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Financial Support Access



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



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Project registration table

Project summary								
Project title	Financial Support Access							
Strategic area	Fuel Poverty and Energy Affordability							
Lead partner name	Lightning Reach							
Lead GDN(s)	Wales & West Utilities							
Funding GDN(s)	SGN Wales & West Utilities							
New/Updated (indicate as appropriate)	New							
Collaborative VCMA Projects Specific role(s) of GDN(s) participating in a collaborative VCMA Project	WWU – Lead SGN – Delivery only							
Date of PEA submission	September 2026							
Project start and end date	01 September 2026 – 31 September 2028							
Project location	England, Scotland and Wales							
Project contact								
Name	Sophie Stone							
Contact details	Sophie.Stone@wwutilities.co.uk							
Project partners and third parties involved								
Organisation name	Role							
Lightning Reach	Lead delivery partner							
Costs and funding								
Total cost (£k)	£180,000							
Total VCMA funding required (£k)	Total funding = £180,000 <table> <tr> <td>GDN</td> <td>Funding</td> </tr> <tr> <td>SGN</td> <td>£120,000</td> </tr> <tr> <td>WWU</td> <td>£60,000</td> </tr> </table>		GDN	Funding	SGN	£120,000	WWU	£60,000
GDN	Funding							
SGN	£120,000							
WWU	£60,000							
Total BAU vulnerability and CO safety activity baseline allowance funding by activity (£k)	N/A							

Problem(s)

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

Across the Wales & West Utilities (WWU) and SGN network areas, increasing numbers of households are experiencing financial hardship, fuel poverty and wider vulnerabilities, driven by ongoing cost-of-living pressures and growing demand for support services. Whilst both GDNs have delivered significant customer vulnerability programmes through the VCMA, many customers continue to face barriers to accessing the help available to them.

A key challenge is the fragmented nature of the support landscape. Thousands of grants, benefits, debt support services and charitable funds exist, yet customers often struggle to identify and access the support for which they are eligible. Frontline organisations face similar difficulties navigating multiple schemes and referral pathways, leading to inconsistent customer journeys, lower uptake of available support and duplication of effort across the sector.

Energy debt is also escalating. Ofgem reported that by June 2025, domestic consumer energy debt had reached £4.43 billion, an increase of 20% compared with 2024 and 71% since 2023. Around 2 million UK households are currently in arrears on their energy bills, with the greatest impact falling on low-income and older households who have limited financial resilience. Beyond the immediate financial burden, debt can have significant wider consequences, increasing stress and anxiety, reducing wellbeing, and discouraging people from seeking support due to concerns about judgement or the fear of worsening their financial situation.

These challenges rarely exist in isolation. Energy debt is often closely linked to other forms of vulnerability, including rent arrears, insecure employment, delayed benefit payments, digital exclusion, and health conditions that can be exacerbated by living in cold homes. As a result, those affected frequently face multiple, overlapping pressures that compound both financial hardship and wellbeing concerns. At the same time, navigating the energy system can be highly complex. Understanding tariffs, debt repayment pathways, supplier disputes, energy efficiency measures and crisis support entitlements requires time, confidence and technical knowledge that many vulnerable households simply do not possess. Accessing help can be equally challenging, often involving engagement with suppliers, government schemes, local authorities and charitable funds. For many customers, this complexity can be overwhelming and can prevent them from obtaining support before their situation deteriorates further.

Consequently, many vulnerable customers only access support once they have reached crisis point. Traditional referral pathways often rely on individuals proactively seeking help or engaging with existing advice services, creating additional barriers for those experiencing financial hardship, health-related vulnerabilities or digital exclusion. This limits opportunities for early intervention and preventative support, reducing the likelihood of positive outcomes while increasing pressure on frontline services.

Furthermore, existing referral and reporting processes can be resource-intensive and provide only limited visibility of customer journeys, support outcomes and emerging trends in need. This constrains our ability to measure impact effectively, identify opportunities for improvement, and optimise service delivery. Ultimately, it can reduce the overall effectiveness of investment in support programmes and limit our capacity to respond proactively to evolving customer needs.

To address these challenges, we have identified an opportunity to work collaboratively with Lightning Reach, a specialist technology provider whose platform simplifies access to financial and wellbeing support through a single digital gateway. By matching customers with relevant grants, benefits and support services, whilst providing referral partners with improved tools and insights, the project will help reduce barriers to support, increase uptake of available assistance and strengthen customer outcomes. This collaborative GD3 initiative

will create a more coordinated, preventative and scalable support ecosystem, enabling vulnerable households across both network areas to access support before issues escalate into crisis.

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.

We will work collaboratively with Lightning Reach to deliver a scalable digital support service that improves access to financial, energy and wider wellbeing assistance for vulnerable households across both network areas.

The project will utilise Lightning Reach's established platform to provide customers with a single route to identify, access and apply for support they may otherwise be unaware of or unable to access. Through the platform, customers will be able to check their eligibility for thousands of national and local support schemes, receive tailored recommendations based on their individual circumstances, and complete applications through a simplified and accessible process.

The scope of the project includes direct customer engagement, targeted outreach activity and referral pathways through trusted partner organisations to ensure support reaches households experiencing fuel poverty, financial hardship, health-related vulnerabilities and other circumstances that place them at greater risk. The project will combine digital self-service capability with supported access routes, ensuring customers who require additional assistance can still benefit from the service.

The objectives of the project are to:

- Increase awareness and uptake of financial, energy and wellbeing support amongst vulnerable households
- Enable earlier intervention by helping customers access support before issues escalate into fuel poverty or financial crisis
- Simplify the customer journey by providing a single, accessible route into multiple sources of support
- Improve customer outcomes by increasing access to grants, benefits, charitable funding and other forms of assistance
- Strengthen referral pathways and partnership working across the vulnerability support sector
- Provide enhanced data and insight on customer needs, engagement and outcomes to support more effective VCMA delivery.

The primary customer benefit will be improved access to support that enhances financial resilience, reduces the impacts of fuel poverty and improves overall wellbeing. Customers will benefit from a simpler and more coordinated experience, reducing the need to navigate multiple organisations, eligibility requirements and application processes independently.

For us the benefits of the project lie in increasing the reach and effectiveness of vulnerability programmes, improving visibility of customer outcomes and maximising the value delivered. Through the collaborative delivery of a shared solution with Lightning Reach, we will be able to connect more vulnerable customers to appropriate support, generate consistent evidence of impact, and deliver a scalable and efficient approach to supporting vulnerable households throughout GD3.

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.

The need for this project was identified through customer insight, stakeholder engagement, delivery experience and data gathered across the SGN and WWU network areas. Evidence from GD2 vulnerability programmes highlighted that many customers experiencing fuel poverty, financial hardship and wider vulnerabilities were not accessing available support until reaching crisis point.

Insights from Lightning Reach's existing platform reinforced this finding, demonstrating significant unmet demand for financial, energy and wellbeing support. The data showed that awareness and accessibility, rather than eligibility, are often the primary barriers preventing households from accessing assistance.

The project has been shaped by engagement with advice agencies, local authorities, community organisations and frontline support providers. Stakeholders consistently highlighted the complexity of the support landscape, with customers often struggling to navigate multiple schemes and application processes. Partners also reported increasing demand for support alongside constrained resources, making it more difficult to provide timely assistance and early intervention.

Stakeholder feedback directly informed the project design. As a result, the service combines digital self-service access through the Lightning Reach platform with supported referrals from trusted frontline organisations, ensuring customers who require additional assistance are not excluded. Feedback also highlighted the need for improved reporting and outcome measurement, leading to the inclusion of enhanced data and insight capabilities.

In developing our RIIO-GD3 business plans, we engaged extensively with customers, vulnerable consumers and industry stakeholders through workshops, webinars, focus groups, customer panels, surveys and research activities. This engagement consistently highlighted the importance of protecting communities by ensuring vulnerable households can access affordable energy, financial assistance and trusted support before circumstances deteriorate.

Learnings from our VCMA portfolios further demonstrated that tailored, accessible support delivers positive outcomes for customers and plays an important role in reducing fuel poverty and improving financial resilience. Whilst some stakeholders favoured more localised delivery models, we concluded that a shared digital platform, supported by local referral partnerships, offers the greatest customer benefit. This approach combines the scale and consistency of a national solution with the flexibility to respond to local needs, enabling more vulnerable households to access support earlier and more easily.

Why the project is being funded through the VCMA

This should include an explanation of why the VCMA project meets the VCMA eligibility criteria, and how it aligns with the GDN's VCMA collaborative strategy.

This project meets the VCMA eligibility criteria as it aligns with the GDNs' collaborative vulnerability strategy, which sets out a shared ambition to keep communities safe and warm, and to support vulnerable households not only in the short term but as part of a longer-term, fair energy transition. The project addresses clear and evidenced barriers faced by households experiencing fuel poverty, low financial resilience and wider vulnerability, particularly difficulties accessing timely and effective support before reaching crisis point.

The project aligns with two key objectives of the collaborative vulnerability strategy:

- Helping more vulnerable households access energy safeguarding and related support services, by providing a simple, accessible route into financial and energy-related assistance.
- Supporting customers' resilience through the transition to net zero, by improving financial stability and reducing pressure linked to unaffordable energy costs, tailored to individual circumstances.

To deliver against these objectives, the project contributes directly to the GDNs' priority delivery areas of:

- Providing direct services for customers, through a shared digital infrastructure that enables households to identify and access relevant support quickly and independently.
- Supporting priority vulnerable groups, including households experiencing fuel poverty, health-related vulnerability and digital exclusion.
- Tackling fuel poverty and energy affordability, by maximising uptake of benefits, grants and financial support that directly improve household income and ability to manage energy costs.

By combining Lightning Reach's established digital platform, delivery experience and data insight with the GDNs' strategic vulnerability priorities, the project enables earlier intervention, reduces system fragmentation and delivers scalable, measurable impact. VCMA funding is therefore appropriate to support this collaborative approach, ensuring greater reach, efficiency and value for money in delivering outcomes for vulnerable customers across participating GDN networks.

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.

This project has been designed to complement and enhance existing BAU vulnerability activity, rather than duplicate it. BAU provision supports core safeguarding, standard vulnerability pathways and network-wide communications; however, evidence from GD2 delivery and Lightning Reach's platform data shows that many households' experiencing fuel poverty, low financial resilience or digital exclusion do not access support through these routes and often engage only at crisis point. The project responds to this gap by improving early access to support, rather than replicating BAU interventions.

VCMA funding enables the deployment of a shared digital access infrastructure that sits outside BAU delivery, providing a single, streamlined route for households to identify, check eligibility for and apply to a wide range of

financial and energy-related support schemes. This infrastructure addresses system-level barriers - fragmentation, complexity and low awareness - that BAU activity alone cannot resolve. Where BAU activity promotes awareness of safeguarding mechanisms such as PSR, the Lightning Reach platform supplements this by enabling practical uptake, helping eligible households translate awareness into action through simplified application and assisted access where required.

The project also delivers additional value beyond BAU scope by providing real-time data, insight and consistent reporting across participating GDNs. This improves visibility of who is being supported, what support is accessed and what outcomes are achieved, enabling more effective targeting, optimisation and shared learning. Clear role separation, defined outcomes and transparent reporting ensure VCMA funding delivers demonstrable additionality, strengthens the effectiveness of BAU activity and maximises value for money while reducing the 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.

Lightning Reach and the GDNs will carry out monthly reporting reviews on measurable outcomes against targets to ensure successful delivery. Quarterly reviews will provide the opportunity for more in-depth analysis and the ability to highlight insights and learnings to share, as well as identify any risks and requirement for any associated actions to mitigate these.

Key outcomes expected from this project*:

Outcome	Overall Target	Target by network	
		SGN Target 67%	WWU Target 33%
Total Reach	40,000	26,800	13,200
Outcomes by activity:			
PSR Awareness	40,000	26,800	13,200
Energy Efficiency Advice (Substantial Measures)	8,580	5,270	2,860
Energy Efficiency Advice (Common Measures)	17,160	11,497	5,663
Energy Efficiency Advice (Behavioural)	17,160	11,497	5,663
Income Maximisation (Welfare Benefits)	21,660	14,512	7,148
Income Maximisation (Debt Management)	6,769	4,535	2,234
Income Maximisation (Grant Applications)	13,538	9,070	4,468
Income Maximisation (Tariff Switching)	10,830	7,256	3,574
Income Maximisation (Water Social Tariffs)	10,830	7,256	3,574

* The outcomes above will be facilitated by the Lightning Reach platform and provided by other organisations that customers of the service likely wouldn't have accessed or engaged with without the support from Lightning Reach

Success Criteria

- Demonstrable improvement in access to support, household financial outcomes, and the quality of insight available to participating GDNs, delivered through a shared digital model
- Increased engagement from vulnerable households, including those not reached through traditional referral routes, measured by uptake of the Lightning Reach platform across SGN and WWU network areas
- Growth in the value of financial support unlocked for households, including grants, benefits, and local schemes, measured by:
 - Total value of support accessed
 - Number of successful applications submitted through the platform
- Enhanced data, insight, and reporting capability for GDNs, evidenced through:
 - Provision of real-time dashboards and consistent reporting
 - Improved visibility of engagement, support accessed, and outcomes achieved
- Delivery of actionable insight to support optimisation of programme delivery, robust impact evaluation, and regulatory reporting under RIIO-GD3

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 generate valuable learning on how digital-first, collaborative infrastructure can improve early access to support for vulnerable households at scale. A key area of learning will be understanding how streamlined, self-serve access combined with assisted referral routes can overcome long-standing barriers linked to fragmented systems, low awareness and digital exclusion. Insight will be gained into which customer groups engage earliest, what types of support are most frequently accessed, and how intervention timing affects financial resilience and energy affordability outcomes.

The project will also provide learning on the use of real-time data and reporting to support more dynamic targeting, optimisation and assurance of VCMA activity. We will gain improved understanding of how consistent metrics, shared dashboards and comparable reporting across networks can strengthen impact measurement, reduce duplication and support regulatory reporting requirements under RIIO-GD3.

Learning will be disseminated through regular reporting, shared dashboards, project review sessions and cross-GDN knowledge-sharing forums, ensuring insights are embedded into ongoing vulnerability strategies and future collaborative initiatives.

In addition, the cross-GDN delivery model will generate learning on the benefits and practicalities of shared approaches to vulnerability support, including efficiency gains, consistency of customer experience and opportunities for wider collaboration. The project will also contribute to the wider development of a digital ecosystem in collaboration with all four GDNs. This project, alongside the Warm Homes network ecosystem, a collaboration with Cadent and NGN, is generating evidence on how a shared digital infrastructure and referral model can support customers to access holistic support services. Learning from the project will help assess

the scalability, replicability and long-term value of this approach, informing future decisions on sector-wide collaboration, customer journeys and vulnerability strategies across GD3.

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 aligns strongly with wider energy industry and consumer vulnerability strategies, particularly the shared emphasis on accessibility, early intervention and inclusive service design for customers experiencing fuel poverty, low financial resilience and digital exclusion. Across the energy sector, there is increasing recognition that vulnerability is often driven not by a lack of available support, but by the complexity and fragmentation of systems that prevent households from accessing help. The Lightning Reach model directly addresses this gap by simplifying access and reducing barriers at scale.

The project also supports cross-utility and cross-sector approaches to vulnerability by providing a shared infrastructure that connects households to a broad ecosystem of support, including energy-related assistance, benefits, grants and wider cost-of-living support. Through established partnerships with charities, local authorities, housing associations, advice organisations and support providers, the project enables coordinated delivery beyond the VCMA, ensuring households receive holistic support regardless of their entry point into the system. This joined-up approach reflects best practice promoted across utilities and consumer protection bodies.

From an innovation perspective, the project addresses a recognised gap in vulnerability provision by combining digital efficiency with inclusive, assisted access. While many services are moving online, few offer a model that enables both self-serve access and supported applications via frontline workers. Lightning Reach's hybrid delivery model ensures that digitally excluded or low-confidence users are not left behind, aligning with inclusive design principles adopted across the energy industry and public services.

The project also supports national and devolved government priorities around financial resilience, cost-of-living support and prevention of crisis, by enabling earlier access to support and reducing reliance on emergency interventions. By providing real-time data and insight, the project also strengthens transparency, accountability and learning across GDNs, helping to embed a more coordinated, evidence-led approach to vulnerability that can inform future policy, funding and collaborative delivery beyond the VCMA.

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.

Lightning Reach and the GDNs will continue to review monthly reports on measurable outcomes, working collaboratively to ensure successful delivery. Each quarter, the core project team will meet to share performance insights, highlight and mitigate any underperformance, and provide structured updates on delivery, risks and emerging outcomes.

The GDNs will report annually on partnership impact, sharing broadly via collaborative and company-specific reports to showcase outcomes and key learnings and inform future delivery. Additionally, the Vulnerability

Working Group will provide performance updates to the National Delivery Group and National Steering Panel (NSP) with all GDNs disseminating results through their business governance processes, including their respective Independent Steering Groups (ISG).

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 £13.95 for every £1 spent.

Social value measurement

Total cost*	£176,849.01
Total gross present value	£2,644,390.27
Net Present Value (NPV)	£2,467,541.26
SROI	£13.95

*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 on behalf of the participating GDNs, with clear governance arrangements in place to monitor delivery, performance and risk throughout the duration of the project. A structured contract framework will ensure that any material changes remain aligned with customer need and stakeholder expectations, safeguarding the effective and responsible use of VCMA funds.

WWU has worked closely with Lightning Reach and SGN to co-design this partnership so that its ambition directly contributes to the GDN's Collaborative Vulnerability Strategy, developed through the Vulnerability Working Group and overseen by the GDN VCMA Steering Group.

The PEA has been reviewed and approved through each network's internal governance processes and formally signed off by the relevant senior leaders.

GDN	Approver (Name and Role)	Date
WWU	Sophie Shorney – Engagement & Social Impact Manager	20/08/26
SGN	Maureen McIntosh – Director of Customer Services	20/08/26

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 'Support Criteria' above;	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

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

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. 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