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Care & Repair Cymru

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### Updated Gas Network Vulnerability and Carbon Monoxide Allowance Governance

Care & Repair are Wales' Older People's Champions. We recently delivered a project funded by Energy Redress and Wales and West Utilities which aimed to reduce the incidence and impact of fuel poverty on older (60 and above) energy consumers in Wales through targeted home energy advice and technical housing solutions. Over a period of 30 months the service reached 2,988 people, including providing almost 1,000 in-person home visits and subsequent tailored solutions to cold homes and fuel poverty, delivering over £1.12m in large energy saving measures and financial gains to our clients. We will be applying to the VCMA fund to upscale the greatly impactful work of this project, with its unique approach of high numbers of individual visits, tailored solutions, and handholding through all processes of finding funding, organising works and income maximisation for every customer.

#### **1. Do you agree with the proposed amendments to the VCMA eligibility criteria to allow an expanded scope for essential gas appliance servicing?**

Yes. We welcome the expanded scope for essential gas appliance servicing as this means projects funded by the VCMA will be able to support households to maintain the condition of their heating system, ensuring they can stay warm at home. This may become even more crucial in Wales, as the NEST programme is replaced by the new Warm Homes Programme (WHP), by Spring 2024, with less financial support available in the WHP in terms of ensuring gas appliances are safe and energy efficient.

We do have some concerns with solely using the ECO4 eligibility criteria as the criteria for gas appliance servicing, especially when supporting older households to accessing this support. We recommend that project partners should be able to use their discretion to allow gas appliance servicing in cases where need is evident, but the household does not meet all the eligibility criteria. It is not clear through the current VCMA guidance whether additional flexible routes to support will be permitted.

Whilst we understand the rationale behind targeting ECO4 eligibility towards households on means-tested benefits, the government's own ECO4 states that 46.1% of fuel poor households are *not* in receipt of benefits. Current ECO4 eligibility particularly penalises low-income older households twofold. Whilst pension credit is an eligible benefit on the scheme, we know that in Wales around 1 in 3 older people in Wales who are eligible for pension credit do not claim it. This equates to around 180,000 older people – who, with the currently proposed VCMA eligibility amendments, would not be eligible for support via the scheme due to a technicality and despite of circumstance. Likewise, many older people who have lived in their family home for decades do not have an EPC rating. In Wales, approximately 280,000 households do not



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have an EPC rating, equating to around 1 in 5 homes. In some more rural areas, such as Gwynedd, this is as high as 32%. Using solely the ECO4 guidelines without discretion when need is identified by a trusted project delivery organisation means that thousands of households in need of support could be missing out.

In addition to this, for the new WHP, Welsh Government has decided to increase eligibility based on applicant income levels so that low-income households as well as those on means tested benefits are eligible, following DWP definition of low income.

We believe that the VCMA should allow for discretion within the eligibility criteria to better target the service based on need in exceptional circumstances rather than a benefits cliff edge approach which will miss some people with insufficient means but in genuine need. This would be in-keeping with the spirit of ECO, by taking on the principles of ECO Flex Routes such as including households on a low income, health conditions or living with severe or long-term ill-health as a stand-alone eligibility criterion as opposed to package of criteria that must all be met.

## **2. Do you agree with the introduction of a common SROI model?**

Yes. We welcome this change as this will support partners to capture their SROI, which can be difficult. Adding a common SROI model will ensure additional consistency and robustness in the data captured.

## **3. Do you support the additional requirements for GDNs to provide project information in respect of high value projects to Ofgem prior to internal sign-off?**

Yes.

## **4. Do you support the potential for the annual showcase event to be held online if GDNs' consultation with their stakeholders shows that such format best serves the purposes of "showcasing work and presenting ideas including, but not limited to, future projects to support consumers in Vulnerable Situations"?**

Yes.