



# Value of Lost Load (VoLL) 2

## Joint DNO Workshop 1 October 2019

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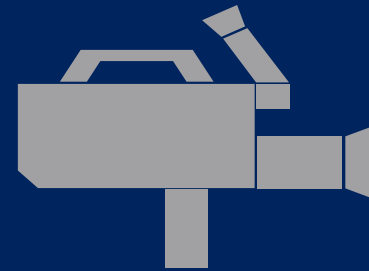
Mobile phones



Breaks



Fire alarms



Workshop will be recorded

# Agenda



|   |  |   |  |
|---|--|---|--|
| <i>Plenary session</i><br>10.30am – 11.30am | <b>Introduction, objectives of today's workshop</b>      | <b>Project background and high level findings</b> | <b>Understanding current uses of VoLL in ED1</b>     |
|   | Paul Auckland<br><i>Head of Economic Regulation</i>      | Tracey Kennelly<br><i>Project Manager</i>         | Jonathan Booth<br><i>Head of Asset Management</i>    |
| 11.30 – 11.40am                             | <b>Break</b>   |   |  |
| <i>Plenary session</i><br>11.40am – 12.30am | <b>Overview of the proposed modelling approach</b>       | <b>Implementation options</b>                     | <b>Implementation challenges for a variable VoLL</b> |
|   | Frazer-Nash Consultancy                                  | Frazer-Nash Consultancy                           | Frazer-Nash Consultancy                              |
| 12.30 – 1.00pm                              | <b>Lunch</b>   |   |  |
| <i>Open discussion</i><br>1.00 – 2.00pm     | <b>Open forum discussion around structured questions</b> | <b>Wrap up – opportunity to get involved</b>      |  |
|   | Electricity North West                                   |   |  |



Welcome



Introduction



Objectives of today

Opportunity to learn from shared experience

Capture parallel studies in related work areas to establish an emerging view



The **social** cost of supply interruptions to customers in £ per MWh



VoLL has existed since 1990  
2013 - London Economics ~£17k/MWh  
average value (excluding I&C)

VoLL varies considerably across domestic and  
SME customer segments

A single average figure is used to provide an  
overall value for a given asset / decision

Ofgem used a figure of ~£16k/MWh for RIIO ED1



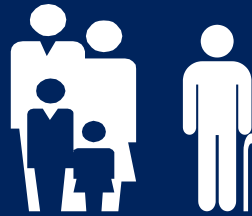
Quantify VoLL by customer segment now and in the future



What is the impact on customers of lost load?



What is the value of this impact expressed as the financial and social cost to customers in £ per kWh?



How does this vary by customer type?



How does this vary by supply interruption components?



How can DNOs mitigate the cost of lost load?

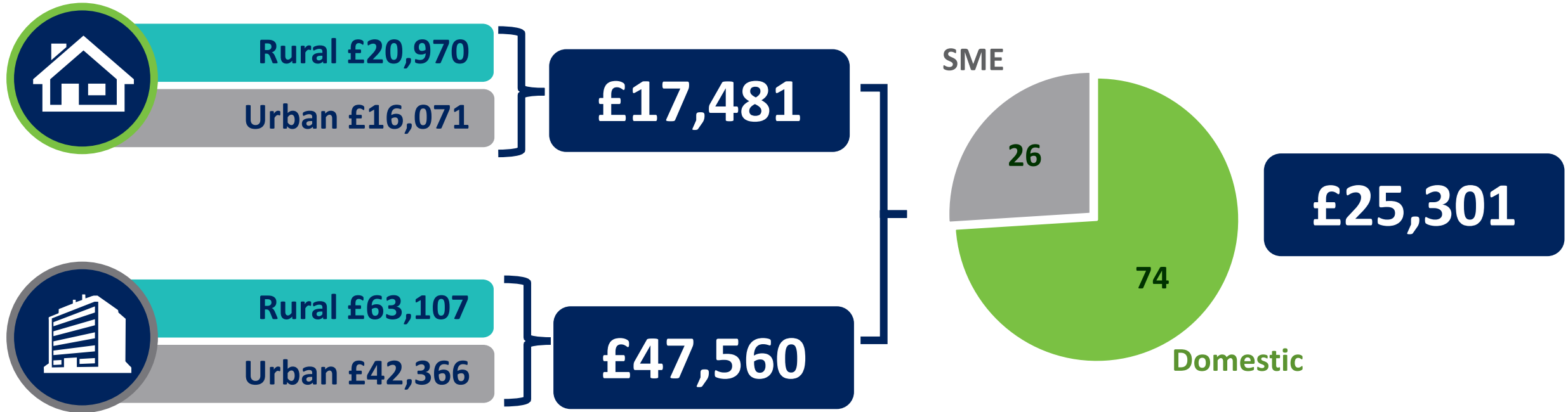


How will this vary with LCT adoption?

6,500 surveys with a wide range of customers across GB in winter and summer  
5050 with domestic customers – 1450 with SMEs



Combining our values to reconstruct 'vanilla' VoLL



LE value = £16,940

# New estimation of VoLL



10 hour LV feeder fault occurring once every five years, over a period of 40 years



Two LV feeders, both supplying 50 homes

Old VoLL

New VoLL



Urban  
X 30

Low use  
X 20

£ 72,000

£ 66,000



Rural  
X 15

Fuel Poor  
X 20

X 15

£ 72,000

£ 106,000

VoLL calculated for each household by applying a weighted combination of values for each household characteristic



VoLL is increasing over time

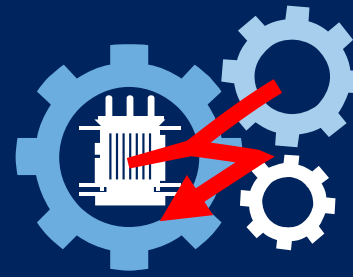
Some differences in research approach vs earlier study



Values notably higher than those observed in the last major study by London Economics in 2013



Project developed a statistical model to capture granular impact of an interruption



VoLL estimates expressed relative to an outage at the **worst possible time** rather than the average



Higher VoLL estimate reflects variations in attributes tested by LE & ENWL  
Demonstrates increasing customer needs & expectations

Increase in overall VoLL WTA estimates (£/MWh)

London Economics (2013) = £16,940

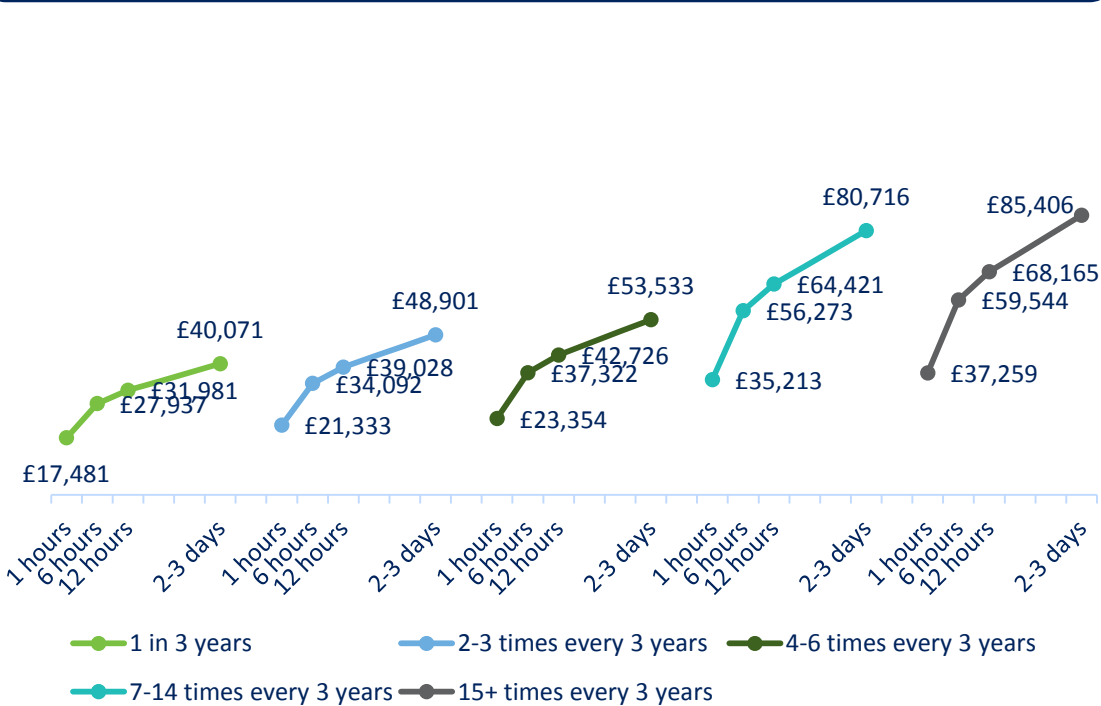
Electricity North West (2018) = £25,300

# How does VoLL vary with the duration of interruptions?

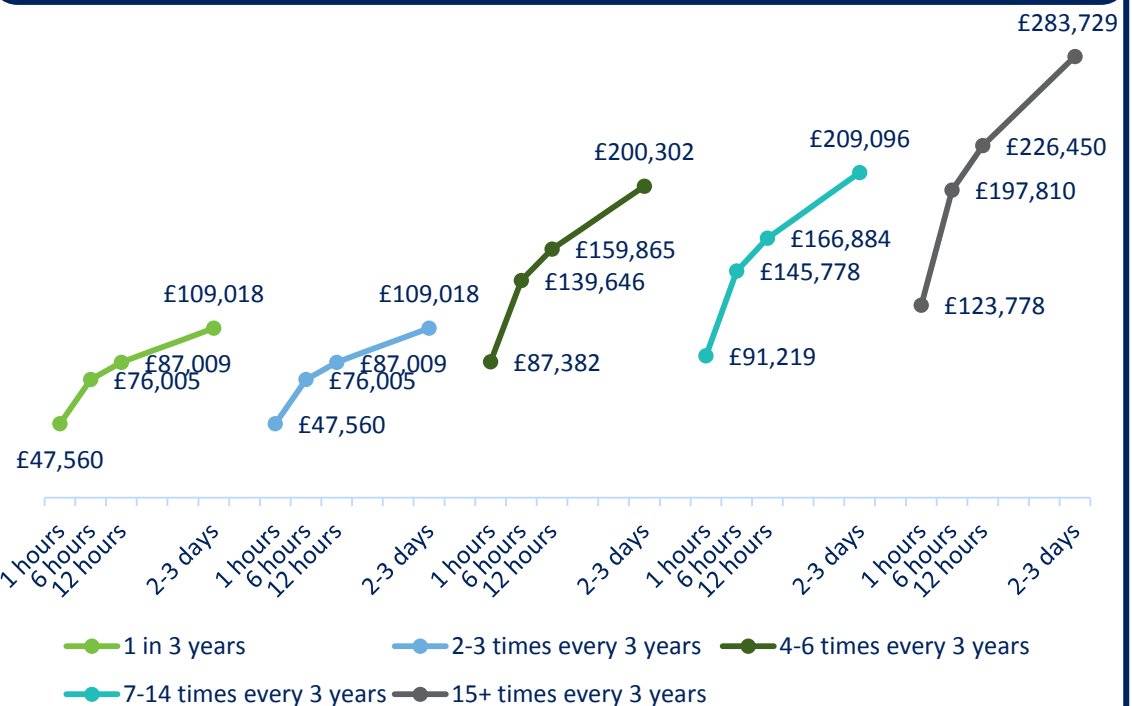


VoLL for domestic and SME customers increases relative to frequency and duration of an unplanned outage

**Domestic (unplanned) VoLL in MW/h by frequency and duration of outage**



**Fig 1: SME VoLL in MW/h by frequency and duration of outage (unplanned)**



# Findings and dissemination



|   |  |  |  |
|---|--|--|--|
| Interim findings disseminated at LCNI conference in Telford | Findings disseminated at Ofgem's network output measures (NOMs) cross-sector working group | Electricity North West innovation and learning event     | Affordability and sustainability advisory panel workshops  |
| December 2017   | February 2018  | July 2018  | July 2018  |
| Ofgem's reliability, safety and environment working group   | Project factsheet available to industry stakeholders at the LCNI conference                | VoLL will be presented at the LCNI conference in Glasgow | All key findings available on our website <a href="http://www.enwl.co.uk/voll">www.enwl.co.uk/voll</a> |
| September 2018 and May 2019                                 | October 2018   | October 2019   | Ongoing  |

# Summary of original findings



Existing approach undervalues the needs of certain customers

Not reflective of those dependent on LCTs



Fuel poor are hugely under represented

Others are over represented potentially driving inefficient investments



A revised VoLL model will provide an effective tool that all DNOs can use without the need for new data flows



Segmentation model enables DNOs to make decisions more reflective of actual customer needs



# VoLL2 summary





Having established key factors contributing to VoLL and empirical research as to their relative strength, we need to look at the practicalities of implementation

At what scale should a more complex VoLL function be applied?

Establish the optimum degree of complexity of a new model

Range from GB level through to individual MPAN

Over what time period should VoLL be considered?

Today's VoLL, tomorrow's, lifetime of the asset/network under consideration?

How to differentiate between embedded and transient factors?

Establish the stability/variability of factors that influence VoLL and the Level of detail at which variables might be combined, relative to network parameters

How to incorporate scenario forecasting and associated uncertainty?

What is the art of the possible with regard to currently available data & systems?



### VoLL2 will gather further empirical evidence



How is VoLL best extrapolated to a population

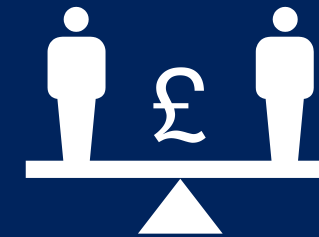
Study will examine relative value HILP events involving many customers vs localised outages



How VoLL is influenced by the greater resilience of certain customer types / communities



The ability of customers to signal VoLL, where social costs are not recognised or borne by the customer



Perceptions of fairness

Unintended consequences of a model that recognises divergence

# Project timeline



## Overview

ENWL022

Value of Lost Load (VoLL) 2

18 month project

## Benefits



Credible assessment of VoLL by key customer segments



Improved strategies to mitigate impact of lost load



More efficient investment decisions



Targeted customer compensation strategies



Transferrable to other DNOs

## Project supporters



## Timeline (strategic analytics element of project only)

Go live  
Nov 2018

Analytics literature review / proposed approach  
Sep 2019

Complete analysis & model build  
Oct 2019

Develop visualisation Tool  
Oct 2019

Strategic analysis recommendations  
Oct 2019

Dissemination of findings  
Nov 2019

Closedown  
May 2020



# Overview – Matrix currently using VoLL

## Early view on potential application in RIIO-ED2



Matrix where current vanilla VoLL is used

Setting IIS incentive rate  
Calibrating CBA model to evaluate benefits of investment

Tailoring network performance factor in Common Network Asset Indices Methodology (CNAIM)

Areas where notional VoLL is used

Worst served customer regime

Areas where VoLL concept not currently used

Guaranteed Standards regime  
Customer service and/or satisfaction measures



| Annual CI and CML incentive rates for RIIO-ED1 |                          |  |
|--|--------------------------|--|
| DNO  | CI incentive rates<br>£m | CML incentive rates<br>£m (11/12 prices) |
| ENWL   | 0.35                     | 0.86                                     |
| NPgN   | 0.24                     | 0.58                                     |
| NPgY   | 0.34                     | 0.83                                     |
| WMID   | 0.37                     | 0.90                                     |
| EMID   | 0.39                     | 0.96                                     |
| SWALES   | 0.17                     | 0.40                                     |
| SWEST  | 0.23                     | 0.57                                     |
| LPN  | 0.34                     | 0.83                                     |
| SPN  | 0.34                     | 0.82                                     |
| EPN  | 0.53                     | 1.29                                     |
| SPD  | 0.30                     | 0.73                                     |
| SPMW   | 0.22                     | 0.54                                     |
| SSEH   | 0.11                     | 0.27                                     |
| SSES   | 0.44                     | 1.08                                     |

|  |               |
|--|---------------|
| Customer number for GB   | 29,184,812    |
| 09/10 cost from licence  |               |
| £/mwhr   | 16000         |
| £/kWhr   | 16            |
| <b>Average consumption (kWhr) per customer per year</b>                                |               |
| For year   | 10,912        |
| <b>VoLL</b>  |               |
| £/mwhr   | 17,600        |
| £/kWhr   | 17.6          |
| Total amount willing to pay for year without electricity                               | 192,045       |
| <b>Per minute</b>  | <b>£0.37</b>  |
| Latest GB average CML (without storms)   | 41            |
| Total amount willing to pay per minute without electricity (ENS to CML incentive rate) | £0.37         |
| <b>Implied VoLL per customer interrupted</b>   | <b>£14.98</b> |



Main driver of asset replacement programme

Condition Based Risk Management (CBRM)

Regulatory position “to maintain underlying asset condition & performance and hence maintain network risk”

# CNAIM: Determining CoF – Network Performance (LV & HV)



The **Customer Sensitivity Factor** is already a component of the CNAIM and is used to reflect circumstances where customer impact is increased due to customer reliance on electricity (eg vulnerable customers)

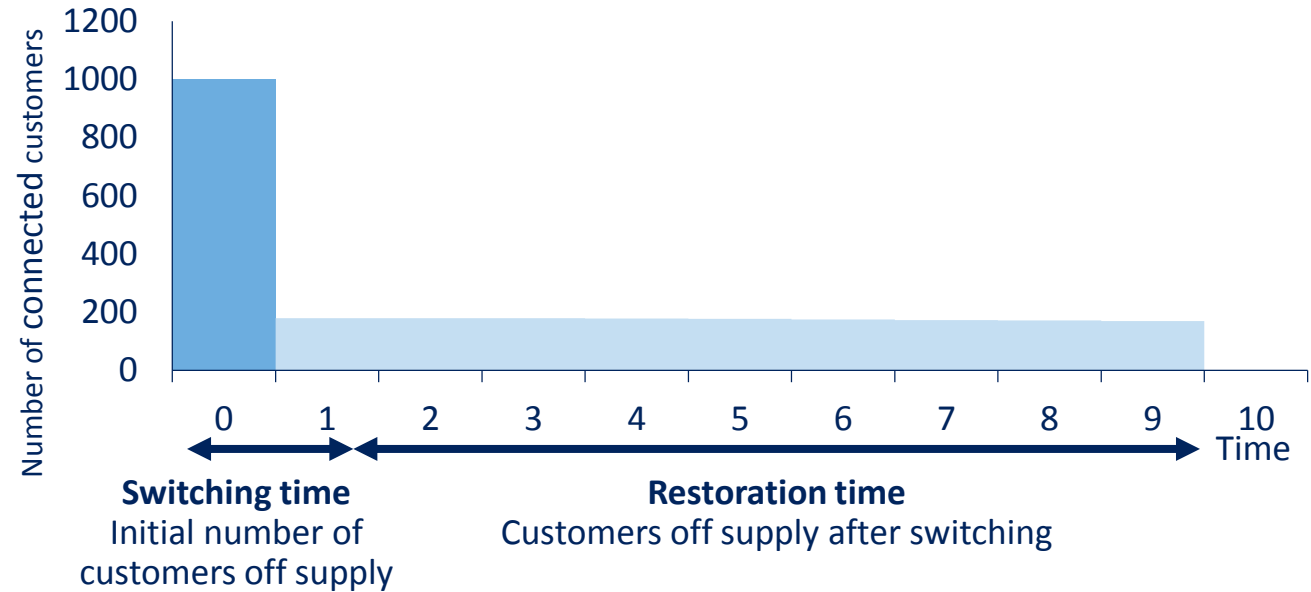


For LV and HV assets, a **‘Reference Network Performance Cost of Failure’** appropriate to the Asset Category is initially applied.

The resulting value can then be modified for individual assets in two ways:

**Directly** - based on the ratio of customers connected to an individual asset, to the equivalent figure used in the average value; and/or

Via the application of a **Customer Sensitivity Factor** to reflect particular customer characteristics (if appropriate)



**Eq 38:** Reference Network Performance Cost of Failure = ((load at risk in T1 x duration of T1) + (load at risk in T2 x duration of T2) +(load at risk in T3 x duration of T3)) x % of failures that result in an unplanned outage x probability of further coincident outage x **VoLL**



VoLL is one step removed from the standard CBA model although it underpins elements of the societal costs included within the assessment tool

## For ED1

Represented two out of the eight 'societal costs' within the CBA tool (v4)

Standard VoLL represented in the form of CIs and CMLs

To establish the CI and CML values the VoLL was converted considering a number of DNO factors

CI and CML reflected a value representative of DNOs differences but essentially grounded in single VoLL

## For ED2

It is likely that the current CBA will need to be updated for ED2. With regards to VoLL:

Should a disaggregate VoLL be utilised within a standard CBA?

Given that VoLL is proxied by CI and CML does the conversion method and underlying factors need updating?

How would the conversion method interact with a disaggregated VoLL?



In RIIO-ED1 Ofgem definition for a WSC is:

One who experiences 12 or more higher voltage unplanned interruptions over a three-year period, with at least three higher voltage interruptions each year

A use-it-or-lose-it allowance to improve network reliability for customers who have a significantly poor service

DNOs must demonstrate that they have delivered a set level of service improvement to these customers in order to receive the funding

Notional VoLL is used in ED1 price for worst served customers (WSCs) and WSC schemes to report activity volumes and expenditure incurred due to schemes commissioned under the WSC mechanism

The CV19 work sheet requires the reporting of direct costs, volumes of schemes and asset changes related to investment for WSCs & WSC schemes. This includes number of customers interrupted in reference period and number of customers interrupted post scheme completion

# Ofgem

Ofgem's current view in the development of aspects of VoLL  
within the regulatory regime for ED2



# Break

Restart at 11.40am





# Value of Lost Load (VoLL) 2 Workshop

Robbie Urwin, Sam White, Anuj Nayyar

1<sup>st</sup> October 2019

# Introduction

- ▶ Frazer-Nash tasked by ENWL to explore the implementation of an alternative segmented VoLL model (work commenced August 2019)
- ▶ This workshop is an industry consultation on the practicalities and regulatory implications for the implementation of such a model
- ▶ The aim of the workshop is to:
  - ▶ Share the proposed approach
  - ▶ Explore the practicalities of implementing a more disaggregated VoLL model
  - ▶ Discuss the practicality and appropriateness of the approach with respect to investment decision support models and the calibration of regulatory incentives
  - ▶ Discuss and share best practice





# Agenda

1. Modelling Approach Overview
  - a) Explanation of the Impact Research Customer Survey
  - b) Proposal for how to derive a VoLL model
  - c) Details on the required inputs for the VoLL model (VoLL Indicators)
  
2. Model Implementation Options
  - a) Geographical Fidelity
  - b) Data Granularity
  
3. Open Discussion



# Modelling Approach Overview



## The Customer Survey (Impact Research)

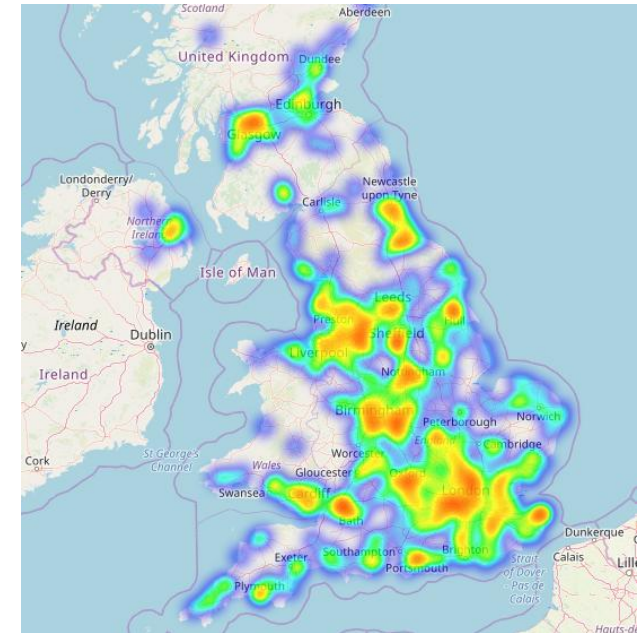
- ▶ Variable VoLL to be derived from choice experiment data
- ▶ Collected from a customer survey conducted by Impact Research
- ▶ 6,500 customers surveyed
  - ▶ 5,000 domestic
  - ▶ 1,500 SME
- ▶ Customers presented with various trade-off scenarios
- ▶ Hierarchical Bayes analysis then used to calculate VoLL

| WTA  | Option A  | Option B   |                       |
|--|---|--|-----------------------|
| Frequency of power cuts/s (over a three-year period) | 7-14 power cuts                                     | 4-6 power cuts                                     | Not sure              |
| Duration of the power cut/s                          | More than 6 hours per power cut                     | 6 hours per power cut                              |                       |
| The amount you receive for this happening            | Payment to you: 15% of your annual electricity bill | Payment to you: 5% of your annual electricity bill |                       |
| Please make your selection here                      | <input type="radio"/>                               | <input checked="" type="radio"/>                   | <input type="radio"/> |

*An example trade-off scenario presented to customers in the survey. Customers were asked to select the option that most accurately reflected their view on what they would expect to receive in such a situation.*

## VoLL Indicators

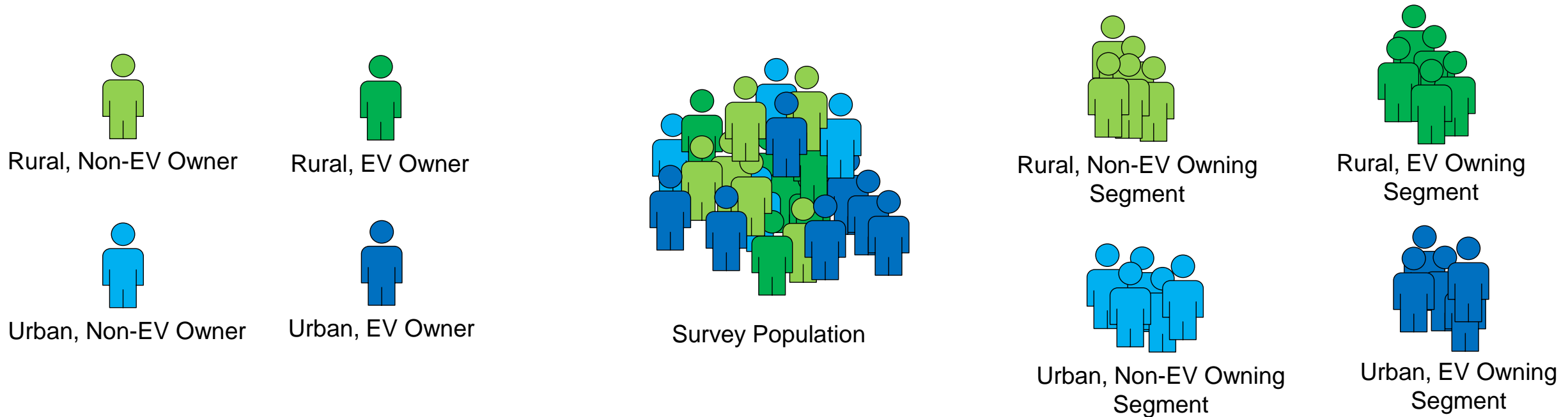
- ▶ VoLL Indicators: The key characteristics of a customer that most influence how they value loss of electricity supply
- ▶ For each respondent, the customer survey catalogues:
  - ▶ Domestic or SME
  - ▶ Age
  - ▶ Gender
  - ▶ Rurality
  - ▶ Income
  - ▶ Vulnerability
  - ▶ Fuel Poverty
  - ▶ Electricity Consumption
  - ▶ Electricity Supply Reliability
  - ▶ Gas Supply
  - ▶ Low Carbon Technology (LCT) Adoption
    - ▶ Electric Vehicles (EV)
    - ▶ Heat Pumps (HP)
    - ▶ Photovoltaics (PV)
- ▶ Analysis of the survey results can be performed to determine which of these attributes are the most significant VoLL indicators



*Locations of survey respondents.  
Orange and red areas have a greater density of respondents.*

# VoLL Estimation for Customer Segments

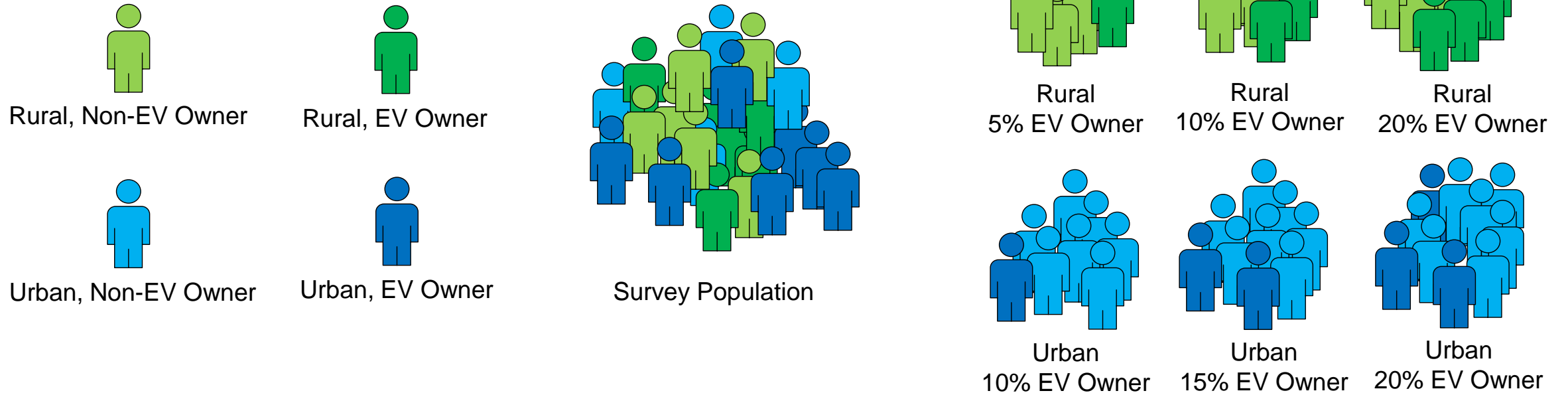
## SIMPLIFIED EXAMPLE – JUST CONSIDERING RURALITY AND EV OWNERSHIP



- ▶ VoLL can be estimated for the entire survey population
- ▶ VoLL can also be estimated for samples of the survey population that represent different customer segments (so long as the sample contains 200+ customers)



# VoLL Estimation for Sample Populations

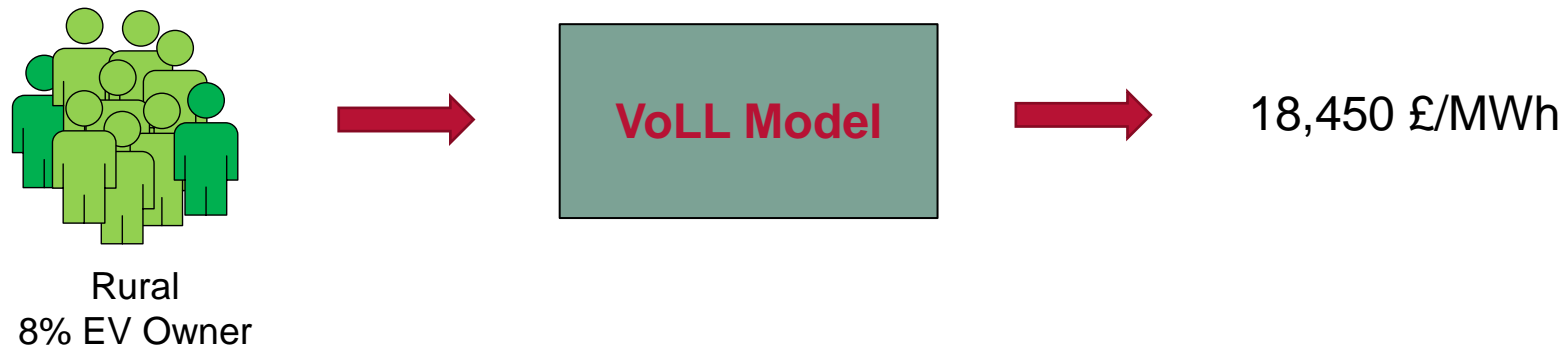


- ▶ VoLL can also be estimated for sample populations containing a mix of customer segments (more representative of 'real' populations)



## The VoLL Model

- ▶ A VoLL model can be trained using millions of different sample populations drawn from the customer survey
- ▶ The model can then be used to predict the VoLL for **ANY** sample population for which the VoLL indicators are known
- ▶ For example this could be:
  - ▶ The households in a Lower Super Output Area (LSOA – approx. 1500 population)
  - ▶ The households in a radius around a distribution substation
  - ▶ The households known to be served by a primary substation





## VoLL Indicator Estimation

- ▶ In order to estimate the VoLL for any given sample population it is therefore necessary to estimate the VoLL indicators for this population
- ▶ The process of down selecting the most important VoLL indicators is still being undertaken
- ▶ Exactly which attributes are chosen will depend on
  - ▶ The significance of the attribute as a VoLL indicator
  - ▶ The availability of data at a suitable granularity
- ▶ However it is highly likely to include:
  - ▶ Fuel Poverty
  - ▶ EV Ownership
  - ▶ Rurality
- ▶ Possible sources of the data required to estimate both these and the other attributes is provided on the next slide

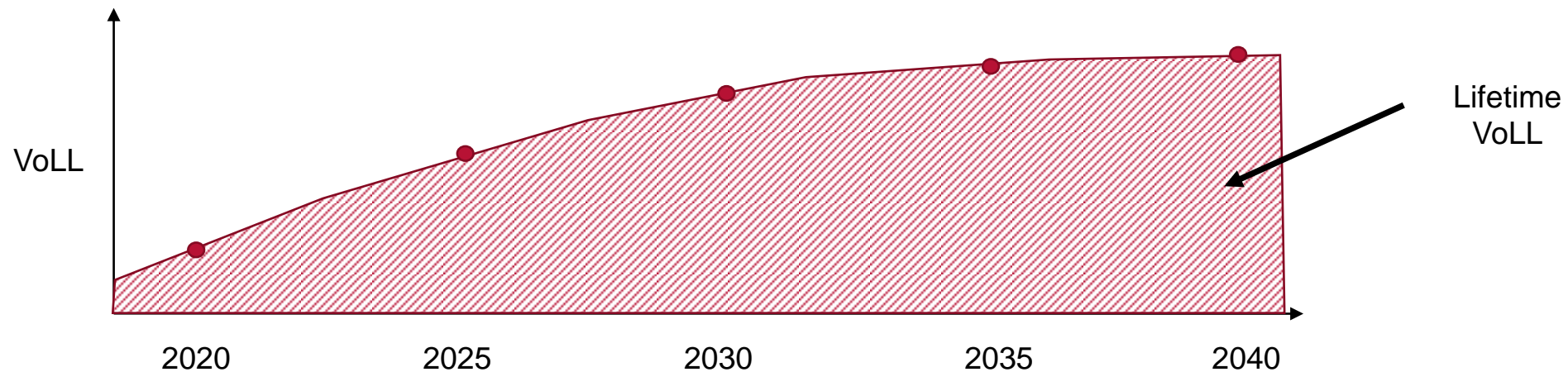
## VoLL Indicator Estimation

| VoLL Indicator     | Data Source                                    | Granularity  | Indicator Likelihood | Damage Function |
|--------------------|--|--|----------------------|-----------------|
| Age                | ONS  | LSOA   | Low                  | TBC             |
| Gender             | ONS  | LSOA   | Low                  | TBC             |
| Rurality           | ONS  | LSOA   | High                 | TBC             |
| Income             | ONS  | LSOA   | Medium               | TBC             |
| Vulnerability      | PSR  | Household  | Medium               | TBC             |
| Fuel Poverty       | ONS  | LSOA   | High                 | TBC             |
| Consumption        | ONS / DNO Databases                            | LSOA / Household                                   | Medium               | TBC             |
| Supply Reliability | DNO Databases                                  | Household  | Medium               | TBC             |
| Gas Supply         | CSE  | Postcode   | Medium               | TBC             |
| EV Adoption        | DNO Databases / National Charge Point Registry | LSOA / Primary Substation / Charge Point Locations | High                 | TBC             |
| HP Adoption        | DNO Databases                                  | LSOA / Primary Substation                          | Medium               | TBC             |
| PV Adoption        | DNO Databases                                  | LSOA / Primary Substation                          | Low                  | TBC             |
| SME Locations      | ONS  | Local Authority                                    | High                 | TBC             |

ONS = Office for National Statistics, PSR = Point Service Register, DNO = Distribution Network Operator, CSE = Centre for Sustainable Energy

## Future Scenario VoLL Estimation

- ▶ The VoLL model can be used to make predictions for any set of VoLL indicator values
- ▶ These VoLL indicators could represent a sample population in the present OR a hypothetical sample population in the future
  - ▶ For example the VoLL model could be used to make estimates of VoLL for a forecast scenario with greater EV penetration
  - ▶ It would then be possible to use such estimates to calculate the 'lifetime VoLL' of an asset





## Modelling Assumptions

1. Only VoLL attributes collected in the Impact Research customer survey have been considered as candidate VoLL Indicators
2. The Impact Research customer survey contained a representative sample of the UK population
3. Estimates of VoLL derived from the Impact Research customer survey are 'correct'  
*(is there a need to periodically repeat the customer survey to keep the VoLL model up to date with the current value customers are attributing to their security of supply?)*
4. The model coefficients calculated for individual survey respondents using Hierarchical Bayes techniques are independent and can be used to derive VoLL estimates for sample populations (this is a statistical assumption, but common practice)
5. Estimates of VoLL do not account for businesses with 250+ employees
6. Estimates of VoLL will be adjusted for low income customers, based on the principle that the value of an additional pound of income may be higher for a low income recipient than a high income recipient (the same assumption was made by Impact Research in their analysis)
7. Overall VoLL is calculated as a load-share weighted average across domestic and SME customers (the same assumption was made by both Impact Research and London Economics)



# Model Implementation Options

## Implementation Options

- ▶ The model could be implemented with varying degrees of:
  - ▶ Geographic Fidelity – i.e. How to identify the sample population?
  - ▶ Data Granularity – i.e. How detailed should the VoLL indicator data be?

### A: Geographic Fidelity

1. LSOA
2. Point and Radius
3. Freeform Polygon
4. List of Households
5. Asset Database

### B: Data Granularity

1. LSOA
2. Household



- ▶ We will consider a SWOT (Strengths, Weaknesses, Opportunities, Threats) analysis for each option and identify a preferred option(s).
- ▶ See SWOT slide hand-out to record your views – to be discussed at open discussion session



# Critical Success Factors

- ▶ What attributes are essential for a successful VoLL model?
  1. Solution accuracy – how accurately is the solution able to calculate VoLL?
  2. Solution practicality – how practical is the solution for integration with investment decision support models and the regulatory incentive schemes?
  3. Implementation practicality – how practical is it to collect the necessary data and implement the solution?
  4. Cost – how costly is the solution?
  
- ▶ Potential discussion points:
  - ▶ What are the implications of this approach for: CBA?, CNAIM?, IIS?
  - ▶ What do you think is an appropriate level of granularity for the model data?
  - ▶ Would you rather have access to the VoLL model as a tool (i.e. a web application) or as a dataset (i.e. spreadsheet or database)?
  - ▶ How available do you believe the discussed data sets to be?
  - ▶ How could you foresee such a model being utilised for forecast distribution scenarios?
  - ▶ Do you foresee any additional challenges with the implementation not already discussed?



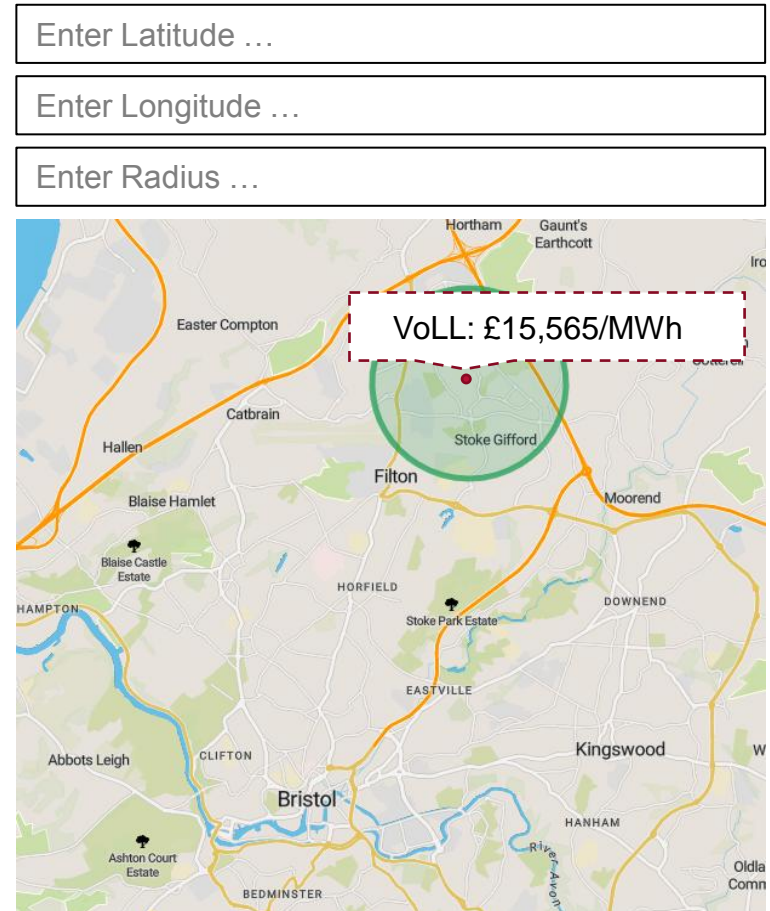
## A.1: LSOA

- ▶ Lower Super Output Area (LSOA) are geographical areas designed to contain a population of around 1500 residents
- ▶ They are areas of consistent size whose boundaries do not change
- ▶ LSOA boundaries were developed by ONS, and a wide range of data is available at this level
- ▶ VoLL could be provided for each LSOA, nationwide, in a tabulated data format (i.e. spreadsheet)
- ▶ However it would be for each DNO to determine how to map from LSOA polygons to a sample population of interest (which is unlikely to map directly to network distribution parameters)
  - ▶ Although guidelines on how to do this could perhaps be published



## A.2: Point and Radius

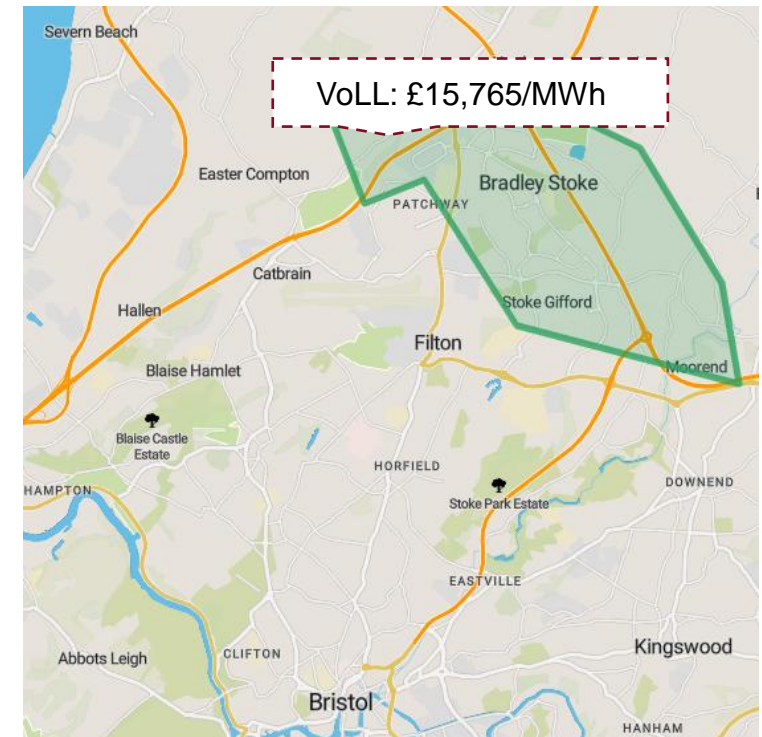
- ▶ Alternatively, VoLL estimates could be provided for the households in any area defined by a point and a radius
- ▶ This could be implemented as a web application, including a point and click and/or text entry user interface
- ▶ This has more flexibility than rigidly defined LSOAs, you could for example estimate the VoLL for a substation in this way (if you assume that it serves all households within a fixed radius)



## A.3: Freeform Polygon

- ▶ VoLL estimates could also be provided for the households in any area defined by a freeform polygon
- ▶ Again this could be implemented as a web application, including a point and click and/or polygon file upload user interface
- ▶ This is similar to the point and radius option, but gives you more flexibility in the shape of the sample population area

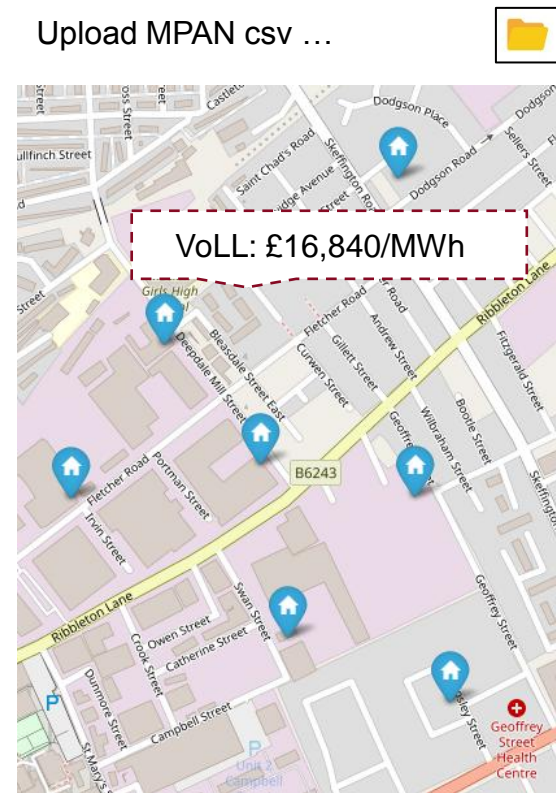
Select Polygon File ...





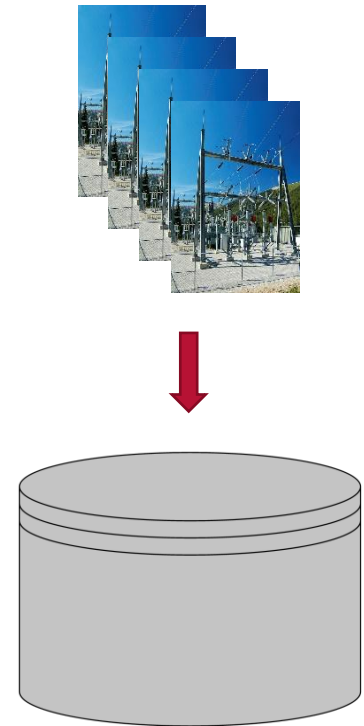
## A.4: List of Households

- ▶ Another option, which offers further fidelity, is to define the sample population by directly providing a list of households – potentially by Meter Point Access Number (MPAN)
- ▶ Estimations of VoLL indicators can be made directly for each household and aggregated to provide the overall VoLL indicators for the sample population
- ▶ Note however that this option provides far more utility if the underlying VoLL indicator data is at a household level
- ▶ Again this could be implemented as a web application whereby household MPANs (or household locations) are uploaded and an estimate of VoLL returned



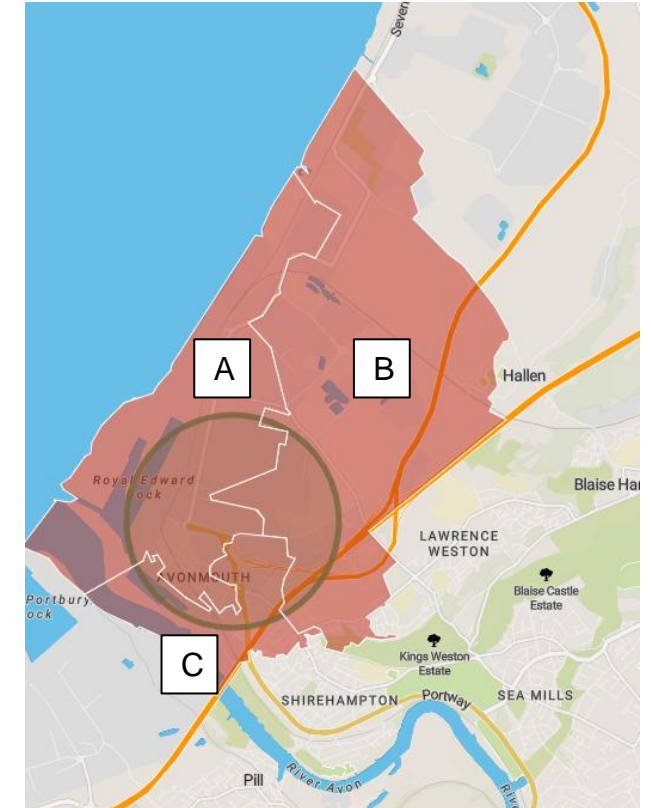
## A.5: Asset Database

- ▶ A database could be developed that contains the VoLL for all network assets nationwide (i.e. all distribution substations, primary circuits, primary substations etc.)
- ▶ This would need to be developed by deriving the households served by each asset from DNO data
- ▶ VoLL indicators could then be estimated for each household
- ▶ The aggregated VoLL for this population would be the ‘asset VoLL’
- ▶ Of all the options this perhaps requires the most upfront effort to implement
- ▶ However it could be the option that is simplest for DNOs to utilise once it has been deployed



## B.1: LSOA Data Granularity

- ▶ Many UK datasets are available at an aggregated LSOA level, meaning that this is the most straightforward option
- ▶ However it is unlikely that the sample population of interest directly correlates to an LSOA
- ▶ For example if you were trying to estimate the proportion of Fuel Poor households within the radius of an asset (the green circle in the figure)
  - ▶ The proportion of Fuel Poor households in the different LSOAs might be
    - ▶ A = 6%
    - ▶ B = 18%
    - ▶ C = 14%
  - ▶ It could be calculated that radius is 50% A, 30% B and 20% C
  - ▶ A weighted average Fuel Poverty would therefore be
    - ▶  $(0.5*6) + (0.3*18) + (0.2*14) = 11.2\%$
- ▶ Equally if you were trying to estimate the Fuel Poverty for a single household (i.e. for approaches A.4 or A.5), you would have to assume that the Fuel Poverty number applies to all households within the LSOA
- ▶ These are clearly estimates, but it *may* be sufficiently accurate and practical for the purposes of the VoLL model



## B.2: Household Data Granularity

- ▶ It may be possible in some (if not all) cases, to gain access to datasets that provide estimates of VoLL indicators at a much more granular level than LSOA
- ▶ This could be:
  - ▶ Output Area (OA)
  - ▶ Postcode
  - ▶ Household
- ▶ For some demographic datasets this level of granularity can be bought (i.e. the Experian Mosaic dataset, ~£20k / year)
- ▶ For other datasets (Electricity Consumption and Supply Reliability) whether or not this is possible depends on what the DNOs can provide
- ▶ The practicality of obtaining such data sets, and the utility it would provide for the model is up for debate
- ▶ The requirement and overhead in keeping this data up to date should also be considered



# Lunch

12.30pm – Afternoon session starts at 1.00pm







What are the implications of this approach for: CBA?, CNAIM?, IIS?

What do you think is an appropriate level of granularity for the model data?

Would you rather have access to the VoLL model as a tool (ie a web application) or as a dataset (ie spreadsheet or database)?

How available do you believe the discussed data sets to be?

How could you foresee such a model being utilised for forecast for forecast distribution scenarios?

Fairness & equity - could a variable VoLL align with the GS regime or drive CSAT measures?

Scale and duration: How to value the wider societal costs of High Impact Low Probability (HILP) events

Do you foresee any additional challenges with the implementation not already discussed?

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# Questions

Thanks for your time  
and contribution

Stay connected...



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Thank you for your time and attention