

energyPLUS

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

Updated: April 2026

PEA reference: PCG-SGNBoth-016a



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Project registration table

Project summary	
Project title	energyPLUS
Strategic area	Supporting Priority Customer Groups
Lead partner name	deafPLUS
New/Updated (indicate as appropriate)	New
Date of PEA submission	April 2026
Project start and end date	April 2026 – March 2028
Project location	SGN's regions
Sectors involved	Gas Distribution Network Charitable Organisations
Project contact	
Name	Janet Duggan
Contact details	Positive.impact@sgn.co.uk
Project partners and third parties involved	
Organisation name	Role
deafPLUS	Delivery of the core funded service
IncomeMax	Referral partner for debt and income support, training
YES Energy Solutions	Referral partner for fuel poverty intervention and grant access
Gas Safe Charity	Delivery of Think CO training
National Energy Action	Training provider
Costs and funding	
Total cost (£k)	Redacted due to commercial sensitivity
Total VCMA funding required (£k)	£150,000
Total BAU vulnerability and CO safety activity baseline allowance funding by activity (£k)	Redacted due to commercial sensitivity

Problem(s)

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

Rising energy costs, fuel poverty and financial insecurity continue to place severe pressure on households across the UK. Since 2021, energy prices have almost doubled, and as of early 2026, it's estimated that around 6.7 million households across the UK are living in fuel poverty. Nearly half of low-income households remain in homes that are hard to heat, leaving millions exposed to cold, damp conditions that harm their physical and mental health.

Deaf and hard of hearing people are disproportionately affected. [RNID](#) estimates 1.2 million people are severely or profoundly Deaf, requiring enhanced support under the Equality Act, and the British Deaf Association reports 87,000+ BSL users. Yet with only 1,500 [NRCPD](#)-registered interpreters in the UK. Deaf people are twice as likely to experience mental health challenges ([SignHealth](#)).

Deaf people face structural barriers to understanding energy bills, accessing welfare support, registering for the Priority Services Register (PSR), and navigating energy safeguarding support.

Deaf households face compounded inequalities that heighten vulnerability to fuel poverty and financial harm. These include difficulties communicating with service providers, interpreter shortages, lower literacy and numeracy linked to language deprivation, and disproportionately high mental health need.

Employment rates are also low, with only 37% of Deaf BSL users in paid work ([RNID](#)). deafPLUS casework shows Deaf people losing homes or falling into debt due to misunderstood online forms or inaccessible provider communication. Deaf people are also disproportionately targeted by scams, with deafPLUS reporting rising cases where inaccessible information and a lack of BSL-accessible warnings leave BSL users at heightened risk of financial fraud, including energy-related scams such as fake rebate offers, bogus meter-inspection visits and fraudulent debt-collection emails, demonstrating the urgent need for scam-awareness education delivered directly in BSL.

Safety risks are also elevated. Most [carbon monoxide](#) (CO) alarms use audible alerts that Deaf people cannot hear, and awareness of strobe or vibrating-pad alarms remains low.

Digital exclusion further increases risk of being missed by targeted campaigns in BSL. Despite digitalisation of essential services, many Deaf people cannot use Video Relay Services (VRS). A [Tower Hamlets pilot](#) found around 80% were unfamiliar with VRS, despite 37% being in employment. This limits access to online energy accounts, benefits applications, and emergency support.

There are even greater barriers to support for Deaf migrants due to combined barriers in communication, financial vulnerability, and housing insecurity ([UCL Deaf Migrants Project, 2023](#)).

Scope and objectives

Outline the scope and objectives of the VCMA project linked to the problem statement above. This should be clearly defined including the benefits which would directly impact customers on the participating GDNs' network(s), and where the benefits of the VCMA Projects lie.

deafPLUS supports Deaf and hard of hearing people with accessible information, advice, advocacy, and specialist communication-inclusive services.

This programme will deliver a targeted, preventative fuel poverty and energy-safeguarding support initiative for Deaf and hard of hearing households across our network, delivered in partnership with deafPLUS.

Together, we aim to ensure Deaf customers can maintain safe, warm, and energy-efficient homes through fully accessible, BSL-led sessions and workshops. These will provide practical guidance on energy efficiency, energy debt, Priority Services Register (PSR) access, and carbon monoxide (CO) safety, all delivered in formats tailored to Deaf language and cultural needs.

Our programme will:

- Deliver Energy Safeguarding & Fuel Poverty Support through one-to-one BSL-led energy advice on billing, debt and affordability, PSR registration support, BSL-delivered CO awareness with accessible alarms.
- Embed EnergyPLUS on the Road (pop-ups across target regions), delivering BSL workshops on CO safety, PSR and fuel poverty, alongside one-to-one safeguarding sessions, CO alarm demonstrations, and digital access stations to introduce Video Relay Service (VRS) use where booths are installed.
- Instal VRS legacy booths in trusted community venues such as libraries, councils, warm hubs and Deaf centres. These booths offer free access to VRS for energy suppliers and essential services, host CO and PSR information, and act as permanent digital access points for Deaf BSL users.
- Extend support beyond energy needs through direct links to partners such as IncomeMax, YES Energy Solutions, Citizens Advice, Fire and Rescue, NHS services, scam-awareness teams, and wider voluntary-sector organisations, ensuring a holistic, coordinated approach to financial resilience, safety, and wellbeing.

By reducing fuel poverty, improving PSR registrations, strengthening CO safety, preventing energy debt, and improving digital access, the programme delivers clear and direct benefits for Deaf and hard of hearing households. Together, we are committed to providing early, practical, and BSL-first support that helps Deaf residents keep their homes safe, warm, and resilient.

Project design engagement

Targeting vulnerability support: This must describe how the GDN(s) identified the vulnerability need being addressed through the VCMA project, including the use of consumer research, stakeholder engagement, and data and technology.

Evidence of stakeholder and/or customer support: Information regarding all stakeholder and/or customer engagement which has contributed to the development of the VCMA Project.

Stakeholder project design input: How stakeholders were actively involved in the project design, and how their input and feedback were incorporated to shape the project design. Where stakeholders disagree about the project design, justification must be provided for why the current project design is deemed preferable.

The design of this project has been shaped by the growing recognition of significant vulnerability among Deaf and hard of hearing customers, informed by insight gained through our eight-month partnership with deafPLUS in 2026-26, during which the energyPLUS pilot provided a deeper understanding of the barriers Deaf households face in maintaining a safe and warm home.

Through this early work, combined with engagement with Deaf community members, BSL users, and health and social-care practitioners, we have seen first-hand the challenges Deaf people experience around energy safeguarding, ranging from higher household energy use linked to assistive technologies, to restricted income caused by systemic employment barriers, and pervasive communication difficulties when trying to access essential services.

These insights were reinforced by data showing low uptake of the Priority Services Register (PSR), gaps in benefit awareness, and widespread inaccessibility of written or telephone-based information. Many Deaf households reported difficulties contacting suppliers, a lack of accessible energy advice, and heightened anxiety around unplanned power interruptions. This evidence clearly highlighted a vulnerability gap requiring targeted, communication-inclusive support, and shaped our commitment to a service that connects Deaf customers to the right help at the right time.

Stakeholders played an active role in shaping the project model. Deaf individuals emphasised the need for BSL-first, communication-inclusive provision, including access to interpreted sessions, community-based outreach within Deaf spaces, and alternatives to phone-based support. Community organisations stressed the importance of flexible delivery that combines group activities with one-to-one support for those who prefer or require a private conversation. Utility and advice partners highlighted the need for clearer, more accessible pathways into PSR registration, social tariffs, and energy-efficiency schemes. Together, this engagement guided our decision to prioritise a blended model that integrates Deaf-led community outreach with tailored individual support, ensuring no one is excluded due to communication barriers, health limitations, or accessibility challenges.

Throughout collaboration with deafPLUS to date, we have tested approaches, shared learning, and refined delivery based on what best meets the needs of Deaf households. Stakeholder feedback consistently reinforced the need for a scalable, inclusive model that addresses the intersecting challenges of energy affordability, communication access, digital exclusion, and financial resilience. The diversity of Deaf lived experience, from BSL-first users to those reliant on visual information, and from confident technology users to those with minimal digital access, demonstrated the importance of personalised, accessible support.

This project has also been shaped by the principles co-developed with our Vulnerability and Carbon Monoxide Steering Group (VSG), ensuring that Deaf customers, as a priority vulnerability group, are meaningfully involved in the design of locally accessible services. The VSG framework emphasises co-production with trusted community partners, equitable access regardless of communication needs, and the importance of tailoring support to local context and cultural norms. By grounding the project in a shared, evidence-based understanding of vulnerability, we are building a service that not only responds to the lived experience of Deaf and hard of hearing people but also aligns with broader commitments to fairness, inclusion, and targeted support for those most at risk.

Why the project is being funded through the VCMA

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

This project meets the VCMA eligibility criteria because it directly supports our Vulnerability Strategy and our overarching ambition to keep communities safe, warm, and supported, both now and as we transition toward a green, clean energy future. Our strategy places vulnerable households at the centre of our decision-making, ensuring that those most in need receive meaningful, practical assistance.

The project is designed to help us deliver SGN's Business Plan commitments, particularly two key customer pledges, the first to support at least 650,000 of the most vulnerable households over the next five years. The second, to ensure that the project has been designed to ensure that it delivers meaningful outcomes and measurable value for customers and stakeholders. This includes maximising the social return on investment (SROI) for every pound spent, while consistently prioritising the needs and experiences of vulnerable customers.

In addition, the project reflects the strategic priorities of our Vulnerability Strategy – an approach shared by all four gas networks – which delivers support across four core areas:

- Providing Services Beyond the Meter – direct services for vulnerable households as we go about our day-to-day operational work that extends beyond traditional gas network responsibilities
- Tackling Fuel Poverty and Energy Affordability – targeted support for customers struggling to afford energy, helping households reduce energy costs, improve efficiency, and access essential advice
- Supporting Priority Customer Groups – identifying and assisting those with heightened needs, ensuring they receive tailored and timely support
- Reducing Carbon Monoxide Harm – a data driven approach to raising awareness, improving safety, and reducing carbon monoxide risks.

By addressing these themes, the project demonstrates strong strategic alignment and delivers tangible benefits to vulnerable customers, making it a clear fit for VCMA funding.

This project forms part of the 'Supporting Priority Customer Groups' theme and budget area.

How VCMA funding complements or supplements BAU activities

Where the VCMA Project is being delivered alongside a BAU vulnerability and/or CO safety activity or activities funded through the GDN's baseline allowance, the GDN must provide sufficient evidence that the VCMA Project complements or supplements the BAU activity or activities to prevent the risk of double funding.

By working in partnership with SGN, deafPLUS has established a robust referral pathway to raise concerns related to key energy-safeguarding services. This collaboration ensures that issues affecting vulnerable individuals, particularly those who may struggle to access or navigate utility services are identified early and directed to the appropriate support.

As a trusted organisation, deafPLUS are well placed to engage effectively with vulnerable individuals and refer eligible people to us for BAU-funded support. This includes access to accessible carbon monoxide alarms, Locking Cooker Valves, and other measures that help maintain safety and independence in the home.

Justification for why the project should not be collaborative

This should include evidenced reasoning as to why the VCMA Project cannot, or should not, be delivered in collaboration with other GDNs. For example, this could include the unique context within a network area, or the development of an innovative pilot project.

While each of the other networks has already built strong local partnerships with organisations that specialise in supporting deaf and hard of hearing communities, this project has been shaped around where additional value can genuinely be added in Southern England and Scotland.

deafPLUS has established relationships, and the specialist capacity to deliver tailored, accessible support in our regions.

As a result, the project has been designed to complement the existing partnership network rather than duplicate provision elsewhere. It takes a place-based approach across these two network regions, drawing on local insight, trusted community connections, and a clear understanding of the distinct communication needs and barriers experienced by deaf and hard of hearing individuals.

The additional benefit is that deafPLUS provide a national advice service so the knowledge will be shared beyond our footprint on key support services including the provision of CO safety advice and the importance of being registered on the PSR.

Outcomes, associated actions and success criteria

Details of the VCMA Project outcomes and the associated actions to achieve these, interim milestones and how the Funding Licensee will evaluate whether the project has been successful. Each action should have a proportion of the funding allocated.

Outcome	Project Target	Interim Milestones
Energy triage	2,000	Quarterly performance - 250
CO safety information	1,350	Quarterly performance - 169
CO alarm provision (accessible)	40	Quarterly performance - 5
PSR conversations	1,350	Quarterly performance - 169
PSR registration	1,000	Quarterly performance - 125
Energy advice (across a number of energy advice measurable areas)	1,600	Quarterly performance - 200
Income maximisation (across a number of income generating measurable areas)	250	Quarterly performance - 31
Accessing third party funding for energy efficiency measures	350	Quarterly performance - 44
Billing/meter readings	1,100	Quarterly performance - 138
Wellbeing support	1,500	Quarterly performance - 188

Scam awareness	700	Quarterly performance – 88
Broadband/digital skills information	400	Quarterly performance - 50
Training – CO/energy efficiency/ frontline worker	4	N/A
Warm spaces	3	N/A

Success Criteria

During this two-year project, deafPLUS will provide direct support to 2,000 Deaf or hard-of-hearing customers across our Southern and Scotland regions. Support will be delivered through a combination of organised events in local warm spaces, BSL workshops, one-to-one safeguarding sessions, and engagement at VRS legacy booths.

In addition, deafPLUS will engage up to 20,000 households through a range of digital platforms and communication channels, providing information on carbon monoxide safety and PSR awareness, energy efficiency advice and financial vulnerability, winter preparedness, and the promotion and awareness of partner services, including the Locking Cooker Valve.

These interventions mean that Deaf and hard of hearing customers report improvements in being able to maintain a safe and warm home, financial resilience, access to entitlements including the Priority Services Register and overall wellbeing.

Potential for new learning

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

The impact of this project extends beyond direct support to Deaf and hard of hearing customers, creating learning that can strengthen practice across SGN's wider Safe and Warm partnership network and inform other community-based initiatives for accessible services for the Deaf community.

This programme will generate significant learning that strengthens SGN's Safe and Warm partnership network and informs wider approaches to accessible support for Deaf BSL users. Building on evidence from the existing energyPLUS programme, the project embeds a BSL-first, in-person delivery model developed in partnership with Deaf-led organisations, community groups and energy specialists. The insights generated through delivery such as patterns of unmet need, barriers to benefit uptake, and the impact of tailored outreach will be shared with local stakeholders to inform service planning and improve outcomes for the deaf and hard of hearing community. We will continue to share the learnings via our local and regional partner events such as our Partner Spotlight sessions, our dedicated partner website pages and Partner Toolkit as well as through our annual vulnerability reports.

The project will also be independently assessed through a programme of qualitative and quantitative research with the deaf BSL users who receive support funded through the VCMA. This evaluation, delivered by a third-party organisation, will capture the lived experience of the deaf community before and after receiving energy safeguarding support, enabling us to understand changes in confidence, financial resilience, access to entitlements, and overall wellbeing. By grounding the assessment in the voices of beneficiaries, we will build a robust evidence base on what works, where gaps remain, and

how locally delivered, person-centred support can be strengthened. The findings will be shared across our partnership network and stakeholders.

By launching VRS legacy booths in key priority areas, we aim to improve access and support for BSL users who struggle with existing VRS channels. The learning from these sites will guide future expansion into other communities with limited accessible services.

Overall, the project contributes to national discussions on reducing inequalities for Deaf households by strengthening early-intervention, accessible and community-led support models. These outputs would be openly shared with the other GDNs via the Vulnerability Working Group and the GDN national Delivery Group and, where requested, the National Steering Panel.

Aligning with and supporting wider vulnerability approaches

Details of how the project supports or aligns with approaches to vulnerability taken by the wider energy industry, other utilities and/or consumer organisations; local, national or devolved governments; or evidence innovation or a gap in vulnerability support provision. For example, this could include evidence of collaboration beyond the VCMA, non-VCMA joint funding of the initiative, or identified gaps in the provision of vulnerability services which the project seeks to address. The GDN should show how the project fits within broader approaches to vulnerability.

This Deaf-focused approach aligns closely with vulnerability strategies across the energy industry, wider utilities and national policy frameworks by placing accessible communication, early identification and partnership-led delivery at its core. The project directly addresses a long-standing national gap in safeguarding support for Deaf and BSL-using households, who are often excluded from essential services due to written-English-only communication, telephone-based systems and inaccessible digital pathways.

The proposal reflects cross-utility and government priorities to remove communication barriers, strengthen access to advice and improve financial and energy resilience for customers with additional needs. By proactively reaching Deaf households, who experience higher risks of fuel poverty, digital exclusion and communication-related safety challenges, the project supports national ambitions to ensure essential services meet the needs of people most vulnerable to rising energy costs and complex billing information.

The model aligns with the Warm Homes Plan and the BSL Act (2022), which call for inclusive, locally delivered, person-centred interventions. Many Deaf households struggle to interpret written energy information without BSL or visual explanation, contributing to mis-billing, debt escalation and limited awareness of CO safety. Providing BSL-first support through workshops, pop-ups, and trusted community spaces mirrors national expectations for accessible, community-based solutions that reduce long-term risk and improve health and wellbeing outcomes.

The project also strengthens awareness and uptake of the Priority Services Register (PSR), in line with utility-wide commitments to support customers with communication barriers. Embedding PSR conversations within Deaf clubs, libraries and community hubs, and using BSL to explain the benefits, ensures Deaf households can access priority restoration, communication support and other entitlements that have historically been under-used within this community.

This project creates a coordinated network capable of delivering holistic, person-centred support. This mirrors the multi-agency collaboration encouraged across national vulnerability frameworks and demonstrates how local ecosystems can work together to improve outcomes for Deaf and hard of hearing and strengthen resilience.

Monitoring and evaluation

Details of how the GDNs will work with their project partners to monitor the impact of the VCMA project and evaluate its effectiveness and success.

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

Together we will ensure that there is an evidence base through audit and research that seeks to understand how effective the project is in supporting their local communities who are struggling to maintain a safe and warm home and assess the before and after to better understand the impact of the services provided on the lived experience of beneficiaries.

We will report annually on partnership impact, sharing broadly via our company-specific reports to showcase outcomes and key learnings and inform future delivery. Additionally, the learning will be shared across the GDN Vulnerability working group as well as disseminating results through our business governance processes, including on request to our Independent Steering Group (ISG).

Scale of VCMA project and SROI calculations, including NPV

Justify the scale of the VCMA project – including the scale of the investment relative to its potential benefits. As part of this, the Funding Licensee(s) should provide the SROI calculation, including NPV. Note: The value in numbers of the SROI and NPV must be provided, rather than confirmation of positive impact.

Together with the other gas distribution networks, we worked with leading social impact research consultancy SIRIO Strategies on the development of the Industry Standard Social Value Framework and supporting GDN Rulebook. We have used that GDN Rulebook to carry out an assessment of financial and wellbeing outcomes applicable to our services for vulnerable households included in this partnership.

We've incorporated social value based on the deliverables and associated targets detailed above. Carrying out an assessment of these predicted outcomes we forecast a positive net Social Return on Investment of £11.25 for every £1 spent.

Social value measurement

Total cost*	£150,000
Total gross present value	£1,822,285.08
Net Present Value (NPV)	£1,673,550.77
SROI	£11.25

*Accounting for inflationary factors over the term of the project.

Internal governance and project management evidence

Provide a description of GDN(s) review of proposal and project sign off, with details on how the project will be managed.

We worked closely with deafPLUS to co-design this partnership so that its ambition directly contributes to our Vulnerability Strategy, developed with support from our stakeholders including through our Vulnerability and Carbon Monoxide Steering Group and overseen by our Independent Steering Group. The PEA has been reviewed and approved through our internal governance processes and formally signed off as detailed below.

Approver (Name and Role)	Date
Kerry Potter, Group Social Impact & Vulnerability Manager	20/04/26
Maureen McIntosh, Director of Customer Services	22/04/26

Eligibility Criteria

Eligibility Criteria	Description	Project qualifies Yes / No
Positive SROI	Have a positive, or a forecasted positive, Social Return on Investment (SROI) calculated in accordance with a model which the GDNs have developed and submitted to Ofgem including for the gas consumers funding the VCMA Project	Yes
Positive NPV	Have a positive, or a forecasted positive Net Present Value (NPV)	Yes
Support Criteria	Either: i. provide support to consumers in Vulnerable Situations and relate to Energy Safeguarding, or ii. provide support for those most at risk of being left behind in the transition to net zero, or iii. provide awareness of, and education on, the dangers of CO beyond the activities funded as business as usual (BAU) through baseline allowances, or iv. reduce the risk of harm caused by CO	Yes
Defined Outcomes	Have specific, measurable, and time-bound outcomes which align with relevant Consumer Vulnerability Strategy objectives to achieve the requirements set out in Support Criteria above;	Yes
Beyond Other Funding	Go beyond activities that are funded through other price control mechanism(s), including baseline allowance funding, or required through licence obligations	Yes
Support or Align	Support or align with approaches to vulnerability taken by the wider energy industry, other utilities and/or consumer organisations, and local, national and devolved government, or evidence innovation or a gap in vulnerability support provision;	Yes
No Other External Funding	Not be delivered through other external funding sources directly accessed by a GDN, including through other government (national, devolved or local) funding	Yes
BAU vulnerability and CO safety activities	Where a GDN's BAU vulnerability and CO safety activities are funded through baseline allowances, these are not suitable for funding through the VCMA. The GDN is permitted to use VCMA funds to supplement or complement its BAU activities, however, it must ensure that its reporting provides sufficient evidence to prevent double funding.	Yes

Eligibility criteria for company specific essential gas appliance servicing

Eligibility Criteria	Description	Project qualifies Yes / No or N/A
Servicing must meet the following criteria:	Either: i. A GDN has had to isolate and condemn an essential gas appliance following a supply interruption or as part of its emergency service role; or ii. A GDN or its Project Partner has identified an essential gas appliance which has not been serviced in the last 12 months in the owner-occupied home of a customer in a Vulnerable Situation where an occupier of the property suffers from a permanent or temporary health condition¹² that makes them more vulnerable to health risks associated with cold homes; or iii. A GDN or its Project Partner has identified an essential gas appliance which has not been serviced in the last 12 months in a tenant-occupied home of a customer in a Vulnerable Situation where it is the tenant's responsibility to maintain the essential gas appliance, where an occupier of the property suffers from a permanent or temporary health condition that makes them more vulnerable to health risks associated with cold homes	N/A
Affordability	The household cannot afford to service the essential gas appliance, as assessed against the affordability criteria set out in the VCMA governance document	N/A
Funding	Sufficient funding is not available from other sources (including a social or private landlord and national, devolved, or local government funding) to fund the essential gas appliance servicing	N/A

Eligibility criteria for company specific essential gas appliance repair and replacement

Eligibility Criteria	Description	Project qualifies Yes / No or N/A
Unsafe pipework and essential gas appliance repair or replacement must meet the following criteria:	Either: i. GDN has had to isolate and condemn unsafe pipework or an essential gas appliance following a supply interruption or as part of its emergency service role; or ii. A GDN or its Project Partner has had to condemn unsafe pipework, or an essential gas appliance, following an essential gas appliance service (as described in 3.19 of the VCMA governance document)	N/A
Health condition	Either: i. The occupier of the property suffers from a permanent or temporary health condition that makes them more vulnerable to health risks associated with cold homes and has a household income of £31,000 or below in 2025/26 prices, adjusted for inflation using Consumer Price Index with Housing costs (CPIH) 13, or ii. the household cannot afford to service the essential gas appliance, as assessed against the affordability criteria set out in Appendix 1 of the VCMA governance document	N/A
Funding	Sufficient funding is not available from other sources (including national, devolved, or local government funding) to fund the unsafe pipework or the essential gas appliance repair or replacement.	N/A