



WALES&WEST
UTILITIES

Warm Wales Healthy Homes, Healthy People

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

Start Date: April 2026
PEA Reference: FP-WWU-001b



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Project Registration Table

Project Summary	
Project title	Healthy Homes, Healthy People (HHHP)
Strategic area	Fuel Poverty & Energy Affordability
Lead partner name	Warm Wales
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	March 2026
Project start and end date	April 2026 – March 2028
Project location	The project will be delivered across all of Wales, reaching all 22 Local Authorities.
Project Contact	
Name	Sophie Stone
Contact details	Sophie.Stone@wwutilities.co.uk
Project partners and third parties involved	
Organisation name(s) and role(s)	All delivery will be completed directly by Warm Wales. Fuel vouchers provided by Fuel Bank Foundation Food Bank Vouchers via Food Share & the Trusell Trust and National Energy Actions Benefit Check calculator. Where householders have high levels of debt that encompasses other debt outside of energy Warm Wales will work with agencies like Citizens Advice & Step Change to signpost householders to specialist debt agencies.
Costs and Funding (£k)	
Total cost	£1,999,271.04
Total VCMA funding required	£1,992,080.60
Total BAU vulnerability and CO safety activity baseline allowance funding by activity	£9,816.44

	See breakdown below. Please note CO alarm costs will be added on once quantities have been agreed under BAU costs.	
	CO Alarm distribution costs	£1,305.00
	CO Alarms	£2,626
	8 CO awareness education sessions	£5,885.44
	Total cost	£9,816.44

Problem(s)

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

In Wales 25% of all households and 83% of lower income households are estimated to be in, or at risk of fuel poverty, making our mission at Warm Wales more important today than ever by working collaboratively to alleviate fuel poverty in Wales.

Affordability of energy bills have contributed to the highest level of fuel debt in the UK (estimated to have reached over £4 billion) in June 2025. This collective debt continues to be driven by the root causes of fuel poverty, not limited to but including:

- The continued impact of the 2024 cost-of-living crisis on standards of living.
- Poor quality - low energy efficient housing stock in Wales,
- Low levels of consumer confidence in adopting emerging technologies
- Continued reliance on traditional fuel sources in a volatile energy sector susceptible to high price increases.

The unprecedented impact of the cost-of-living crisis, including the large increases in utility bills has seen the demand for our services rise significantly. This is especially apparent when considering the increase in numbers of vulnerable households living in, or at risk of fuel poverty.

Research conducted by Public Health Wales demonstrates the wider impact of living in fuel poverty and highlighted areas of concern that related to fuel poverty and the significant health challenges being in fuel poverty can have on communities.

The root causes of fuel poverty continue to be aligned to:

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- Affordability and the price of energy
- Low energy efficient housing stock
- Low household incomes

To address these challenges by focusing on affordability, preventing and improving energy efficiency, providing crisis support, and strengthening health and wellbeing, our project aims to:

- deliver person centred interventions focusing on alleviating the impact of fuel poverty, maximising income, lowering the cost of bills, and supporting householders to address cumulative fuel debt
- educate householders on the practical steps that can be taken to improve the energy efficiency of homes. Our preventive activities focus on supporting applications for government property-focused efficiency schemes and advice on adopting energy efficient behaviours in the home.
- working in partnership with other organisations to provide access to emergency support and immediate relief to vulnerable households facing living in cold homes with no funds to cover basic provisions required to heat and power their homes.
- working closely with householders, our triage and needs assessment process enables us to understand the wider impact that fuel poverty can have on the mental and physical wellbeing of our beneficiaries.

Through our interactions our caseworkers take a whole-person approach and often identify other socio-economic factors amplified by being in fuel poverty. Working with local partners to signpost to specialist services for other basic needs support and adopting the principles of social prescribing, our caseworkers provide holistic support that also helps to improve; financial and mental wellbeing, food poverty, health inequality and the quality of living standards (cold and damp homes) experienced by so many in fuel poverty.

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.

Our HHHP programme provides crisis support to vulnerable households but tackles the root cause of fuel poverty by delivering a range of in-depth and light touch services. These services are designed around intervention-led support for those facing and experiencing fuel poverty and preventative awareness sessions on improving the energy efficiency of homes to reduce energy expenditure.

Our delivery interventions are designed to address the three main factors that contribute to fuel poverty: low-income, high-energy costs and poor energy efficiency.

HHHP will provide valuable access to support the most vulnerable to the impacts of fuel poverty by delivering advice, guidance, advocacy, and in-depth support to reduce the detrimental impact fuel poverty has on our communities. HHHP will:

- Ensure that beneficiaries can meet their basic needs.
- Engage, encourage, educate, and empower communities.
- Ensure everyone has access to safe, sound, and secure warm housing.
- Deliver a suite of interventions to alleviate the impact of fuel poverty and improve the energy efficiency of homes.

Prevention based activities: a proactive approach raising awareness of the support available and providing advice sessions to build resilience and knowledge on reducing the likelihood of falling into fuel poverty.

Crisis based activities: providing support for the most vulnerable; and those at risk of losing access to basic human needs: a warm, safe homes and access to food.

Casework interventions: addressing the three main factors of fuel poverty namely, low-income, high-energy costs and poor energy efficiency. Following our triage and needs assessment, an individualised support plan is created that outlines the most suitable actions to address individual needs.

Casework support will be delivered via a mixture of in-person, remote and in-home provision.

These activities will:

- Be delivered pan-Wales
- Take a person-centred approach through individualised needs assessment and triage
- Connect communities with specialist support available through our network of partners
- Provide support, advocacy, and guidance on engaging with utility providers to resolve issues with arrears, access to social tariffs and vulnerability programmes to access any available funding making warm safe living more affordable
- Support the development of resilient, informed beneficiaries, improving financial, mental, and physical health exacerbated by fuel poverty and living in cold damp homes

Benefits of the project include:

- Beneficiaries will have a better understanding of their energy bills, increased confidence to switch suppliers, reducing debt and expenditure and will be able to heat their homes more affordably
- Vulnerable householders will have a better understanding of social tariffs and priority services available to them
- Incomes will be maximised through lowering consumption, reducing utility charges, securing repayment plans and benefit checks
- Beneficiaries will have a greater understanding of the impacts of cold, damp homes and the dangers of carbon monoxide
- Communities in Wales will have a greater understanding of the energy sector, environmental impacts, and advances in energy efficient heating sources
- Beneficiaries are less likely to experience anxiety and low mental health associated with being in debt
- Children and young people living at home will benefit from early intervention and happier, healthier, and warm home environments
- Low-income families are less likely to be in poverty and choosing between basic needs to prioritise and less likely to go without access to heating or hot water

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.

HHHP has been designed based on the historic patterns of community need over the last two years. Warm Wales have analysed incoming referral data and identified that households in Wales continue to face the challenges from the root causes of fuel poverty namely, low income, price of energy and low energy efficient housing. The scale of need identified continues to reflect the aim of the project and demonstrates the need to continue these services.

Working directly with our beneficiaries we have learnt that rising debt, volatile energy prices and the health inequalities of living in cold damp homes continue to cause low financial and mental well-being amongst those in fuel poverty. We have used the insight gained directly from vulnerable households to design delivery interventions tailored to address the needs of beneficiaries and focus on interventions identified as having the most impact on beneficiaries in terms of perceived value to them.

In 2025 Warm Wales commissioned an independent review into the services we provide, that highlighted the impacts of our services, alignment to current government, NHS and GDN vulnerability strategic priorities. Warm Wales have been working in collaboration with stakeholders such as Public Health Wales, Regional Health Boards, Welsh Government and within the Energy Sector to ensure our service delivery aligns to vulnerability strategies.

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, Warm Wales 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:

- 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 Warm Wales, to navigate available support.

The project has been co-designed in collaboration with Warm Wales 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 Warm Wales 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.

Over the 2-year project, Warm Wales will deliver eight dedicated carbon monoxide (CO) awareness education sessions within the communities they are supporting, funded through WWUs BAU allowance. These purpose designed sessions will complement the VCMA funded fuel poverty and energy safeguarding activities, ensuring that households engaged through the project receive targeted, accessible CO safety education.

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 Warm Wales services.

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

WWU will also provide Warm Wales 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.

Healthy Homes Healthy People will directly support a total of 14,500 unique households, broken down as below:

- 11,500 households' access to in-depth casework support and light touch advice and advocacy services. Focusing on at least one of the following interventions: reducing expenditure, billing support, fuel debt management and energy efficiency of the home.

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- 1,000 households will access urgent crisis support such fuel and food vouchers and emergency assistance grants.
- 2,000 households will attend preventative awareness sessions to improve household resilience and knowledge of energy efficient behaviours in the home.
- Achieve an estimated financial gain of £3.5million for beneficiaries.
- In addition, through partnership and engagement work in communities, HHHP anticipate reaching an additional 20,000 households through indirect promotion and engagement of the support available.

Key outcomes expected from this project:

* Outcomes are split 40:60 weighted towards Year 2 delivery

Outcome	Year 1 Households	Year 2 Households	Total Households
Unique Direct Reach	5,800	8,700	14,500
Reach through casework/advice/advocacy services	4,600	6,900	11,500
Emergency Fund Provision- Food/Fuel vouchers/ Discretionary Assistance Fund	400	600	1,000
Energy Efficiency Awareness Session	800	1,200	2000
In-direct reach	8,000	12,000	20,000

The above outcomes are based on the assumption that each household will receive on average four interventions. Of the 11,500 households supported through in-depth case work or light touch advice, at least:

- 10% will receive energy efficiency advice to access substantial support measures
- 33% will need support with bills/meter readings
- 10% will be supported with accessing third party funding for energy efficiency measures
- 33% will be supported with welfare benefit checks
- 33% will be supported with debt management
- 10% will be supported with debt write-off
- 33% will be supported with tariff switching
- 15% will be supported with water social tariffs

Success Criteria

To achieve these outcomes Warm Wales will:

- Promote the service digitally and in person at community events
- Identify referral pathways with specialist partners
- Utilise social media and other platforms to enhance indirect reach of services and awareness campaigns.
- Triage all incoming referrals to identify support needs and interventions
- Embed in person drop in advice at local advice centres
- Support vulnerable households to access vulnerability support programmes to manage fuel bills and improve the energy efficiency of their home.
- Provide all beneficiaries with advice and guidance on CO safety, Priority Services Register Awareness and energy efficiency.

All delivery will be completed directly by Warm Wales. Warm Wales will utilise fuel vouchers provided by the Fuel Bank Foundation, Food Bank Vouchers via Food Share & the Trusell Trust and National Energy Actions Benefit Check calculator and Entitled To for full assessment.

Where householders have high levels of debt that encompasses other debt outside of energy Warm Wales will work with agencies like Citizens Advice & Step Change to signpost householders to specialist debt agencies.

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 programme, Warm Wales will gain insight into the lived experiences of people in fuel poverty, these insights will also provide the scale of need, impact on physical and mental health as well as financial gains.

Learnings will also provide further insight into:

- Levels of debt in Wales
- Householder 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

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 strategies across the energy industry, health sector, local government, and third-sector organisations by addressing clear gaps in fuel poverty support and embedding Warm Wales established vulnerability triage model.

Warm Wales approach is consistent with the principles of Energy UK's Vulnerability Commitment and complements the tailored support schemes offered by energy suppliers such as British Gas Energy Trust, E.ON Next and Octopus Energy. The project enhances cross-utility collaboration through referral and signposting pathways already in place with organisations including NEST, Dŵr Cymru, retrofit installers, local authorities, and housing associations, ensuring households can access grants, efficiency schemes, and specialist support beyond the VCMA scope.

The programme is further aligned to national and regional public-sector priorities through Warm Wales active involvement in local authority strategic groups, regional health board innovation hubs, and government advisory panels, enabling the project to contribute to broader policymaking and system-wide approaches to vulnerability. Importantly, the project directly supports the ambitions of the Welsh Governments Warm Homes Plan by promoting improved energy efficiency, reducing fuel poverty, and ensuring that vulnerable households are supported to access government-funded schemes and local delivery programmes.

This project fills critical gaps in existing provision by combining crisis intervention, income maximisation, energy efficiency support, and holistic needs-based casework, ensuring vulnerable households in Wales receive coordinated, multi-agency support that complements, rather than duplicates, other industry and government initiatives.

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 Warm Wales to monitor the delivery, impact, and effectiveness of the project throughout its duration. Warm Wales 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.

In addition to monthly reporting, WWU and Warm Wales 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 Warm Wales 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.

Warm Wales 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

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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 £12.84 for every £1 spent

Social value measurement - GDN Rulebook v. September 2024

Total cost*	£1,991,527.93
Total gross present value	£27,569,131.19
Net Present Value (NPV)	£25,577,603.26
SROI	£12.84

*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 Warm Wales 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	N/A

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	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.	
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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