



WALES&WEST
UTILITIES

ECOE Advice – Future Ready Growth

Vulnerability and Carbon Monoxide Allowance (VCMA)
Project Eligibility Assessment (PEA)

Start Date: April 2026
PEA Reference: FP- WWU-006b



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Project Registration Table

Project Summary	
Project title	Sustainable Community Solutions – ECOE Advice
Strategic area	Fuel Poverty and Energy Affordability
Lead partner name	SCS - ECOE Advice
Lead GDN(s)	Wales & West Utilities (WWU)
Funding GDN(s)	N/A – company specific
New or updated	New
Collaborative VCMA Projects	N/A
Date of PEA submission	April 2026
Project start and end date	April 2026 – March 2028
Project location	Torbay, Teignbridge, Mid Devon, East Devon and Exeter
Project Contact	
Name	Tom Robinson
Contact details	Tom.Robinson@wwutilities.co.uk
Project partners and third parties involved	
Organisation name(s) and role(s)	ECOE will deliver this project through a strong network of established partners across Devon and the wider Southwest including energy groups like TEC, SDCE & PEC
Sectors Involved	Gas Distribution Network Charitable Organisation
Costs and Funding (£k)	
Total cost	£626,967.13
Total VCMA funding required	£625,654.13
Total BAU vulnerability and CO safety activity baseline allowance funding by activity	CO Alarms – 200 - £2,626

Problem(s)

This section needs to outline the problem(s) which is/are being addressed by the VCMA project.

Rising international instability, including ongoing conflict in the Middle East, continues to drive up energy costs and place sustained pressure on household living standards. In response, the UK Government's Fuel Poverty Strategy aims to lift one million households out of fuel poverty, with the Warm Homes Plan (WHP) focusing on improving the energy efficiency of homes through insulation and retrofit. The WHP recognises that achieving lasting impact requires building trust and capacity to deliver advice and support that is accessible to all. Locally embedded, tailored energy advice—designed around individual households and their homes—is essential, as national, one-size-fits-all approaches are more likely to result in low uptake and relapse. Supporting households to understand where to start with both short- and longer-term home energy improvements is critical, and scaling this provision requires sustained investment.

As regional governance continues to evolve, agility is increasingly important, requiring investment in systems that enable learning and the integration of best practice across districts and the wider Southwest. We are deepening collaboration with Southwest partners and exploring efficiencies of scale to strengthen regional delivery.

Fuel poverty presents a significant and escalating challenge across Torbay and Devon, driving both existing and newly emerging vulnerabilities. Torbay has one of the highest fuel poverty rates in the Southwest, with 16.3% of households (7,992 homes) affected. Across Devon, 11% of households (41,104 homes) were living in fuel poverty in 2023. These trends reflect the combined pressures of older, inefficient housing stock, rural isolation and a high proportion of off-gas properties that are costly to heat. These conditions disproportionately affect people who are already vulnerable—such as older adults, disabled people and those with long-term health conditions—while increasingly pushing low-income private tenants and owner occupiers into energy insecurity, cold and damp homes, and rising energy debt. Structural barriers, including high housing costs, poor-quality housing and digital exclusion, further compound these challenges.

Alongside this wider context, ECOE Advice has transitioned from a hosted model to a standalone charity (SCS), strengthening governance and long-term service resilience. This transition is necessary to ensure continuity and quality of support for vulnerable households; however, it creates short-term capacity challenges that, if unaddressed, risk limiting reach, accessibility and service effectiveness for customers most in need.

Scope and Objectives

Outline the scope and objectives of the VCMA project linked to the problem statement above. This should be clearly defined, including the benefits which would directly impact customers on the participating GDNs' network(s), and where the benefits of the VCMA Projects lie.

This project will build on the long-standing approach to delivering trusted, high-quality in-person energy support for communities across Devon and Torbay. Through this programme, ECOE Advice will ensure that vulnerable customers continue to receive timely, practical assistance, including carbon monoxide safety guidance and early conversations that support the transition to a net zero future. Support will be delivered through the following ways:

- home visits
- hub drop-ins
- Energy Advice Centres
- Community events and specialist clinics

Maintaining leased premises in Exeter and Paignton ensures that accessible, face-to-face support remains available in areas of greatest need. These sites enable customers who do not wish to receive home visits to seek help locally, improve response times and increase the number of households we can support efficiently.

Alongside face-to-face delivery, the project will provide tailored household support including carbon monoxide safety, Priority Services Register engagement, personalised energy efficiency advice and energy triage. Advisers will also support access to emergency provision, keep-warm resources and onward referrals, including Fire and Rescue Service visits and gas safety interventions where required.

To maximise the impact of this project, ECOE Advice will recruit four 0.4 FTE roles - a Data Lead, a Well in the Home Health Energy Advisor, a People and Culture Lead, and an Income Generation Lead - alongside a 0.2 FTE Fuel Poverty Client Coordinator.

Benefits include:

- Access to trusted, in-person and community-based energy advice.
- Improved energy efficiency, reduced fuel poverty and safer, warmer homes.
- Strengthened referral pathways and faster response times.
- Better data integration enabling earlier identification of vulnerability.
- Enhanced financial resilience and improved household wellbeing.
- Improved physical and mental wellbeing

Project Design Engagement

Targeting vulnerability support: This must describe how the GDN(s) identified the vulnerability need being addressed through the VCMA project, including the use of consumer research, stakeholder engagement, and data and technology.

Evidence of stakeholder and/or customer support: Information regarding all stakeholder and/or customer engagement which has contributed to the development of the VCMA Project.

Stakeholder project design input: How stakeholders were actively involved in the project design, and how their input and feedback were incorporated to shape the project design. Where stakeholders disagree about the project design, justification must be provided for why the current project design is deemed preferable.

This project has been designed based on the historic patterns of community need, identified through a combination of consumer research, local data analysis and stakeholder engagements gathered through ECOE Advice's GD2 project. Devon and Torbay have some of the highest fuel poverty rates in the South-West, including 16.3% of households in Torbay and 11% across Devon living in fuel poverty. This is driven by older housing stock, rural isolation, high off-gas usage and low incomes.

The project design is grounded in extensive engagement with customers, frontline workers, community organisations, local authorities and health partners. This engagement consistently demonstrates the need for accessible, trusted and relational support for households struggling with fuel poverty, risky home environments and health-related vulnerabilities. Learning from GD2 shows that many require trusted, face-to-face and relational support to identify risks in the home and access appropriate protections and interventions.

Stakeholders consistently highlight that one-size-fits-all national schemes are insufficient to reach those most at risk, particularly people who are digitally excluded or socially isolated. These insights have shaped a locally embedded, flexible delivery model focused on early identification of vulnerability, integrated triage and targeted support informed by data and lived experience.

Why the project is funded through VCMA

This should include an explanation of why the VCMA project meets the VCMA eligibility criteria, and how it aligns with WWU company specific vulnerability strategy and GDNs collaborative vulnerability strategy.

This project meets the VCMA eligibility criteria and strongly aligns with Wales & West Utilities' Consumer Vulnerability Strategy, which sets out a clear commitment to keeping communities safe, warm, and supported—particularly those most at risk of fuel poverty, energy insecurity, or digital exclusion. ECOE Advice plays a vital role in achieving this ambition by delivering trusted, place-based, person-centred support over and above activities funded through baseline allowances or statutory

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obligations, to households who are often the least likely to access help without targeted, community-embedded intervention.

The project directly supports vulnerable consumers by providing tailored energy safeguarding services, including practical in-home and community-based energy advice, carbon monoxide safety education, and early-stage conversations that support vulnerable people preparing for the transition to net zero. This aligns with the core objectives of the collaborative GDN vulnerability strategy, including:

- Empowering communities to identify and support households experiencing vulnerability, particularly those who are isolated, digitally excluded, or living in cold, unsafe homes.
- Improving access to essential safeguarding services, such as advice on energy affordability, safety, ventilation, carbon monoxide awareness, and access to support schemes.
- Ensuring that under-served and high-risk households—especially those disproportionately affected by poor housing quality, low income, or health vulnerabilities—receive equitable support delivered through trusted local partners.

The project has been co-designed in collaboration with ECOE Advice and developed in line with the updated VCMI governance framework, embedding strong oversight, accountability, and continuous improvement from the outset. The VCMA eligibility criteria have been met and are detailed within the table at the end of the PEA.

Both WWU individual and the GDNs' vulnerability strategies underpin this project under the pillar of 'Fuel Poverty and Energy Affordability' and, by combining WWUs evidence-led targeting and ECOE Advice specialist expertise in fuel poverty interventions, the project is designed to ensure that households facing the highest risks of cold homes, energy debt, and unaffordable bills receive the tailored, practical, and accessible support they need to improve their energy affordability and wellbeing.

How VCMA funding complements or supplements BAU activities

Where the VCMA Project is being delivered alongside a BAU vulnerability and/or CO safety activity or activities funded through the GDN's baseline allowance, the GDN must provide sufficient evidence that the VCMA Project complements or supplements the BAU activity or activities to prevent the risk of double funding.

By working together, WWU has an established pathways to identify households experiencing fuel poverty or vulnerabilities exacerbated by living in a cold, damp home, who may benefit from additional support delivered through ECOE Advice's services.

WWU can provide ECOE Advice with BAU-funded measures, such as locking cooker valves where individuals are identified as benefitting from them during the project.

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WWU will also provide ECOE Advice with a supply of CO alarms to distribute to eligible customers that have been engaged through VCMA activities. This approach strengthens customer outcomes by complementing the fuel-poverty-focused VCMA activities with essential CO safety support.

All VCMA-reported outcomes will be delivered as a direct result of VCMA-funded activity, with BAU-funded interventions recorded separately to prevent any risk of double funding.

Outcomes, associated actions and success criteria

Details of the VCMA Project outcomes and the associated actions to achieve these, interim milestones and how the Funding Licensee will evaluate whether the project has been successful. Each action should have a proportion of the funding allocated.

Across the project period, ECOE Advice will directly support 6,000 individuals, prioritising those experiencing fuel poverty, health vulnerabilities and digital exclusion. Each outcome will be delivered through a combination of in-person home visits, Energy Advice Centres, community clinics, telephone support and digital channels.

Key outcomes expected from this project:

Outcome	Year 1 Individuals	Year 2 Individuals	Total Individuals
Unique Reach	3,000	3,000	6,000
Income Maximisation (Welfare Benefits)	250	250	500
Wellbeing Support	300	300	600
Energy Efficiency Advice (Behavioural)	2,000	2,000	4,000
Energy Triage	2,000	2,000	4,000

This project supports households to reduce fuel poverty through energy triage that identifies immediate risks and underlying affordability issues, followed by targeted income maximisation and tailored energy efficiency advice that reflects the household's circumstances. This integrated approach enables households to increase income, reduce energy costs and take practical steps towards warmer, more affordable homes.

The project will increase access to trusted, locally embedded support for households least likely to engage with mainstream or national schemes, including those who are digitally excluded, socially isolated or reluctant to seek help. By delivering services through accessible, locally embedded and

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remote advice channels, the project removes barriers to engagement and ensures that the most vulnerable households can access early, preventative support.

Success Criteria

To achieve these outcomes, ECOE Advice will:

- Deliver trusted, tailored energy advice through home visits, advice centres and community outreach
- Provide carbon monoxide safety awareness and facilitate appropriate safeguarding measures
- Support households to increase income, reduce fuel costs and improve energy efficiency
- Enable access to Priority Services Register registration and wider support services
- Work in partnership with local authorities, health services and community organisations
- Use robust data, monitoring and reporting systems to track outcomes and share learning

Potential for new learning

Provide details of what the GDN(s) expect(s) to learn and how the learning will be disseminated.

This project offers an important opportunity for Wales & West Utilities to generate new insight into how tailored, place-based energy advice can better support vulnerable customers across Devon and Torbay. Through delivery, we expect to develop learning in several priority areas relevant to GDNs:

- The level of support required to achieve meaningful outcomes, beyond simple unique-reach metrics
- Opportunities to connect and analyse data across health, energy and housing systems
- How to effectively assist households experiencing issues with low-carbon or smart technologies
- Improved understanding of pathways between cold homes and health outcomes
- Strengthening customer voice, participation and co-designed service models
- Developing sustainable organisational structures and workforce approaches

Collectively, this learning will help GDNs refine future vulnerability strategies, support innovation in cross-sector collaboration and strengthen the evidence base for long-term, place-based investment in energy safeguarding.

Aligning with and supporting wider vulnerability approaches

Details of how the project supports or aligns with approaches to vulnerability taken by the wider energy industry, other utilities and/or consumer organisations; local, national or devolved governments; or evidence innovation or a gap in vulnerability support provision. For example, this could include evidence of collaboration beyond the VCMA, non-VCMA joint funding of the initiative, or identified gaps in the provision of vulnerability services which the project seeks to address. The GDN should show how the project fits within broader approaches to vulnerability.

ECOE Advice recognises that fuel poverty rarely exists in isolation; it is closely linked to wider financial hardship, poor health, digital exclusion and limited access to essential services. This model therefore integrates income maximisation, fuel and food voucher support, wellbeing interventions and digital skills, mirroring multi-utility and cross-sector approaches to vulnerability.

ECOE Advice collaborate with partners beyond VCMA funding, including local authorities, health and wellbeing teams, community organisations and retrofit partnerships. These relationships help to address gaps in provision, particularly for households who fall between schemes or require more intensive, relationship-based support than mainstream services can offer.

However, as a fuel poverty charity, the capacity to advocate on behalf of clients is limited; ECOE Advice can provide immediate help but cannot always resolve systemic issues such as landlord non-compliance, failed installations or complex billing disputes. This project will help evidence where advocacy gaps persist and where industry-wide solutions are needed.

Looking ahead, global instability & climate change are creating new vulnerabilities, including cost of living and overheating risks. Better data integration - particularly with health partners, would enable stronger social return on investment analysis including improved wellbeing. This project will generate insight into how such integration could be scaled.

Monitoring and evaluation

Details of how the GDNs will work with their project partners to monitor the impact of the VCMA project and evaluate its effectiveness and success.

WWU will work closely with ECOE Advice to monitor the delivery, impact, and effectiveness of the project throughout its duration. ECOE Advice will provide WWU with monthly performance reports detailing progress against agreed outcome measures, including the number of households and individuals supported, the nature of interventions delivered, financial gains achieved, and any emerging trends in vulnerability or fuel poverty. These reports will enable WWU to track delivery against the PEA and respond quickly to any areas requiring adjustment.

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In addition to monthly reporting, WWU and ECOE Advice will hold quarterly review meetings to assess project performance in greater depth. These meetings will provide an opportunity to review operational insights, address any risks or underperformance, and ensure the project continues to meet the needs of vulnerable households across the WWU network. WWU will also work with ECOE Advice to ensure appropriate auditing and impact assessment processes are in place, including the evaluation of before-and-after changes in household circumstances, financial resilience, and wellbeing outcomes.

ECOE Advice will provide anonymised case studies and beneficiary testimonies, where appropriate, to substantiate the project's impact on lived experience and demonstrate the value delivered through VCMA-funded interventions. WWU will produce an annual summary of project performance and key learnings within its company-specific VCMA report, thereby upholding transparency and accountability. These insights will also inform the development of future initiatives, support the refinement of service delivery, and contribute to the continuous improvement of WWU's wider approach to identifying and supporting vulnerable customers.

Scale of VCMA project and SROI calculations, including NPV

Justify the scale of the VCMA project – including the scale of the investment relative to its potential benefits. As part of this, the Funding Licensee(s) should provide the SROI calculation, including NPV. Note: The value in numbers of the SROI and NPV must be provided, rather than confirmation of positive impact.

Together with the other Gas Distribution Networks we worked with leading social impact research consultancy SIRIO Strategies on the development of the Industry Standard Social Value Framework and supporting GDN Rulebook. We have used that GDN Rulebook to carry out an assessment of financial and wellbeing outcomes applicable to our services for vulnerable households included in this partnership.

We've incorporated social value based on the deliverables and associated targets detailed above. Carrying out an assessment of these predicted outcomes we forecast a positive net Social Return on Investment of £2.65 for every £1 spent

Social value measurement - GDN Rulebook v. September 2024

Total cost*	£596,674.83
Total gross present value	£2,178,302.69
Net Present Value (NPV)	£1,581,627.86
SROI	£2.65

*Accounting for inflationary factors over the term of the project.

Internal governance and project management evidence

Provide a description of GDN(s) review of proposal and project sign off, with details on how the project will be managed.

Project management for this partnership will be led by WWU, with clear governance arrangements in place to oversee delivery, performance, and risk throughout the duration of the project. A structured contract framework between WWU and ECOE Advice will ensure that any material changes remain aligned with customer need, regulatory expectations, and the responsible use of VCMA funds.

WWU has worked closely with ECOE Advice to co-design this project so that its ambition directly supports WWU's Consumer Vulnerability Strategy and strengthens the network's wider approach to identifying and assisting households in fuel poverty.

The project has been reviewed and approved through WWU's internal governance processes and formally signed off by the relevant senior leaders, ensuring robust oversight from initiation through to completion.

GDN	Approver (Name and Role)	Date
WWU	Rob Long – Chief Operating Officer	08/07/2026

Eligibility criteria

Eligibility Criteria	Description	Project qualifies Yes / No
Positive SROI	Have a positive, or a forecasted positive, Social Return on Investment (SROI) calculated in accordance with a model which the GDNs have developed and submitted to Ofgem including for the gas consumers funding the VCMA Project	Yes
Positive NPV	Have a positive, or a forecasted positive Net Present Value (NPV)	Yes
Support Criteria	Either: i. provide support to consumers in Vulnerable Situations and relate to Energy Safeguarding, or ii. provide support for those most at risk of being left behind in the transition to net zero, or iii. provide awareness of, and education on, the dangers of CO beyond the activities funded as business as usual (BAU) through baseline allowances, or iv. reduce the risk of harm caused by CO	Yes
Defined Outcomes	Have specific, measurable, and time-bound outcomes which align with relevant Consumer Vulnerability Strategy objectives to achieve the requirements set out in paragraph b;	Yes
Beyond Other Funding	Go beyond activities that are funded through other price control mechanism(s), including baseline allowance funding, or required through licence obligations	Yes
Support or Align	Support or align with approaches to vulnerability taken by the wider energy industry, other utilities and/or consumer organisations, and local, national and devolved government, or evidence innovation or a gap in vulnerability support provision;	Yes
No Other External Funding	Not be delivered through other external funding sources directly accessed by a GDN, including through other government (national, devolved or local) funding	Yes
BAU vulnerability and CO safety activities	Where a GDN's BAU vulnerability and CO safety activities are funded through baseline allowances, these are not suitable for funding through the VCMA. The GDN is permitted to use VCMA funds to supplement or complement its BAU activities, however, it must ensure that its reporting provides sufficient evidence to prevent double funding.	N/A

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Eligibility criteria for company specific essential gas appliance servicing

Eligibility Criteria	Description	Project qualifies Yes / No or N/A
Servicing must meet the following criteria:	Either: i. A GDN has had to isolate and condemn an essential gas appliance following a supply interruption or as part of its emergency service role; or ii. A GDN or its Project Partner has identified an essential gas appliance which has not been serviced in the last 12 months in the owner-occupied home of a customer in a Vulnerable Situation where an occupier of the property suffers from a permanent or temporary health condition¹² that makes them more vulnerable to health risks associated with cold homes; or iii. A GDN or its Project Partner has identified an essential gas appliance which has not been serviced in the last 12 months in a tenant-occupied home of a customer in a Vulnerable Situation where it is the tenant's responsibility to maintain the essential gas appliance, where an occupier of the property suffers from a permanent or temporary health condition that makes them more vulnerable to health risks associated with cold homes	N/A
Affordability	The household cannot afford to service the essential gas appliance, as assessed against the affordability criteria set out in the VCMA governance document	N/A
Funding	Sufficient funding is not available from other sources (including a social or private landlord and national, devolved, or local government funding) to fund the essential gas appliance servicing	N/A

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Eligibility criteria for company specific essential gas appliance repair and replacement

Eligibility Criteria	Description	Project qualifies Yes / No or N/A
Unsafe pipework and essential gas appliance repair or replacement must meet the following criteria:	Either: i. GDN has had to isolate and condemn unsafe pipework or an essential gas appliance following a supply interruption or as part of its emergency service role; or ii. ii. iii. A GDN or its Project Partner has had to condemn unsafe pipework, or an essential gas appliance, following an essential gas appliance service (as described in 3.19 of the VCMA governance document)	N/A
Health condition	Either: i. The occupier of the property suffers from a permanent or temporary health condition that makes them more vulnerable to health risks associated with cold homes and has a household income of £31,000 or below in 2025/26 prices, adjusted for inflation using Consumer Price Index with Housing costs (CPIH) 13, or ii. the household cannot afford to service the essential gas appliance, as assessed against the affordability criteria set out in Appendix 1 of the VCMA governance document	N/A
Funding	Sufficient funding is not available from other sources (including national, devolved, or local government funding) to fund the unsafe pipework or the essential gas appliance repair or replacement.	N/A