

Thomas Bell Consulting response to Ofgem Consultation on modification to the Vulnerability and Carbon Monoxide Allowance (VCMA) Governance Document.

Q1: Do you agree with the proposed amendments to the VCMA eligibility criteria to allow an expanded scope for essential gas appliance servicing?

Yes. The inclusion of servicing is welcomed and will bring both relief and improved safety to those that cannot currently afford to service essential gas appliances, given the proposed criteria, this will bring most benefit to owner occupiers, who in many instances forego servicing as other financial pressure constraints hit them hard, particularly the elderly and those with very young children, who in many cases spend most of their time at home, and are then consequently exposed to higher risk of CO poisoning from failure to service appliances.

An area that does need more work however, is what happens should essential appliances be condemned, following service work, should support not be available for the replacement of condemned appliances, I could see very vulnerable customers, removed from the risk brought by unsafe appliances, but exposed to further risk if left without basic essentials such as heating or cooking, I would suggest that this needs further consideration and be subject to ECO4 eligibility requirements in order to qualify for replacement under VCMA, as in most instances, alternative funding sources are unavailable,

Whilst inclusion of servicing is welcomed, and clarification is made regarding the exclusion of energy efficiency measures (insulation), which is understood, its often very small measures that bring access to people with immediate and visible benefits to vulnerable customers, the provision of basic draught exclusion measures, for example provide access to homes, development of trust which in turn results in further benefits such as advice and financial benefits reviews for customers, perhaps this could be relaxed to allow inclusion of minor measures, with a modest capped financial level.

Q2. Do you agree with the introduction of a common SROI model?

Yes, and whilst sounding simple in nature the development of a common tool is complex, however once developed this will bring the ability to directly map and compare the outcomes or expected outcomes of projects, I understand that the GDNS are developing collaboratively a tool for this purpose, if this tool were to be made available to other sectors it could then bring wider benchmarking capabilities.

Q3. 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 in principle, however I feel this should be quid pro quo, and in return Ofgem should agree/ approve these high value projects meet the essential criteria, as without this it may be that the risk associated for claw back at a later date impedes the ability/ desire to be bolder with higher value project, which potentially I have the ability to bring much higher benefits to vulnerable customers.

Q4. 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. This will bring benefit and drawbacks, benefits from greater inclusion from organisations that are often time and financially challenged with travel to National events, drawbacks from face to face and networking opportunities missed, however National showcase, supported by small regional events could provide an effective balance.

