

Pembrokeshire Energy & Community Support Programme

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

Start Date: April 2026
PEA Reference: FP- WWU-007a



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Project Registration Table

Project Summary	
Project title	Pembrokeshire Energy & Community Support Programme
Strategic area	Fuel Poverty & Energy Affordability
Lead partner name	Pembrokeshire FRAME
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	Pembrokeshire
Project Contact	
Name	Owain Johns
Contact details	Owain.Johns@wwutilities.co.uk
Project partners and third parties involved	
Organisation name(s) and role(s)	All delivery will be completed directly by Pembrokeshire FRAME
Costs and Funding (£k)	
Total cost	£184,926.00
Total VCMA funding required	£184,663.40
Total BAU vulnerability and CO safety activity baseline allowance funding by activity	£262.60
	See breakdown below: 20 x CO Alarms = £262.60

Problem(s)

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

Communities across Pembrokeshire face increasing challenges linked to fuel poverty, energy insecurity, and poor housing conditions. Older adults, carers, disabled residents, neurodiverse individuals, families in crisis, those leaving hospital or homelessness all face higher risks from cold, damp homes and struggle to navigate support systems. Additionally, the increase in the standard charge in July 2026, according to National Energy Action, will mean extra hardship and more people having to make tough decisions around 'heating or eating'. Many lack awareness of The Priority Services Register (PSR) protections or carbon monoxide (CO) safety and as a result of historical poor information and installations through ECO4, there has been a break down of trust between communities in Pembrokeshire and support services there to provide awareness.

Energy issues rarely occur alone – bills, debt, unsafe appliances, and lack of confidence compound vulnerability. Rural isolation and digital exclusion further reduce access to help in Pembrokeshire, which is a predominantly rural county with a quarter of its rural population aged over 65. Local services remain stretched, with fragmented pathways and gaps that allow people to fall through. A coordinated, person-centred, community-embedded service is needed to improve safety, stability, and long-term resilience.

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.

The project will deliver comprehensive, frontline energy support to households across Pembrokeshire. Key activities will include:

- Energy triage
- Provision of tailored energy efficiency advice
- Wellbeing support
- Income maximisation assistance
- Delivery of carbon monoxide safety information
- Promotion of Priority Services Register awareness and registrations

Where appropriate, the project will also facilitate referrals for Locking Cooker Valve installations.

Referrals for more substantial energy efficiency measures will be made via trusted partner organisations, but the installation of such measures will not be funded through VCMA. In parallel, the project will strengthen local workforce capability through the delivery of structured training to ensure

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consistent, high-quality support that builds on the trusted service provided in GD2. Increased community involvement and partnerships with local referral agencies will strengthen the reputation of the project by maintaining a consistent team resource in the Pembrokeshire area.

This project will assist Pembrokeshire FRAME to raise awareness of energy efficiency and tackle fuel poverty among vulnerable households across Pembrokeshire. Through this project, FRAME will act as a trusted community point of contact, providing residents with information, practical advice and clear signposting to appropriate support services with the aim of increasing awareness of carbon monoxide dangers and equip vulnerable residents, volunteers and staff with the safety knowledge and guidance needed to reduce risk in the home. In doing so, the project aims to support residents to live in safe, warm and affordable homes, improving wellbeing and resilience for those most at risk.

Over the 24-month delivery period, Frame expects to reach 5,453 individuals directly across Pembrokeshire with the support services outlined above and will provide evidence of financial savings.

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.

Engagement with local stakeholders and a wide range of social care, health, housing and community organisations across Pembrokeshire has consistently highlighted a strong need for coordinated energy guidance, income maximisation support and wellbeing interventions.

Stakeholders and residents have reported significant challenges in understanding and navigating energy bills and accessing appropriate support schemes. Evidence gathered through existing delivery activity - particularly at community events, outreach clinics and other locally delivered engagement opportunities - demonstrates growing demand for simple, trusted and accessible face-to-face support.

Additionally, this project will play an integral part of The Pembrokeshire Poverty Round Table, chaired by local MP Henry Tuffnell, who chairs a quarterly meeting with multiple stakeholders involved with matters relating to poverty and the cost of living in his constituency. This includes CAB, Pembrokeshire County Council, Dyfed Powys Police, the housing and education teams, the local VCR PAVS and FRAME as part of the project.

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This project is an inaugural member of the 'Words to Action Community of Practice' which aims to bring together front-line workers and management to best support each other to improve outcomes for clients within Pembrokeshire. It has also been active in delivering schools' education to secondary school pupils (Year 9) around the cost of living, money saving tips and the future of low carbon energy options. This was a collaboration with Really Pro Ltd who have a contract with Pembrokeshire schools to provide specialist education services, and FRAME is optimistic about similar opportunities in the future.

Through the development of our RIIO-GD3 business plan, we engaged extensively with customers, vulnerable consumers, local authorities, charities, community groups and industry experts through more than 200 activities, including workshops, webinars, focus groups, customer panels, surveys, and qualitative and quantitative research. This wide-ranging engagement gave us deep insight into the lived experiences of households and consistently highlighted the profound impact that cold, damp homes have on both physical and mental health. Stakeholders and vulnerable customers told us that rising energy costs, inadequate heating and poor home conditions are contributing to worsening respiratory illness, increased anxiety, and broader long-term health issues, with many households falling through the gaps of national support schemes.

Through this engagement, stakeholders highlighted several priority areas which included:

'Protecting Communities'

Stakeholders stressed the importance of making sure people, particularly those in vulnerable circumstances, can access secure and affordable heating. They also emphasised the role we can play in delivering wider social and environmental benefit through how we use our resources and design our activities, supported by trusted organisations who are embedded in the communities we serve.

Learnings across our VCMA portfolio have shown that providing tailored, hands-on support is highly valued by customers and plays a vital role in helping to alleviate fuel poverty. This has further informed our strategic priorities as we move into our next price control period.

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, as the project aligns with WWU consumer vulnerability strategy, in which we have a clear ambition to keep communities safe and warm, and for customers to receive the support they need from those best equipped to provide it, particularly those most at risk of fuel poverty or energy insecurity.

As a trusted delivery partner, FRAME plays a critical role in helping WWU achieve its ambition by supporting households who are both most in need and least likely to access help without targeted, community-based support.

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The project also aligns with several shared objectives within the GDN collaborative vulnerability strategy, including:

- Empowering local communities to identify and support vulnerable households with their energy safeguarding needs.
- Improving access to essential energy safeguarding services for households experiencing fuel poverty or energy affordability challenges.
- Reaching under-served communities who benefit most from trusted intermediaries, such as FRAME, to navigate available support.

The project has been co-designed in collaboration with FRAME 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.

This project falls under the pillar of ‘Fuel Poverty and Energy Affordability’ and, by combining WWUs evidence-led targeting and FRAME 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.

FRAME’s primary focus is on addressing fuel poverty and energy affordability; however, through its established engagement with beneficiaries, the organisation is also well placed to provide wider energy safeguarding support.

As part of routine interactions with households, FRAME will deliver carbon monoxide safety and Priority Services Register (PSR) awareness, alongside the provision of small practical interventions such as carbon monoxide alarms and keep-warm packs, where appropriate – the number of individuals projected to benefit are listed in the section below. These supplementary measures, funded through BAU arrangements, enhance the overall support offer and ensure a holistic, person-centred approach to energy safeguarding that responds to the multiple and intersecting risks faced by vulnerable households.

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.

Key outcomes expected from this project:

This project directly supports 5,453 individuals, with additional reach achieved indirectly through the provision of CO safety information and wellbeing support.

The primary outcomes focus on CO safety information, Priority Services Register (PSR) awareness and registration, energy efficiency advice, and income maximisation, which collectively account for most individuals supported.

Outcome	Year 1 Individuals	Year 2 Individuals	Total Individuals
Unique Reach	2,583	2,870	5,453
CO Alarm Provision	10	10	20
CO Safety Information	4,975	5,960	10,935
PSR Awareness	1,292	1,485	2,777
PSR Registration	87	87	174
Energy Efficiency Advice (Substantial Measures)	26	30	56
Energy Efficiency Advice (Common Measures)	40	48	88
Energy Efficiency Advice (Behavioural)	2,583	2,870	5,453
Income Maximisation (Welfare Benefits)	861	990	1,851
Income Maximisation (Debt Management)	517	594	1,111
Income Maximisation (Debt Write-off)	129	149	278
Income Maximisation (Energy Funding)	101	110	211
Income Maximisation (Grant Applications)	26	30	56
Income Maximisation (Tariff Switching)	13	20	33
Scams Awareness	517	594	1,111

Success Criteria

FRAME will achieve the project's outcomes through a coordinated, locally embedded delivery model that provides early, person-centred energy and wellbeing support to vulnerable households across Pembrokeshire. They will work closely with trusted local partners including health, social care, housing and voluntary sector organisations to identify households at risk early, reduce barriers to engagement, and ensure support is timely, accessible and targeted to individual need. Practical interventions such as CO alarms, behavioural advice, and onward referrals for additional support will contribute to improved household safety, stability and resilience.

Success will be driven by strong partnership working, trained frontline staff and robust referral pathways that avoid duplication, and allow outcomes to be clearly attributed to VCMA funding. FRAME will use structured delivery targets, monitoring and reporting to ensure forecast outputs are achieved, including agreed volumes of energy advice interactions, wellbeing support, PSR engagement and safety interventions. Continuous learning from delivery, partner feedback and data will inform improvements throughout the project, while collaboration through local networks will strengthen coordination across services. This approach ensures outcomes align with VCMA priorities for prevention, early intervention and cross-sector collaboration, while delivering measurable benefits to customers.

Potential for new learning

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

This project will provide insight to learn how locally delivered, partnership-led support can improve early identification of vulnerability, increase PSR and CO safety engagement, and strengthen outcomes for customers in rural communities.

Key insights expected from project learning

- Effectiveness of early partner referrals
- Best methods for local engagement
- Impact of face-to-face delivery
- Drivers of PSR awareness and uptake
- Barriers to supporting complex needs
- Approaches to avoiding duplication
- Potential for wider replication

Past learnings have shown that personalised, accessible and trusted local delivery prevents crisis escalation. Pre-identification through organisational partners such as Pembrokeshire Care Society, Age Cymru Dyfed, Hywel Dda teams, PAVS and Community Hub links improves outcomes which allowed them to reach individuals and households pre-crisis, while Words to Action further strengthens communication, peer support and county-wide planning.

New learning opportunities also include improved data sharing and extended educational work, and the project should be open to continuous improvement through multiple learnings – this would be advantageous if FRAME were to expand into neighbouring Carmarthenshire.

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.

This project strongly aligns with wider vulnerability approaches across the energy industry, local government, health services and the voluntary sector by addressing clear gaps in joined-up, place-based energy and wellbeing support for vulnerable households in rural Pembrokeshire. The project adopts a preventive, early-intervention approach, supporting industry priorities around Priority Services Register (PSR) awareness, carbon monoxide safety, safeguarding and accessible advice for customers with complex needs.

FRAME's delivery model complements existing supplier and utility vulnerability provision by embedding energy support within trusted local pathways spanning health, social care, housing and community organisations. Collaboration with partners such as Hywel Dda Health Board, Pembrokeshire County Council, PAVS, Age Cymru Dyfed and community-based services ensures households are identified early and supported through coordinated referral and signposting, enabling access to wider support beyond the VCMA scope and reducing the risk of duplication across funded services.

The project is aligned with local and devolved government priorities focused on poverty prevention, wellbeing and safeguarding, and supports county-wide multi-agency working through networks such as the Words 2 Action Community of Practice. By strengthening links between energy advice, income maximisation, housing and health services, the project fills a recognised gap between statutory and community provision, offering practical, accessible support to households who may struggle to engage with traditional energy channels. This approach complements wider industry and public sector activity while providing learning to inform future, scalable vulnerability delivery models.

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 maintain active oversight of the project in partnership with FRAME, working collaboratively to track delivery, impact and overall effectiveness across the lifetime of the programme. FRAME will submit monthly delivery and performance updates to WWU, setting out progress against agreed outcomes. This reporting will include details on the volume of households and individuals supported, the types of interventions delivered, financial outcomes achieved for beneficiaries, and any emerging themes relating to vulnerability or fuel poverty. This approach will allow WWU to monitor performance against the PEA and take prompt action where refinement or corrective measures are required.

Alongside routine monitoring, WWU and FRAME will convene quarterly performance review meetings to undertake a more detailed assessment of delivery. These sessions will be used to explore operational learning, identify and manage risks, address any instances of under-delivery, and confirm that the project continues to respond effectively to the needs of vulnerable households across the WWU network. WWU will also work with FRAME to ensure proportionate audit and evaluation arrangements are in place, including the assessment of changes in household circumstances, financial resilience and wellbeing over the course of the intervention.

Where appropriate, FRAME will supply anonymised case studies and beneficiary feedback to evidence the lived-experience impact of the project and demonstrate the value of VCMA-funded activity. WWU will capture and report on overall project performance and key learning annually through its company-specific VCMA reporting, supporting transparency and accountability. Learning from delivery will also be used to inform future project design, strengthen service delivery models and contribute to continuous improvement in WWU's broader approach to identifying and supporting customers in vulnerable situations.

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.

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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 £11.65 for every £1 spent.

Social value measurement - GDN Rulebook v. September 2024

Total cost*	£184,926
Total gross present value	£4,668,029.07
Net Present Value (NPV)	£4,484,054.86
SROI	£24.37

*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.

Delivery of this partnership will be overseen by WWU, with proportionate governance and assurance arrangements in place to manage delivery quality, performance and risk across the project term. A formal agreement between WWU and FRAME will set out roles, responsibilities and controls, ensuring delivery remains aligned to customer needs, regulatory obligations and the appropriate application of VCMA funding.

The project has been shaped through joint working between WWU and FRAME, drawing on FRAME's local delivery experience and WWU's vulnerability priorities to ensure the activity supports the Consumer Vulnerability Strategy and enhances existing approaches to addressing fuel poverty and energy affordability across the network.

The proposal has progressed through WWU's internal governance framework and received approval from the relevant senior leaders, providing assurance that suitable oversight and accountability arrangements are in place throughout the lifecycle of the project.

GDN	Approver (Name and Role)	Date
WWU	Gwyn Thomas - Communications and Customer Senior Manager	05/06/2026

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