

Shelter Cymru Arian

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

Start Date: April 2026
PEA Reference: FP- WWU-004a



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Project Registration Table

Project Summary	
Project title	Arian
Strategic area	Fuel Poverty & Energy Affordability
Lead partner name	Shelter Cymru
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	Wales
Project Contact	
Name	Tom Robinson
Contact details	Tom.Robinson@wwutilities.co.uk
Project partners and third parties involved	
Organisation name(s) and role(s)	All delivery will be completed directly by Shelter Cymru
Sectors Involved	Gas Distribution Network Charitable Organisation
Costs and Funding (£k)	
Total cost	£242,000
Total VCMA funding required	£242,000
Total BAU vulnerability and CO safety activity baseline allowance funding by activity	N/A - PEA may be updated at the time of providing items such as CO alarms/Warm Packs

Problem(s)

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

Whilst extreme inflation has eased, the Cost-of-Living Crisis is not over for many households. The lingering impact of increased prices means the cost of everyday essentials such as food and energy remain high and many core costs continue to rise.

Rent is typically the biggest household cost. Welsh rents continue to escalate faster than anywhere else in the UK - higher than incomes and standstill benefits— which is causing crisis for so many people.

Households already struggling financially are most severely affected by these increases. People fear they will be unable to pay their energy bills and cut back on food essentials. For people on low incomes any increases in rent and living costs can push people into poverty, debt and homelessness.

This can be seen reflected in the current scale of homelessness in Wales:

- 10,941 people in Wales are homeless and living in temporary accommodation
- The average cost of rent in Wales has increased to £811 – up 8.5% in a year
- 1 in 216 children are homeless and living in temporary accommodation

The Human Cost of Homelessness

People experiencing homelessness face significantly worse health outcomes. Public Health Wales reports that they are nearly 40% more likely to have at least one major health condition and three times more likely to suffer chronic illnesses. Their mortality risk is six times higher than the general population, with life expectancy reduced by 33 years for men and 39 years for women in Wales. Those facing homelessness or housing insecurity also experience heightened risks to both physical and mental health, with older people, children, those with existing health problems and unemployed individuals being the most affected. Rising living and energy costs further intensify this vulnerability, with up to 70% of people cutting back on essentials and limiting household appliance use.

People at Greater Risk of Homelessness

People at risk of homelessness are more likely to experience physical and/or mental health problems and are often already facing significant poverty or hardship. These challenges make it even more difficult to navigate the often-complex support systems needed to move away from crisis.

Shelter Cymru provides advice and hands-on support for as long as clients need it, ensuring that vulnerable people are not lost in the process. The Arian service strengthens this further by providing structured, ongoing financial and housing support to people at critical risk. Last year, 36% of people using Shelter Cymru's services experienced mental health issues, 26% reported physical health conditions, 17% were over the age of 65, 11% were under 25, Over 30% relied on external referrals to manage financial hardship—the root cause of instability for many

By offering swift, informed and holistic help 'under one roof', the Arian service ensures people receive timely and appropriate support to prevent crisis and keep individuals, families and children safe in their homes.

The Financial Cost of Homelessness

Homelessness also carries a substantial financial burden. Poor-quality housing and the resulting health issues cost the NHS in Wales around £95 million annually, while the broader societal cost is estimated at £1 billion per year. Supporting a household experiencing homelessness costs approximately £20,000 annually—a total of £275 million across Wales—while temporary accommodation costs have doubled between 2021 and 2024. Additional pressures on public services amount to £4,700 per household due to increased interaction with health, social care and criminal justice systems. However, by supporting 11,958 households last year and preventing homelessness in 88% of known outcomes, Shelter Cymru potentially saves society over £260 million each year.

Operating in every county across Wales, Shelter Cymru delivers vital support to help prevent homelessness before it begins—ensuring people can stay safe, secure and warm in their homes.

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.

Shelter Cymru will provide one-to-one income maximisation and debt-support through its Arian service to people across Wales whose financial insecurity places them at risk of homelessness. The programme is designed to provide intensive, hands-on, long-term support. Arian addresses the financial hardships that frequently underpin housing crises, ensuring that vulnerable individuals receive swift, holistic assistance without the delays and risks associated with external referrals.

The specialist Arian team, supported by Shelter Cymru's wider network of case workers, will deliver services through a mixture of face to face, over the phone, and with existing trusted advisers.

The Arian service is a three-tier model, of which Tiers 1 & 2 are VCMA funded and reported, and Tier 3 is non-funded wider benefit:

Tier 1 – Shelter Cymru Arian advisers provide direct, in-depth support to clients

Tier 2 – Shelter Cymru's case workers seeking guidance from Arian advisors to manage specific complex cases with debt/benefits needs

The project will:

- Support individuals in every county of Wales.
- Provide intensive 1-2-1 support - for as long as needed
- Support for the most vulnerable - particularly those facing poverty, debt, and heightened health risks linked to homelessness.
- Offer Income maximisation and debt management - including hands-on help with claims, applications, appeals, and representation.

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- Deliver flexible support, tailored to each client's needs (face-to-face, phone, or through trusted case workers).
- Upskilling of case workers, providing training and resources to embed income and debt support within wider advice work.
- Raise awareness of CO safety, PSR, warm-home support, and green energy innovations.

Benefits of the project include:

- Preventing homelessness by addressing the financial root causes of housing instability.
- Increase financial resilience so clients can sustainably manage their income, bills, and debt.
- Ensure swift access to essential benefits and social tariffs that help keep homes warm and safe.
- Provide holistic support under one roof, avoiding the risks and delays of external referrals.
- Strengthen the wider Shelter Cymru service, through training and tools that enable all case workers to provide financial guidance.
- Raise awareness of critical CO safety and support such as, PSR, energy efficiency, green innovations

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.

The design of Shelter Cymru's Arian service has been shaped through extensive engagement with stakeholders, frontline teams, and the lived experiences of the people most affected by fuel poverty, financial hardship, and housing insecurity. WWU identified the vulnerability need through its consumer research, ongoing analysis of fuel poverty indicators, and insight gathered from community partners highlighting the increasing financial pressures on low-income households in Wales. Shelter Cymru's service data, supporting over 21,219 people last year, including 6,345 dependent children, provided further evidence of escalating crisis points linked to unaffordable rents, rising living costs, and energy insecurity.

Stakeholder engagement has been integral to developing this project. Thousands of people proactively seek support from Shelter Cymru each year, generating over 500,000 annual online advice page visits and creating a rich evidence base of customer need, particularly around debt, benefits access, and energy affordability. Feedback from Shelter Cymru's Housing Law Caseworkers and solicitors was also critical in the project's design, consistently highlighting how in-house financial expertise prevents clients being lost through external referral pathways and results in quicker, more effective resolutions to housing crises. Their insight directly shaped the continuation and strengthening of Arian's three-tier

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model, ensuring support remains holistic, timely, and embedded across Shelter Cymru's wider advice delivery.

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, Shelter Cymru 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.

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

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- 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 Shelter Cymru, to navigate available support.

The project has been co-designed in collaboration with Shelter Cymru 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 Shelter Cymru's 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 pathway to identify households experiencing fuel poverty or vulnerabilities exacerbated by living in a cold, damp home, who may benefit from additional support delivered through Shelter Cymru's services.

Shelter Cymru may refer customers into WWU where they identify individuals who could benefit from BAU-funded measures, such as locking cooker valves.

WWU will also provide Shelter Cymru 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.

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:

The Arian service will directly support 2,030 individuals.

Outcome	Year 1 Individuals	Year 2 Individuals	Total Individuals
Unique Reach	1015	1015	2030
Tier 1 cases	696	696	1392
Tier 2 cases	324	324	648

Success Criteria

During this two-year project, Shelter Cymru will provide face-to-face support to 2,030 individuals through the Arian service, using a tiered delivery model to ensure support is proportionate to need. Tier 1 will offer intensive, hands-on casework delivered directly by the Arian specialist team, providing in-depth debt management and income maximisation support. This includes advising on available help, supporting clients to complete applications where required, preparing and submitting appeals, and acting as the client's representative when necessary.

Tier 2 will provide specialist support to Shelter Cymru Case Workers managing complex housing cases, where the Case Worker remains the lead professional but is supported by expert guidance from the Arian team. This enables Case Workers to navigate complex benefits, debt and affordability issues effectively, ensuring clients receive high-quality financial support alongside wider housing and safeguarding interventions.

In addition, all Arian clients will receive tailored income maximisation and debt support, energy and utility advice including CO and PSR awareness, and ongoing trusted support delivered in the way that best meets their needs, with the aim of preventing crisis and helping people maintain safe and warm homes.

Alongside those directly supported by Arian, more clients will benefit from the wider partnership, not funded directly by the VCMA and known as Tier 3. These individuals will receive information and guidance through end-of-service leaflets issued by Shelter Cymru caseworkers, independent of Arian, ensuring consistent access to key income, energy and affordability advice.

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To achieve these outcomes, Shelter Cymru will:

- Provide intensive one-to-one income-maximisation and debt-management support through the Arian team.
- Upskill all Shelter Cymru case workers through regular training
- Proactively follow up on every referral, often on the same day, to prevent clients falling into crisis.
- Ensure every client receives CO safety, PSR awareness, warm-home guidance and information on green-energy savings as part of their end-of-service communications.

In line with the partnership proposal, the project will incorporate light-touch awareness raising on energy efficiency, carbon monoxide safety, Priority Services Register support and green energy options through adviser conversations and end-of-service communications, alongside core income maximisation and debt support.

Potential for new learning

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

Through monitoring the impact of the Arian programme, Shelter Cymru will gain insight into the lived experiences of people in fuel poverty, including the scale of need, impacts on physical and mental health, and the effectiveness of early, holistic intervention in stabilising households, reducing energy-related risks, and supporting people to maintain safe and warm homes.

Learnings will also provide further insight into:

- Levels of debt in Wales
- Individual needs and lived experiences of people in fuel poverty
- Numbers of low-income homes transitioning to more energy efficient heating sources and take up of retrofit measures
- Demographics of householders and tenures of properties most likely to be experiencing fuel poverty

In addition, monitoring will capture financial gains achieved through income maximisation and debt relief, alongside learning on how and when vulnerable households most effectively engage with energy advice, Priority Services Register support and carbon monoxide safety information.

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

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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 strategies across the energy sector, local government, health services, and third-sector organisations by addressing clear gaps in fuel poverty and financial-hardship support for people at risk of homelessness in Wales. The Arian service complements existing energy safeguarding commitments across the industry, including the principles outlined in national vulnerability frameworks and the targeted support schemes operated by energy suppliers, by ensuring that vulnerable households receive the specialist, hands-on financial intervention needed to stabilise their circumstances and maintain a safe, warm home.

Arian strengthens cross-utility collaboration through established referral and signposting pathways already used by Shelter Cymru, including links with organisations such as NEST, Dŵr Cymru, local authorities, housing associations, community organisations and retrofit support services. These partnerships ensure clients can access grants, energy efficiency schemes and wider specialist support that sits beyond the scope of VCMA funding, enabling a truly holistic approach to prevention.

The project also aligns with national and regional public-sector priorities, including the Welsh Government's Warm Homes Plan and broader objectives to reduce fuel poverty and improve household energy efficiency. Shelter Cymru's role in local authority partnerships, multi-agency homelessness prevention forums, and community outreach initiatives ensures that learning and insights from Arian directly contribute to wider policymaking and system-wide responses to vulnerability across Wales.

By combining crisis intervention, income maximisation, energy efficiency guidance, debt support, and holistic casework under one roof, Arian fills critical gaps in current provision. It provides coordinated, multi-agency support that complements—rather than duplicates—other industry, government and third-sector initiatives, ensuring that vulnerable households receive timely, practical and accessible assistance at the point they need it most.

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 Shelter Cymru to monitor the delivery, impact, and effectiveness of the project throughout its duration. Shelter Cymru 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 Shelter Cymru 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 Shelter Cymru 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.

Shelter Cymru will provide anonymised case studies and beneficiary testimonials, where appropriate, to help evidence the lived experience impact of the project and demonstrate the value of VCMA-funded interventions. WWU will summarise project performance and learning annually within its company-specific VCMA reporting, ensuring transparency and accountability. These insights will also be used to inform future project development, refine service delivery, and support continuous improvement in WWU's wider approach to identifying and assisting 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 £18.73 for every £1 spent

Social value measurement - GDN Rulebook v. September 2024

Total cost*	£242,000
Total gross present value	£4,552,708.70
Net Present Value (NPV)	£4,321,917.75
SROI	£18.73

*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 Warm Wales 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 Shelter Cymru 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	Bethan Jones- Head of People and Customer Experience	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

Eligibility criteria for company specific essential gas appliance repair and replacement

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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. 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