>This data is key to the supply and demand balance and to understand the linepack swing, therefore necessary for market participants to contribute effectively towards a balanced end of day position. The lack of this information currently can impact end consumer as less efficient market balancing means more volatility and more cost to manage a portfolio. Currently without this data we rely on the daily forecast demand provided by NG. The granularity we would appreciate is at least hourly but ideally 2 minutes categories LDZ, DC,CCGT and split by LDZ all DC all CCGT. Frequency hourly.</p>
Shell	Within day trading	<p>Transparency of actions taken by NG would allow the market to receive indication which are not currently available. Knowing that NG are trading would provide guidance to the market that there are concerns. This lack of information currently impacts the end consumer as there are no drivers to react to price triggers if all transactions look like they are with other market counterparties. Without this information we track SMPB and SMPS from other sources. The granularity we would like is at the time of the event and each subsequent event.</p>
NGN	Gas Quality	<p>It would be helpful to monitor CV at terminals and multi junctions to provide insight which would help forecast target CV for biomethane sources which could minimise CV capping. Without this information, this impacts the end consumer as there is the risk of CV capping for biomethane sites as these sites have intermittent flows but feed into the FWACV calculation. Without this information, we can't do the analysis. The level of information required would be a tracking graph with option to download on excel giving historical gas day. We would require this daily.</p>

CATS	Regional Linepack	This information could help us stay within the spec required by Grid. When pressure rises or drops it can cause us to go off spec so advance notice of the pressure change means we can start to make changes in advance to prevent this from happening. This affects end consumers by not having this information as a TFA means we have to shut down the oil rigs as there is no export route. Without this information, currently we can only react if it happens. The information required is what is the extent of the pressure change and the duration so we can make plans for the plant. We would like the information as soon as there is a change of pressure at the Bishop Auckland compressor.
Ceramfed	Day in brief	This would be a useful overview. It impacts the end consumer currently as there is a lack of the information. Instead at present we get market summary reports from suppliers. We would appreciate this information daily or weekly.
RWE	Day in brief	Essential to understand what NG believes the state of the system to be in. Currently we make this assessment based on other data. We would require the data system wide with detail on entry and exit point issues. We would want this information daily.
	Alerting System	Fundamental data to make trading decisions. Lack of data impact end consumer as poor information leads to poor trading decisions. At present, we calculate data from other available information. We would want this at entry and exit point level and as soon as Grid becomes aware of it.
	Trading information	Useful to know when actions are being taken to balance the system. Currently we wait for the after the day reports. We would like trade volume and price. We would like this information as close to when it happens.
	Instantaneous demand	Supply provided currently is only half the picture and so demand would complete this. It currently impacts end consumer as it is impossible to know whether a nomination to inject or export is real and thus impacts it will have on the linepack being able to see it in real time would allow a calculation on the validity of nominations. Without this at present we assume the validity of nominations. Same level of granularity as currently provided for supply. Would like it instantaneous.
	Regional Linepack	On time linepack would be useful maybe not regionally. Please just publish at the same time each hour rather than different times within the 10 minute window.
RWE	Trading information	Need better visibility of when NGG takes buying/selling actions and exact time of transaction, volume and price. It impacts end consumer by not having data as the signals that NGG are sending to the market are not transparent - we have poor visibility of NGG actions within the day the only way we know if NGG have taken action is if their action sets SMP buy or sell. Without this information, we query DIE Balancing summary. We need the information when it happens.