
APPENDIX A4

VULNERABILITY STRATEGY

11th December 2024

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Executive summary

As a Gas Distribution Network, we serve 3 million gas customers across the NGN region.

At least 25% of those are on the Priority Services Register (PSR). Many more are facing short-term hardship made worse by the COVID 19 pandemic and the recent energy and cost-of-living crises.

At NGN, we not only recognise our regulatory obligations to understand and support our customers living in vulnerable situations, but we work tirelessly every day to go beyond these obligations. We improve the lives of customers and communities, helping them to live well and warm.

Our approach has always been to take a broad view of the support we provide. Not only do we assist customers we come into contact with every day through our operational activities, but we also work with specialist partner organisations to reach our least served communities. Only by doing this can we offer a fair and inclusive service to all our customers.

We are also mindful of the transition to net zero. We need to provide targeted support to make sure that customers in most need are not left behind.

Our revised strategy makes sure that the most at-risk customers remain safe and warm at home. We want households in our region to have access to services that are inclusive and specific to their needs. We continually listen to customers and stakeholders so that our response is appropriate and customer focused.

To address the complex and ever-changing needs of customers in vulnerable situations, we need to work together. Collaboration is our strength. We already have mature relationships with a range of partners within the utility space and beyond. We will continue to work closely with partners, gas distributor networks (GDNs) and other utilities in RIIO-GD3 to maximise the impact of our initiatives and promote a smoother, more efficient customer journey.

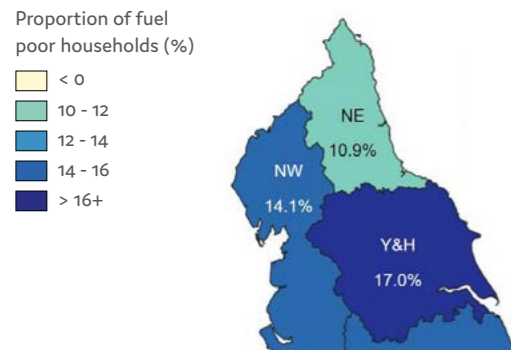
We have committed to impactful and enduring outcomes for our customers in RIIO-GD3. These include:

- 38,000 of our highest risk households to be helped out of fuel poverty through in-depth case work
- A further 113,000 households to be supported with one-to-one awareness, signposting and lower-level advice
- £1.3m shareholder investment into NGN Customer Support Fund and NGN Community Partnering Fund
- All unbilled energy revenue (theft of gas) to supplement NGN Customer Support Fund
- A regional collaborative PSR awareness strategy
- A regional collaborative vulnerability investment strategy

NGN Region – background and challenges

We understand the needs of customers across our network. We know our region has some of the highest rates of fuel poverty in the UK – around 17% in Yorkshire and Humber compared to the national average of 13.1%. Six local authorities in this area had an estimated fuel poverty rate above 18% in 2022, and we know that parts of the Northwest have similarly high rates of fuel poverty ([DESNZ, Sub-regional fuel poverty in England, 2024](#)), as shown in the image below.

Figure 1: Proportion of households in fuel poverty, by Region, 2022



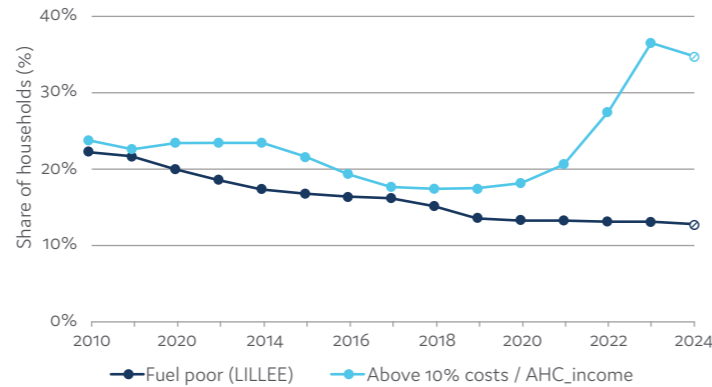
Other challenges relating to low household incomes in Yorkshire and Humber, the Northwest and the Northeast, include lower rates for employment and a higher proportion of economically inactive people than the national average. Census data shows lower levels of literacy and numeracy, as well as lower health outcomes than the national average.

The varied landscape of the NGN region means that some rural communities face the greatest challenges in staying warm and well at home. Living in a rural area is often particularly uncertain, with many households being off gas and reliant on more expensive and unregulated fuels, as well as being exposed to more extreme weather conditions and therefore at a greater risk of interruptions to their energy supply. Households in isolated or exposed locations can be hard to heat, and may be further from support when they need it most. Rural households often have a higher fuel poverty gap, meaning that they need a higher income to move out of fuel poverty. Annual Fuel Poverty Statistics in England ([DESNZ, February 2024](#)) reported that the UK average fuel poverty gap increased by 20% between 2022 and 2023, producing more of an impact for these households, and putting them at even greater risk.

It has been difficult to determine the fuel-poor status of households since the definition in England changed to Low Income Low Energy Efficiency (LILEE), so we use the previous definition (the 'income after housing costs' (AHC) affordability metric) to assess need where necessary. The two definitions present different pictures of the influence of recent economic challenges on fuel poverty rates. The graph below shows no impact on fuel poverty levels in recent years when using the LILEE method for assessment, but a significant change when using the affordability metric.

Comparison of the fuel poverty metric with the 10% AHC metric

Figure D.1 Comparison of the fuel poverty metric (LILEE) with 10% AHC metric



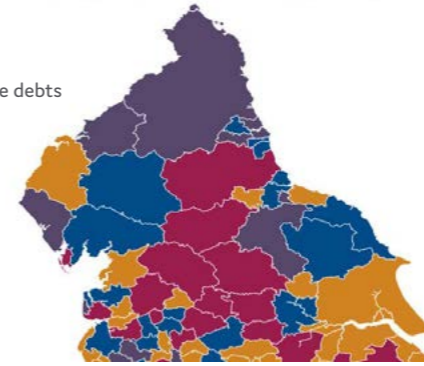
Higher energy costs in recent years have also contributed to rising debt, with data from Citizens Advice indicating that energy debt is now the most common type of debt affecting their clients in our region. The charts below illustrate this change over the last three years.

Key energy charts from cost-of-living data dashboard by Citizens Advice on 16 Apr 2024

The most common types of debt issues we help people with by local authority by quarter

2021-22 (Q1)

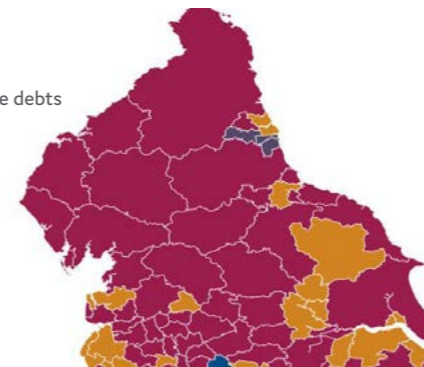
- Credit, store & charge card debts
- Council tax arrears
- Energy debts
- Rent arrears
- Water supply & sewerage debts



The most common types of debt issues we help people with by local authority by quarter

2023-24 (Q1)

- Credit, store & charge card debts
- Council tax arrears
- Energy debts
- Rent arrears
- Water supply & sewerage debts



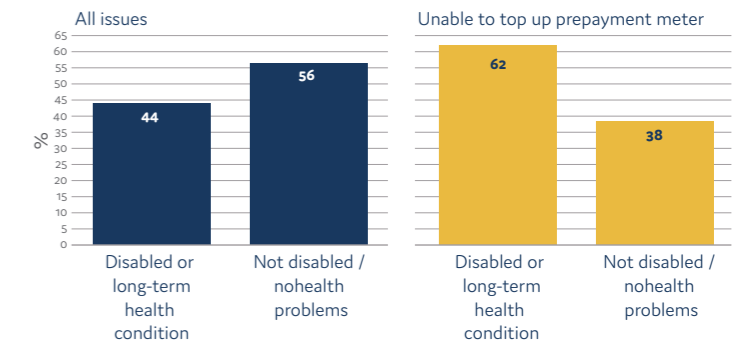
Our annual Customer Perceptions Research has consistently told us over the last three years that a top priority for domestic customers is keeping bills as low as possible. Findings from the most recent survey showed that 57% of domestic customers across our network have difficulty paying for energy at least some of the time.

The complexity of issues has also increased. Over half of the people seeking help with energy issues from Citizens Advice since 2023 also needed help with crisis support, like food bank referrals or emergency charitable support (Citizens Advice National).

We understand the need for short-term and crisis support, while also working to ensure availability of more in-depth support to help reduce the longer term consequences of energy affordability. For example, we know that households using pre-payment meters (PPM) are among those at highest risk of fuel poverty. National Citizens Advice data tells us that a high proportion of customers seeking their support for PPM top-ups also have a disability or long-term health condition (see the chart below). Additionally, two-thirds of those who have moved to a PPM as a result of debt have a disability or long-term health condition.

The people we're seeing who can't afford to top up their prepayment meter by demographic group

Disability



Our RIIO-GD3 Strategy

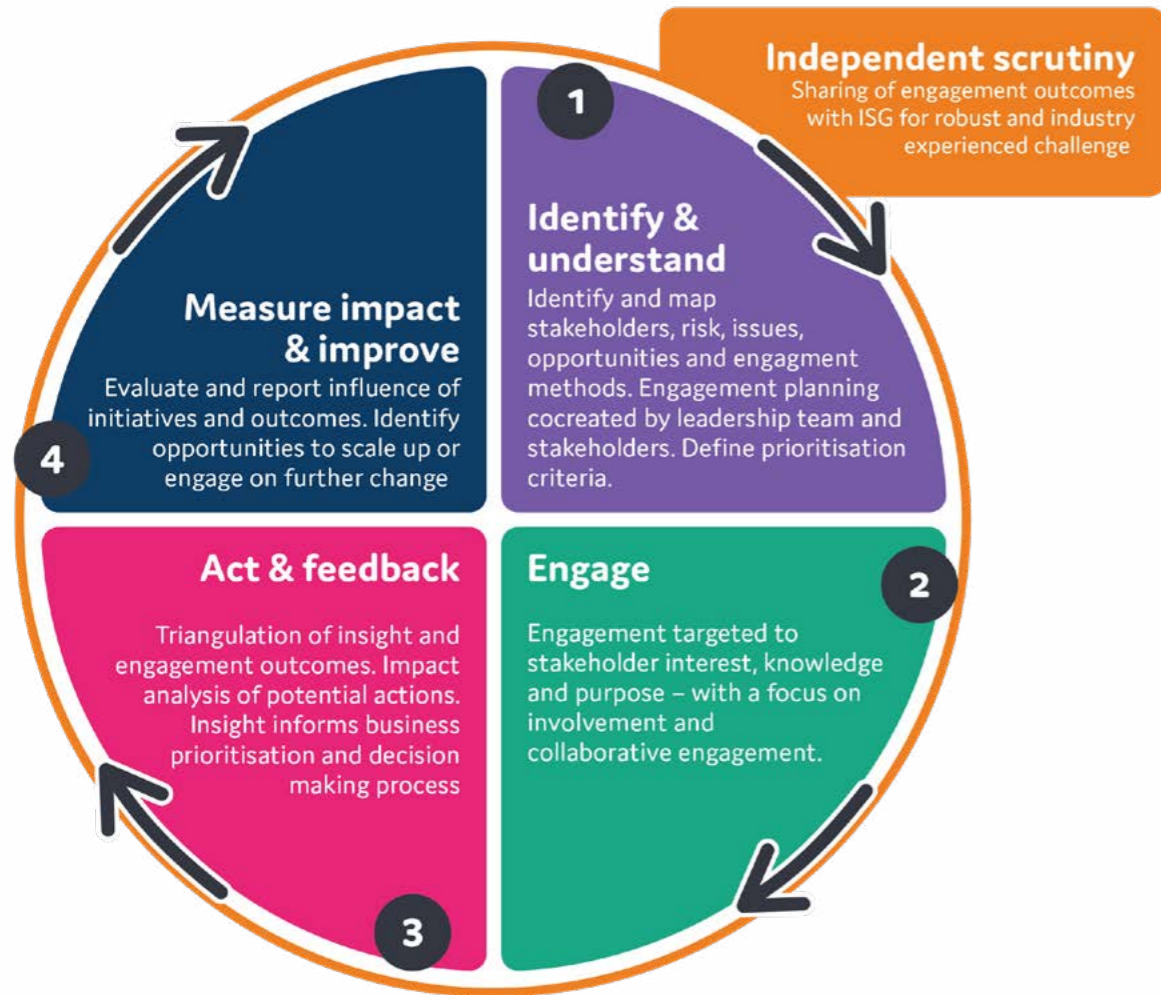
The term ‘vulnerability’ can be seen as detrimental, so we will continue to use the phrase ‘customers in vulnerable situations (CIVS)’ rather than ‘vulnerable customers’. ‘Situations’ can relate to individual circumstances as well as structural and market-based inequalities. Because the support required can be complex and multifaceted, our approach must be flexible and holistic.

Both before and during RIIO-GD2, we have put our customers at the heart of everything that we do, specifically focusing on supporting CIVS. Key RIIO-GD2 outcomes are detailed in Appendix 1 and provide a firm foundation for extending our support during RIIO-GD3.

To define our commitments and approach during RIIO-GD3, we have used our NGN embedded engagement approach, as shown in the image below.

Our approach

We have embedded a 4- stage approach to planning and delivering engagement.



Identify and understand

In 2023, we reviewed how we categorise vulnerabilities, recognising that our existing five broad categories limited our understanding of the complexity of need. Independent research considered:

- Gaps in current categorisation
- Applying evolving best practice thinking
- Determine appropriate level of granularity

We used these sources:

- NGN RIIO-GD2 Vulnerability Strategy
- NHS best practice papers
- Healthwatch guidance on seldom heard
- PSR eligibility criteria
- Les Newby Associates – Bespoke Social Indicator Mapping for NGN
- Energy Networks Association (ENA) Inclusivity Groups
- Health Conditions in the NGN Region

As a result, we have expanded our categories from:

- Financial hardship
- Physical challenges
- Mental wellbeing
- Rural vulnerability
- Temporary vulnerability

to 10 more detailed levels of vulnerability that reflect complexity of need (see the image below):

A. Physical Challenges A1 Blind / Partially sighted A2 Hearing impairment A3 Poor mobility A4 Restricted hand movement A5 Unable to answer door A6 Chronic/serious illness A7 Poor sense of smell/taste	B. Mental Wellbeing B1 Neuro diverse B2 Specific learning difficulty B3 Mental health challenges B4 Addiction	C. Financial Hardship C1 Fuel poor C2 Unemployed C3 Pre-payment meters	D. Temporary vulnerability D1 Post hospital recovery D2 Pregnancy and maternity D3 Young adult householder D4 Life changes	E. Socio-demographic E1 Ethnic minority groups E2 Lesbian, Gay, Bisexual, Transgender, and Queer people E3 Younger people E4 Pensionable age E5 Families with young children <5 E6 Gender reassignment E7 Military veterans E8 Ex-offenders
F. Household composition F1 Refugees/asylum seekers/newly arrived communities F2 Gypsy, Roma Traveller (transitory communities) F3 People who are homeless F4 Carers F5 People living in tower blocks F6 Single parents F7 Working location (Office, outdoors, home)	G. Rural vulnerability G1 Farming communities G2 Geographically remote	H. Accessibility including language H1 No/limited access to digital technology H2 English not first language H3 A social / communicate /on impairment H4 Limited free time	I. Medically Dependant on Energy I1 Nebuliser and Apnoea monitor I2 Medicine refrigeration I3 Oxygen Use I4 Stair Lift, Hoist, Electric bed I5 Heart, lung & Ventilator I6 Dialysis, feeding pump and automated medication I7 Oxygen concentrator I8 Other medical dependency	J. Cultural J1 Faith Groups

Our mapping research also revealed which of these themes included the highest proportion of customers across our network. The following themes and subcategories were most prominent:

- Financial hardship – including fuel poverty, PPM and unemployment
- Household composition – including working location (office, outdoors, home)
- Physical challenges – including hearing impairment and poor mobility
- Sociodemographic factors – including pensionable age, ethnic minority groups and younger people
- Mental wellbeing – including mental health challenges
- Rural vulnerability – including geographically remote and farming communities
- Cultural – including faith groups

This information has allowed us to understand how successfully we engage with these groups, and to identify gaps and seek to support the relevant customers and communities. This is our Inclusive Engagement and Support Framework.

We used this Inclusive Engagement and Support Framework to review our NGN CIVS Strategic Partner Framework. This was previously mapped against our five operational geographic areas but, by engaging with our partners and putting inclusive engagement and support at the heart of this group, we now align membership to the 10 granular levels of support within the NGN region.

Engage

We engaged with our customers and stakeholders to help us decide our strategy for RIIO-GD3, what our gaps are and what commitments we should be making to our customers. We have also held regular review and challenge sessions with our Independent Stakeholder Group. The table shows some of our key engagement research and mechanisms.

Channel	When
NEA and NGN Customers in Vulnerable Situations and Community Resilience: A Cross-Utility Study	2023
NGN Customer Perceptions Annual Research – quantitative report	Dec 23
Independent Steering Group – deep dive – CIVS priorities	Feb 23
NGN Customer Perceptions and Priorities Research – qualitative report	Apr 23
NGN Key Stakeholder Bilaterals (Priorities) – Citizens Advice, National Energy Action, Electricity North West, Northern Powergrid, Yorkshire Water, Northumbria Water	Feb 24–Apr 24
NGN CIVS Annual Strategic workshop	23rd Apr 2024
NGN Citizens Panel – Services beyond the meter	27th Apr 2024
Independent Steering Group – Monthly – all ISG – CIVS stakeholder feedback and NGN direction	
Leeds Poverty Truth Commission Community-led immersive sessions tackling what poverty really means, and how organisations can work in partnership	Jan 24–Oct 2024
Three Hands – Outside In – immersive sessions with lived experience experts	Feb 2024–Sep 2024
NGN Key Stakeholder and Strategic Partner Bilaterals (preferences and review of draft business plan and vulnerability strategy, including key definitions – ‘most at risk’ and ‘fair transition to net zero’) including Citizens Advice, National Energy Action, Electricity North West, Northern Powergrid, Yorkshire Water, Northumbrian Water, Fuel Bank Foundation, Carens Room, Rural Design Centre, Scope, Yorkshire Energy Dr, Northern Cancer Voices, Stockton and District Advice and Information Service and Citizens Advice Northumberland	Jul 24
GDN Collaborative VCMA Showcase	18th Jul 2024
Independent Steering Group – deep dive – strategy, commitments, definitions	16th Aug 2024

Act and feedback

All stakeholder and customer feedback is regularly independently reviewed and cross-checked to identify key themes that we should be focusing on. This helps us to understand diverse views and how influential different groups are, which helps us to develop our strategic framework, understand our gaps and develop our CIVS commitments. The table below shows a summary of the stakeholder feedback.

The stakeholder insights referenced in this document can be seen in full in Appendix A3 of our RIIO-GD3 business plan.

Insight	Feedback
15	Our plans should show that most customers see financial hardship as the main element of vulnerability
15	We should enhance the sustainability of our social investments by equipping partners and communities to continue projects when initial seed funding stops
15	We need to expand the reach of the Priority Services Register to ensure effective targeting and take-up of support services among non-financial vulnerabilities
10	Regional collaboration with utilities partners has identified opportunities and best practices for dealing with severe weather incidents, especially those which support CIVS
16	Bill payers, especially those in vulnerable situations, support ‘services beyond the meter’ within our core role that can be implemented at minimum cost
15	We should act to reduce the additional risks of carbon monoxide caused by the cost-of-living crisis
7	Businesses and the public believe that, within our current energy system, the risks and benefits of climate change will not be fairly distributed. We must protect those most at risk of unfairly carrying costs and burdens, especially CIVS, young people, rural customers and small businesses

In addition to our engagement on the Business Plan, we have also engaged specifically on our Vulnerability Strategy. A summary of this engagement can be found in Appendix 3 to this document.

RIIO-GD3 Strategic Framework

A key piece of research that influenced our insights was ‘Customers in Vulnerable Situations and Community Resilience: A Cross-Utility Study’ (National Energy Action (NEA) and NGN), which described the engagement mechanisms above. It looked at how utilities companies currently provide support, drawing out best practice for customers and communities, and how this support might need to evolve to meet the challenges of the future energy transition. The six principles in this research form the basis of our RIIO-GD3 strategic framework.

RIIO-GD3 strategic principles	Including	Insight/strategy reference
1 Understanding vulnerability	Individual and personal factors Structural factors Intersectionality	NGN Embedded Engagement Framework
2 Taking a ‘vulnerability-first’ approach	Strategic and practical planning Partnership and collaboration	15 / 16
3 Debt and Affordability	Debt Affordability Customer service	15
4 Communications and accessibility	Meeting diverse needs Being accessible to all	See separate Customer Service Strategy
5 Support for all	PSR Beyond PSR	15
6 Personal safety	During an outage A safe and just transition to net zero	15 / 7

We used this framework and our insights to develop 21 key CIVS commitments for RIIO-GD3. These have been grouped against each key insight and also link to the four key areas of support that the GDNs have reported in RIIO-GD2.

For each commitment, we will detail what we are doing, and what customer outcomes this will deliver. We will also detail if the commitment is new or enhanced.

New – additional commitments that we will deliver in RIIO-GD3

Enhanced – commitments from RIIO-GD2 that we will build upon and enhance

RIIO-GD3 Strategic Priorities

Supporting customers in fuel poverty

Insight	Feedback
15	Our plans should show that most customers see financial hardship as the main element of vulnerability

Supporting customers in fuel poverty is core. Few things are more essential than staying warm and safe. However, millions of households struggle due to poor housing, low incomes and high bills. NEA UK Fuel Poverty Monitor 2024 shows that 6.5 million UK households are estimated to be in fuel poverty, 2 million more than at the beginning of the energy crisis.

Many customers are facing financial hardship for the first time, and we have heard that supporting those in financial hardship must be a key priority. These outputs are targeting support towards those households who are most at risk, and are designed to deliver both immediate relief and longer term, sustainable benefits. We have also committed £1.3m of shareholder funding to provide essential support where gaps in funding exist, and to also help grow our network of grassroots projects and partnerships.

Our fuel poverty and energy affordability focus helps customers achieve affordable warmth

Stakeholder feedback shows that we should be:

- Reaching areas and customers not previously supported
- Offering direct referrals to debt advice through partnerships
- Having a balanced portfolio of short and long-term projects
- Addressing the gap of working with smaller partners on pilot/innovative projects

CASE STUDY: NOAH’S ARK - BREAKING THE FOOD POVERTY CYCLE. BUILDING EMOTIONAL AND FINANCIAL RESILIENCE FOR FOOD BANK USERS

Ms X met Noah’s Ark at a local foodbank in Brighouse. She advised she that was not great at managing her money and could do with some help with budgeting. Ms X attended the first ‘Budget Like A Boss’ course ran by Noah’s Ark. She received a referral form to complete, so they could review her finances. As part of the advice process, Noah’s Ark score using a clinical outcome measuring tool called CORE-10. Ms X’s budget was in deficit and she had 24 different debts totalling over £26k.

Ms X was advised to apply for a Debt Relief Order (DRO) to clear her debts and regain control of her finances. The support given to Ms X was arranging a DRO, temporary food support, attending Budget Like A Boss course, providing a carbon monoxide alarm and she was also referred to the Groundworks Green Doctor service for help with energy efficiency and support to reduce her energy consumption.

Ms X thanked Noah’s Ark, stating that she “felt like a weight had been lifted off her mind”. She feels she can now set new goals and manage her money better.

The table shows our resulting commitments.

Enhanced/New	Voluntary commitment	To
Enhanced	Support the 38,000 highest risk households with in-depth case work, including debt advice and management (Tier 1 – see measurement p17)	Provide affordable warmth to underserved customer groups
Enhanced	Support 113,000 households with one-to-one awareness, signposting and lower-level advice (Tier 2 – see measurement p17)	Provide information and support to underserved customers who can self-refer and take action
Enhanced	Invest £1m in the NGN Customer Support Fund to provide essential crisis support to customers where no other funding exists, and to complement the delivery of VCMA-funded projects (see p22)	Provide immediate relief to customers who have no other route for support
Enhanced	Support 13,000 households with enhanced GSOP 1 provision an additional payment following a supply interruption lasting between 4 and 24 hours	Provide immediate relief to customers during a gas interruption
Enhanced	Invest £300k NGN Community Partnering Fund to develop 50 pilot grassroots partnerships/ projects during RIIO-GD3	Provide grassroots support in underserved communities
Enhanced	Grow 10 NGN Community Partnering Fund projects into VCMA projects	Provide growing and sustainable support to underserved communities

These commitments are designed to help those most at risk to have affordable warmth at home by offering immediate relief where this is needed, and then by offering tailored and targeted support to provide sustainable, positive change.

We will use our NGN Customer Support Fund and NGN Community Partnering Fund to enhance support where appropriate, and provide support where no other funding exists. It will also help us grow our partnerships within communities.

Developing sustainable support

Our stakeholders are concerned that the cost of living is becoming overwhelming, and they want us to develop a comprehensive strategy that includes both short-term, immediate crisis support and longer term sustainable projects to drive systemic change. We must collaborate widely to maximise all available funding within our sector.

Our ambition is to work with partners to create a sustainable approach to support projects to continue beyond initial funding

Stakeholder feedback shows that we should be:

- Having an NGN Strategic Partner Framework
- Pursuing investment opportunities that yield dual benefits – alleviating fuel poverty while concurrently advancing sustainability goals
- Working with regional distribution network operators (DNOs) to understand gaps, prevent overlap and design a collaborative vulnerability investment strategy
- Being clear about social return on investment measurement, what is an appropriate level, and how can we support partners

Insight 15 We should enhance the sustainability of our social investments by equipping partners and communities to continue projects when initial seed funding stop

Enhanced/New	Voluntary commitment	To
New	Create a collaborative investment strategy with DNOs to minimise duplication and maximise impact	Allocate funding effectively, and plug gaps in funding smaller pilot projects to reach underserved communities where the cost to serve is greater
New	Extend remit of ISO 22458 Inclusive Energy Service Provision to include audit of partner organisations and projects	Provide assurance to partner organisations, accredit projects, and help to attract external funding
New	Measure all regulated and shareholder-funded vulnerability projects against the UK Energy Networks Sector-Wide rulebook for Social Return on Investment (SROI)	Be able to compare/contrast all NGN vulnerability projects, and also provide certainty to partners about the benefits of projects to customers
Enhanced	Include DNOs in the governance process for key programmes of work, such as Off Gas Warmth	To remove any unconscious bias in our decision-making and deliver holistic support
Enhanced	Evolve location of the Community Partnering Fund to target areas where we have gaps in grassroots partnerships	Provide grass roots support to underserved communities

These commitments are designed to make sure that we invest our available funding wisely, that we strengthen our partnership working through targeted and meaningful collaboration, and that we understand the outcomes for the customers that we support.

Bilateral engagement with DNOs supported the proposal for increased collaboration to achieve the best, most efficient outcomes for our mutual customers. “Joint arrangements may help us to provide more funding in certain areas, where needed, to support those most vulnerable” (Louise Lowes, Northern Powergrid).

The extension of the ISO 22458 remit and the extended measurements of projects for SROI will be of mutual benefit to NGN and the partners involved. These commitments will help to achieve greater sustainability for projects that we support through our vulnerability funding mechanisms. As these additional offerings can be encompassed within our annual assessment for the standard, and existing resource for SROI measurement, they will be of minimal impact and cost to NGN.

Supporting priority customers

Insight 15 We need to expand the reach of the Priority Services Register to ensure effective targeting and take-up of support services among non-financial vulnerabilities

Stakeholders have told us that collaboration is key to expanding the reach of the PSR, and we should align our activities with those of the DNO sector, to minimise duplication and maximise impact. This approach will help to avoid a post-code lottery of support, both regionally and across the UK.

They have also told us to focus not just on the number of referrals, but also to make sure that we are getting referrals in the right areas, by understanding where our gaps in membership are. We must also consider targeted support for those who are eligible and/or are already registered, and think about what support we provide beyond the PSR.

Knowledge of and referral onto the PSR is vital as the first-line of defence to help customers during gas supply interruptions, and to open the door to wider support through our vast array of regional and national charity partnerships. Our ambition is to extend the reach of the Priority Services Register, and to provide support to those with priority needs

Stakeholder feedback shows that we should be:

- Stretching our referral targets
- Working with regional DNOs to understand gaps, prevent overlap and design a collaborative PSR awareness strategy
- Knowing how this strategy can reach marginalised communities

CASE STUDY: AGE UK NORTH TYNESIDE – INFORMATION AND ADVICE ROLE

70 year old Mrs X, contacted Age UK North Tyneside in August 2023 after her husband passed away. She was his carer for several years, as well as looking after her adult daughter who had lifelong physical and cognitive disabilities. The death of her husband had a devastating impact on her mental health and her financial situation. An Age UK Information and Advice Coordinator attended a home visit. They went through a guided conversation with Mrs X, consisting of a healthy home chat and providing energy-saving information. The advisor registered Mrs X and her daughter on the Priority Services Register as they both met the eligibility criteria.

A full benefit check was completed, which revealed that Mrs X was in receipt of her full entitlement to benefits. However, Mrs X’s disabled daughter was in receipt of Personal dependence Payment (PIP) disability benefit, no-one was claiming Carer’s Allowance. Age UK North Tyneside also contacted the fire service who visited the home and replaced the old smoke alarms. Mrs X now feels she will be able to keep her home safe and warm for herself and her daughter. Mrs X said “The relief of having all the worry and stress lifted is priceless!”

Enhanced/ New	Voluntary commitment	To
New	Collaborative regional PSR awareness strategy with respective DNOs to avoid duplication of effort and address gaps in awareness and registrations	Allocate funding effectively, and plug gaps in funding smaller pilot projects reaching underserved communities with a higher cost to serve
Enhanced	Refer 50,000 customers to the PSR over 5 years	Ensure eligible customers receive additional support when they need it

Under the RIIO-GD3 Regulatory Framework, we also have two requirements to:

- Measure PSR complaints handling – To understand how we are managing and resolving complaints for this group of customers, and what improvements we might need to make
- Measure PSR Customer Satisfaction Score – To understand and continually improve how we serve PSR customers

More details on this can be found in our [Customer Service Strategy](#).

Our approach will allow us to identify gaps in our current awareness programme, and to make the right partnerships to target registrations in the right places.

CASE STUDY: NGN AND GROUNDWORK - ONE NUMBER PROJECT

Owner occupiers, Mr and Mrs X, had called the National Gas Emergency Service to report the smell of gas. NGN attended immediately and found a leak on pipework within the household’s back boiler system. The engineer had to isolate the supply due to the poor condition of the system. Mr and Mrs X were concerned about being left without heating and hot water and were extremely worried about how they would afford the repairs. They also had a disabled son living at home.

The engineer explained the support that was available through the One Number project, and with the residents’ consent, sent a referral through to Groundwork. The customer was assessed as eligible for assistance and the work was undertaken to install a fully funded new boiler system. Mr and Mrs X also received energy efficiency support to make sure that they understood how to keep energy bills as low as possible.

Providing services beyond the meter

Insight 16 Bill payers, especially those in vulnerable situations, support ‘services beyond the meter’ within our core role that can be implemented at minimum cost

We have heard that customers benefit from these services, but we should not to go beyond our core role. Generally, customers support actions that deliver immediate, short-term benefits. They want us to deliver services that are linked to safety, such as appliance repairs and carbon monoxide investigations. However, energy efficiency advice should be delivered by expert partner organisations.

It is vital that we provide support within our core role as a gas distributor, and do not duplicate support that other agencies are providing, and also that we partner well to deliver these services. We recognise that CIVS are less likely to be able to afford to repair/replace appliances following emergency work, and that they are also less likely to keep themselves safe by maintaining their gas appliances.

Our ambition is to provide direct operational support to the most vulnerable households across our network, helping people keep safe and warm

Stakeholder feedback shows that we should be:

- Undertaking carbon monoxide investigations
- Carrying out repairs and replacements
- Partnering with others that can offer energy efficiency advice

Enhanced/ New	Voluntary commitment	To
Enhanced	Appliance repair and replacement following an NGN call out – supporting 3,975 customers during RIIO-GD3	Provide both immediate and longer-term help to ensure customers stay warm and safe at home
Enhanced	Essential gas appliance servicing – supporting 1,500 customers during RIIO-GD3	Help customers maintain essential gas equipment so they stay warm and safe at home

We have committed to undertake carbon monoxide investigations – see page 20. We have also committed to undertake energy efficiency advice, which will be provided through partner organisations.

Protecting from carbon monoxide

Insight 15 We should act to reduce the additional risks of carbon monoxide caused by the cost-of-living crisis

For NGN, emergency visits confirming or suspecting cases of carbon monoxide poisoning have risen by 40% since 2021. This is due to both regional awareness campaigns that help people to understand the signs and symptoms and also increased safety issues caused by the cost-of-living crisis.

Customers and stakeholders believe that we are best placed to increase carbon monoxide awareness, which should be a priority, given the safety implications. Customers would also like us to carry out additional carbon monoxide investigations.

We want to raise awareness of the dangers of carbon monoxide, remind people how to stay safe, and help communities understand the impact of carbon monoxide on different vulnerabilities and age groups.

CASE STUDY: NGN CMDDA1 CO SAFETY CHECKS

NGN attended a report of carbon monoxide (CO) in County Durham. The customer was heavily pregnant and was complaining of feeling unwell. When she mentioned this to her midwife, bloods were taken and a positive CO reading was found.

The NGN engineer inspected the appliance and made safe, arranging for a CO investigation to be carried out the next day. CO readings were identified from the cooker and a fault was also found on the central heating boiler flue. The appliances were disconnected and a referral was made to the One Number VCMA project to support the customer to have her faulty appliances repaired or replaced.

The customer was assessed as eligible for the One Number service and received a new cooker and an alteration to the boiler flue to keep her and her unborn baby safe.

NGN had previously shared CO awareness information with NHS Midwives as part of a separate VCMA project. It was confirmed that it was this briefing which had influenced the midwife involved to carry out a CO test for the customer.

Stakeholder feedback shows that we should be:

- Promoting awareness and education
- Targeting additional support for those who need it the most

Enhanced/ New	Voluntary commitment	To
Enhanced	100,000 customers to receive face-to-face carbon monoxide awareness sessions over 5 years	Keep customers safe at home
Enhanced	3,250 customers receive carbon monoxide checks during RIIO-GD3	Keep customers safe and warm at home
Enhanced	Continuously improve CO awareness reach, by maximising every opportunity for customers to see, hear or read CO safety messages	Keep customers safe and warm at home

These commitments help our customers understand the dangers of carbon monoxide, and provide immediate support when appliances need to be isolated. We will also continue to educate younger customers, and those who are financially vulnerable.

Supporting those most at risk in a fair transition to net zero

Insight 7 Businesses and the public believe that, within our current energy system, the risks and benefits of climate change will not be fairly distributed. We must protect those most at risk of unfairly carrying costs and burdens, especially CIVS, young people, rural customers and small businesses

Stakeholders and customers are concerned about what a fair and just transition to net zero means, and how achievable it is for those most at risk. With the GDNs, we have developed definitions for ‘most at risk’ and a ‘just transition’.

The common definitions agreed by all GDNs for ‘most at risk’ and ‘just transition’ are detailed below:

Customers **most at risk** of being left behind are ‘Those experiencing a temporary or long-term situation which would impact the household in one or more of the following ways:

- Low or static household income, which impacts on essential costs/energy affordability
- Additional/unavoidable energy costs – specific need to stay warm at home (e.g. health issues – more susceptible to/at risk from the cold, elderly/mobility issues/unable to leave the house, or at home more frequently, expensive/hard to heat homes, including those off the gas grid)
- Additional barriers to accessing or engaging in support (e.g. language or communication barriers (including literacy), lack of access to services, lack of social/support networks, socially or digitally excluded)

These are individuals typically signed-up-to the PSR or are eligible to be on the PSR’.

‘A **‘just transition’** means playing our role as a GDN to:

- Advocate to ensure no one, particularly those most at risk, is left behind or burdened as the UK transitions to cleaner energy
- Ensure everyone – despite where you live, social and economic status – benefits equally from the transition to cleaner energy, and is aware of the choices they have available to them’

We have embedded the fair and just transition to net zero within Strategic Principle 6 (see page 9)

Here are our practical measures and commitments for the six key focus areas:

- Embed support for customers through our business as usual activities (for example – through our new customer journey mapping commitment see p15)
- Embed energy efficiency advice and referrals into projects supported by all available funding streams (for example – through our enhanced energy efficiency advice commitment see page 16)

- Commit funding to provide first-time gas central heating and in-house measures as a transition to net zero, and where no other options are available in short/medium term (for example, ‘off-gas warmth’ is linked to the Customer Support Fund– see page 22)
- Commit funding to repair/replace unsafe appliances following our intervention. (for example, by providing ‘services beyond the meter’– see page 22)
- Provide services that maintain customer safety through the energy transition (for example, by supporting carbon monoxide awareness campaigns – see page 20)
- Provide partners with access to industry-agreed awareness programmes and training on decarbonisation, so they can develop programmes of energy-specific support for households through the transition. This will be delivered by working with partners through our well-established industry working groups.

CASE STUDY: GROUNDWORKS ENERGY MANAGEMENT SYSTEMS (GEMS) - SHINEY ADVICE AND RESOURCE CENTRE ENERGY AUDIT

The Shiney Advice and Resource Project (ShARP) has been operating since 1981, in an ex-mining community, where there are higher than average levels of deprivation. The fabric of the building was in a poor condition in many areas. There was evidence of water damage in several rooms, possibly caused by damage to the roof, this required further investigation to determine the cause of this and the extent of any possible remedial works. The boiler was installed about 30 years ago, which has an efficiency in the range of 80-85%. The organisation found it challenging to control the temperature in the building. The building lacked any zonal control of heating, and lighting in some areas, such as the library, were still provided by fluorescent tube lighting.

The GEMS audit was funded through NGN's VCMA and provided a number of recommendations on how the service could improve the energy efficiency of the building, enable better heating solutions and reduce the carbon footprint of the building. ShARP were given a full overview of the findings and summary of results including a breakdown of investment costs, potential monetary savings and payback time. The service will be able to use this audit to consider upgrades to the building, enabling them to continue to provide vital services to people in the local community.

Enhanced/ New	Voluntary commitment	To
Enhanced	30,000 customers to receive energy advice over 5 years, via trusted partners	Help alleviate fuel poverty and reduce carbon emissions
New	All VCMA projects will be assessed against the NGN Inclusivity and Vulnerability Impact Assessment tool	Make sure that we recognise any barriers to support, address and mitigate risks, and deliver projects that are fair for all
New	Map all existing and new customer journeys	Maximise intervention opportunities to support the journey to net zero

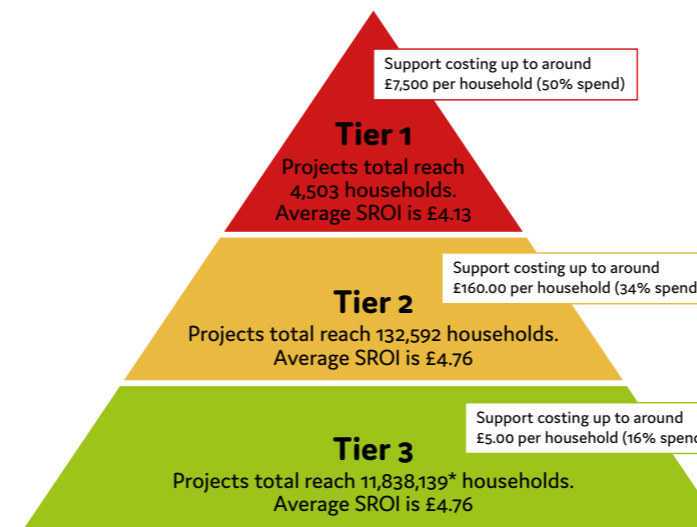
These commitments are designed to support a 'fair transition' for all customers. We will apply our new NGN Inclusivity and Vulnerability Impact Assessment tool whenever we are making investment decisions about CIVS, to make sure that our actions do not directly or indirectly neglect certain customer groups.

Measure and improve

We always work to make sure that we fully understand the impact of our projects, so that we can make informed decisions about forming new partnerships and starting projects, and how these can evolve and grow. Over the last 12 months, we have adopted and adapted a three-tier model, first introduced by SGN, to categorise the projects we fund:

- Tier 1 projects focus on appliance repair and replacement, in-depth case work and supporting high-risk groups, where there may be complex barriers to access or engagement
- Tier 2 projects focus on direct awareness and lower-level advice
- Tier 3 projects focus on awareness campaigns, and lighter touch and self-initiated support

Combined NGN and collaborative VCMA spend – RIIO-GD2 yrs 1-3



*3% from the total reach as agreed with GDN's – this is the likelihood of people that would take action following an intervention

Measuring in this way has enabled us to better target our support and understand the impact of our social return on investment (SROI):

- Collaborative projects have a higher SROI value on average, although NGN SROI values have a more consistent range
- There is a higher percentage of collaborative spend on tier 1 projects overall
- We have been able to reach more people through individual awareness campaigns (tier 3)
- SROI values are more consistent through tiers 1 and 2
- SROI for tier 3 is generally higher; these projects target easier-to-reach customer groups, using broad media campaigns

We will continue to use this approach, alongside quarterly/annual partner reports, actual SROI calculations, case studies and partner spotlight sessions (such as our quarterly hot topic workshops) to understand the impact of our VCMA projects.

Common Social Return on Investment (SROI) Toolkit

In March 2023, Sirio was commissioned by the UK's energy networks to develop an industry-wide social value framework. The framework was delivered in December 2023. A key driver was to report social impact results comparably and consistently across the industry. This can only be achieved by agreeing on a common set of inputs for specific initiatives.

Bearing in mind the growing investment in the Vulnerability and Carbon Monoxide Allowance, and Ofgem's desire to introduce impact measurement as an integral part of this scheme's governance, the GDNs have developed a sector-wide rulebook. This standardises the inputs that GDNs will use to measure the impact of common initiatives, maximising comparability and consistency while keeping the framework simple to use. It takes the ENA Social Value Framework a step further by assigning specific benefits (including proxies and discount factors) to preselected outcomes (e.g. providing carbon monoxide alarms and energy efficiency advice).

The GDNs can now use a standard measure of the social impact of their activities.

Forecast v actual SROI

After the common SROI tool was introduced, we reviewed a sample of projects from each of the four VCMA themes to check the actual social value against what was originally forecast.

This has helped us to monitor the average social value across our projects and allowed us look at how the projects can be improved to maximise the impact of VCMA funding. This includes revising how projects are reported, to ensure that delivery partners are capturing evidence to support the outcomes, where possible.

For example, it can be particularly difficult to evidence health and wellbeing outcomes, but we can help partners evidence the value of their work for other funders, as well as us. We realised that our own targeted awareness campaigns have been more successful within our network area than those delivered collaboratively, showing that this is a good investment of our individual VCMA allowance.

All reassessments have demonstrated an increase in social value from the original forecast. For example:

Carbon monoxide awareness
Community Energy & CO Awareness Project (Highfield Coop)
Raising awareness in minority ethnic communities of the dangers of carbon monoxide
13% increase from forecast

We recognise that, SROI is not the only way of measuring customer impact. Case studies and feedback directly from partners and customers alongside other less measurable outcomes, must also be included to make sure we consider all the benefits for our customers.

Through regular engagement opportunities, we will continually seek feedback from partners and stakeholders. We will remain flexible and adaptable to changes in the social and economic landscape of our network to meet the needs of our customers in vulnerable situations.

Customers in vulnerable situations (CIVS) – Stakeholder Engagement Framework

New: Partner networking call	Monthly	This is for our partners to network, and share project ideas and best practice. A different partner hosts the call each month and showcases their project to the rest of the group
Maintain: Independent Stakeholder Group (ISG)	Bimonthly	This includes deep-dives into vulnerability themes. It is a chance to update the group on VCMA progress and an opportunity to challenge and review against performance and delivery
Enhanced: Strategic partner roundtable	Quarterly	Meeting with our strategic partners to monitor and review progress of VCMA projects. Ofgem metrics are reviewed, and lessons learned and future opportunities are discussed
Maintain: Infrastructure North	Quarterly	This is a collaboration with partners in the north and Yorkshire – Northern Powergrid, Yorkshire Water and Northumbrian Water
Maintain: Utilities Together	Quarterly	This is a collaboration with all utilities in Cumbria / Northwest of England. Partners are NGN, Cadent, Electricity Northwest and United Utilities
Maintain: CIVS newsletter	Quarterly	This updates stakeholders on VCMA projects and other funding streams. The newsletter also includes business updates and future engagement activities

How we will deliver our RIIO-GD3 Strategy

Building on our track record of keeping our promises and delivering over and above for customers in most need, we will use all approaches to meet and exceed our RIIO-GD3 voluntary commitments. Here, we describe the activities that we will undertake as business as usual, the available funding mechanisms and what we will use them for, and our approach to collaboration. We will determine the most appropriate funding source for proposed projects.

Business as usual

These are the ongoing activities that we, as a group of GDNs, have agreed should be carried out to support CIVS. This means that CIVS across the UK will get a consistent level of service. The total value of BAU activities to support CIVS in RIIO-GD3 is £7.27m. This includes £4.88m of activities funded under VCMA in RIIO-GD2 that will move to BAU.

The forecast SROI value has been provided for activities that have been delivered under VCMA during RIIO-GD2, but are moving to BAU in RIIO-GD3. For RIIO-GD3, the forecast SROI will be calculated using the agreed common methodology.

Justification for the activities listed is detailed in BPDT 8.24.

Dedicated CIVS support services

This team supports and advises operational colleagues, directs customers to partner organisations, provides safeguarding advice and support, and offers bespoke support to PSR customers. The SROI for this activity is £1.57 This activity was VCMA funded in RIIO-GD2 and is valued at £0.35m for RIIO-GD3.

Personalised welfare

We are obliged under GSoP3 to offer and provide alternative heating and cooking during gas supply interruption to homes on the PSR, and to provide hot water and food in some circumstances.

We offer a wide range of services to customers on the PSR and to non-PSR customers who meet the needs codes criteria. These services include:

- Hot plates, microwaves, fan heaters and oil filled radiators
- Hot water urns, kettles, portable showers
- Keep warm packs, heated throws, seat covers, jackets
- Provision of hot food through local caterers and vouchers with delivery companies
- Alternative accommodation or access to local services for bathing / respite. This activity was BAU funded in RIIO-GD2 and is valued at £1.38m for RIIO-GD3.

Safeguarding services

We offer:

- Locking cooker valves (typically used to allow people with early-stage dementia to cook, but enabling family / carer to lock the gas in the off position so that it cannot be left on)
- Easy-assist emergency control valves (ECV), operated via a push button and spring, to quickly shut off the gas if the customer cannot grip and turn the ECV handle
- Translation tools / apps so that our engineers can communicate with customers on site, allowing instant translation or three-way calls in multiple languages, including BSL. This activity was BAU funded in RIIO-GD2 and is valued at £0.043m for RIIO-GD3.

Training

Our employees take part in annual e-learning and face-to-face training so that they know the key signs of vulnerability and the services that can support customers. Priority customer teams and local operational champions have additional training on specific vulnerabilities (e.g. dementia, autism, domestic abuse and vulnerable children). The SROI for this activity is £6.06. This activity was VCMA funded in RIIO-GD2 and is valued at £0.225m for RIIO-GD3.

Memberships and accreditation

As a member of national working groups and supporter of charities, we can access the stakeholders and literature which help us to form our future business plans, build relationships and projects, develop our knowledge and skills, and provide a route to collaborative engagement with politicians and decision makers. This activity was BAU funded in RIIO-GD2 and is valued at £0.308m for RIIO-GD3.

Examples include:

- APPCOG – All Party Parliamentary Carbon Monoxide Group
- NEA – National Energy Action
- Scope Utilities membership (SUM)
- British Standards Institution (BSI): To ensure our services are fit for purpose and comply with our licence obligations, we are accredited under the ISO / BS for Inclusive Service Provision through the BSI, which requires a comprehensive annual six-day audit

Education

We deliver carbon monoxide training to primary and secondary schools, and to young adults outside of education. We will continue to do so through a mixture of NGN colleagues and partnership organisations. The average SROI for this activity is £5.01.

The GDN will also keep educating people on the benefits of the PSR and how a single registration means they can be supported by their energy suppliers, DNOs and water companies. PSR and CO education activities were VCMA funded in RIIO-GD2 and are valued at £1m for RIIO-GD3.

Carbon monoxide safety

We will continue to run targeted winter and summer carbon monoxide awareness campaigns in RIIO-GD3. While people are increasingly aware of the risks, with many more homes having a carbon monoxide alarm, the cost-of-living crisis has meant some customers have neglected servicing their gas appliances, leading to an increased risk of carbon monoxide release. We need to keep up the messaging by working with organisations such as the Gas Safe Register (GSR) and RoSPA. This activity was VCMA funded in RIIO-GD2 and is valued at £0.28m for RIIO-GD3.

We will keep providing free carbon monoxide alarms to eligible homes in RIIO-GD3. Social and private landlords have an obligation to fit a carbon monoxide alarm in their homes, so we will only provide them to homes where the landlord is absent and the tenants are at risk. Our focus will therefore be on supporting private homes with no alarm. We will provide 91,780 standard CO alarms to customers during RIIO-GD3. The SROI for this activity is £12.00. This activity was VCMA funded in RIIO-GD2 and is valued at £1.25m for RIIO-GD3.

Stakeholders have told us that a basic alarm is not suitable for those who are deaf or blind or with poor sight. We will therefore fund some alarms which link to strobe lights, vibrating pads / wearable tech, and, through the Homeshield innovation project, potentially send alerts to family or carers. We will provide 1,000 accessible CO alarms to customers during RIIO-GD3.

Our core licence obligation is to make homes safe by closing the ECV, with the customer responsible for contacting a GSR engineer to carry out further checks. We have trained engineers to carry out further checks to establish if carbon monoxide is present and to establish its source through the CMDDA1 process, using flue gas analysers. In RIIO-GD3, we propose to offer this service to all customers on the PSR in private homes (tenants will be referred to their landlords for support). The majority of alarms are found to be false and therefore the customer's gas supply can be switched back on provided all appliances have passed the CMDDA1 checks. Where carbon monoxide is found, the customer may be supported under the 'services beyond the meter' element of the VCMA, with GDN-funded repairs or signposting to the Energy Company Obligation (ECO) or another scheme. The average SROI for services beyond the meter activity is £2.53. CMDDA1 checks were VCMA funded in RIIO-GD2 and are valued at £1.01m for RIIO-GD3.

Connections

Under the GDNs' licence obligations, if the customer is physically unable to safely access the ECV or meter, we are required to fund the alteration the position of the gas service. Details of how we may go beyond this requirement are found in the GDNs Connections and Distribution Standard Charges publication. This activity was BAU funded in RIIO-GD2 and is valued at £0.66m for RIIO-GD3.

Measurement and eligibility (VCMA)

Our dedicated SROI analyst is working within the Costs Assessment Team. We have made sure that this role is independent of the core Vulnerability Team, to ensure effective and independent challenge to any project assessments. The SROI for this activity is £2.73. This activity was VCMA funded in RIIO-GD2 and is valued at £0.33m for RIIO-GD3.

Vulnerability and Carbon Monoxide Allowance (VCMA)

The VCMA is a 'use it or lose it' funding mechanism, distributed to partnership organisations via the gas networks. This gives partners the opportunity to support those who are most in need, through innovative and eligible projects. VCMA projects are focused on supporting CIVS and must go above and beyond our business as usual activities. We will continue to support partners to develop sustainable projects through guidance, networking and learning opportunities, focusing on exit strategies to ensure sustainability beyond VCMA. Our external governance panel assesses projects, monitors progress and reviews outcomes.

VCMA funding is our greatest opportunity to achieve our targets during RIIO-GD3 (see page 21), as it allows us to invest according to regional need, and focus support on tiers 1 and 2. Through stakeholder insights and bespoke vulnerability mapping we know that there are a number of gaps in support provision within our network. Our VCMA projects will target key focus areas including increased levels of debt, health inequalities, cultural and rural inequalities and accessibility. These factors have the highest detrimental impact to vulnerable customers across our network. Our RIIO-GD3 strategy will seek to address these gaps through a range of tier 1 and 2 projects, both regionally and locally. Tier 3 projects will enable lighter touch, widespread awareness and information to enable self-initiated support and guidance.

To achieve meaningful outcomes for customers in vulnerable situations during RIIO-GD3, we estimate we will need £15.9m, to reach over 585k customers across three tiers of support. For completeness, carbon monoxide awareness reach has been included in the table below albeit this will be included in BAU activities in RIIO-GD3 (see above).

The breakdown of this forecast across the four broad delivery themes is detailed below:

Broad theme	Forecast spend	% of overall VCMA	Reach
Fuel Poverty and Energy Affordability	£5,963,191	38%	293,433
Supporting Priority Customers	£4,473,316	28%	255,884
Services Beyond the Meter	£5,426,113	34%	36,475
Carbon Monoxide Awareness	BAU	0%	10m
TOTAL	£15,862,621	100%	10,585,792

*Excluding campaign reach

Appendix 4 provides further detail of the activities proposed under each VCMA in RIIO-GD3.

Fuel Poverty and Energy Affordability

Spend focus within this theme will consist of a mixture of collaborative and NGN only projects. Partnerships will primarily offer bespoke, 1-1 advice and support, with more in-depth support offered concentrating specifically on energy and debt casework. Support will be targeted towards vulnerable households living in financial hardship, and/or most at risk of fuel poverty. Delivery of projects under this theme will be throughout our network, with specific targeting in communities experiencing high levels of deprivation. The average project spend will be £331k, over a five year period.

Supporting Priority Customers

Spend focus within this theme will consist of a mixture of collaborative and NGN only projects. We acknowledge that some communities find it more challenging to access help without trusted support and are more impacted by living in a cold and unsafe home. Projects under this theme will work with specialist organisations to reach high risk and underserved groups. The majority of project delivery will be through 1-1 support and ensure that eligible households are registered on the Priority Services Register (PSR). We will continue to identify and target support towards groups which we know to be most at risk such as rural and farming communities, those with specific health needs, and those with sensory impairments. The average project spend will be £280k, over a five year period.

Services Beyond the Meter

Support under this theme will keep customers safe and warm through the repair, replacement and servicing of essential appliances. Through eligibility checking, we will ensure that support is targeted towards those who would otherwise struggle to safely maintain their appliances following a supply interruption. Through this workstream, NGN can directly support households that may not otherwise be identified by support services. Guided by stakeholder feedback, this offering will be brought in-house in RIIO-GD3, to improve efficiency and the overall customer journey. This workstream has a high cost per customer but is hugely impactful for eligible beneficiaries.

Should the confirmed RIIO-GD3 VCMA amount change, we will scale support up or down accordingly, but the split across the three broad themes will remain the same, in line with stakeholder feedback.

RIIO-GD3 approach to spend split across three-tier model

Stakeholders requested a greater focus on in-depth, one to one support in RIIO-GD3. We will be targeting those who are most at risk through tier 1 and 2 projects and reducing the lighter-touch support offered within tier 3 (see page 17 for further details of the tiered model).

Following stakeholder feedback, our proposed VCMA spend acknowledges an appetite to be more ambitious. Our experience and learnings through RIIO-GD2 have allowed us to expand our knowledge and refine our approach towards vulnerability. This progression will enable greater efficiency in future; delivering more, for less, to those who need it most. This approach has been fostered through the partner relationships that we have formed, and a strong internal culture dedicated towards the needs of customers.

Concentrating higher spend towards tier 1 interventions (59%), we aim to deliver projects that enable more qualitative outcomes in RIIO-GD3. Through these meaningful interventions, our allowance will be used to alleviate financial hardship by providing direct, in-depth, holistic support, and scaling up the repair and replacement of essential appliances for vulnerable households. We have focused on areas of greatest need and ensured that these align with our strategy. Throughout the four broad themes, we will seek to provide advice and information around the journey to net zero, ensuring that households most at risk are well supported and empowered.

	RIIO-GD2 % spend	RIIO-GD3 % spend
Tier 1	50%	59%
Tier 2	34%	35%
Tier 3	16%	6%

NGN Customer Support Fund (CSF)

This fund was originally set up at the start of RIIO-GD2 to provide immediate relief to customers in financial crisis, where they cannot get support from any other funding streams. We will continue to work with stakeholders to identify gaps in funding, and prioritise a ‘worst first’ approach.

Shareholder funding will increase from £750k in RIIO-GD2 to £1m for RIIO-GD3 and will continue to be supplemented by unbilled revenue income on an annual basis.

Category of support	% CSF spend	Example
Provision of first-time gas central heating	25% plus 100% of unbilled energy revenue	Off Gas Warmth
Enhanced compensation payments	40%	Enhanced GSOP 1
Crisis funding	10%	Foundation for Independent Living Trust – Health Through Warmth
Supplementing VCMA projects with measures that cannot be funded under VCMA	25%	NEA – Warm Homes, Healthy Futures

CASE STUDY EXAMPLE – OFF-GAS WARMTH

Mrs X, an 83-year-old owner occupier, was ineligible for Fuel Poor Network Extension Scheme funding. She was affected by poor mobility (she used a stair lift) and mental ill health. She struggled to manage her unreliable coal-fuelled heating system and her property was assessed as Energy Performance Certificate (EPC) band E. Mrs X lived alone with a household income of less than £20k pa. She was assessed as being fuel poor using the 10% methodology and was spending 20% of her income on energy costs. No funding was available, including from the local authority, to pay for a replacement central heating system. Low carbon options were not deemed suitable for Mrs X’s needs and she wanted to have a gas-fuelled system installed. With winter approaching, this case was deemed a priority due to the associated health risks.

The case was approved for CSF funding by members of the governance panel, who all agreed that this was a worthwhile use of funds to achieve affordable warmth for the customer. Mrs X’s gas connection and full central heating system was installed soon after. She was referred to the PSR, received carbon monoxide awareness information and was supported to apply to her local authority for additional insulation measures to improve the energy efficiency of her home.

NGN Community Partnering Fund (CPF)

This fund was originally set up in 2015 as the Community Promises Fund. As the VCMA and Customer Support Funds have evolved, we have ringfenced the Community Partnering Fund (CPF) to provide initial funding for grassroots organisations to test small-scale projects and approaches that can potentially be grown, to attract funding from either CSF or VCMA.

In RIIO-GD3, we plan to enhance our shareholder commitment to CPF from £250k to a minimum of £300k over 5 years

Applications to the fund will continue to be chaired independently, with membership including external subject matter experts.

Approach to collaboration

Collaboration can work in many different ways. Customers want organisations to work together to deliver the best outcomes for them. By doing this, we can create projects that tackle needs beyond our region, and can deliver a more holistic approach.

VCMA

Ofgem’s VCMA governance document states that at least 25% of the allowance must be spent on collaborative projects incorporating a national reach, while the remaining allowance must be spent on localised projects in each of the GDN areas. A collaborative project must include at least two GDNs.

Our collaborative VCMA strategy is to engage with stakeholders, utilising feedback and undertaking research, to determine customers’ greatest need for support. This aligns with how we identify customer need, resulting in many different projects covering a range of geographical demographics. Our strategy has four key pillars:

- **Fuel poverty and energy affordability:** Programmes designed to help customers achieve affordable warmth
- **Supporting priority customer groups:** Programmes targeted at PSR-eligible customers and disadvantaged communities
- **Services beyond the meter:** Direct operational support provided to CIVS as we go about our work
- **Carbon monoxide (CO) awareness:** Programmes to increase awareness of CO, how to stay safe and the impact of CO on different vulnerabilities and age groups (to be funded under BAU. See page 20)

Key drivers which have helped shape our strategy include stakeholder feedback, customer need, commitments made through our business plans and Ofgem governance. We will continue to develop our strategy in line with these key areas.

All collaborative VCMA project proposals are reviewed by our industry working groups and aligned to one of our key strategic pillars and the PSR needs codes. This helps us to identify and react to gaps in support for certain vulnerable groups, with a particular focus on those who are underrepresented or underserved.

Each network has its own strategy for delivering the VCMA, based on local demand and need, which complements our collaborative approach and thinking.

We identify, design and deliver programmes through a five-stage process:

1. **Identifying customer need:** flexibly reacting to stakeholders' insights
2. **Identifying projects and partnerships:** finding suitable projects and national partners to deliver accessible and tailored support services
3. **Delivering programmes:** monitoring and assessing delivery to maximise outcomes for the most vulnerable communities across our network
4. **Measuring outcomes and benefits:** Using tools such as SROI to measure the financial and social benefits to customers and communities
5. **Reviewing and learning:** Evaluating programmes, sharing best practice and learning to help shape future projects and our strategic approach

Several industry working groups help us share best practice and form common approaches:

VCMA Steering Group: Brings together the VCMA leads and key external stakeholders to sign off collaborative projects, align strategies, monitor outcomes, review budgets and liaise with Ofgem on things associated with VCMA.

GDN Consumer Vulnerability Working Group: Focuses on creating sustainable community projects and partnerships that treat customers fairly, by collaboratively sponsoring both national and regional initiatives. Priorities include raising awareness of the PSR through joint

engagement that supports priority customer needs. It now incorporates the Fuel Poverty and Energy Efficiency (FPEEG) Working Group.

GDN CO Collaboration Working Group: Brings together carbon monoxide leads from across all four GDNs, as well as key external stakeholders such as Policy Connect, FireAngel and Gas Safe Register. The group discusses key activities associated with carbon monoxide, including collaborative and individual projects, policy updates and changes to industry standards.

Customer Service and Vulnerability Working Group: Brings together electricity distribution network operators (DNOs) and GDNs to progress change and cross-industry improvements, share best practice and discuss collective issues. This group takes the lead on industry-wide, customer-related topics, including customer service, vulnerability, consumer engagement and industry crisis response.

Regional collaboration

We also have strong regional collaboration links, through both Infrastructure North, formed of NGN, Northern Powergrid, Northumbrian Water and Yorkshire Water. We work together to tackle common issues within our region.

Utilities Together has similar membership, but covers Central and Northwest England.

We will continue to use these groups to deliver comprehensive support for our shared customer base.

Governance and assurance

The well-established independent VCMA Governance Group reviews our regional projects. The panel is made up of colleagues from water companies, DNOs and Citizens Advice, currently meeting every month. Project proposals are shared in advance and the project review process addresses the following questions:

- Does the project proposal meet VCMA eligibility criteria?
- Does the proposal align with NGN's current CIVS Strategy?
- Cost per beneficiary?
- What is the SROI value?

If a project is rejected, the partner is given feedback and an action plan is drafted, to identify gaps in the proposal.

The increased VCMA funding has enabled this panel to be broadened and hold review meetings more often. We also use this forum to challenge and sanction our part in GDN collaborative projects.

Additional external and internal assurance on our overall VCMA Strategy includes:

- ISO 22458 – Consumer Vulnerability Kitemark (evolved from BSI 18477, which we have held since 2015), awarded in 2023
- Business in the Community – Responsible Business Tracker. Our activities have been assessed against this standard since 2019. Our engagement with community partners is recognised as best practice
- Independent Stakeholder Group and Social Issues Subgroup. These discuss topics around VCMA strategy and delivery
- NGN Board. VCMA strategy delivery is described in monthly management reports, and any changes to approach and strategic direction are discussed

The level of governance in place for VCMA projects has been applied as best practice across all areas in which we consider vulnerability, including CSF, CPF and BAU activities.

We will continually review and improve these processes to make sure that our work is governed and assured to industry guidance and best practice principles.

In summary, in RIIO-GD3 we have stretching ambitions to support customers in fuel poverty, to raise awareness of the dangers of carbon monoxide, and to support those most at risk of being left behind in the transition to net zero. Our targets will be treated as a minimum. What really matters is that we continue to listen and engage with our stakeholders and customers, to make sure we provide the support and guidance they require, so that we can have the most impact on those in most need.

Appendix 1 - Impact in RIIO-GD2

Our dedicated CIVS Strategy is continually reviewed to reflect changes in need. The most recent update was in June 2023, reflecting the increase in the Vulnerability and Carbon Monoxide Allowance from c. £7m to £20m.

The six key priority areas identified by our stakeholders are summarised below, along with examples of how we have responded to this feedback.

Priority Area	Case study to illustrate NGN response
<p>Priority Area 1: Increased focus on health. Must be driven by priorities of NHS to avoid hospitalisation.</p> <p>Projects should align health and high-risk deprivation, building on health projects that use data well.</p> <p>Use data to inform health categories of the most at risk and least able to achieve affordable warmth.</p>	<p>Warm Homes, Healthy Futures</p> <p>This collaborative VCMA project with NEA and all four GDNs aims to connect health professionals and local public health bodies to energy advice and other specialist services. This will enable us to support people to live in warm and safe homes and improve health.</p> <p>To get the best results, the project will use the NHS England Core20Plus5 approach to build health sector partnerships. This is an existing framework for action across much of the NHS that mirrors VCMA priorities around low-income areas, priority demographics and cold homes-related health conditions. We believe that the model can also help people worst affected by cold homes in Wales and Scotland. The target is to engage with 24,000 beneficiaries.</p>
<p>Priority Area 2: Collaboration and linking up partners and funding. Targeting specific geographical areas identified with partners as areas of high deprivation/risk but underserved by current projects. This could be achieved by joint stakeholder engagement.</p> <p>Outreach programme to get more partners on board, targeting hard-to-reach areas.</p> <p>Build on existing northern networks, such as Infrastructure North, to maximise reach.</p>	<p>Citizens Advice Bradford</p> <p>We have worked closely with other utility partners to respond appropriately to meet the needs of customers in high-risk areas. A jointly funded project with Northern Powergrid (NPg) enabled Citizens Advice Bradford to provide specialist energy and debt advice to customers in the area. The diverse audience reflects the local demographic, particularly those from minority ethnic backgrounds. This area is known to have some of the highest levels of deprivation but was previously underserved by both utilities. This joint funding resulted in a wider service provision for customers that might not otherwise have been achieved through an individually funded project.</p>
<p>Priority Area 3: Increasing capacity for support within partner organisations. Scaling up to reach more people in fuel poverty – consider grant funding via larger national charities to reach smaller local groups.</p> <p>Longer term projects funded to increase sustainability/certainty. Consideration of immediate versus long-term support.</p> <p>Consistency of service provision across the network in terms of advice and information. It may be necessary to increase partner capacity within key strategic referral networks to address inconsistencies in support provision through localised referral networks.</p>	<p>Fuel Bank Foundation (FBF)</p> <p>Initially a ‘small winter fund’, it was scaled up to a VCMA project and expanded with a further 75 partners over the colder winter months to provide longer term security in 2024. This project allowed an expansion of FBF’s existing partnership model across Northeast England by targeting centres and partnerships in rural and coastal communities that are often overlooked and underserved.</p> <p>To complement its Fuel Bank programme, FBF expanded its Heat Fund across the North of England, coupled with targeted marketing to raise awareness of the help that is available within communities that rely on unregulated fuels such as LPG, biomass and heating oil. Through this expansion, the Heat Fund aims to provide support to 100 households who live off the gas network and are reliant on more expensive, unregulated fuel types to stay warm and well at home.</p>

Priority Area	Case study to illustrate NGN response
<p>Priority Area 4: Connecting and responding to different aspects and complexities of vulnerability. Targeting support to reach those who may not have access to or knowledge of support available.</p> <p>Those who may not ask for help.</p> <p>Those seeking support for the first time.</p> <p>Young people who may be living independently for the first time and struggling to meet/understand their energy needs/requirements.</p> <p>Tailoring VCMA#2 response to match the diverse nature of NGN communities and needs.</p> <p>Understanding needs and tailoring approach to where it is needed.</p> <p>Digital inclusion, household and community resilience.</p>	<p>Maternity digital inclusion and equity</p> <p>Working with South Tees Hospitals, we set up a digital inclusion project to support people accessing maternity services in the area, which has many types of deprivation and health inequalities. The project helps pregnant women to gain the skills and confidence to use a smartphone app to access digital maternity notes and health information. This includes information on carbon monoxide, the PSR and energy efficiency advice/signposting.</p> <p>This addresses concerns that, without access to such support, health inequalities could widen if women are unable to access their own medical information and important messages about their maternity care. This project directly supports digital inclusion for high-risk groups, via the relationships developed through this specialist service.</p>
<p>Priority Area 5: Continued support for those in financial hardship. Financial hardship is more widespread, affecting more people – so more people are vulnerable/needing to access support in general (debt advice).</p> <p>New vulnerabilities are emerging and impacting those people who are ‘just about managing’.</p> <p>Within this, there are some with greater risks/depth/complexity of vulnerability e.g. greater barriers/challenges to accessing support – knowledge of services/access to services/digital exclusion/language or communication barriers.</p> <p>Consider geography – coastal towns and tenure.</p>	<p>Centres for Warmth (CFW)</p> <p>Taking best practice from Cadent, we are evolving Centres for Warmth to enable community centres to reach vulnerable people who may not go elsewhere or know how to access services which may benefit them. A mapping exercise identified target areas, prioritising worst-served communities. We used our NGN Social Indicator Mapping, alongside the now widely used Vulnerability Visualisation Tool, to establish our top six priority areas.</p> <p>The CFW model takes a holistic structured approach, tackling an immediate need to support fuel-poor households within a community setting. Centre users benefit from a combination of services:</p> <ul style="list-style-type: none"> • Energy advice • CO awareness and advice • Income maximisation through benefit entitlement checks and managing debt • Free or reduced cost food/clothing • Fuel top-up vouchers • Links to other NGN funded partner information/assistance <p>Customers will be offered training, information, advice and services tailored to their own communities to:</p> <ul style="list-style-type: none"> • Improve physical health, mental health and wellbeing • Increase household income • Help communities better manage their energy consumption

Priority Area	Case study to illustrate NGN response
<p>Priority Area 6 – Scaling up existing projects.</p> <p>Build on successful projects and extend partnership networks into areas of greatest need.</p> <p>Continue to learn and share from each other. Where a project may have concluded within one region, its approach may be effectively used in another region.</p>	<p>Skills 4 Work – A trusted source of information and practical support.</p> <p>A key component of our strategic approach is to make sure that we scale up successful projects and continue to evolve how we support our partners to deliver to the best outcomes for our customers.</p> <p>Through our Community Partnering Fund (CPF), we supported four projects in 2022/23. One of the successful applicants was Skills 4 Work (Gateshead) Ltd, which delivered workshops and information sessions on the PSR.</p> <p>This was a success and developed into a VCMA project in February 2024. This project will ensure that individuals and families are aware of available support regarding their utility bills, increase registration on the PSR and be more aware of the dangers of carbon monoxide poisoning and how this can be tackled. Skills 4 Work is well placed to reach vulnerable young adults who are living independently, some without other support networks, and socially isolated older people who attend its weekly lunch sessions.</p> <p>Skills 4 Work 's social media platforms engage with a wider audience and share information as widely as possible.</p>

Two unique NGN funds compliment the support we provide through the VCMA.

Customer Support Fund (CSF; previously called Hardship Fund)

We originally committed to an annual allowance of £150k to support our most vulnerable customers, where other funding (such as VCMA) could not be used. We have been strategic in how this fund is used to ensure greatest impact and to avoid duplication with other funding mechanisms. Importantly, we have used this fund to provide additional support on VCMA projects. We have continued to be flexible and responsive to the needs of customers across our network. In 2022/23, this allowance was increased to £600k to address the higher level of need from the energy and cost-of-living crises.

In October 2022, using the increased allowance, we offered an additional payment to customers with a supply interruption of between 4 and 24 hours. This extended our Guaranteed Standards of Performance payment to acknowledge the immediate financial burden. We continued this commitment into the remainder of RIIO-GD2, in line with customer feedback.

In 2023/24, we were the first, and currently only, GDN to ringfence revenue gained from pursuing unbilled energy ('theft of gas') to help support our customers in extreme crisis, increasing the CSF by c. £118k.

This commitment will continue throughout RIIO-GD2 and will fund the work to support off-gas, vulnerable households to obtain first-time gas central heating through our project Off Gas Warmth, in partnership with Communitas Energy. This supports customers with multiple health risks associated with living in cold homes, where they would otherwise have struggled to stay warm and well. It has made a significant positive impact on the small number of households who have benefited and supports our commitment to prioritising health. We are also looking to evaluate carbon savings associated with this work. In 2024/25, the unbilled revenue will increase the CSF by c£42k.

Community Partnering Fund (CPF)

The CPF has enabled small, local projects to develop to reach those most vulnerable in their communities. We have maintained our commitment to invest £50k per year in this fund and have targeted various geographic areas within our network. During RIIO-GD2, the Community Partnering Fund has supported 23 grassroots community projects with grants of up to £10k per organisation, administered through local grant-giving bodies. This fund has enabled us to build stronger relationships with small community-based organisations, and we have benefited from the insights of these stakeholders during our engagement events. The CPF allows us to test small projects with our grassroots partnerships, and support them to have the confidence to evolve and grow projects into the VCMA. We are proud that six of the initiatives funded through CPF have become larger VCMA-funded projects.

Appendix 2 – RIIO-GD2 Vulnerable Customer Outputs

We are proud of what we delivered for our customers and communities with our wide range of funding resources.

Measure	Current performance April 2021 to March 2024	Forecast performance to end RIIO-GD2
Customer interventions – Total tiers 1–3	11,975,234*	21,816,741*
Customer interventions – Tier 1 projects focused on appliance repair/replacement, in-depth case work and targeting support towards high-risk groups	4503	30,847
Customer interventions – Tier 2 projects focused on direct awareness and lower-level advice	132,592	358,335
Customer interventions – Tier 3 projects focused on awareness campaigns, lighter touch and self-initiated support	11,838,139*	21,427,559*
Value of NGN-led collaborative projects (% of overall collaborative spend across all GDNs)	10% (£1,434,423) Original VCMA allowance £60m (25% = £15m)	35% (£14,820,111) Increased VCMA allowance c£170m (25% = £42.5m)
NGN % VCMA collaborative spend (minimum 25% as per VCMA guidance)	35%	33%
Average SROI	£8.52	£11.02
Number of projects	72	98
Number of partners	42	63
PSR referrals	23,841	43,847
CO awareness visits/surveys with customers	54,371	91,191
Energy efficiency direct advice interventions	5,877	12,618
Services Beyond the Meter including repair, replacement and servicing	122	550
CO inspections (CMDDA1 checks)	72	375
Grassroots projects supported through Community Partnering Fund (CPF)	23	40
CPF projects grown into VCMA projects	6	8
Households supported with enhanced GSOP 1 payment (for 4-24hr supply interruption)	3,780	10,015

*Includes widespread awareness campaigns reach

Appendix 3 – RIIO-GD3 CIVS Strategy Engagement Summary

Channel	When	Feedback
NEA and NGN – Customers In Vulnerable Situations And Community Resilience: A Cross-Utility Study	2023	Adopt six best practice guidelines for understanding and supporting CIVS: Understanding vulnerability, Taking a ‘vulnerability-first’ approach, Debt and affordability, Communications and accessibility, Support for all and Personal safety.
NGN Customer Perceptions annual research – quantitative report	Dec 2023	Affordability: Vulnerable customers such as those who struggle to pay their bills and those in lower social grades were significantly more likely to have altered their energy usage and methods to save money. ‘Medically dependent on energy’ is voted as most important aspect of vulnerability for us to focus on. Older customers gave this option significantly more weight. Fuel poverty support: Partner with organisations to reach digitally disengaged, pre-payment meter users, and those on benefits, and deliver fuel poverty support information.
NGN Customer Perceptions and Priorities research – qualitative report	April 2023	Providing in-depth support for customers in fuel poverty was ranked #1 out of 23 business priority areas. Expanding carbon monoxide awareness campaigns was ranked #7. Participants emphasised the importance of providing communication options to cater to different needs, such as those with disabilities or language barriers. Digitally excluded customers may rely more on traditional communication methods like phone calls and letters. Older customers are more isolated as the cost-of-living crisis becomes more acute. Spending more time at home increases their gas usage.
NGN Key Stakeholder Bilaterals	February 2024 – April 2024	<ul style="list-style-type: none"> The ED2 funding model is appropriate to cover largescale, easy-to-reach and measurable advice services, but is less adaptable to fund harder to reach, more time-intensive and sensitive vulnerable programmes A collaborative investment strategy with respective DNOs avoids duplication and recognises/fills gaps Collaborative PSR strategy with NPg Specific focus on digital inclusion Tiered approach to support, and forecast reach is based on different funding allowance levels Refresh strategic partner framework Assurance of partner delivery through BSI audit Establish principles for what services should be BAU, and what should be funded through available allowances Favouring collaborative projects, and they provide a common, fair service for all customers

Channel	When	Feedback
NGN Customers in Vulnerable Situations – strategic workshop	23rd April 2024	Measurement <ul style="list-style-type: none"> Measuring quality rather than quantity Addressing root causes, not just helping with crisis More measurement on improvements to mental wellbeing Collaboration and duplication <ul style="list-style-type: none"> Cross-utility collaboration is really important Making sure that collaborators have the same values and an aligned vision Taking a personal approach, being committed to addressing to vulnerability and collaboration, having ‘can do’ attitude and an ambition for impact Understanding funding gaps <ul style="list-style-type: none"> Broken boilers, gas or oil and gas safety checks Support needs to be relevant
Leeds Poverty Truth Commission	January–October 2024	Vulnerability is situational. Social poverty should be considered alongside fuel/food/health poverty. The impact of COVID is still being felt – face-to-face services never came back, so customers and communities continue to be more isolated.
Stakeholder triangulation	Phase 2 February 2023	<ul style="list-style-type: none"> Our plans should show that most customers see financial hardship as the main element of vulnerability We should enhance the sustainability of our social investments by equipping partners and communities to continue projects when initial seed funding stops We need to expand the reach of the Priority Services Register to ensure effective targeting and take-up of support services among non-financial vulnerabilities Regional collaboration with utilities partners has identified opportunities and best practices for dealing with severe weather incidents, especially those which support CIVS Bill payers, especially those in vulnerable situations, support ‘services beyond the meter’ within our core role that can be implemented at minimum cost We should act to reduce the additional risks of carbon monoxide caused by the cost-of-living crisis Businesses and the public believe that, within our current energy system, the risks and benefits of climate change will not be fairly distributed. We must protect those most at risk of unfairly carrying costs and burdens, especially CIVS, young people, rural customers and small businesses

Appendix 4 - RIIO-GD3 VCMA Approach to Spend

The tables below show our proposed approach to VCMA spend in RIIO-GD3, split by theme, project type and tier of support delivered. Whilst our targets are more ambitious for RIIO-GD3 due to the focus on tier 1 support (targeted, higher cost interventions), the reach across the three tiers is lower overall than we have achieved in RIIO-GD2 due to a lower VCMA allowance.

Fuel poverty and Energy Affordability				
Project type	Coverage	Tier	Cost (5yrs)	Reach
In-depth, independent energy, benefits and debt advice and casework targeted towards specific high-risk communities	Targeted	1	£1,462,500	6,540
In-depth independent energy advice and casework for fuel poor households, encompassing advice on low carbon energy solutions	Network wide	1	£1,305,000	12,659
Independent, direct energy efficiency advice including in home visits	Targeted	2	£380,000	7,320
Centres for Warmth Programme - delivered through trusted community partners situated in the heart of the most deprived communities across the NGN network			£1,660,000	26,800
Fuel poverty, energy efficiency, PSR and CO support within local communities			£95,000	2154
Energy efficiency awareness training for frontline partners	Network wide	2	£570,691	9,710
Independent, direct energy advice and casework				
Independent benefit and income maximisation advice and casework	Network wide	3	£490,000	5,000,000
Energy efficiency awareness campaigns				228,250
Immediate fuel crisis support, including information and onward signposting	Network wide	3	£490,000	228,250
		TOTAL	£5,963,191	

Supporting Priority Customers				
Project type	Coverage	Tier	Cost (5yrs)	Reach
In-depth, independent energy, benefits and debt advice and casework	Targeted	1	£622,785	1485
• Overcoming barriers to engagement for specific priority groups			£1,050,000	2508
In-depth, independent energy, benefits and debt advice and casework	Network wide	1	£329,009	9560
• Overcoming barriers to engagement for specific priority groups (health focus)				
In-depth, independent energy and benefits advice and casework	Targeted	2	£706,578	21,081
• Overcoming barriers to engagement for specific priority groups				
Direct energy efficiency, PSR and CO support within local communities	Network wide	2	£937,500	15,000
• Overcoming barriers to engagement for specific priority groups				
Small community projects delivering direct energy efficiency, PSR and CO support	Network wide	2	£400,000	0
• Overcoming barriers to engagement for specific priority groups				
Project coordination support across all projects	Targeted	3	£125,000	5,000,000
Targeted Priority Services Register awareness aimed at eligible groups	Network wide	3	£302,444	206,250
General energy efficiency, PSR and CO support, including information and onward signposting				
• Overcoming barriers to engagement for specific priority groups				
		TOTAL	£4,473,316	

Services Beyond the Meter				
Project type	Coverage	Tier	Cost (5yrs)	Reach
Repair, Replacement and Servicing of essential appliances for vulnerable households meeting eligibility criteria	Network wide	1	£4,656,404	5,475
Mobile support for vulnerable communities, including energy efficiency information, advice and signposting	Targeted	2	£769,710	31,000
		TOTAL	£5,426,114	

