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1. ABOUT SSEN DISTRIBUTION

We are Scottish and Southern Electricity Networks Distribution (SSEN). We are the Distribution Network Operator (DNO) responsible for delivering power to 3.9 million homes and businesses across central southern England and the north of Scotland.

Our network serves some of the UK's most remote communities and also some of the most densely populated. Our two networks cover the greatest land mass of any of the UK's DNOs, covering 72 local authority areas and 75,000km2 of extremely diverse terrain. Through our Priorities Services Register (PSR), we help customers who may need additional support and partner with trusted and expert organisations in a range of initiatives to assist those living in fuel poverty.

SSEN is part of SSE plc, a UK-listed energy company that operates throughout the UK and Ireland. SSE develops, owns and operates low carbon energy assets including onshore and offshore wind, hydro power, electricity transmission and distribution networks (SSEN), alongside providing energy products and services for businesses. As a provider of critical national infrastructure, SSE and its businesses play a vital role in accelerating the transition to a net zero world at a national and local level.

SSEN DISTRIBUTION

NETWORK ATAGLANCE

SHEPD

Scottish Hydro Electric Power Distribution

Nearly **4million** homes and businesses

Over **1million**Priority Services Customers

Over 128,000km of overhead lines and underground cables

Over **460km** of subsea cables powering our island communities

Over **4,400** employees across the country

SEPD

Southern Electric Power Distribution





2. FOREWORD



Electricity Distribution Network Operators are a key part of the energy landscape, and have an important role to play in ensuring customers and businesses have access to a safe and reliable supply of power. We take this role very seriously, especially for people in our licence areas living in vulnerable situations.

ANDREW SCOTT
DIRECTOR OF CUSTOMER SERVICE

In the third year of our RIIO-ED2 price control, we've undertaken a further refresh of our strategy, to refine our scope, share our progress, understand any changes and emerging issues we need to consider. We really want to focus on those areas where our actions can have the most impact.

Our three strategic focuses of supporting customers on the Priority Service Register (PSR), supporting those in fuel poverty and enabling the low carbon transition remain.

One of the cornerstones of the support we offer is through our Priority Services. At the beginning of 2025, we broke through the 1 million mark for the total number of customers we support in this way. There was an increase of 112,000 households during the past year; our biggest-ever increase during a 12-month period. Our focus on promoting and growing Priority Services means we can identify which customers may need support during a power cut, and provide them with additional information and advice. It also ensures we're focusing our welfare response during storms on the communities who need it most. Growing the numbers signed up for Priority Services enables us to identify customers in fuel poverty, or who'd benefit from support moving to low carbon technologies in their home. In addition to growing the numbers of people we support, we're proud of our best-ever customer satisfaction results among those signed up, with scores increasing to 9.2/9.4.

We've worked hard to improve and better define our processes, thus enhancing the experience customers receive.

Last year, there was a 17% increase in the number of households supported through fuel poverty measures and who were helped with their own Low Carbon Transition journeys. The increase in customers accessing this support came in the context of a challenging winter, especially for those impacted by the change to the Warm Home Discount Scheme and the removal of the Winter Fuel Payment. Building on the success of our existing partnerships, we've forged new links with charities Carers UK and Warm Welcome, which are already helping our customers.

Priority Services are crucial – but they're far from being the only way we provide support. One of the commitments we've made for RIIO-ED2 is the provision of our Power Cut Plans. These are tailored for customers signed up for Priority Services with advice and specific guidance for their circumstances or condition. They've been compiled with the support of leading charities, such as Kidney Care UK, and organisations whose insights ensure we're providing advice relevant to the individual customer. Another commitment is the forthcoming provision of home battery packs for more vulnerable customers in our communities who are dependent on electricity. This provides an additional level of resilience for these customers in case of an unplanned power cut, and

enables them to remain in their homes during an outage because they can keep their essential equipment powered. During the past year, we've been running a pilot with a small number of customers to assess how people might use a battery during a power cut.

The response from customers involved has been overwhelmingly positive, and we're progressing the procurement of batteries for these specific groups of customers.

As we focus on the remaining two years of the current price control, our commitment to protect and support our customers and communities remains steadfast, but we must also look ahead to plan and protect existing and new customers in the next ED3 price control. It's important we build a strategy that looks into the future and sets a clear direction for the long-term, with enduring goals with vulnerable customers at its centre.

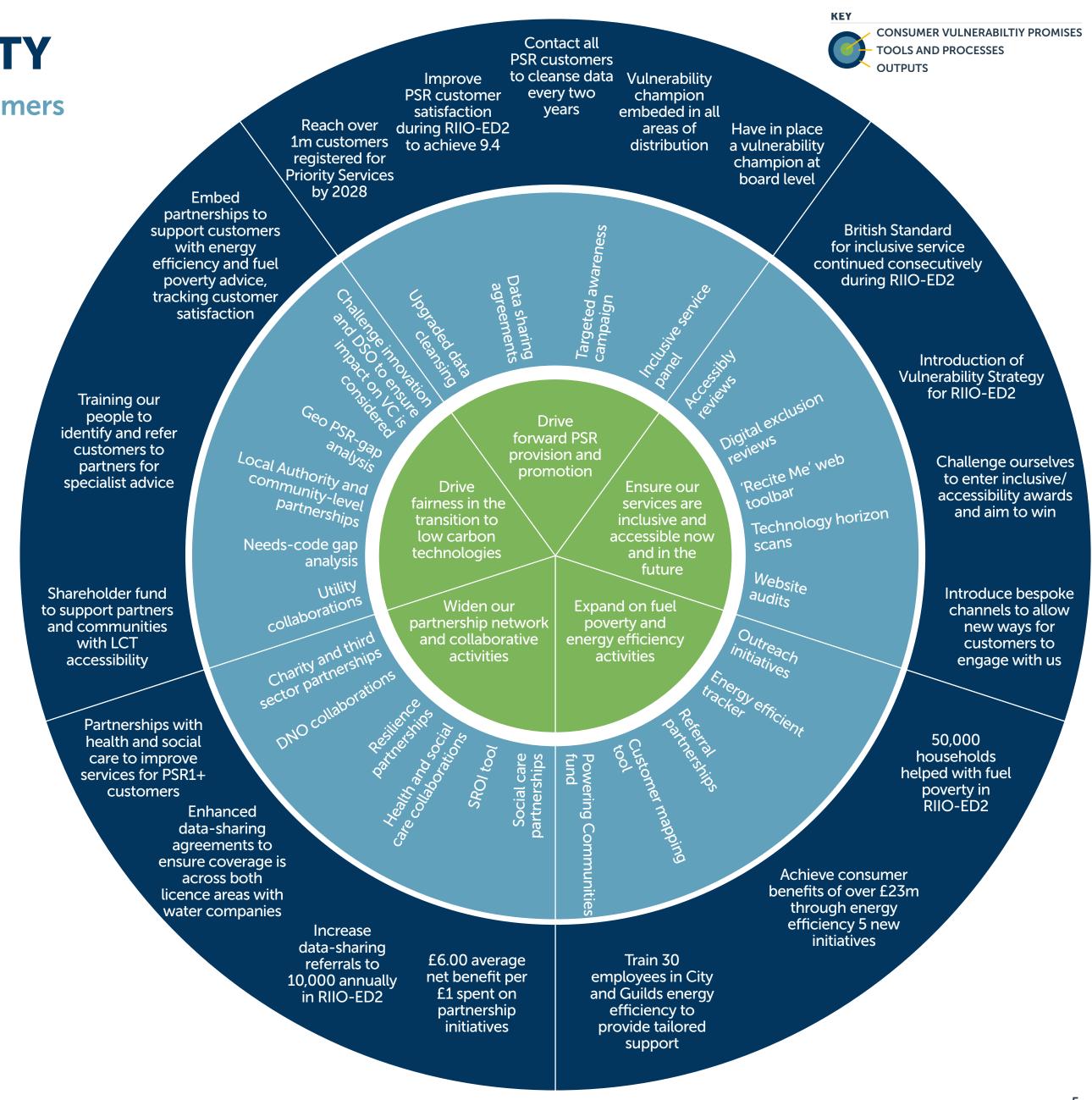


3. OUR FOCUS ON CONSUMER VULNERABILITY

Our commitment to our customers: Meet our obligations to treat all customers fairly, including those in vulnerable situations. Put in place a vulnerability strategy, to be reviewed and refreshed annually.

Customers are placing their trust in us to deliver a strategy that not only responds to their needs and expectations now but also considers what the world will look like in the future. We have worked with customers and stakeholders to update our vulnerability strategy and to better understand what the transition to low carbon technologies means for those in more vulnerable situations. As such we have introduced a fifth promise to ensure that we "drive fairness in the transition to low carbon technologies so that we can concentrate on doing everything possible, to ensure that no customers are left behind". There are five consumer vulnerability promises at the heart of our consumer vulnerability strategy, and these are demonstrated in our strategy wheel.

The wheel provides a clear view of the outputs we want to achieve to meet Ofgem's Principles/baseline standards and the extra work we will be doing to meet our own consumer vulnerability promises and go further in safeguarding our customers. We are committed to engaging with customers in vulnerable situations, and the trusted organisations who represent them, to deepen our understanding of complex vulnerability including those who become temporarily vulnerable. We will work in partnership to deliver a wide range of services that targets support where it is needed most in the communities we proudly serve.





4. ENGAGING OUR CUSTOMERS, PARTNERS AND STAKEHOLDERS

Our commitment to our customers: Meet our obligations to treat all customers fairly, including those in vulnerable situations. Put in place a vulnerability strategy, to be reviewed and refreshed annually.

OUR ENGAGEMENT PLAN:

"Engaging with our customers, partners and stakeholders" is fundamental to delivering our consumer vulnerability commitments. We have identified key stakeholder feedback sources:



Inclusive Service Panel (our panel of industry experts).



Independent Stakeholder Group.

Stakeholder events.



Broad Measure of Customer Satisfaction survevs.



Online engagement (i.e. surveys on social media and correspondence prompted via our website).



Local grassroots engagement.



Distribution System Operations (DSO) Advisory Board.



Bi-laterals with key stakeholders and organisations.

We will continue to engage using the above methods as well as seeking out new sources to challenge and/ or shape our service offering. We will engage with stakeholders on our strategy annually to ensure we are delivering for those customers and communities who require additional support. As our stakeholders can often have multiple demands on their time, we will collaborate across our internal teams, with other DNOs and with our partners to carry out joint engagement activities where possible to reduce stakeholder fatigue and increase collaboration opportunities.

OUR APPROACH TO PARTNERSHIPS

Partnerships are key to the successful delivery of our vulnerability strategy and ensuring we are providing support to those customers who need it most. Our embedded approach to consumer vulnerability is underpinned by our stakeholder-led consumer vulnerability promises. Our partnership framework builds on our consumer vulnerability promises and is based on the belief that partnerships can deliver better outcomes than if we acted alone and is underpinned by the following four principles below.

Having the two-year commitment to our partners has meant they can plan, prioritise and promote their support for our vulnerable customers in several ways.

- Some partners have been able to extend the contracts of their staff, allowing more customers to be supported across our licence areas.
- Projects and ideas that were in a test or pilot phase have been extended showing more results over longer periods of time. This provided more reportable evidence in areas of fuel poverty and energy efficiency measures.
- The joint partnerships have created increased awareness in local communities, meaning better collaboration and an enhanced level of trust.

- We have expanded our support of enabling funds in the North and South where more households could be helped to access grants and ensure they no longer had cold damp homes.
- Regular contact with our partners provides us with further invaluable insight from customers which allows us to quickly review, and improve the support available, which meets the rapidly changing energy climate.
- Social Return on Investment is a calculation used to identify the effectiveness of each partnership to ensure we are investing in the right areas.

OUR CONSUMER VULNERABILITY PROMISES

Drive forward Priority Services Register provision and promotion

> **PSR** provision and promotion

Ensure our services are inclusive and accessible now and in the future

> Inclusive and accessible services

Expand on fuel poverty and energy efficiency activities

Supporting fuel poverty

Widen our partnership network and collaborative activities

> **Evolving our** partnerships

Drive fairness in the transition to low carbon technologies

> Fairness in low carbon technology











OUR PARTNERSHIP FRAMEWORK

Our partnership framework is based on the belief that partnerships can deliver better outcomes than if we acted alone and is underpinned by the following principles:

Developing partnerships that are purposeful and in line with the needs, wants and requirements of our stakeholders.

Strengthening relationships with partners who share our values and aims and understand that our aims must deliver tangible outcomes.

Working closely with our partners throughout to monitor and quality assure outputs so that services and provisions are consistent for all.

Regularly evaluate the partnership **relationship** to ensure it continues to deliver in line with stakeholder feedback.



5. OUR KEY HIGHLIGHTS

We have made progress towards delivering our commitments made to customers in vulnerable situations over the last year, with our PSR commitment delivered three years ahead of target.

Increasing the number of households registered on the PSR is critical, as it means we can support more customers during power cuts and storms. We saw this support in action throughout the year but especially during the four named storms we saw last winter, and one in early August of 2025. Another key highlight was enabling more households to access essential support, resulting in a higher financial gain, across what was a challenging winter for our customers impacted by the change to the Warm Home Discount payments and the removal of the winter fuel payment. We have pulled out some key highlights from the last 12 months. More information on these highlights can be found in our **Annual Vulnerability Report**.



1M+ households registered on PSR.



69.8% PSR Reach, SHEPD 78.3% SEPD 68%.



Increased customer satisfaction for PSR customer experiencing a power cut to 9.2/10.



Over 16K+ households supported with fuel poverty, energy efficiency and low carbon technology advice.



76 communities supported with LCT and resilience projects with funding provided through our Powering Communities to Net Zero Fund. Over £886K awarded.



10 colleagues achieved City & Guilds in Energy Efficiency.



Delivered £4,311,500.18 Net Present Value through our partnership programme.



Supported customers across five names storms.



8/10 accessibility ranking for our website.



Introduced two new partnerships to deliver energy efficiency, low-carbon technology advice, and targeted support to customers facing fuel poverty.





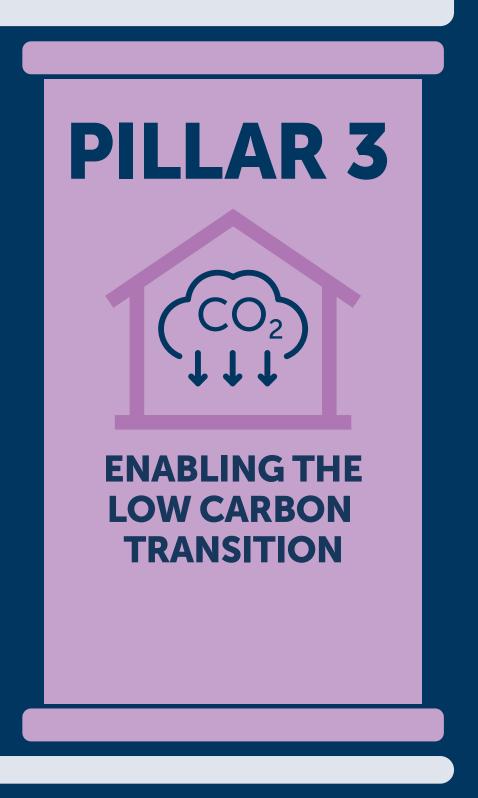
6. COMMITMENTS

Our three strategic pillars of support for Priority Service customers, supporting households in fuel poverty and enabling the Low Carbon Transition (LCT) remain, and here we explore the commitments within those pillars, their performance and priorities as we move into the last two years of RIIO-ED2.









SUPPORT FOR PRIORITY SERVICE CUSTOMERS

We have five commitments to our customers and three innovation projects that all contribute to our strategic pillar of support for Priority Service customers.

- 1 Training and development Introduce 200 Vulnerability Allies across the business from the start of ED2
- PSR Customer Satisfaction Improve PSR customer satisfaction scores to 9.4
- Personal and Social Support Packs Deliver 5,000 power cut resilience packs to PSR customers.
- PSR gap analysis Reach over 1 million PSR registrations by 2028, refreshing our data every 24 months.

Personal Resilience Plans - Customer Value Proposition (CVP) – Proactively provide PSR customers with Personal Resilience Plans (PRPs) containing specific advice tailored to a customer's individual needs, helping them know what to do during power cuts. And provide 20,000 battery backups to customers who depend on electricity for medical reasons.

PERFORMANCE:

Vulnerability Allies at SSEN challenge the business to act inclusively, helping shape services and attitudes that meet all customer's needs. The group has grown to 76 members who make a meaningful impact across the organisation. Highlights include raising awareness, encouraging a culture of inclusion, and supporting and reviewing our Annual Vulnerability Report (AVR), vulnerability e-learning and marketing plans.

Customer satisfaction is driven by our continuous improvement across colleague training. Our new channel management solution ensures our customers can use their channel of choice and customer satisfaction is recognised by our British Standards accreditation and our website has retained its number one spot for digital accessibility.

Personal support packs will provide vulnerable customers with emergency light, power, and warmth during power cuts, helping customers stay safe and supported ahead of winter 2025.

We have met our commitment to reach over 1 million customers three years early and continue to focus on closing the gaps identified by insights gathered from commissioned research. These have been embedded into the summer and winter campaigns and includes a social media campaign lead by paid for Influencer content. All driving measurable improvements in our campaign KPI's. Our data cleanse process ensures we hold accurate data on our customers, and we continue to keep our 100% commitment to maintain this every year for PSR 1+ (those medically dependent on electricity) customers and every 24 months for everyone else.

Following the initial rollout of Personal Resilience Plans to customers on life saving kidney dialysis, we extended this to all PSR customers and have sent over 100,000. Developed alongside experts, the PRPs are written with accessibility and inclusivity in mind, working with communication experts Better Company, and using the Better Words methodology to make sure the plan is clear.

Over 20 PSR1+ customers impacted by power cuts participated in our 6-month battery backup trial. The customer feedback has been positive with one customer describing the battery as "a lifesaver" and another critically ill customer called the battery "a further layer of resilience and empowerment". Our regulated tender continues to identify the best battery and supplier for the roll out of all 20,000 battery backups for our most vulnerable customers. This is due to be completed by the end of 2025, and strong progress is being made in meeting our targets set for ED2.



PRIORITY FOR 2025 ONWARDS:

Within this strategic pillar our focus will be on promoting the Vulnerability Allies internally to ensure our purpose remains true and drives a cultural shift, whilst continuing to listen to our Allies, driving engagement and enchancing the role they play within SSEN.

Our embedded customer service improvements must continue to drive improvements, and our aim is to over deliver and excel in reassuring and supporting our customers who are experiencing power cuts.

Whilst our PSR has grown there is still an estimate of over 500k households eligible for the PSR but not yet registered. This means we need to find the most effective ways of raising awareness and providing the right support so the value of the PSR is clear, accessible and relevant. We will do this using data and insight to target and close the gaps in the most meaningful way possible.

Our personal packs and PRPs will continue to be distributed and will make vulnerable customers more prepared and resilient in a power cut. Our PRPs effectiveness has been measured, and the insights will inform further iterations to ensure we meet the diverse needs of our customers. To ensure targeted allocation of battery packs, we continue working with data from the Energy Saving Trust alongside our own eligibility data and fault history to identify those most likely to benefit from an emergency battery in their own home.



STRATEGIC PILLAR ONE (CONTINUED)

SUPPORT FOR PRIORITY SERVICE CUSTOMERS

Innovations already making a difference for customers facing vulnerability

Vulnerability Future Energy Scenarios (VFES)

Our award-winning VFES is fully integrated into our business and is a key component of our strategic development plans. VFES accurately predicts where communities are less resilient, less affluent, and more seriously affected by prolonged or frequent power cuts. We are constantly investing in our networks, upgrading capacity and improving resilience. At a High Voltage (HV) level, this is driven by upgrades to our Grid Supply Points (GSP), where the transmission networks meet our distribution networks. All GSP planning now includes VFES data, enabling benefits from improved resilience in areas of high vulnerability to minimising disruption during upgrade works.

Vulnerability Identification Via Informative Data (VIVID)

We are regularly challenged to find the 'missing vulnerable' households; the people who are eligible for priority services, but who are unaware of this extra support. Energy suppliers, local authorities and the third sector also struggle to find the most vulnerable, or hard to reach, people in society. VIVID developed advance, secure and GDPR compliant data sharing protocols to combine efforts across these sectors and prevent people slipping through the net. VIVID and VFES are being embedded into a new project called Vulnerability Evaluation for Resilience, Investment and Flexibility (VERIFY). We are currently awaiting a decision on funding for this project.



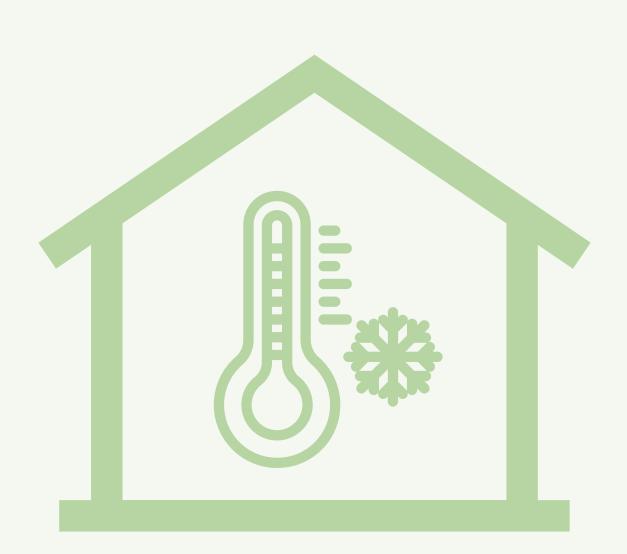
SUPPORTING HOUSEHOLDS IN FUEL POVERTY

We have three commitments that contribute to our strategic pillar that focuses on delivering fuel poverty support to those households that need our help the most.



Fuel Poverty support – our commitment to support 50,000 households (equivalent to 114,000 customers) with fuel poverty support and advice by the end of 2028.

Training and Development – our commitment to train 30 employees to the City & Guilds energy efficiency qualification in ED2.



PERFORMANCE:

Our energy efficiency packs will help customers make effective steps in their own homes to lower their bills and we're working with our partners to create these packs so customers who are already interested in making a positive change can insulate more doors and windows in their home free of charge. We are on track to meet our targets.

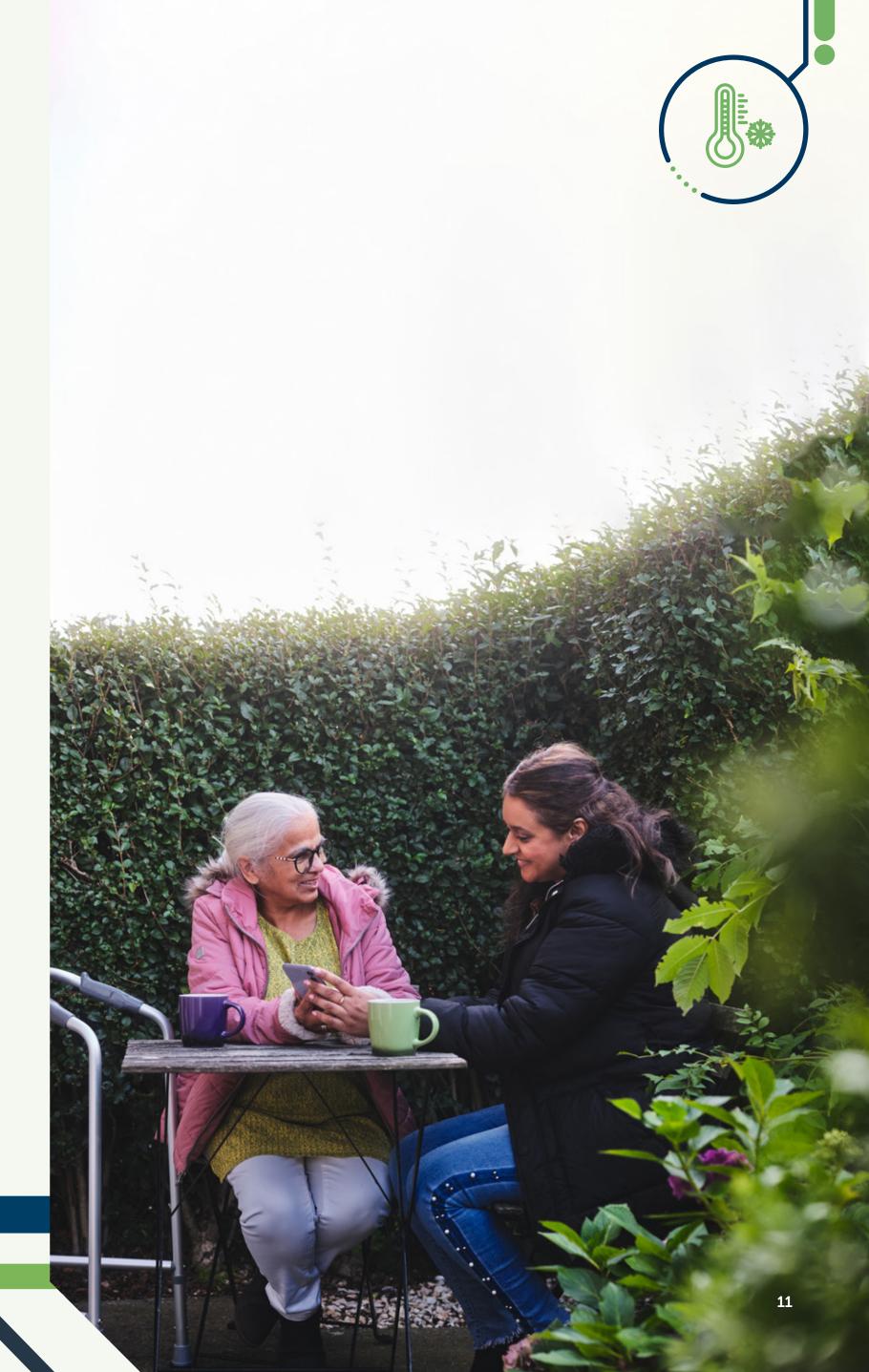
Fuel poverty support to households is delivered through our partnership programme by funding 13 national partnerships which operate across our North and South licence areas, as well as local partnerships which support customers in specific regions. Through these trusted and respected channels, we can deliver real value.

Ten colleagues have graduated with their level 3 City and Guild Energy Efficiency, with a further two continuing their studies. Measures are in place to track and review the effectiveness of this course, meaning we will end the year with more insight enabling us to select the most effective training moving forward.

PRIORITY FOR 2025 ONWARDS:

By collaborating with our partners, we will target customers already interested in saving money so we can ensure our packs are put to good use. The groundwork has been done to ensure we have the right products in place to make the practical difference our customers need. The focus for the last two years is to ensure these energy efficiency packs are well received by our customers, make a helpful difference and are adapted where needed.

As the number of households in fuel poverty is set to increase we must broaden our partnership portfolio to ensure we are represented in our communities where the need is greatest, using the trusted voice of our partners to deliver, or signpost support that delivers real value. Alongside this investment our City and Guild trained colleagues will give energy efficiency advice to our customers helping them to save money, whilst we look to increase the number of front-line colleagues who can benefit from similar training.

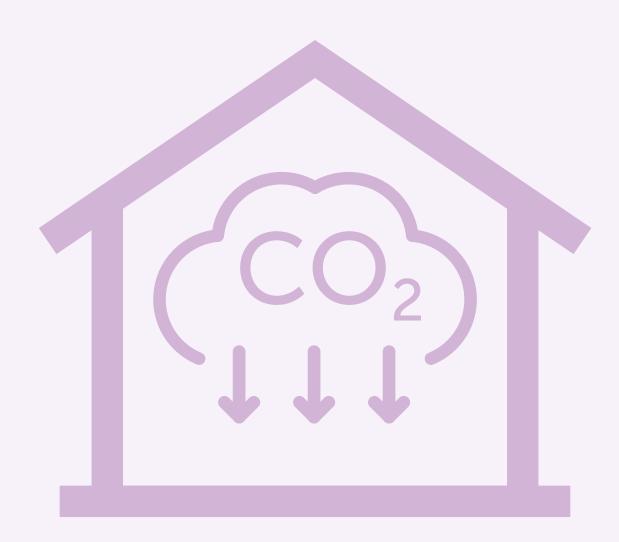


ENABLING THE LOW CARBON TRANSITION

We have one commitment and one innovation project that contribute to our strategic pillar that focuses on enabling the Low Carbon Transition (LCT) with those households that need our help the most.



Shareholder fund – Our commitment to introduce a shareholder-financed £500,000 annual 'Powering Communities to Net Zero' fund to support LCT accessibility initiatives for those in vulnerable situations, and community-led environmental and resilience schemes.



PERFORMANCE:

As part of our ED2 commitments, we have established a £2.5 million fund to support community organisations in improving resilience and adopting Low Carbon Technologies (LCTs). The fund is open to not-for-profit and community groups across our North and South licence areas, with at least £1.25 million allocated to each region over the course of ED2.

This year, over £900,000 was awarded to 76 projects across the north of Scotland and central southern England. Of these, 33 projects were supported under the Low Carbon Technology category, receiving £421,791 (£233,759 in the North and £188,032 in the South), enabling communities to decarbonise their operations.

PRIORITY FOR 2025 ONWARDS:

To continue supporting our communities with the shareholder fund.

It's a critical step in supporting not just the projects and causes, but demonstrating to a much wider demographic the benefits of low carbon technologies.

We will also work with those successful applicants to see how they can widen the support they give their communities by promoting the PSR and its benefits in terms of safety, planning and resilience.





7. SUMMARY OF COMMITMENTS

This table provides a summary of our commitments, their milestones and progress up to September 2025.



A milestone that is at significant risk and highly likely to be missed

AMBER

Progress is delayed but is likely to be achievable before the end of the RIIO-ED2



Progress against the milestones are on track.



Vulnerability strategy Commitment	Description	Key milestone	RAG status	Status update up to September 2025
Vulnerability	situations. Put in place a vulnerability strategy, to be reviewed and refreshed annually	Annual Stakeholder Review of strategy and feedback.	GREEN	Stakeholder engagement took place in October 24. Additional engagement planned for summer/autumn 2025.
Strategy		Annual strategy refresh and publication.	GREEN	Strategy launched in October 2024 with a refresh due by end of October 2025.
	Reach over 1 million PSR customers by 2028, refreshing our data every 24 months.	Achieve 1 million PSR customers by March 2025.	GREEN	Last year we increased the PSR by 112k households through, exceeding our target of 1 million PSR customers.
PSR Gap Analysis		Refreshed Customer Mapping Tool to further enhance PSR identification to be in place by March 2025.	AMBER	Further updates needed before a full roll takes place in 2025, and more local authorities, partners and colleauges have been trained in its usage. however some users are in place.
		PSR 1+ customer data refreshed annually with all other customers refreshed every 2 years.	GREEN	We continue to contact 100% of PSR customers to refresh their data.
		Implement 'Brilliant Basics – Meeting the Growing Needs of our Customers programme' to a achieve score of 9.2 by March 2025.	AMBER	We have seen further increases in our score through ongoing improvements made to our customer journeys.
PSR Customer Satisfaction	Improve PSR customer satisfaction scores to 9.4.	Implement Improved Channel Management programme to achieve a score of 9.3 by March 2026.	GREEN	Phase one of our new channel management has now been implemented with further rollouts expected in Autumn 2025.
		Implement An Empowered Workforce programme to achieve a score of 9.4 by March 2027.	GREEN	We have completed the first phase of our Empowered to Care Programme, with more than 1,000 customer facing employees taking part in a 5-module training programme.

Continues overleaf

Vulnerability strategy Commitment	Description	Key milestone	RAG status	Status update up to September 2025
	By 2028 support 50,000 households (equivalent to 114,000 customers) with fuel poverty.	Set up 5 new partnerships to support customers over ED2.	GREEN	2 new partnerships in 2024 with another one about to launch winter 2025.
Fuel Poverty Support		Introduce new 2 year partnership frameworks for strategic partnerships by March 2025.	GREEN	We are in consultation with all partners on the remaining 2 years of ED2 and what their focus will be.
		Consult with stakeholders on 'partnership' fund for potential partners to bid for funding to support customers in key areas.	GREEN	Roundtables are being organised to discuss what this price control and the next means for supporting vulnerable customers with the full range of advice.
Training and development	Train 30 employees to the City & Guilds energy efficiency qualification and introduce 200 Vulnerability Champions across the business from the start of ED2.	10 employees to have completed City and Guilds Energy Efficiency Training by March 2025 with all 30 in place by March 2027.	AMBER	10 colleagues had achieved the qualification by September 2025.
		80 Vulnerability Allies to be in place by March 2025 with all 200 in place by March 2028.	AMBER	Our Vulnerability Allies community has grown to 76 colleagues with engagement plans in place to grow the community further.
		Using customer insight to design and develop packs with zero single use items/plastics by March 2025.	GREEN	We have agreed the contents of the packs, with an expected order date in October 2025 for delivery ahead of winter.
Personal and Social Support Packs	By 2028, deliver 5,000 energy efficiency packs to fuel-poor households and 5,000 power cut resilience packs to PSR customers, tailored to their needs.	ds and 5,000 Issue 4,000 packs to customers by March 2026. AMBER Rollout plan in place for delivery o	Rollout plan in place for delivery of packs across our licence areas.	
		Issue 6,000 additional packs to customers ahead of winter 2027.	GREEN	Following the rollout of the initial packs, we will review the plan to distribute the remaining 6,000 packs by the close of ED2.

Continues overleaf

RED

A milestone that is at significant risk and highly likely to be missed

AMBER

Progress is delayed but is likely to be achievable before the end of the RIIO-ED2

GREEN

Progress against the milestones are on track.

Vulnerability strategy Commitment	Description	Key milestone	RAG status	Status update up to September 2025
	Proactively provide PSR customers with PRPs containing specific advice tailored to a customer's individual needs, helping them know what to do during power cuts. Provision of 20,000 battery backups to customers who depend on electricity for medical reasons.	Personal Resilience Plans (PRP) provided to all current PSR customers after data cleanse by 2028.	GREEN	As of April 2025, all new PSR customers receive a PRP along with all customers going through the data cleanse process with over 120,000 PRPs issued year to date.
Personal Plans		6,000 batteries and 125,000 Personal Resilience Plans issued by March 2026.	GREEN	Battery procurement activity is in progress and on track, and due to be completed by the end of 2025. Personal Resilience Plans launched in April 2025 and are making strong progress.
Resilience Plans		15,000 batteries and 250,000 Personal Resilience Plans issued by September 2027.	GREEN	We have created plans to deliver 15,000 batteries and 250,000 Personal Resilience Plans ahead of September 2027.
		20,000 batteries and 374,691 Personal Resilience Plans issued by March 2028.	GREEN	Our refocused plans have us on track to deliver all batteries and Personal Resilience Plans by the end of the ED2 price control.
		Scope fund and launch initial round of funding by end of September 2024.	GREEN	The second round of funding was open for applications in May 2025 with those applications now being reviewed and assessed.
Shareholder Fund	and community-led environmental and resilience schemes.	Completed stakeholder engagement and review of fund, including SROI benefits of funds allocated to date.	GREEN	Review of fund completed with round 2 of funding due to launch May 2025. Societal benefits completed for round 1 of fund.
		Four rounds of funding completed by December 2027.	GREEN	Further rounds of funding are expected to launch in May/ June of each year during ED2.

RED

A milestone that is at significant risk and highly likely to be missed

AMBER

Progress is delayed but is likely to be achievable before the end of the RIIO-ED2

GREEN

Progress against the milestones are on track.



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