

GDN Collaborative Vulnerability & Carbon Monoxide Allowance (VCMA)

Project Eligibility Assessment (PEA)

Citizens Advice National - Energy Safeguarding and CO Safety partnership 23/24 – 25/26

Dan Edwards – dan.edwards@sgn.co.uk

March 2023

Gas Network Vulnerability & Carbon Monoxide Allowance (VCMA) Governance Document - Project Eligibility Criteria

Section 1 - Eligibility criteria for company specific projects (other than condemned essential gas appliance repair and replacement)	
In order to qualify as a VCMA project, a project must:	
VCMA Eligibility Criteria	Criteria Satisfied (Yes/No)
a) Have a positive, or forecasted positive Social Return on Investment (SROI), including for the gas consumers funding the VCMA project;	Yes
b) Either: <ul style="list-style-type: none"> i. Provide support to consumers in vulnerable situations, and relate to energy safeguarding, or ii. Provide awareness on the dangers of CO, or iii. Reduce the risk of harm caused by CO; 	Yes
c) Have defined outcomes and the associated actions to achieve these;	Yes
d) Go beyond activities that are funded through other price control mechanism(s) or required through licence obligations; and	Yes
e) Not be delivered through other external funding sources directly accessed by a GDN, including through other government (national, devolved, or local) funding.	Yes
Section 2 - Eligibility criteria for company specific essential gas appliance servicing, repair, and replacement projects	
In order to qualify as a VCMA project, unsafe pipework and essential gas appliance servicing, repair or replacement must meet the following criteria:	
a) A GDN has to isolate and condemn unsafe pipework or an essential gas appliance following a supply interruption or as part of its emergency service role;	N/A
b) The household cannot afford to service, repair, or replace the unsafe pipework or essential gas appliance; and;	N/A
c) Sufficient funding is not available from other sources (including national, devolved, or local government funding) to fund the unsafe pipework or essential gas appliance servicing, repair, or replacement.	N/A
Section 3 - Eligibility criteria for collaborative VCMA projects	
In order to qualify as a collaborative VCMA project, a project must:	
a) Meet the above company specific and boiler repair and replace (if applicable) project eligibility criteria;	Yes
b) Have the potential to benefit consumers on the participating networks; and	Yes
c) Involve two, or more, gas distribution companies.	Yes

Gas Network Vulnerability and Carbon Monoxide Allowance (VCMA) Governance Document - Project Registration Table 2

Information Required	Description																									
Project Title	Citizens Advice National - Energy Safeguarding and CO Safety partnership extension 23/24 – 25/26																									
Funding GDN(s)	SGN, Northern Gas Networks, Wales & West Utilities																									
Role of GDN(s) *For Collaborative VCMA Projects only	SGN – Project lead NGN / WWU – Project participants																									
Date of PEA Submission	15/03/23																									
VCMA Project Contact Name, email, and Number	Dan Edwards - Social Impact Programme Lead dan.edwards@sgn.co.uk																									
Total Cost (£k)	£2,505,388 (exc. VAT) over 3 years <table border="1" data-bbox="424 790 1377 1055"> <thead> <tr> <th></th> <th>Citizens Advice Cost</th> <th>CO alarm cost</th> <th>CO + Energy pack fulfilment</th> <th>Overall total</th> </tr> </thead> <tbody> <tr> <td>NGN</td> <td>£639,753.05</td> <td>£34,240.00</td> <td>£17,727.55</td> <td>£691,720.60</td> </tr> <tr> <td>SGN</td> <td>£1,037,126.73</td> <td>£55,520.00</td> <td>£28,738.77</td> <td>£1,121,385.50</td> </tr> <tr> <td>WWU</td> <td>£640,299.23</td> <td>£34,240.00</td> <td>£17,742.68</td> <td>£692,281.91</td> </tr> <tr> <td></td> <td>£2,317,179</td> <td>£124,000.00</td> <td>£64,209.00</td> <td>£2,505,388.00</td> </tr> </tbody> </table>		Citizens Advice Cost	CO alarm cost	CO + Energy pack fulfilment	Overall total	NGN	£639,753.05	£34,240.00	£17,727.55	£691,720.60	SGN	£1,037,126.73	£55,520.00	£28,738.77	£1,121,385.50	WWU	£640,299.23	£34,240.00	£17,742.68	£692,281.91		£2,317,179	£124,000.00	£64,209.00	£2,505,388.00
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Problem(s)	<p>Since the winter period of 2020/21 energy prices have soared and the number of UK households estimated to be living in fuel poverty has risen from circa three million in early 2021 to over 6.7 million households now being in fuel poverty. This is expected to increase further to around 8.2 million from 1 April 2023 as the current package of support for households runs out and the Energy Price Guarantee changes¹.</p> <p>This is exacerbated by the fact that nearly half of low-income households are still living in hard to heat homes, the rate of improvements is well below what is needed to lift people out of fuel poverty by a target date of 2030.</p> <p>The cost-of-living crisis is causing the energy landscape to constantly change, and it is becoming increasingly difficult for consumers to stay up to date on energy and how to manage their fuel bills. There are a wide range of issues to consider and often many different agencies or information services to contact for advice and support, which can be difficult for all consumers and particularly those in vulnerable situations or fuel poverty.</p>																									

¹ [NEA Fuel Poverty Statistics Explainer](#)

	<p>Citizens Advice have seen more people going to them for help with crisis support, energy problems and not having enough money to make ends meet than ever before. This is evidenced by the fact that throughout 2022 they had seen more people who were unable to top up their prepayment meter than for the entirety of the previous 10 years combined². The current demand for energy and crisis support is not sustainable and Citizen’s Advice are doing everything they can to meet the continually growing demand.</p> <p>Carbon Monoxide (CO) can pose a serious threat to human health and even fatality, with around 40 deaths caused by CO poisoning each year in the UK and 4,000 people treated in hospital as a result of CO poisoning. Many people in the UK who use carbon fuelled appliances are not aware of the dangers of CO and do not have a working audible CO alarm. Of 8,000 people surveyed in 2020 45% didn’t know that CO doesn’t have a smell, and only 42% had a working audible CO alarm. Lack of awareness about the dangers of and ways in which to prevent harm from CO are a major contributing factor to why we’re still seeing CO related deaths and harm in a time when safety devices such as CO alarms are cheaper and more accessible than ever.</p> <p>There is a direct correlation between fuel poverty and carbon monoxide poisoning. Lower income householders are often reliant on older boilers, older heaters or even gas stoves or cookers to heat their homes. National Energy Action and Gas Safety Trust research found 35% of low income and vulnerable households surveyed exceeded the 10ppm threshold for carbon monoxide levels.³ People living in deprived areas are also less likely to own an audible CO alarm than homes in non-deprived areas, further increasing the risk of CO poisoning.⁴ Older people, pregnant women, and young children have also been found to be particularly vulnerable to CO poisoning, spending more time at home and with a need to stay warm, resulting in using the heating more regularly.⁵ Consumers in rented accommodation and particularly social tenants are less at risk due to RSL requirements for annual gas safety checks, higher energy efficiency standards, and the legislation throughout England and Wales that now requires all rented homes to have a CO alarm installed in any room where there is a fixed combustion appliance (excluding gas cookers in England).</p> <p>Since our original project went live in December 2021 the team at Citizens Advice have seen record numbers of clients in energy crisis seeking support as they face energy debt, or self-disconnection as they are unable to top up their pre-payment meters. The evidence of increased need reflected by the energy price cap changes at the same time as record cost of living increases has hit those on low incomes hardest. There is no end date for the current crisis and things are likely to get worse before they get better, so there is an ongoing need for Citizens Advice to support those most in need and we can help them to do that.</p>
<p>Scope and Objectives</p>	<p>Delivered in partnership with Citizens Advice, and co-funded by three UK Gas Distribution Networks, this project extends the previous GDN collaboration project with Citizens Advice that ran from Jan 2022 – March 2023 and aims to continue with support for vulnerable households providing a single point of contact for independent and bespoke support to keep a safe and warm home for less. Working regionally in the Northern Gas Networks, SGN, and Wales & West Utilities network areas through</p>

² [CA Cost of Living Crisis dashboard February 2023](#)

³ Cited on Safelincs blog (2020) [Carbon monoxide poisoning: who is most at risk?](#)

⁴ Kokkarinen et al (2014) Investigation of audible carbon monoxide alarm ownership

⁵ Ibid. Safelincs, Carbon monoxide poisoning

	<p>Citizens Advice’s network of local Energy Advice Partnership Hubs, with the potential to access the full Citizens Advice network where required, the partnership will deliver:</p> <ul style="list-style-type: none"> • Increased capacity of the existing Citizens Advice Energy Advice Programme (EAP) enabling more customers to be supported with in-depth energy advice – behavioural, providing information on how to save energy by personal action this includes: <ul style="list-style-type: none"> ○ Energy tariff support / advocacy – supporting people with energy bills, debt, switching, fuel bill renegotiation – support to be an active energy consumer ○ Benefit entitlement checks to ensure customers are receiving the appropriate benefits and grants based on their individual circumstances, including but not limited to Warm Home Discount • Ongoing dedicated frontline worker CO safety training provided for Citizens Advice energy advisors supporting the programme, to educate them on the sources, signs, and symptoms of CO poisoning (including the risks around low-level poisoning), what actions to take if CO poisoning is suspected, and what they can do to prevent CO. Enabling them to identify CO signs/risks and provide CO awareness sessions for the customers they support • CO awareness sessions provided to customers including key CO messaging; annual appliance testing, CO alarm ownership/maintenance, identifying signs/symptoms of CO, and actions if CO exposure/presence is suspected • Provision of an Energy and CO Safety pack for customers most in need and who are at higher risk of CO exposure. Pack contents includes; a CO alarm, a CO safety leaflet, a thermometer card, and an energy saving advice leaflet • PSR registrations to the energy PSR (ensuring where possible the ‘tick’ to share information beyond the DNO / Supplier) • Locking Cooker Valve referrals into regional GDN where a need is identified to add a safety device to the gas cooker • Onward referral support to address other barriers to living in a safe and warm home, this could include but is not limited to; emergency funds, housing support, food vouchers etc.
<p>Why the Project is Being Funded Through the VCMA</p>	<p>This project operates within Northern Gas Networks, SGN, and Wales & West Utilities networks and extends the previous collaborative partnership from April 2023 through to the end of March 2026. It has been co-designed with Citizens Advice to increase capacity for their Energy Advice Programme, provide much needed CO awareness capability and find solutions that work for all our customers. It qualifies under the VCMA funding criteria as it will provide energy efficiency advice and CO safety advice/interventions, empowering each householder to use energy safely, efficiently, and affordably.</p> <p>Eligibility Criteria</p> <ul style="list-style-type: none"> a) We have forecast a positive net SROI b) This project will provide support to consumers in vulnerable situations and relate to energy safeguarding, provide awareness of the dangers of CO and an Energy and CO safety pack to support those most in need that will reduce the risk of harm caused by CO c) We have defined outcomes for this project and the associated actions to achieve these as detailed below; d) This project and its outcomes go beyond activities that are funded through other price control mechanisms or required through licence obligations; and

	<p>e) Is not being delivered through other external funding sources directly accessed by a GDN, including through other government (national, devolved, or local) funding</p>
<p>Evidence of Stakeholder/Customer Support</p>	<p>SGN Customer Engagement Group and Vulnerable Steering Group Engagement During the shaping of the SGN business plan we committed to, over the 5-year price control, to support over 250,000 vulnerable customers to use gas safely, affordably, and efficiently. To ensure that we adapt to market conditions we continue to engage our SGN Vulnerable Steering Group, they help us shape our vulnerability and CO strategies and our priorities for GD2 based on current need. Our expert stakeholders representing a range of vulnerable customer segments guided us to work with existing organisations that already support those in crisis and where we are able to broaden the reach or increase the capacity of those established charities that support people most in need. It is with guidance and support from our dedicated Vulnerable Steering Group that SGN prioritise support for those most likely to need help from their utility company due to low incomes, in extreme financial vulnerability and fuel crisis.</p> <p>NGN Customer Perceptions Research Each year NGN use annual Customer Perceptions Research to understand the priorities of their customers. Amongst a set of general tracker questions ie, the same questions that are asked year on year, the evidence in the most recent research, indicated that keeping bills as low as possible ranked more highly than providing a safe and reliable supply of gas for the first time. This is a clear indication as to how concerned customers are about the cost of energy and the need for support to address these issues.</p> <p>WWU Stakeholder Engagement Stakeholders are very concerned about the cost-of-living crisis and in particular the cost of energy leading to people rationing use or not using at all. Organizations have told us of the demand for their services increasing 300% over the last 18 months at a time when funding is a challenge.</p> <p>We have tested our commitment to helping customers via partnerships such as the Citizens Advice with our Consumer Engagement Group and our Citizens panel. All agreed we are in a good place to assist and play our part in identifying vulnerable people, many of whom find themselves in difficulty for the first time and improving their financial situation and hopefully through a warm and safe home their health and wellbeing.</p> <p>Through our Business Commitments tracking research undertaken by Accent in late 2022, commitments for customers on energy costs and carbon monoxide were ranked most important after reliability and safety by our customers.</p> <p>GDN CO Collaboration Group When discussing the potential extension of this collaborative VCMA project with the members of the GDN CO Collaboration Group, the strategic stakeholders including all four GDNs, Gas Safe Register and Project Shout supported extending this partnership for the remainder of GD2.</p> <p>GDN GD2 Consumer Vulnerability and Carbon Monoxide Steering Group The GDN GD2 VCMA steering group work membership includes senior leaders from each representative gas network and representation from key consumer advocacy groups including Citizens Advice, National Energy Action, and Energy UK. The steering group ensures that the VCMA is managed in accordance with Ofgem</p>

	<p>guidelines and the strategic ambitions of the group. This initiative was reviewed and recognised as meeting an urgent and current need in the community.</p> <p>Feedback from Matt Copeland member of our strategic steering group and Head of Policy and Public Affairs at NEA said “I support the Citizens Advice National partnership going through the VCMA. This winter, and throughout next year, it will be increasingly important to provide additional practical support to struggling energy consumers. These projects will look to give additional advice, but also, crucially, financial support to those households that need it most, so that they can stay warm and well at home through this period of extended high energy prices”.</p> <p>Citizens Advice – Cost of Living Dashboard</p> <p>Citizens Advice are collating the data from the support they’re providing in our communities, this data is significant and has highlighted not just the increase in need for households throughout the last few years, but more recently the challenges faced by customer groups most impacted by the cost-of-living crisis. Key insights from the research highlights that there has been a significant increase of households in energy crisis, those unable to afford to top up prepayment meters or going into energy debt.</p>
<p>Outcomes, Associated Actions and Success Criteria</p>	<p>Through this partnership the Citizens Advice local Energy Advice Programme teams will work within Northern Gas Networks, SGN, and Wales & West Utilities network areas to directly support at least 23,300 vulnerable people over three years with access to practical advice on the dangers of CO and how to mitigate these, as well as in-depth energy advice that improves their financial independence, their health and wellbeing, and increases their confidence to manage their household utility costs.</p> <p>The partnership will be embedded in the Citizen Advice Energy Advice Programme and provide the following outcomes:</p> <ul style="list-style-type: none"> • CA Energy Advisors educated on CO safety and confident to provide CO awareness to customers they work with • All customers supported will have a greater understanding of the importance of gas safety and the dangers associated with CO, with their CO awareness measured via the standard CO awareness survey • All EAP customers will have a greater understanding of how to save energy and will be supported to become an active energy consumer • Through the energy and CO safety packs, customers identified in greatest need will be provided with a CO alarm and instructions on how to use it, and energy and CO safety literature to help them better understand how to use energy safely, efficiently, and affordably <p>Success Criteria</p> <p>Over three years from April 2023 to March 2026 our partnership is forecast to deliver;</p> <ul style="list-style-type: none"> • 50+ Additional CA Energy Advisors provided CO safety training • 7,888 customers supported to use energy safely, efficiently, and affordably via one-to-one energy and CO awareness discussions • 15,414 customers will be more aware of the risks of CO and how to mitigate these following one-to-one CO awareness discussions • 11,625 energy and CO safety packs issued (following a one-to-one energy and/or CO safety discussion) • Up to 4,000 customers supported to switch tariff or supplier, ensuring they are getting the best price for their energy usage – <i>Due to the ongoing cost-of-living crisis and energy market conditions this may not be possible, but based on programme delivery from the original project this is a reasonable estimate</i> • 5,000+ customers supported with fuel bill renegotiation and payment options for fuel debt

	<ul style="list-style-type: none"> • 9,000+ eligible customers supported to access and receive Warm Home Discount – <i>This will be dependent on the continuation and availability of the scheme</i> • 10,000+ PSR Registrations • 50+ LCV Referrals to regional GDN <p>To monitor our impact in line with the above, we will:</p> <ul style="list-style-type: none"> • Monitor outcomes against services provided • Monitor who is making use of the service - customer demographics, vulnerabilities, and needs • Survey service users for satisfaction and impact • Work closely with our partners to ensure that we all understand the issues faced to continue to develop our services by need • Provide case studies of the impact of the programme on frontline support and impact of individuals supported by the initiative (partner and individual) • Work with Citizens Advice to solve the problem around measuring the outcomes from a partner that is embedded within other referral pathways. For example, if someone is supported through the EAP team they may get referred out to receive other services, so what does that mean in terms of overall impact and value for the customer.
Project Partners and Third Parties Involved	<ul style="list-style-type: none"> • Citizens Advice England and Wales – Lead delivery partner, managing relationship with all local Citizens Advice Hubs involved in their Energy Advice Programme. • SGN – Lead gas network, providing funding and support to the delivery team, including training and access to broader referral partners and direct services for customers including but not limited to Locking Cooker Valves, CO alarms and access to the Fuel Poor Network Extension Scheme. • Northern Gas Networks / Wales & West Utilities – Partner gas networks providing funding and access to broader referral partners and direct services for customers including but not limited to Locking Cooker Valves, CO alarms and access to the Fuel Poor Network Extension Scheme. • Fireblitz Extinguishers Ltd – Supplier of the CO alarms for inclusion in the energy and CO safety packs. • Mailbox Direct – Delivery partner, assembling and sending out the energy and CO safety packs
Potential for New Learning	<p>Through customer feedback, surveys, and case studies we expect to understand how effective one-to-one energy advice and CO safety discussions are for people in crisis.</p> <p>Working with Citizens Advice and their broader network we are hoping to enhance our understanding of the additional benefits for customers that come from a partner embedded within other referral pathways and able to refer out customers in need to other services.</p> <p>Working closely with Citizens Advice and engaging with them consistently around the cost-of-living crisis we have gained a great depth of insight into the challenges households are now facing in paying their bills and keeping food on the table. Citizens Advice saw more people coming to them in 2022 for help with crisis support, energy problems and not having enough money to make ends meet than ever before. In response to the Cost-of-Living crisis and the insight Citizens Advice have provided indicating that they are getting more requests than ever before for support Northern Gas Networks, SGN, and Wales and West Utilities have decided to extend this partnership through to the end of GD2 in March 2026 giving Citizens Advice</p>

	confidence in their ability to maintain this service long term and the ability to support more people with their in-depth energy advice.																
Scale of VCMA Project and SROI Calculations	<p>This project is working with Citizens Advice England and Wales, and local Citizens Advice Hubs across England and Wales in Northern Gas Networks, SGN, and Wales and West Utilities footprints.</p> <p>We've used outcomes and delivery figures from the original project to allow more accurate forecasting of project outcomes. Working with SIA Partners we've developed a number of social proxy values aligned to the work and outcomes we and our partners are delivering. Using these along with the DNO SROI assessment tool and methodology we have carried out an in-depth assessment of the financial and wellbeing outcomes associated with this project, and we forecast a positive net SROI of £5.54</p> <table border="1"> <tr> <td>Total cost</td> <td>£2,415,536.55</td> </tr> <tr> <td>Total gross present value</td> <td>£15,792,998.82</td> </tr> <tr> <td>NPV</td> <td>£13,377,462.27</td> </tr> <tr> <td>SROI</td> <td>£5.54</td> </tr> </table> <table border="1"> <tr> <td>PV of customer financial benefits</td> <td>£11,427,626</td> </tr> <tr> <td>PV of societal benefits</td> <td>£4,365,373</td> </tr> <tr> <td>% Customer financial benefits</td> <td>72.4%</td> </tr> <tr> <td>% Societal benefits</td> <td>27.6%</td> </tr> </table>	Total cost	£2,415,536.55	Total gross present value	£15,792,998.82	NPV	£13,377,462.27	SROI	£5.54	PV of customer financial benefits	£11,427,626	PV of societal benefits	£4,365,373	% Customer financial benefits	72.4%	% Societal benefits	27.6%
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VCMA Project Start and End Date	1 st April 2023 – 31 st March 2026																
Geographical Area	<p>The project will take place across local Citizens Advice hubs in England and Wales within the GDN regions for Northern Gas Networks, SGN and Wales and West Utilities:</p> <ul style="list-style-type: none"> • North East • South East • South London • South West • Wales • Yorkshire & the Humber 																
Remaining Amount in the Allowance at Time of Registration	<p>Remaining funding left in the Licensee's/ Licensees' funding pot.</p> <p>Amount before this project: TBC Project costs: £2,505,388 Remaining following this project: TBC</p>																

Gas Network Vulnerability and Carbon Monoxide Allowance (VCMA) Governance Document - PEA Control Table

In order to ensure that a VCMA project is registered in accordance with the Ofgem VCMA governance document (incl. project eligibility assessment), the below table should be completed as part of the project registration process.


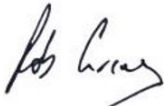
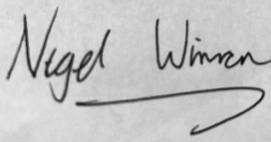
Stage 1: GDN Collaboration Group PEA Review
Meeting date review completed: February 2023
Review completed by:

GDN:	Name:	Job Title:
NGN	Steve Dacre	Vulnerability Innovations Lead
SGN	Kerry Potter	Group Social Impact and Vulnerability Manager
WWU	Elizabeth Warwick	Stakeholder Engagement Manager

Stage 2: GD2CVG Panel Review
Meeting date sign off agreed: February 2023
Review completed by:

GDN:	Name:	Job Title:
NGN	Eileen Brown	Customer Experience Director
SGN	Maureen McIntosh	Head of Customer Experience
WWU	Nigel Winnan	Head of Customer and Social Obligations

Step 3: Participating GDN individual signatory sign-off

GDN	Name:	Job Title:	Signature:	Date:
NGN:	Eileen Brown	Customer Experience Director		28.03.2023
SGN:	Rob Gray	Director of Stakeholder & Communications		28/03/23
WWU:	Nigel Winnan	Head of Customer and Social Obligations		28/03/23

Step 4: Upload PEA Document to the Website & Notification Email Sent to Ofgem (vcma@ofgem.gov.uk)

Date that PEA Document Uploaded to the Website: Dates may vary as each GDN will individually upload on their websites.

Date that Notification Email Sent to Ofgem: