

RIIO-GD2

An overview of our
Business Plan 2021-2026

PART 1: AN OVERVIEW OF OUR PLAN

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In this section

Here we introduce you to our business plan and explain how it was created, including an introduction from our CEO, a summary of what we will deliver and why our Board support it.

A message from our Chief Executive Officer

There is no doubt that we are in the most exciting and vibrant environment that the energy sector in the UK has faced in a long time. Of course, continuing to strive for real ambition in extending the very high standards of safety, reliability, customer service and value for money we have come to accept and enjoy, is accepted. However, we also all now recognise the need for us to do a lot more to help deliver the ambitions to limit society's impact on climate change and the wider environment. Whilst also ensuring that we protect those individuals and communities that we serve who are most vulnerable.

We fully embrace and support these challenges and the ever-increasing expectations that our customers place upon us. These match our own ambitions to be ranked amongst the very best companies in the UK and not just in the energy or utilities sectors. Together these objectives support and encourage a culture of innovation, efficiency and quality across the business as we constantly strive to extend the frontiers of performance.

This long-term ambition is what has taken us to the forefront of performance in the sector. Ofgem consistently benchmark us as the most efficient gas distribution network in the UK, our customer satisfaction scores at 9 out of 10 or higher and levels of network safety, reliability and environmental performance are higher than at any point in the past.

This business plan for 2021-2026 has been shaped by the most extensive consultation exercise in our company's history. More than 189,000 voices across the region have influenced our plan, and importantly 92% of customers have confirmed that they support the proposals they have helped to shape.

- Customers want us to strike the right balance between a high-quality service and affordable bills. We have answered this challenge, with a 8.6% real terms reduction in average domestic customer bills together with an ambitious programme of service improvement.
- Safety and reliability remain our customers' key priorities. From 2021, we will invest a further £800 million in our network, to ensure ever greater levels of reliability and safety. We will get the gas back on more quickly after a supply interruption, cut reinstatement times from five days to three, provide two-hour appointment slots for customers and offer a more streamlined, convenient connections service.
- Customers also told us they want us to be more ambitious in reducing our business carbon footprint and limit our impact on the wider environment. In response, we have developed a far-reaching programme that will see us create natural wildlife habitats on our sites and introduce new measures to reduce plastic wastage and eliminate waste from excavations. We have set out our ambition for our

direct activities to be carbon neutral – net-zero – by 2031. We will, make our vehicle fleet cleaner and greener, plant 40,000 trees in our region and source all our energy from green, renewable sources. Additionally, over the period to 2026, we will reduce gas leakage (shrinkage) by a further 23%.

- Our region contains some of the most deprived places in the country, and stakeholders want us to use our reach and resources to support struggling customers and communities – but without trying to do the job of dedicated third-sector organisations. In response, we will train our colleagues to spot signs of vulnerability and offer appropriate support and referrals. We will launch a hardship fund for customers in immediate financial need; introduce a dedicated hotline for customers on the Priority Services Register, and continue our Community Partnership Fund, which provides grants for life-changing grass-roots projects. This will see us, and our shareholders, invest £1m into the communities we serve to help those most in need.
- Value for money of course also remains a key focus for our customers. Through embedding the significant efficiencies made to date, proposing further improvements in productivity and a reduction in shareholder returns we are proposing a significant reduction in bills over the period. Compared to RII0-1, average domestic customers bills will be 8.6% lower over the five-year period to 2026.

With one eye constantly on the future, many of the customer outcomes and commitments we set out in this plan have been under development for several years and as such we are both certain of our ability to deliver and in almost all instances at no additional cost to customers. As such the Customer Value Proposition set out within this plan is significant - we estimate it will deliver over £90m of additional benefit to customers over the 5 years to 2026 when compared to 'business as usual'.

With the UK targeting net-zero carbon emissions by 2050, customers and stakeholders want us to continue to develop clean and sustainable forms of energy and to identify and deliver a very clear pathway towards this target. We recognise that the future of energy in the UK will become increasingly complex that will see a greater integration of energy systems, an increased role for data, smart systems and analytics that that leverage maximum benefit from the new technological solutions that will arise to meet these challenges. But also, a critical role for more established, but still developing energy technologies such as biomethane and heat pumps.

We have led the industry in the development of the case for role of hydrogen to replace natural gas, which can help deliver an affordable transition to a decarbonised UK.

This programme is at an exciting point, with around 700 of our customers being supplied with natural gas blended with up to 20% hydrogen as early as 2020 and several 'real-world' trials happening in the next regulatory period. These will put the theory into practice and complete the evidence base, to support government policy and decision-making on the appropriate pathways to net-zero by 2050.

Such an ambitious programme of service improvement is only possible because of the far-reaching reforms we have made across our business in recent years. These changes, which are detailed within the plan, have, against a basket of measures, placed us at the frontier of performance in the sector. Whilst also delivering and in many areas exceeding, all the commitments and targets set for the current regulatory period that ends in 2021.

We have attempted to leave no stone unturned in our efforts to ensure that our business is as efficient as it can be and measurably the most efficient gas distribution network in the UK. Using Ofgem's framework for assessing efficiency confirms that we have maintained that position consistently over the period since 2005.

Based on the total expenditure of each company, our analysis places us in a very strong position when compared to the rest of the sector – 6% ahead of the next most efficient Gas Distribution Network (GDN) or group of GDNs, 9% ahead of the sector average and close to 20% ahead of the least efficient in the sector. This creates long term value for our own customers through lower bills. Importantly, bringing all other networks into line with our benchmark levels of efficiency we estimate would reduce annual costs in the sector by £115m a year or £575m over the five-year period of RIIO-2 and delivering significant value for gas customers across the whole of the UK.

However, we have not stopped there and have included an ongoing productivity improvement of 0.5% pa within our expenditure forecasts – more than the forecast improvements in the wider economy over the same period. Cumulatively this delivers a further £18m reduction in planned expenditure over the period.

The ongoing support of our shareholders and their long-term commitment to our business and the communities that we serve, will remain a key feature of our success in RIIO-2. A strong ambition to be the best is matched by strong corporate governance and a prudent and conservative approach to the financial management of the business.

This has provided us with the flexibility to navigate a challenging financial landscape and support initiatives such as a direct shareholder investment of £30m to deliver the reforms mentioned above. We are now able to commit to an overall financial package that represents a 40% reduction in shareholder returns on a like for like basis whilst maintaining a financeable business over the period.

The journey to shape our business into the industry leading organisation we have today has been extremely challenging, but it has placed us in an enviable position.

The result is a plan in which we have great confidence and pride – a plan that quite simply delivers more for less and remains truly representative of priorities and aspirations of the people we serve.

It is vitally important that our stakeholders trust us to deliver on the promises and commitments included in this plan and our past performance helps to give confidence that we will deliver.

I would like to thank the many thousands of people who gave up their time to share their thoughts with us in the creation of this plan, through surveys, face-to-face interviews, workshops and the sector's first ever Citizens' Jury.

My thanks also go to our Customer Engagement Group (CEG), which has provided scrutiny, challenge and guidance at every stage of the process to ensure that we are delivering for our customers. I am delighted that the CEG will continue to work with us throughout the next period and play a central role in ensuring we exceed our customers' expectations.



Mark Horsley

Mark Horsley
Chief Executive Officer, Northern Gas Networks

1.1. A summary of our 2021-2026 business plan

We are in a period of significant change for energy in the UK. As we all progress towards our shared ambition of decarbonising the energy system in the UK, changes will be needed at all levels to achieve the target of net-zero carbon emissions by 2050. This business plan is set against this background and a clear pathway and the actions that we believe we, as a key part of the energy system, will need to take to help facilitate achieving this vision. Against the backdrop of this potentially significant and structural change in the industry some things also stay the same. The need to meaningfully engage with our customers and wider stakeholders to fully understand their requirements of us is now more important than ever. Our aim has been to ensure that whilst we have one-eye firmly on what is required of us in the longer term, we do not lose sight of the fundamental role we play today and during the intervening period.

1.1.1. Reducing customer bills

We recognise that affordable energy bills are a priority for all our customers. This business plan will deliver a £34m pa average reduction in revenue when compared to RIIO-1 – a £172m reduction over the five-year period when compared to RIIO-1. This will deliver an 8.6% reduction in average domestic customer bills which will fall from c.£139 p.a. in RIIO-1 to c.£127 p.a. in RIIO-2. This reduction will be made possible through:

- Embedding all the significant efficiency gains made over the RIIO-1 period into regulatory allowances for the period and delivering further productivity gains;
- A 40% reduction on returns available to our shareholders, from 6.7% (Real RPI) to 4% (Real, RPI).

This reduction will be delivered whilst maintaining the necessary levels of investment to deliver the level of network resilience and integrity that customers require, whilst also significantly increasing the levels of service that they will receive.

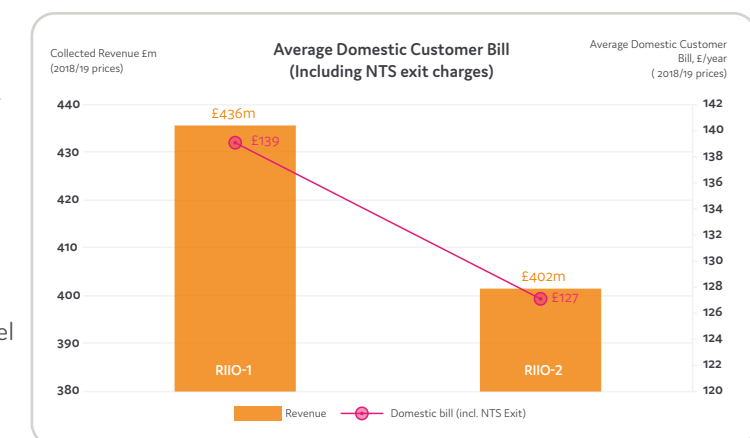


Figure 1.1: Average NGN revenue and average domestic customer bill in RIIO-1 and RIIO-2

1.1.2. Our track record

It has always been important to us that we have the support of our customers and stakeholders to deliver on their expectations. During RIIO-1 we have strived to illustrate that we can be trusted to deliver our promises during RIIO-2.

We will meet or exceed all the targets set for us during RIIO-1. We are one of only two GDNs that will achieve this outcome, delivering all of our outputs while delivering all the workload funded over the period leaving no cost or risk behind and no legacy issues carried forward into RIIO-2.

We are the most efficient gas distribution network in the UK. We have consistently ranked as the most efficient operator by Ofgem. Based on the total expenditure of each company, our analysis places us in a very strong position when compared to the rest of the sector – 6% ahead of the next most efficient GDN or group of GDNs, 9% ahead of the sector average and close to 20% ahead of the least efficient in the sector. We estimate would that these levels of performance would reduce annual costs in the sector by £115m a year or £575m over the five-year period of RIIO-2 and deliver significant value for gas customers across the whole of the UK.

We have achieved this position by being innovative in our thinking and directly and aggressively challenging industry norms and practices by bringing forward market-led, commercially focussed business solutions across almost every areas of our business.

We have been amongst the best performing GDNs for customer service since 2013, with an average satisfaction rating of 9.1 out of 10. In every aspect of our operations we always put our customers first. We have sought to understand our customers better and improve our services by benchmarking ourselves outside of the sector and bringing initiatives into our business from other industries. Our award winning customer service and community engagement is globally recognised.

We have continually sought to do the right thing and voluntarily introduced minimum standards of performance across key elements of our business and doubled the level of compensation for customers when we fail to meet their expectations. We have a strong social ethos and are committed to supporting struggling customers and communities wherever we can.

This has included helping to establish hubs in rural areas where socially-isolated customers can go for warmth and company; training customer care colleagues to spot signs of vulnerability and provide appropriate support; working with experts to deliver energy audits and money-saving advice in customers’ homes and launching a community grants programme for grass-roots schemes which make a difference.

Our environmental performance in our day-to-day operations has delivered significant, through greener work sites, offices and vehicles and a pipe network that is less prone to leaks. We have dramatically improved the amount of spoil we recycle or reuse on our worksites, and used innovative working practices, such as using solar-powered pumps to clean up contaminated land on former gas holder sites.

By the end of RIIO-1 we will have 17 biomethane facilities connected with a combined capacity of 17,000scmh, enough energy to heat over 60,000 homes a year. Through a targeted investment programme in mains replacement and pressure management capabilities to date in RIIO-1 we have reduced the amount of leakage from our network by 18% which represents a reduction of over 400,000 tonnes of CO2 emissions. Our work in the field of research into hydrogen through projects such as Hydeploy and H21 and other forms of sustainable energy has established NGN as an expert with an international reputation. We have used this knowledge to support regional businesses with their own green ambitions, and to lead the national conversation. This work provides the key evidence to make informed policy decisions on key aspects of the net-zero pathway during the RIIO-2 period.

1.1.3. A plan developed in partnership with our customers and stakeholders

To ensure we are getting this balance correct, the engagement programme for our RIIO-2 business plan has been the most far-reaching and detailed we have ever undertaken. Rather than defining the agenda ourselves, we asked customers and stakeholders to tell us what they wanted to talk about, and how they wanted to engage with us. We used a broad range of mechanisms, from online surveys to one-to-one interviews, to reach 26,000 stakeholders in the process. We were the first energy distribution company to create a Citizens’ Panel – a 50-strong, demographically representative group of customers who deliberated on key aspects our plan.

Through a targeted and sensitive approach, such as interviews in customers’ homes, we also engaged seldom heard and hard-to-reach voices. Alongside RIIO-2 specific engagement, we utilised the wealth of information available to us through our business-as-usual operations – close to 115,000 enquiries, 38,000 customer satisfaction surveys and nearly 10,000 complaints. Throughout the process, we were challenged and supported by our Customer Engagement Group (CEG). With membership drawn from across the stakeholder community, the CEG helped us refine the consultation process, scrutinised and challenged successive drafts of our business plan, and observed the consultation process in action.

In acceptability testing research, 92% of customers told us they found the resulting plan acceptable, with this number rising to 96% among future customers. Although stakeholder expectations vary, they are united by five core priorities, which underpin our plan:



Safety: providing a safe gas supply is most stakeholders’ top priority

Reliability: stakeholders want reliable, uninterrupted supplies and want us to focus on minimising disruption to their lives

Value for money: bills should be no higher than necessary and services should be affordable for all

Protecting the environment: reducing the environmental impact of our operations is of increasing importance

Preparing for the future: play an active part in the UK’s transition to a low carbon future

We have received strong support from our customers and stakeholders that would like this approach and level of engagement with the business to continue. We have committed to an enhanced programme of stakeholder engagement throughout RIIO-2 with an enduring role for our CEG and our Citizen’s Jury. We will act and feed back on the issues that we hear and hold an annual stakeholder conference on the impact of stakeholder views on our business.

1.1.4. Our RIIO-2 outputs: highlights

Our RIIO-2 business plan contains a total of 64 outputs, all with associated performance targets.

These outputs span three core themes:

- Meeting the needs of customers and network users
- Maintaining a safe and resilient network
- Delivering an environmentally sustainable network

All 64 outputs have been influenced by our extensive stakeholder and customer engagement programme. They are ambitious, bespoke outputs, and are aimed at improving service delivery and setting new benchmarks for our industry, at no additional cost to our customers.

Through these outputs, we will deliver £90 million of additional value to our customers over the next five years. Several bespoke outputs are focused on improving customer convenience and removing commonly-cited frustrations. For example, we will reduce reinstatement times from five working days to three calendar days, so that excavations are filled in more quickly. We will also commit to restoring gas supplies to customers appliances (not just their gas meter) within set timeframes.

Where we fail to meet guaranteed industry levels of service, we will pay customers double the amount of statutory compensation – reflecting our determination to treat our customers fairly at all times. 10 outputs are specifically focused on improving services for vulnerable customers , in line with our strong social ethos. For example, we will introduce a new £150,000 per annum hardship fund, paid for through a direct contribution from our owners, and launch a 24 hour hotline for customers on the Priority Services Register.

We will reduce our business carbon footprint by 47% by the end of RIIO-2. From reducing vehicle emissions to planting 40,000 trees, we will implement a far-reaching environmental programme, with the aim of having net zero carbon emissions by 2031. Crucially, our full suite of outputs will be delivered at no additional cost to the customer. Bills will fall by 8.6%, compared to RIIO-1 levels.



1.1.5. A sustainable plan for the future

The business plan is set against a background of a changing energy landscape and the challenges presented by the target of net-zero by 2050. We have developed a clear view of an appropriate pathway to this target and sought to ensure that we maintain the flexibility to adapt to an evolving environment whilst ensuring that costs for customers are minimised.

A whole systems approach that facilitates strong collaboration and integration across utilities, operations, markets and supporting processes forms the basis of our strategy and plans to deliver the sustainable energy solutions required to meet these targets. The plan builds upon the significant progress we have made during RIIO-1 with our industry leading research projects such as Hydeploy, H21 and Integrel. We have set out our plans and actions for RIIO-2 that will significantly advance the progress to wards net-zero over RIIO-2.

The business plan is built upon a common scenario of the future developed collaboratively with energy distribution and transmission companies across the industry that sets a consistent and whole systems view of future demand on the UK's energy system.

1.1.6. Driving efficiency & change through innovation

Innovation has been key to our success in RIIO-1, allowing us to enhance service delivery and save money. From introducing new robotic systems which avoid the need to make large excavations in the road, to developing tools to clean up ‘muck and mess’, we have taken a wide-ranging and imaginative approach.

In RIIO-2, we will continue to innovate across all our activities, as well as investing over £11m in projects related to support the energy system transition and improving our services to vulnerable customers.

Our approach will include:

- Keep bills affordable by using innovative technology and processes to reduce the costs associated with running our network;
- Improve the customer experience by developing quicker, less intrusive and greener ways to deliver our core network services with focus on the needs of vulnerable customers;
- Inform policy decisions on future decarbonisation of the energy sector, through projects that demonstrate the contribution that can be made by green forms of gas, such as hydrogen and biomethane, in a whole systems energy landscape; and
- Improve the way we manage our network by creating a modern, data-driven organisation enabling the opportunity for evidence-based decision-making that is predictive, automated and technology driven.

1.1.7. Delivering value for money

We will be continuing to invest in our network and wider business during RIIO-2 to ensure we can deliver the resilience, integrity and service levels that customers expect from us. Our network is now safer, more reliable and has a lower environmental impact due to the ongoing significant investment we have made during RIIO-1. However, to maintain network risk levels, we will be investing a further £800m over RIIO-2 and spend a further £440m in operating and maintaining the network.

These levels of expenditure are based upon our industry leading levels of cost efficiency and include a commitment to a further 0.5% pa improvement in efficiency over the RIIO-2 period which will deliver a further £18m in cost efficiency for customers.

Our expenditure plans fully support the delivery of the outcomes, priorities and preferences that have been clearly relayed to us via our enhanced stakeholder engagement programme. We have shaped the largest element of our investment plans, our mains replacement programme, to directly reflect stakeholder preferences for increased safety, reliability and environmental performance and increased our investment in replacement of large diameter mains to deliver this outcome.

Each element of our planned programme has been analysed in detail to ensure it is delivering maximum net value for our customers. Comprehensive sensitivity analysis and optioneering of investment solutions have been supported by cost benefit analysis and Network Asset Risk Measures (NARMs) to provide a robust and fully justified programme.

We are proud to have led the performance frontier for the Gas Distribution Networks in the UK over the last 15 years. The transformation of almost every element of our business during the RIIO-1 period means we are better placed than ever to meet the ambitions and expectations of our current and future customers. Our workforce, supply chain, systems, processes and organisational culture means we are certain of our ability to meet the challenges we will face.

However, we believe more can be achieved. We strive to continue lifting the industry’s definition of frontier performance. We are excited about providing better value for money to our customers and improving the customer experience, as well as the efficiency, safety, reliability and environmental performance of our network.

The energy and drive to succeed comes from within our colleagues and their pride in delivering an industry leading set of services to our customers and communities. We will continue to push the boundaries of performance in the energy industry and keep giving our customers a world class service. Our aim is to keep providing stakeholders and the industry with an example of what is possible.

‘This represents the most ambitious and innovative business plan we have ever developed.’

1.2. Board assurance statement

Our business strategy remains to consistently provide, develop and maintain a safe, affordable and secure distribution pipeline system, for the provision of energy supplies to the people and businesses within our region. This business plan represents the foundation of our business over the next five years and beyond. It has been our focus to ensure that it is underpinned by our core values and continue ‘doing the right thing’ for our customers in the short and longer term.

1.2.1. Business planning and NGN Board engagement

The plan has been developed over the last two years and the NGN Board and its members have engaged in every step of the process. Our business is underpinned by a strong and well-established compliance culture which the Board directly monitors through its risk management, audit, treasury and compliance committees. We have been collectively and individually actively engaged in the development of our plan:

- Our Chief Executive Officer and Executive Board member, Mr Mark Horsley, has overseen the day to day development of the plan through his executive function;
- This role has been supported by an NGN Board appointed RIIO-2 Steering Group comprised of both Board members and appointed representatives. They have played a vital and detailed role in reviewing, challenging and shaping the plan and updating the wider NGN Board throughout this process;
- We have collectively reviewed, challenged and shaped the elements of the plan and specific risk areas regularly at our Board meetings and Committees;
- Our two independent, Non-executive Directors have played a critical role in this process. Mr John Burnham was a full-time member of our NGN Board appointed RIIO-2 Steering Group providing direct challenge on the ambition and efficiency of the proposals. Mr Paul Rogerson provided a direct link to the NGN Board for the Chairperson and members our Customer Engagement Group (CEG) on the issues raised by our extensive engagement programme.

Our Board and customer engagement programme, combined with the completion of our assurance programme described below, has enabled us to provide high quality challenge, ownership of the overall strategy and provided the direction of the plan in the short and longer term.

As a result, we are satisfied that this represents an overall robust and deliverable plan that is of the highest quality - underpinned by an assurance framework and governance processes designed to deliver high-quality data.

We believe that the business and this business plan is based upon a strong understanding and is resilient against the key risks over the RIIO-2. We have a robust and long-established Risk Management framework for assessing and managing risks to the business which we review as a Board on a regular basis.

1.2.2. Ambitious commitments underpinned by robust assurance

Our approach to assurance of the business plan is based upon our robust assurance framework that is used for all our reporting and has been guided by our overarching Regulatory Reporting Policy for the business and the supporting Data Assurance Guidance ("DAG") processes which are operated in NGN overall regulatory reporting.

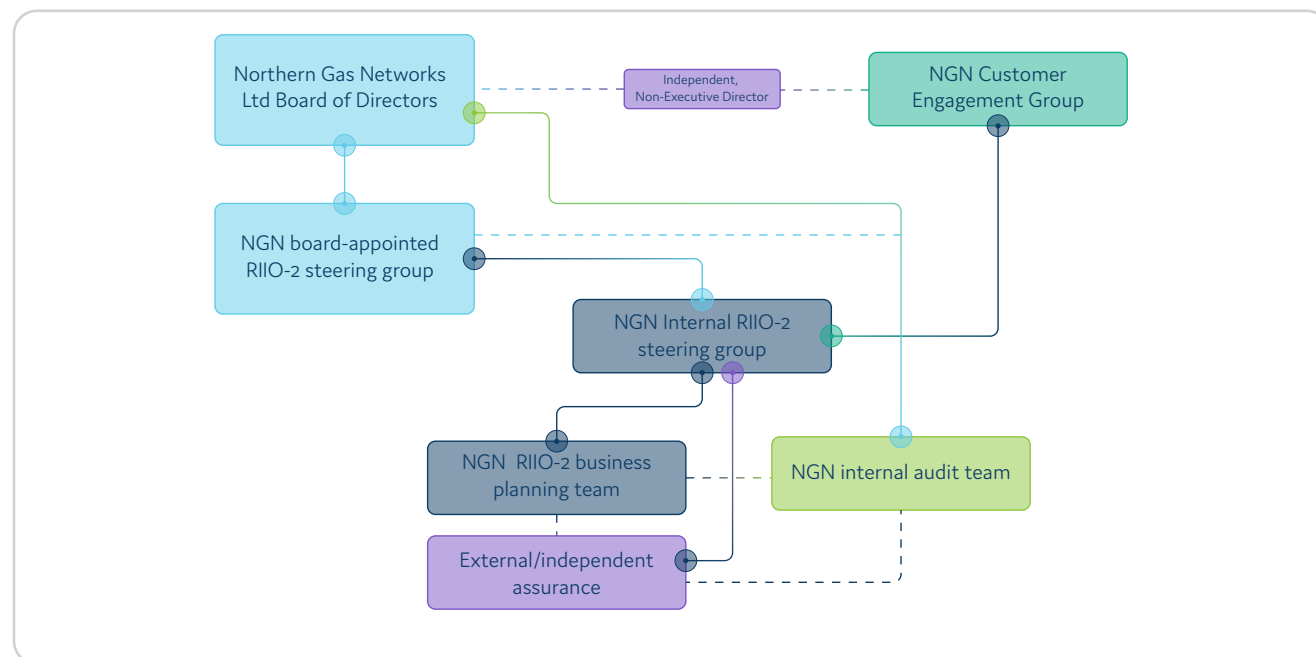


Figure 1.2: Average NGN revenue and average domestic customer bill in RIIO-1 and RIIO-2

We approved our RIIO-2 governance and assurance framework in 2018. This included approval of the objectives of the framework and a high-level assessment of the evidence points that would be used to provide that assurance.

The framework provides comprehensive coverage of the key aspects of the plan. Areas that were assessed as medium or high importance were subject to independent assessment to validate our proposals and conclusions, using both internal and external assurance providers targeting specific business knowledge and/or specific technical skills to ensure appropriate oversight. The work performed by external providers included a review of NGN's DAG processes over prior reporting to provide an independent opinion on the adequacy of these processes which have then been used to inform the assurance framework operated over the RIIO-2 business plan. The framework was managed by our internal RIIO-2 Steering Group.

On completion of the governance and assurance process, prior to finalising our RIIO-2 business plan for submission, we appointed Ernst & Young to perform further and final checks to confirm to the Board that all aspects of the pre-agreed assurance programme had been fully and satisfactorily completed and thus provides assurance that a robust and auditable quality assurance process has been followed in developing this plan. Having approved the assurance framework, reviewed the assurance findings and management's response, we have collectively satisfied ourselves that the assurance undertaken demonstrates that:

- The business plan has been informed by customer engagement and by feedback from our CEG about the quality of that customer engagement and how this has been incorporated into our plan;
- The outcomes and output commitments made within the plan are deliverable;

- The outcomes and performance commitments reflect customer needs and preferences and are ambitious;
- Is built on expenditure forecasts that are efficient which have been produced using a robust and efficient process.

Additionally, we have considered the assurance statement required by Ofgem under paragraph 4.117 of the "RIIO-2 Sector Specific Methodology Decision – Finance", dated 24 May 2019, and paragraph 3.28 of Ofgem's Business Plan Guidance, dated 31 October 2019. In response to this requirement, we have collectively satisfied ourselves that NGN would be financeable during the RIIO-2 price control period on both the notional and actual capital structure based using the Ofgem SSMD working assumptions, and that all applicable measures to aid financeability have been considered.

However, this assurance should not be interpreted as the board's acceptance of Ofgem's financial framework and the proposed working assumptions for cost of capital allowances nor that the business plan would be financeable beyond the RIIO-2 price control period. We continue to disagree with Ofgem on several of their SSMD working assumptions including Cost of Equity, Cost of Debt and the inclusion of an expected incentive outperformance. We have set out our justification for these differences in our attached appendices which also includes an appendix to this document that sets out the results of the financial and financeability analysis based on NGN's own base assumptions.

Our track-record over the period since 2005 provides a strong reference point for the level of commitment that we have in delivering on our promises to our customers and seeking to continue to push the frontiers of performance and exceed expectations. The focus of the Board will continue to support NGN in its ambitions through significant investments and innovations in the network, supporting infrastructure and people aimed at improving the performance of the business in both the short and longer term.

Our measure of success for the business over the RIIO-2 period will be NGN's performance against the commitments set out within the regulatory contract with our customers. The significant development to the terms and conditions of NGN's employees we have overseen during RIIO-1, means that we are very well placed to ensure that individuals at all levels of the organisation now face the right financial incentives to deliver on these commitments during RIIO-2.



Andrew John Hunter
Chairman, Northern Gas Networks