



CEG

**Customer
Engagement Group**

NGN CEG Report 2021/22

30 June 2022

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1. Chair's Introduction and summary

This report summarises the work of the CEG during 2021/22 and reflects on how NGN has delivered the commitments made to customers and stakeholders during the first year of the RIIO-GD2 five-year price control period.

Our last report (June 2021) focussed on how NGN had been preparing for the start of RIIO-GD2 and its readiness to deliver its commitments for 2021-2026. We were satisfied that NGN had made good progress ahead of the start of RIIO-GD2 and by April 2021 it had a clear set of objectives to drive delivery of outputs for 2021-22.

I wish to thank my fellow CEG members for their continuing diligence and commitment. We remain fully focussed on ensuring that the needs and preferences of customers and stakeholders, are at the forefront of decision-making within NGN. The CEG members bring expertise and experience from across the necessary disciplines required for our role. I also wish to thank NGN's Chief Executive and senior team for the professional way in which they engaged with us. This ensured that we received all of the information requested in a way that was digestible, and yet comprehensive enough to allow us to challenge and probe in a meaningful way. NGN has also continued to provide the secretariat for the group which continues to be a most welcome support.

The aims of this report are to provide Ofgem, NGN and its customers and stakeholders with a concise view of how the company has considered stakeholder views to shape its more detailed delivery programmes, leading to meaningful benefits and outcomes.

We seek to represent the best interests of stakeholders and customers and recognise the firm commitment from NGN to work with us to that end.

We hope you find this report interesting and if you have any feedback, we'd love to hear from you. Please email ceg@northerngas.co.uk

Summary

Overall, we consider that NGN prepared well for the start of RIIO-GD2, and in this report we have been able to make many positive observations about what the company is doing to drive forward delivery on its vision and commitments in what has been, and continues to be, a challenging environment for the industry, its customers and stakeholders.

Key topics we focussed on included support for customers in vulnerable situations, the Environmental Action Plan, Innovation projects spanning technical, social and future

energy systems, digital and data systems and workforce resilience, and of course stakeholder engagement activities. **Our main observations are set out below, but please look to the main body of the report for context and detail:**

- The Company undertook to deliver shareholder-funded commitments on higher customer service/compensation standards, and we have seen promising action to deliver the outcomes these commitments are intended to achieve
- A re-focus of NGN's Innovation Strategy on customer benefit and a genuine push to maximise securing additional funds is enhancing the Company's work in this crucial area
- NGN has a strong focus on the transition of the gas network from methane to hydrogen and notably has been working hard on public engagement across generations to improve its own understanding of what's important to, and how to communicate with, different groups
- On customer service and vulnerability, the Company treats regulatory requirements as a minimum and seeks to understand what good looks like from a customer perspective
- We have been particularly impressed by its work to support customers in vulnerable situations
- We saw the Company embrace a number of areas of activity (underpinned by stakeholder engagement) which will help drive forward NGN's environmental vision, including a supplier code of conduct, the development of the format and content of an annual environmental report, and emissions reduction from its fleet of vehicles
- Good progress has been made on data and digital issues, including a significant transformation of the digital team, and work on cyber security
- In the area of workforce resilience we note some further encouraging developments, including its approach to inclusion and belonging and mental health and well-being;
- Importantly, on stakeholder engagement, the Company has a wide range of engagement channels and mechanisms, and these were delivered appropriate to stakeholders' preferences and capabilities. Young Innovators Council has been particularly effective and has demonstrated how engagement can lead to better engagement. In terms of feedback to stakeholders and customers, we particularly liked the 'You said, We did' approach taken to the Customers In Vulnerable Situations working group, and which has been adopted more widely

Observations on areas for future focus and follow up include the following, some of which NGN can have significant impact on and some which require broader national consideration:

- Affordability and resilience in the face of the cost of living crisis and other global and local issues
- The potential for many more households to move into vulnerable situations. We have issued 2 further challenges to NGN in this area
- Policy uncertainty around the future of gas
- The potential impact of wider geo-political turbulence on future investment
- The importance of Local Area Energy Plans for businesses such as NGN and for its customers, and the challenges that NGN, local councils and others face in ensuring they have the necessary resources to deliver regional priorities
- Better recognition of the opportunity of Biogas nationally and its blending in the network especially given its positive impact on the energy security agenda
- A continued push on low carbon vehicle replacement with other utilities and organisations
- Fuel Poverty Network Extension Scheme (FPNES) targets remain challenging for all GDNs due to policy changes in funding first-time gas central heating. We would urge OFGEM to closely monitor the feasibility of the FPNES licence obligation. Alternative social measures should be devised
- Delivering innovation projects while still horizon scanning for future opportunities may require additional resources
- NGN's performance in complaint handling is well managed and consistently provides results in the upper ranges but we have been encouraging the Company to also focus on reducing the number of complaints it receives so improving company experience without the need for recourse to the Company. It has done this, and we are seeing good results, which we hope will be sustained but recognise the challenges ahead
- Benchmarking for the industry leading approach around cyber security would be useful for the Government to implement
- NGN is still a male dominated company and while recruitment policies have been actively reviewed there is no quick fix
- Monitoring of the impact of the widening of recruitment to a broad geographical area and the use of flexible working patterns and remote working should be maintained to encourage and deliver DEI goals
- On costs and prices, we are urging the Company to consider what more it can do to help struggling families

2. Policy Context and issues impacting on NGN

There is no doubt that this year has seen huge turmoil in energy with the greatest level of disruption nationally and globally for many years. This has been brought about by a number of factors, not least the Russian invasion of Ukraine.

Achieving net zero and decarbonising the UK's energy systems continued to be the main drivers of UK energy policy. The Committee on Climate Change published its 6th Carbon Budget in December 2020 and it reviewed progress towards its fifth carbon budget and the challenges ahead to meet the statutory 2050 target and interim milestones. Continuing pressure to go faster towards net zero has also come from other sources and, following delays in energy policy, there were a flurry of statements, strategies and policy proposals from Government that will shape the future of heating, power, and transport – and the use of gas in the energy system.

There was major upheaval in the UK's energy retail markets with 25 supply companies serving 231,000 NGN customers going out of business between August 2021 and February 2022 leaving debts to be recovered via Ofgem's **Supplier of Last Resort (SoLR)**.

Whilst SoLR protects individual customers impacted at the time of their company's collapse, the costs are recovered at a later stage across all dual fuel domestic customers via network charges and NGN has been working with suppliers and Xoserve to make arrangements to pass on these costs.

Total national industry claims of £1.83bn through SoLR were reported to us in February, with a total of £825m (45%) allocated to gas, and £95.6m for NGN.

Gas charging methodology was amended in January to enable costs to be based on usage, not a fixed amount per customer, to reduce the burden on lower income/low user households. In 2022-23 NGN customers will pay on average £38.45 and a further £500m anticipated costs on both gas and electricity will be passed through in 2023/24.

Additionally, a further 112,000 NGN customers have also been impacted by Bulb Special Administration and no buyer has come forward to acquire that company and take on the debts which the Government is currently underwriting.

Policy uncertainty over the future role of gas remains, but the Government provided an indication of how it sees the potential use of hydrogen and pathways for decarbonising heat in buildings. These announcements were accompanied by new innovation funding and opportunities for NGN to test and trial both technical changes and stakeholder opinion

and reaction to net zero solutions. The NGN innovations team have responded to that opportunity over the course of the year.

A significant amount of NGN Board and senior management time has been devoted to the **hydrogen** agenda. Important as this for the future of the company, the CEG has ensured that sufficient attention has also been paid to delivering the promises set out in the business plan.

The **cost-of-living crisis** that is affecting millions of lower income households has resulted from a range of factors. Temporary uplifts in Universal Credit during the pandemic phase of Covid-19 were withdrawn and many households had become reliant on the additional £20 a week to balance fragile budgets. Inflation has been increasing – in part driven by global energy prices and these impact struggling households most acutely. Most starkly domestic energy customers, who saw an average 20% increase in prices announced in October 2021, and a 54% average increase from 1 April 2022, are now bracing themselves for a further massive increase from 1 October 2022. Fuel poverty campaigners, think tanks and service delivery bodies are reporting increased levels of fuel poverty and have been advocating additional support from Government and through company initiatives.

Whilst we have not seen any evidence, the CEG is considering whether the **wider geo-political turbulence** and policy uncertainty will impact investment decisions in energy systems, and this is an area we shall explore in the coming year to ensure the planned investments are made where needed to ensure safety, affordability and resilience.

3. Regulatory Framework

There is no statutory requirement for NGN or the other gas distribution companies to retain a CEG and therefore no formal guidance was issued by the regulator. There was, however, a set of recommendations issued by Ofgem in November 2021 to the companies on the role they wished to see the CEGs play and their expectations of reporting by the groups.

We therefore reviewed our Terms of Reference (TOR) which we had deemed appropriate for the transitional year leading up to the start of RIIO-GD2.

We aligned our role and functions to deliver the outcomes Ofgem had recommended to help the company design and evolve approaches to consumer engagement and challenge activities.

These include scrutiny of:

- Commitments in the business plan that Ofgem do not monitor through the Regulatory Reporting Packs (RRPs)
- Company performance in areas of the RRP where there is a particular need for consumer insight, e.g. areas that have a significant impact on consumers and stakeholders
- New and emerging consumer issues that may need to be reflected in the development of the RIIO-GD3 price control
- Key price control reopener projects, particularly those that are likely to have a strategic impact

Ofgem also indicated that it wished to see periodic and independent reporting by the CEG to the company which should be made public so that best practice can be shared with other CEGs and used to help drive improvements in performance across the sector. Any specific arrangements needed to ensure that the consumer voice is shaping company board level decision-making were also to be identified.

A copy of the revised TOR was published on our website and this report seeks to follow Ofgem's recommendations as appropriate.

4. CEG work programme summary

Over the course of the year, the CEG engaged constructively with the company through a focussed set of activities. We have maintained **a programme of bi-monthly meetings and regular subgroup and deep-dive sessions**. We have also continued to observe stakeholder engagement events reported on below.

In relation to the recommendations from Ofgem we can confirm:

- There was only one regulatory Reopener in 2021-22, and our work programme remained as planned at the start of the year
- The Chair of the CEG engaged with the Non-Executive Director who was nominated the key CEG contact on the Board of NGN. He attended our meeting on 4 April 2022. To ensure increased Board sensitivity to issues concerning customers, we agreed a schedule for engagement with the group 3 times a year commencing in 2022-23 with a review of our RIIO-GD2 first year report findings
- NGN's Chief Executive attended each of the groups' bi-monthly meetings to provide an update on issues most impacting the business and potentially impacting customers
- A review of the business plan took place with the senior NGN team in the light of emerging themes including changing regional ambitions, major hydrogen and other

energy future developments, cost of living crisis and the adequacy of NGN's response. Whilst the strategy remains fundamentally unchanged, new priorities have **emerged for 2022-23 including resilience, affordability and delivering regional priorities**

CEG members attended 25 external (almost entirely virtual) events to observe engagement events and programmes and provided feedback to NGN and the full CEG group.

All of our CEG meetings have been virtual – in line with NGN's response to the safety of its staff and stakeholders, which has unfortunately again limited our ability to undertake site visits and witness delivery first-hand.

Out of scope for us this year has been the Repex programme. Whilst this represents the largest amount of investment by the company, it is a requirement overseen by the Health and Safety Executive where stakeholders are less able to influence the outcomes. We do, however, intend to review performance in the coming year in the context of customer value, safety and resilience.

5. NGN delivery of its commitments

We were mindful that 2021-22 is the first of the 5-year RIIIO-GD2 price control period and that outputs for this period are not necessarily linear.

At the end of the year the CEG received a summary of how far NGN had delivered its commitments and target outputs for the year. Whilst most were on track and some had been exceeded, there were some challenges in meeting the target for FPNES, and low carbon vehicle replacement. Whilst this latter target will be made up in the coming year, the FPNES targets remain challenging for all GDNs due to policy changes in funding first-time gas central heating. This is reported on further in section 11 below. We would urge Ofgem to closely monitor the feasibility of the FPNES licence obligation given government policy and the lack of funding for first-time central heating schemes. Alternative social measures should be devised.

There were a number of commitments that NGN pledged to deliver that weren't included within the final financial agreement with Ofgem. These higher customer service/compensation standards rely on shareholder funding. We reviewed how far those commitments were being met given there was no regulatory requirement to do so.

We were pleased to see that most pledges were being developed or delivered, or alternative services were meeting the desired outcomes. We shall however keep these under review.

The Vision statement at the start of GD2 was revisited, and stakeholders were consulted on what a new vision might focus on. There will be more work with stakeholders in 2022 to make the vision more meaningful to customers based on a wider exercise to refresh the company's business strategy. Early discussions suggest the strategy remains appropriate, although some issues have come more to the fore for customers and the company that will have a greater focus in the coming year (e.g. affordability, moving more quickly to future energy systems, and regional priorities).

6. Innovation

With encouragement and support from the CEG, NGN re-configured its innovation strategy to place a clear focus on customer benefit, additionality, and the appropriateness of funding streams. The decision-making process was also significantly enhanced, with representation from across the business in the voting process and enhancements in the level of sponsorship (and detail of presentations) evolving during the course of the year. However, the approved innovation allowance funding for vulnerable customer innovation was a much lower amount in 2021-22 (£275,243) than the average annual budget (£800,000) across RIIO-GD2, and we will be monitoring more closely the development of the pipeline of proposals and the decision-making processes in the coming year.

Customer and stakeholder priorities were acknowledged via many of the projects presented to the 'Think Tank' which is Chaired (on an independent basis) by a CEG member.

The CEG welcomed the notable success of NGN in respect of the Strategic Innovation Fund (SIF) where 5 projects were approved, including digitisation, the highly innovative Customer Energy Village and the potential use of hydrogen in heavy duty transport. Ref: <https://www.northerngasnetworks.co.uk/2022/03/02/ngn-granted-500k-ofgem-funding-for-five-innovation-projects-accelerating-net-zero-transition/>)

During the year the company underwent a shift towards more proactive engagement with publicly funded research and innovation programmes and was successful in securing additional funds. This had been strongly encouraged by the CEG and has led to a much-enhanced innovation programme. The challenge for 2022 and beyond will be in delivering the programme whilst still horizon-scanning for new opportunities.

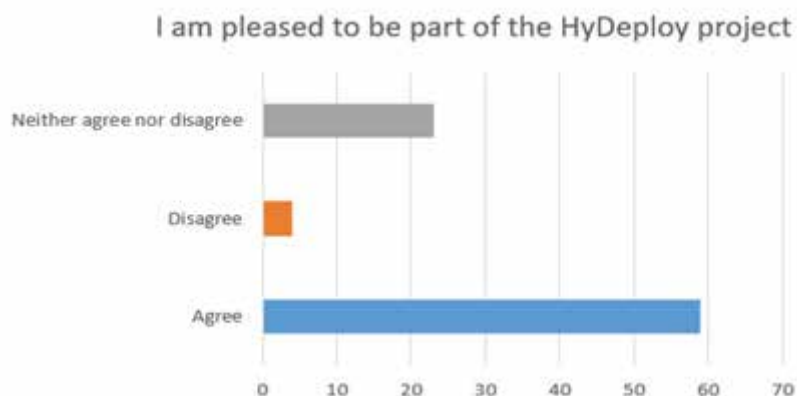
Innovation is not a stand-alone topic and we comment on specific areas of innovation in other sections of the report.

7. Future Energy

Over the past 12 months the future networks sub-group reviewed plans to transition the gas network from methane to hydrogen, with many projects in planning coming to a reality. Our scrutiny of these incremental “gas goes green” projects, is focused on understanding how a hydrogen future network impacts customer safety and bills alongside the benefits of decarbonisation.

The Hydrogen House is the focal point of public and political engagement in the transition to hydrogen as an energy source for domestic use. It has attracted a good number of visitors including from schools and colleges, and we were particularly pleased to see the Young Innovators Council attend in person for a meeting and visit. We observed this group which provides a key feedback mechanism to NGN from a future customers point of view. NGN’s public engagement across generations has given them some excellent feedback and understanding around what’s important and how to communicate to these different groups. The Hydrogen House has been an excellent conversation starter around the move from methane to hydrogen to provide energy to homes and businesses. The project has allowed NGN to establish effective communications with a wide range of stakeholders including the local community and youth groups, as well as industry.

Hydrogen blending trial – HyDeploy is a hydrogen blending trial at Winlaton, Gateshead in Tyne and Wear, which started on the 4th of August 2020 for 668 homes, a primary school and a few small businesses. Public engagement with impacted customers was undertaken. The main concerns expressed were around safety and billing implications for the project as there was no opt-out possibility due to the nature of the network. This will be different for the hydrogen/net zero village trial which is under development and where an alternative heat source for residents will be required if they do not want to use hydrogen. Using the small level of dissatisfaction from the HyDeploy project will give insight into the reasons why people may opt for a non-hydrogen solution. **The chair of the CEG attended a meeting with residents at the Hydrogen House along with Ofgem and senior NGN leaders, to help facilitate a discussion on HyDeploy, the feedback from which will inform future projects for NGN, Ofgem policy and other UK hydrogen trials.** NGN received significant local and national media coverage for this trial and is better positioned within the gas sector as an effective innovator.



Customer Energy Village is a joint project with Newcastle University, National Energy Action and North East Energy Catalyst. The project secured £1.96 million from the North East Local Enterprise Partnership (NELEP) through the Local Growth Fund and Getting Building Fund. The construction started in February 2022 and will allow different types of energy solutions to be assessed in order to identify a variety of options that will work across the wide range of homes in the UK. This project will support future customer options (what's right for their property). The CEG provided input into the planning and tendering phases to ensure stakeholder and customer views were being considered and we will provide oversight and challenge going forward to ensure this important project returns maximum customer benefit.

Future networks and stakeholder groups - Many of the future network focus areas have been brought to public forums for discussion and challenge. CEG members observed discussion on NGN's hydrogen strategy, the Hydrogen House and the Hydrogen Village/Town proposals. Questions and challenges focused on safety concerns, the cost of the transition (boiler and appliance replacement) and where the hydrogen was coming from and its associated carbon footprint. The plan to included more public engagement through these groups and developing a specific Hydrogen Village stakeholder plan is welcomed by the CEG.

Hydrogen Village Whilst this report was being written it was announced that NGN and Cadent had both been successful in their bids to develop their plans for Hydrogen Village trials. The CEG will be actively engaged in scrutinising the development of the plans with local stakeholders in the coming year.

Local Area Energy Plans (LAEPs) bring the whole energy system together, they are being developed by local government and councils, with input from Northern Gas Networks to a number of the plans across their region. The CEG has strongly supported active engagement with the LAEPs and is involved with this important process and will continue to observe LAEP development to see how NGN supports a good mix of options to the

benefit of the customer. We remain concerned about the volume of work required to produce high quality and meaningful LAEPs. Working alongside Northern Powergrid under a code of practice will assist in coordinating action but additional resources for local authorities will be needed to ensure smart local energy systems for the future.

More generally, NGN will need to continue to build its team to deliver its increasing numbers of projects.

Biomethane We consider that Biogas and its blending in the network needs to be more prominent given its positive impact on the energy security agenda. This seems to be taking second place to hydrogen, and we will be encouraging NGN to continue to look for opportunities to support entry of biogas into the network. Wider innovation will continue to be needed around blending technologies, for example sensors, that might impact on the decarbonisation of the network infrastructure.

8. Customer Service and Vulnerability Strategy

CUSTOMER AND VULNERABILITY STRATEGY

The CEG has been impressed with the way that NGN sought to treat any regulatory requirement as a minimum and to understand what good looks like from a customer perspective. The CEG has also been impressed with the way in which NGN has translated this into a strategy that focuses on those who are most in need.

NGN has demonstrated a strong social ethos and a commitment to supporting both customers and communities in vulnerable situations. During RIIO-GD1 the focus was on implementing and embedding practices that supported through individual means and also supported communities through collaboration and partnership working. The company used external accreditation and audit to ensure the strategy was targeted and achieving results. This ethos continued into the RIIO-GD2 business planning process. During this time, stakeholders emphasised the point that NGN must not seek to replace or replicate the work of others more qualified to deliver certain services. They were clear, for example, that NGN is not a Local Authority or the NHS, a fact that the CEG has endorsed to ensure that the work of NGN is appropriate and complementary, and ensured that this is a golden thread running through the development and delivery of the strategy in the last year.

NGN's strategy included ensuring that no vulnerable customer is left behind. The CEG actively encouraged NGN to refine this to ensure that customers most in need are supported first, and that their needs are top of the list, while at the same time focussing on vulnerability as a whole. NGN embraced this ethos and worked with stakeholders and

within the CIVS workshops to find ways to keep vulnerability front-of-mind across the business.

The CEG has supported various initiatives within the strategy and has provided scrutiny and challenge to ensure customers' needs are met, particularly in these difficult times. Changes to the strategy have come, in large part from data, evidence, etc. as might be expected, but also from our deep-dive sessions and from our influence in the planning and delivery of the CIVS sessions to ensure stakeholders' time is used to best effect.

Our involvement has resulted in changes to practice such as NGN focusing more on the evaluation of projects it has funded. This evaluation sought to understand where/how projects could be replicated at minimal/no cost, where and how communities could help sustain initiatives themselves, so projects could become enduring once the funding ceased and to understand how other partners could support or develop projects for the benefit of other customers/communities. It also resulted in a greater focus on the Social Return on Investment (SROI) of both engagement and funded projects as described elsewhere in this report. Involvement from the CEG further resulted in the creation of more informal environments for stakeholders to discuss issues with NGN and among themselves to enhance the services provided to those in vulnerable situations and so further embed NGN's aim to 'do what it can and partner well with others to do more.'¹

As NGN sought to further develop its strategy, we observed that, whilst much work was being done with stakeholders and communities more was required in terms of training and supporting staff to understand vulnerability, recognise the great opportunity they have with every customer contact and ensure that every area of the business understands its role in helping customers in these challenging times. NGN recognised this too and relaunched its Customer and Vulnerability Strategy last year. Alongside maintaining and developing the success with external stakeholders and customers, the relaunched strategy will have a particular focus on internal stakeholders, on fully equipping staff with tailored customer service training and skills and on recognising and rewarding exceptional customer service to name a few. The CEG applauds this initiative and urged NGN to ensure there is appropriate support for staff, that there are sensible metrics to underpin the changes and that there is a strong focus on looking out for unintended consequences and behaviours.

1 NGN Customer and Vulnerability Strategy

CUSTOMERS IN VULNERABLE SITUATIONS

The Social sub-group met regularly throughout the year and established a rhythm of reviewing the planning, execution and outputs of the Customers in Vulnerable Situations (CIVS) workshops (with at least one CEG member attending each workshop/engagement event) and carrying out deep dives into NGN's four main objectives for the year which are described later in this section.

Progress on the objectives was reported to the whole CEG at bi-monthly meetings. The CEG has been impressed with the way NGN has delivered against its objectives. It has been equally impressed with the open and honest way NGN has engaged with stakeholders at the CIVS workshops (at least 30 front-line agencies each time – the turnout certainly assisted by having virtual sessions, which for many small organisations are easier to attend) and with the Social sub-group, celebrating what has gone well and providing candid explanations on areas that required improvement or further work. Using the 'You said, We did' approach and providing useful reports after every event has provided demonstrably increased trust among stakeholders who have clarity that their feedback had been listened to and acted upon and how this has impacted improved customer outcomes.

Each deep dive carried out by the Social sub-group involved a forensic examination of NGN's performance and its planning, identified issues and further actions and, in two instances, raised specific challenges to the company. Data examined was triangulated with other information provided to the CEG to create an accurate picture of performance. The CIVS workshops provided excellent examples not only of stakeholder engagement but of co-production. Operating across these and the deep-dives generated improved practices and performance.

Details of the main objectives and CEG/sub-group impact are provided below:

- **Meeting NGN's stretch target of 2000 fuel poor connections² per year.** Ofgem set a target of 1,000 new connections per year over the course of the price control period but, in its business plan, NGN set itself a stretch target of 2,000 per year. The CEG urged NGN to also focus on ensuring customers were realising the benefits of having a new connection or finding alternative options for those who could not achieve a connection.
- **Maximising Vulnerable & Carbon Monoxide Allowance (VCMA) to those most in need by using data to target geographical areas and customer groups.** The CEG encouraged NGN to carry out further stakeholder mapping to identify gaps and better understand areas of need and then to focus more on where there were areas of unmet need rather than on achieving a balance between categories of projects. Supported by stakeholders,

2 The Fuel Poor Network Extension Scheme (FPNES) is a scheme delivered by the Gas Distribution Networks (GDNs) in partnership with other organisations to help tackle fuel poverty by supporting off-grid, fuel poor households to connect to the gas network – source https://www.ofgem.gov.uk/sites/default/files/docs/2021/02/fpnes_governance_document_tracked.pdf

this has resulted in a more targeted approach to some types of project. As the financial and energy crises deepen the CEG is looking to NGN to create more projects to support the financial aspects of vulnerability.

- **Assessing Social Return on Investment (SROI) to understand which projects are delivering the most impact.** The CEG encouraged NGN to do more to understand the value of the engagement it carries out across all channels, as well as the outcome of the engagement. Creating more informed and engaged stakeholders as part of the involvement process creates social, environmental, and economic value which the CEG would like NGN to better understand as this will, we believe, create better engagement and improved outcomes for customers. This work needs to continue throughout the life of the price control period to inform RII0-GD3. SROI benchmarking has been problematic for Ofgem and this could be an area on which NGN take the lead for the GDNs.
- **Encouraging sustainable projects that endure beyond the end of NGN funding.** NGN is to be applauded for the way it has approached and delivered the development of projects to help customers in vulnerable situations. Where it has not been able to deliver projects itself, it has sponsored and helped develop work where strategic and stakeholder partners deliver; and customers and communities have seen real benefit as a result. Funding is not infinite, and NGN cannot continue to fund projects indefinitely. The CEG has urged NGN to seek to strike a balance between reliance on services and sustainability of support to, where possible and desirable, achieve a 'hand up rather than hand out' approach and so create enduring projects.

The CEG support stakeholders in their desire for NGN to do more to help them help each other. Stakeholders welcomed the CEG suggestion of the development of a collaborative online platform for stakeholders to get involved, share best practice, etc. The CEG would now like to see NGN further develop this platform to make it more intuitive for users and allow stakeholders to better share ideas. We consider this could potentially be developed under an innovation project.

- **Improving partnership working to create sustainable solutions.** NGN works effectively with its partners but gaps still exist. During the pandemic it experienced difficulties engaging with Local Authorities whose priorities lay elsewhere. Similarly, there are geographical pockets where it engages much less and the CEG pressed NGN to address these deficiencies. CEG members provided contacts to aid the process and the Social sub-group worked with NGN to refine the focus of the CIVS workshops to best use the wisdom of the groups. The introduction by NGN of the 'spotlight sessions' at the CIVS brought projects and activities to life for stakeholders and encouraged greater collaboration which is to be commended. Refining this focus also helped stakeholders better understand the VCMA and determine their satisfaction with the level of investment made so far, where they felt the different funds could have most impact, etc. The CEG involvement was particularly pertinent in the area of Carbon Monoxide, where pressing for a refocus helped NGN understand what it wanted to know from stakeholders rather than simply providing information and assuming understanding.

- **Improving Customer Satisfaction score with corresponding % year-on-year reduction in complaints** – covered in the Customer Service section below.
- **The industry regulator Ofgem sets targets** some of which feature in the objectives described above. The table below shows NGN’s performance against these objectives.

Ofgem Metric	Target	Performance at 1 April 22
Fuel Poor Connections	1,000 per annum	810
Carbon Monoxide (CO) Awareness Sessions	10,000 per annum	17,955
Number of consumers reached through CO awareness sessions and average awareness score before/after	No target set	From 5.88 to 7.55 (increase of 27.64%)
Priority Service Register sign ups	5,000 per annum	5,533
Priority Service Register Customer Satisfaction Score	9.15/10	9.35/10

EXTRA SUPPORT

Customers are facing a financial crisis compounded by the global pandemic, the removal of the energy price cap and the war between Russia and Ukraine. Not only has this hit the most vulnerable in society hard it has created a new population of customers in vulnerable situations and those who are financially distressed. Whilst the Company is alert to the difficulties its customers face, we have requested regular updates from NGN to demonstrate:

- what it is doing to prioritise the interests of vulnerable customers engaging with the changing energy landscape not only to prevent further hardship but to ensure benefit including demonstrating the impact of these actions
- how it is creating enduring links/referral routes to aid vulnerable customers in making a smooth transition to different sources of energy

The CEG will continue to monitor progress in these areas across the life of the price control period, with a focus on areas where there is least resilience in customer/community capabilities.

CUSTOMER SERVICE

Ofgem monitors customer satisfaction across a range of NGN’s activities and performance has consistently been in the upper ranges. During 2021/22 the CEG examined customer satisfaction with NGN’s performance in relation to the Priority Service Register (PSR) and complaint handling.

Priority Services Register

Achieving 5,533 referrals, NGN exceeded its target of 5,000 target PSR referrals by almost 11% and slightly exceeded the regulatory satisfaction target. The CEG felt quality was equally, if not more important than quantity and commends these achievements especially as NGN is not responsible for the registration process once it makes a referral, nor is it the final arbiter for which customers are placed onto the register. The CEG continues to be keen to ensure that all appropriate customers are included on the PSR and that NGN understands which customers are and are not accepted and why, what works well and what requires more work. NGN undertook work to understand this and amended its processes to improve quality further. What it has yet to do is carry out a forensic examination of customer feedback in the PSR customer satisfaction survey. Recently, the CEG has urged NGN to examine individual responses to understand why some customers had a more satisfying experience than others, and we will be monitoring this over the coming year. The CEG believes this is essential not only because of the financial/energy crises but also the impact of recent storms and the potential for a regulatory imperative to increase the number and quality of referrals to the register.

Complaint handling

Ofgem measures NGN's performance in complaint management by the number of successful outcomes at different points in the process and the number of cases referred to the Energy Ombudsman because they have encountered deadlock between the customer and the company. NGN's performance in these areas is well managed and consistently provides results in the upper ranges. The CEG however, believed that NGN should also focus on reducing the number of complaints it receives so improving customer experience without the need for recourse to the company. The CEG further believed that this should be done without impacting the quality of complaint management or affecting customer outcomes in this and other areas. NGN embraced this ethos and set a target of a 5-10% reduction in complaints year on year. In 2020/21 NGN saw a reduction in complaints largely as a result of work being paused due to the pandemic. The CEG had expected an increase in complaints in 2021/22 as work returned to normal but NGN improved on the reduction by almost 11% without impacting customer satisfaction or any quality measures, which is to be commended. The CEG accepts that it may be difficult to sustain a year on year reduction in complaints of 5-10% but expects NGN to continue to strive to reduce complaint numbers, maintain quality performance and avoid unintended consequences as a result. The CEG anticipates that the internal work being carried out as part of the relaunch of the Customer and Vulnerability Strategy will be of value here.

9. Environmental Action Plan

NGN was clear in its priorities for this year and the CEG supported the focus proposed. The CEG wishes to recognise the constructive manner in which challenges made on behalf of our constituency group were considered and, in many instances, accommodated. The three main areas of activity (underpinned by stakeholder engagement) are set out below:

- **Develop NGN's Supplier Code of Conduct and share with stakeholders to obtain feedback prior to finalising and launching it in 2022.** This supply chain focused initiative was the subject of a significant level of engagement from the CEG environmental sub-group to ensure that SME providers were not disadvantaged and to anticipate the need to create an appropriate level of transparency. Similarly, the breadth of issues included within the code were challenged and evolved, albeit within the context of a strong initial framework. The need to provide for consistent standards, whilst ensuring levels of appropriate engagement with different scales of suppliers, was also identified during the CEG process. Clarity of terminology was also highlighted by the CEG as 'Supplier Code of Conduct' could also be interpreted as 'gas supplier code of conduct'. As such, consideration should be given to re-naming this 'Supply Chain Code of Conduct'.
- **Develop Annual Environmental Report format and content, including data automation.** Again, a significant level of CEG engagement was focussed on this agenda and resulted in meaningful change around structure and the delivery of information. Drawing on lessons learnt from other sectors, the CEG was able to challenge on evolving best practice standards and to provide insight into the way in which integrity can be maintained whilst ensuring complex information is communicated effectively.
- **Vehicle decarbonisation – continue EV infrastructure work, identify collaboration opportunities.** The CEG welcomed the ongoing commitment to drive change around this important agenda, particularly regarding scaling up infrastructure across other utility businesses in order to allow for new technologies to be adopted at pace.

Other initiatives noted by the CEG as being in line with customer and stakeholder preferences included the engagement with the Young Innovators Council and the ongoing commitment to biodiversity and tree planting, the latter two having a significantly increased importance in the eyes of the general public.

10. Data and Digital

NGN's digital team has undergone a significant transformation since the start of the RIIO-GD2 process. This has resulted in the introduction of 26 new posts the majority of which have now been filled. A change in NGN's recruitment policy has enabled recruitment from outside the NGN footprint area and the ability to secure the required skills from a challenging market. This is not without challenges, however, which we flag in the HR section below.

NGN has reported that it is industry-leading with its approach to cyber security. The current approach is a large-scale project which has been implemented in a short timescale. Although NGN's approach and implementation have been commended by the Deputy Director General responsible for cyber security for Government, its approach and implementation has not been formally benchmarked as far as the CEG is aware.

A number of NGN's activities within the digital workspace could easily be classified under an innovation banner. The CEG raised a challenge that digital innovation was not being considered within the wider innovation arena within the company. This challenge resulted in the digital team holding a weekly meeting with the innovation lead and, thereby, identifying the efficient use of resources and the avoidance of duplication.

NGN had placed a heavy reliance on the introduction of new technology, and this has not been without its problems.

- **Chat bot.** This bot consists of various components. Its introduction within the IT function has resulted in a measurable reduction in the number of staff required to respond to internal queries about IT. Those staff on fixed-term contracts which were no longer required produced a cost saving. Other staff affected by this development have been redeployed into operational activities increasing overall efficiency.
- **Process automation.** A new customer portal is still under development – initially to help connections customers provide and access information at each stage through the connections process. The CEG expressed its concern early in the development phase of the dangers of placing software design development in the hands of one company. NGN acknowledged this. A number of issues have arisen from this, and the customer-facing part of the portal is facing a significant delay.
- **Innovation.** NGN continue to work with a number of organisations such as Leeds University and NEXUS to look at new and innovative ways of working. NGN has an ambition to work with smaller organisations, however, its current procurement systems and procedures are making this difficult for some SMEs. NGN is aware of the problem and is proactively looking to make changes without compromising safety or quality.

- **Wearable technology.** The use of this technology is currently at the proof-of-concept stage and, if suitable, will allow for internal efficiencies and potential safety improvements. The ability to review deep excavations without visiting site allows for speedier sign off and resolution. This technology will also allow NGN to remotely audit and conduct site assessments. The CEG recognises the work and achievements in this area but has also continued to challenge NGN in the use of this technology and its communication about any data security issues to both the public and its employees. Its implementation is already having an impact on reinstatement times which could be hugely advantageous to customers experiencing a loss of supply. Future systems smart homes and integrated smart local energy systems should unlock huge potential for data and digitisation- this needs to be looked at in Data and Digital considerations.

11. Workforce development and resilience

Workforce recruitment and training spans and impacts other areas of NGN's business. Whilst we held a dedicated subgroup in 2021-22, it has been agreed by the CEG that going forward this will be incorporated within the work of other subgroups and ultimately reported within the relevant sections of future reports.

Initial discussions with NGN identified that this was a wide and varied area of work, which led to the challenge from the CEG to focus on some key deliverables over the initial 12months. This challenge was accepted and acted upon.

Recruitment. NGN is still a male dominated company with diversity seen as an ongoing challenge. Recruitment policies have been actively reviewed and the initial results are seen as positive by the CEG, although it is also recognised that there is no quick fix, and it will take time to embed.

NGN has also reviewed its policy in relation to office-based locations and working arrangements. The introduction of flexible working patterns and remote working has resulted in a positive impact on recruiting specialists (especially in the digital team (see above)) from a wider pool and not just confined the NGN footprint area. No staff survey has yet been conducted, so it is too early to assess the impact on morale either positive or negative, for those who, due to their roles, cannot take advantage of this new way of working.

Inclusion and belonging. NGN has been proactive in this area by working with a number of business partners to design, develop and deliver a number of training courses to managers within the organisation. Focus has initially been placed on managers within the southern areas of NGN's footprint. The CEG has challenged as to whether this may cause a disparity in knowledge skills and attitude within the business for a short while, and consequent impact

on customer experience. This will be difficult to gauge, however NGN is cognisant of the feedback. As part of NGN's inclusion and belonging policy and philosophy, the company is currently actively seeking involvement from its LBGTQ+ employees to shape and support the future. This activity began relatively recently, so it is difficult for the CEG to evaluate its effectiveness and its impact on customer perception at this stage.

Mental Health and Wellbeing. The CEG was informed that NGN is in the process of recruiting mental health champions to support staff in times of need and challenge. The CEG encouraged NGN to ensure that these individuals are co-opted from all areas of the business and recruitment is aligned with the inclusion and belonging policy. This recruitment has only just commenced and, therefore, the outcomes of this campaign cannot yet be assessed.

Schools and Education. NGN has invested a significant amount of time working with local educators to raise its profile and support STEM education within schools especially in encouraging young women into the industry. No benchmarking currently exists or quantitative data in relation to how many individuals have chosen a career in the gas industry as a result of this activity. The CEG has challenged NGN in relation to where these activities are being undertaken and the perception that the same opportunities are not being offered within the north west area of NGN's operational areas.

12. Non-RRP outputs

The CEG received an update in April 2022 on how NGN was proposing to deliver non-regulated performance targets that it had proposed in its business plan for RIIO-GD2.

The RRP outputs related to three different areas of enhanced customer service (customer service, connections and emergency repair/supply interruptions).

NGN reported that it will not be introducing key account managers for gas shippers, suppliers and transporters, as existing relationships and communications are good, and it was no longer felt necessary to create single points of contact. (ODI-R targets dropped for RIIO-GD2.)

NGN had proposed to develop a customer satisfaction survey for customer groups that are not covered by the regulated customer satisfaction surveys. A piece of work is still to be undertaken to establish what added value and insights any new survey might offer. No progress in 2021-22.

NGN has proposed to offer enhanced compensation payments and service levels relating to gas connections. The company is outperforming its General Standards of Service (GSOS) targets and reporting is being developed to monitor the enhanced targets. These will be considered by the CEG in the coming year.

With regard to emergency repairs and supply interruptions, NGN is meeting or working towards the enhanced targets it set.

Going forward, NGN reported that:

- A report will be presented to the leadership group on a quarterly basis for review
- The non-regulated outputs will be presented to the Citizens panel to gauge stakeholder feedback on relevance
- Outputs brought forward from the session above will form part of the Strategic Plan for outputs, which is being developed for September 2022

13. Stakeholder Engagement

NGN set out three main objectives for its Engagement Strategy in 2021/22- Identifying and understanding changing needs and preferences; effective delivery of an engagement programme; benchmarking the strategy and assessing its effectiveness.

The CEG was particularly focussed on NGN's culture and capabilities to deliver its planned engagement activities.

A wide range of engagement channels and mechanisms were delivered appropriate to customer and stakeholders' preferences and capabilities. Feedback reports showed that the use of voting platforms, virtual whiteboards, external facilitation were popular and enabled meaningful dialogue and the sharing of ideas and information.

The Stakeholder Manager provided updates at the CEG bi-monthly meetings on engagement insights and how these had been applied. At the end of the year, NGN provided a summary of findings from events/research/bilateral meetings/enduring working groups and how these had been applied and responded to.

Feedback has taken different forms but a 'You said, We did' report back to the CIVS working group was very well received and was adopted more widely.

NGN has chosen not to have a formal external audit of its engagement strategy given the ongoing scrutiny by the CEG and our role in observing engagement methods.

Whilst there is no formal benchmarking of stakeholder engagement by Ofgem in RIIO-GD2, the company sought to compare its engagement strategy with good practice elsewhere and referenced performance by Business in the Community's members. It showed a significant improvement in how NGN had engaged on sustainability issues since last year and ranked among the top performing companies in 2021, scoring the highest score for its engagement programme.

The CEG has been impressed by the commitment of the senior management team to engage and co-design programmes with customers and key stakeholders – including innovation projects to support customers in vulnerable situations and in response to increasing need due to the energy and cost of living crises.

Members of the CEG observed 25 stakeholder events and provided feedback to the company reflecting, in particular, on the facilitation of the events, the content and materials used, and stakeholder views. These related to the main work streams and included diverse groups of customers for example the Young Innovators Council (14-18 year-olds), the Citizens Panel (general public); Customers in Vulnerable Situations (CIVS) community of interest group (frontline agencies and NGN delivery partners).

The YIC was formed as part of NGN's attempts to hear from more seldom heard voices. This has resulted in future customers views being considered in the design of programmes and proposals being adopted which will result in improved engagement methods and greater levels of engagement by young people. The 35 members of the group have shown they are passionate about sustainability and in helping NGN to 'do the right thing'. The report on the impact of the YIC sets out the very tangible ways in which its members' views have shaped different work streams leading to improved outcomes for stakeholders and customers. We encourage other companies to adopt a similar approach to the facilitation of this group which has clearly enabled some of the seldom heard voices to come to the fore. More information can be found in the YIC annual report: <https://together.northerngasnetworks.co.uk/events/young-innovators-council-2021/>

The CEG reviewed the draft engagement programme built around NGN's submission to Ofgem for its Net Zero Village trial. As a result, NGN enhanced its plans to ensure greater transparency and clarification of the rights and responsibilities of all parties.

NGN's Annual Customer Perceptions Survey was influenced by involvement of the CEG. Whilst 75% of the survey questions are the same each year to allow the company to monitor changing attitudes and perceptions, there was an opportunity to delete/adjust/include new questions that the CEG felt would be important to customers. Questions relating to hydrogen, and the composition of NGN costs (average domestic bill) were modified to improve clarity and understanding.

NGN has been very open to challenges and willing to discuss its plans regarding data policy and processes. Currently issues predominantly relate to internal stakeholders, therefore the full view of their impact may not be seen until the next internal satisfaction survey.

Over the year we have observed and commented on the way in which NGN communicates with its stakeholders and we list some examples below of where we have seen improvements:

- Event facilitation – regular, fully-briefed facilitators who have undergone facilitation training provide continuity, demonstrate increased confidence (in both stakeholders and facilitators), and resulting in better use of time and more meaningful discussion.
- Clearer engagement materials provided at events
- Stakeholder mapping to ensure all/correct stakeholders are being engaged with, gaps are identified etc. resulted in refreshing and mixing stakeholder groups for different events to provide extra challenge. This was instigated by NGN but with encouragement and support from the CEG
- A number of links to partner organisations that may help to plug funding gaps or help deliver programmes have been provided by the CEG
- NGN has been encouraged to place more emphasis on the importance of understanding impact alongside SROI when assessing the success of projects
- NGN is considering external input into project review sessions as a result of CEG challenge
- Networking sessions are now included at the beginning and end of virtual CIVS workshops as requested by members of that group to help build more collaborative partnerships
- Longer CIVS workshops with a focus on relationship development with attendees is reinforcing the value NGN places on stakeholder relationships and their importance and involvement in decision making – particularly around identifying new projects, supporting each other where there are synergies/overlaps between projects
- NGN is providing reading material ahead of workshops to help better inform stakeholders on discussion topics
- The creation of a portal via SharePoint where information on projects, networks, etc., can be shared and easily accessed has been welcomed by the CEG and delivery partners

You can find their annual stakeholder report in the “Our Communities” section on their website. <https://www.northerngasnetworks.co.uk/document-library/>

14. Costs and prices

The amount customers pay for the running of the gas network varies annually depending on a number of factors but generally the amount varies little for each year of a price control period. The CEG raised concerns about the impact of inflation, and the pass through of costs for Supplier of Last Resort (SoLR) resulting from a significant number of failed gas suppliers (28 in 2021-22) which will be added to NGN's costs and passed through to domestic customers via Distribution Use of System (DUOS) charges.

We were briefed by NGN on the different factors impacting network charges for the coming year and urged NGN to consider how it could potentially spread SoLR costs over a longer period to ease the burden on financially vulnerable customers whilst wholesale prices remain high. However, the regulations on pass-through of these costs were set by Ofgem which will be over 2 financial years. Whilst the costs are relatively small compared to the rise in global gas prices facing customers, the impact of failed suppliers in 2022-23 will be around £37 for the average NGN domestic customer which will add to the financial pressures facing households.

The company is shielded from high inflation through regulatory mechanisms which allow it to increase its prices in line with inflation and to pass through other costs, which ensures the company's financial stability, but with inflation remaining high this could result in higher charges to its customers.

15. CEG Effectiveness

The CEG reviewed its governance documents this year, including the effectiveness criteria which was designed at the start of Ofgem's Enhanced Engagement process in 2018. The group undertook a review of its effectiveness in March 2022. Many of the original criteria are now embedded in the operating model that has been developed over the past 3 years that ensure our independence, transparency, and expertise, therefore, we focussed on the following four overarching criteria to demonstrate how we have influenced NGN's business plan as it embarked on the first year of RIIO-GD2 delivery:

- **the design and delivery of policies and programmes clearly reflects the challenges made by the CEG**
- **as a result of CEG involvement (subgroups, deep dives, etc.) stakeholder views have influenced, and been properly considered in, the design and delivery of work programmes**
- **NGN's engagement with stakeholders has been influenced because of CEG scrutiny and challenge**
- **the CEG has influenced NGN to perform in ways that have led to improved customer outcomes**

These reflect the areas where changing circumstances might impact customers and stakeholders' views on social, environmental and innovation programmes.

There is an iterative process to our work which depends on constructive working practices with NGN. We recognise that in many instances our group may not have instigated changes, but we have encouraged the company to go further and faster; helped to shape and develop thinking rather than necessarily proposing new approaches; and validated or challenged proposals rather than create them. We believe that we have, in a number of areas, steered delivery in ways that should result in better customer and stakeholder outcomes. In many instances we have been pushing at an open door and we commend the company for its commitment to listening to and reflecting on our observations.

We have provided a separate report to NGN on our effectiveness, some of the issues raised within it are reflected in this report.

16. NGN responses to CEG issues and challenges

Issues were recorded and minutes of meetings shared across the company with each business lead reporting on how they had used feedback to influence their work programmes.

NGN has responded positively to the issues raised by CEG members. Very few formal challenges were raised where we felt the company needed to do things differently, but we continued to shape aspects of delivery to ensure customer outcomes and benefits remained the focus.

17. Forward Look 2022/23 work programme

There are significant challenges facing the whole of the energy industry but for the GDN's and, NGN in particular, the role of gas in heating homes is a key issue. We shall continue to focus on the development of **hydrogen** trials and seek to understand the implications for domestic customers. NGN is undertaking work on the 3 most important aspects of concern to customers – namely the potential cost of green hydrogen, safety, and the customer journey, in the transition away from natural gas in the home.

Affordability and willingness/ability to pay for rising gas bills will impact not just financially vulnerable households and people living in fuel poverty. We will consider NGN's response to the energy crisis and what more the company can do to help the hardest hit through effective social programmes.

Affordability, and **resilience** will be key themes for NGN in the coming year and the CEG will ensure it scrutinises how the company will continue to engage with its delivery partners and other stakeholders to ensure customers in vulnerable situations interests are prioritised. Resilience covers many things and the CEG will consider this across all operations.

We have seen evidence that NGN is supporting its supply chain through the economic and Covid-related challenges, and we shall continue to scrutinise the NGN's responses to the needs of its supply chain as further challenges emerge in this coming year as a result of the war in Ukraine and continuing economic pressures whilst also seeking improved customer satisfaction scores.

Regional Priorities are being collated through enhanced engagement with local authorities and other anchor institutions. There is a gap in knowledge and resources between local areas as highlighted in Local Area Energy Plans (LAEPs). Understanding how the ambitions

for net zero are to be achieved and the role that NGN can play will be an important part of their delivery in the coming year and will therefore be a focus for the CEG work programme.

Investment levels in the energy sector will need to increase significantly in coming years. With global concerns over the impact Chinese controls in Hong Kong (where NGN owners are based) and policy uncertainty around the future of gas it is important that stakeholders focus on how future developments can be properly funded in a way that is fair to customers. Whilst financing of NGN is outside the scope of the CEG, we will monitor any major issues that could negatively impact on customers and report on them to Ofgem.

During this coming year Ofgem will begin to consult on **RIIO-GD3** and early thinking will be needed on how customers and stakeholders' preferences will be taken into account and the role of stakeholder engagement to inform RIIO-GD3 plans. Local and regional ambitions and national priorities may align under the banner of net zero, but the demand for the pace of change and local energy systems may be very different from region to region and will require careful scenario planning and forecasting.

Of course, the CEG will hone in on the very specific **deliverables and commitments** NGN has pledged to stakeholders and customers during RIIO-GD2. The focus of our work is based on the new priorities NGN has identified which have resulted from its engagement with stakeholders and customers over the past year.

These are set out in NGN's stakeholder engagement report and some key areas for deep dives will be linked to NGN's refreshed strategic direction for innovation, vulnerable customers, energy efficiency, sustainability, hydrogen, and looking after communities through social mobility, inclusion and education and skills.

The way in which we work has evolved but it has always relied on cooperation with NGN. Having taken a broad brush approach this year with oversight of all the main objectives, capabilities and deliverables, we propose to carry out deep dives on a few discreet areas in the coming year. We hope to restart in-person meetings and site visits this coming year but will continue to be guided by NGN and good practise in response to Covid outbreaks. Safety remains a key priority for customers, and we shall consider safety as a cross cutting issue along with innovation and stakeholder engagement.

18. CEG members

The 2021-22 CEG has 10 members

Laura Brown

Ivan Jepson

Melanie Laws

Alan Lowdon OBE

Brian Matthews

Carole Pitkeathley

Simon Pringle

Eddie Proffitt

Jenny Saunders CBE DCL (Chair)

Dave Wright

Their biographical details can be found on the [NGN CEG website](#)

