



**RIIO-ED2 Vulnerability  
ODI Assessment – AVR  
Covering Letter**

**27/06/2025**

# Covering letter

## Introduction

Ofgem has introduced a new Vulnerability ODI in the RIIO-ED2 period. This is in place to incentivise DNOs to deliver desired outcomes for customers in vulnerable circumstances. The ODI sets out parameters for metrics that focus on the Priority Services Register (PSR), the customer satisfaction level enjoyed by customers receiving Fuel Poverty (FP) and Low Carbon Transition (LCT) support services, and the social value delivered via these support services.

Sirio has been appointed as the single assessor for the duration of the price control to ensure the DNO's adherence to the principles of the ODI framework. The metrics in scope of the assurance process are presented in the table below.

| Metric                          | Assurance check                                                                                                                            |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| PSR reach                       | PSR reach has been reported in line with the common methodology                                                                            |
|                                 | Confirmation that the licensee has attempted to contact 100% of its registered PSR customers to verify their data every 24 months          |
| Value of FP services delivered  | Assurance that performance against the targets has been calculated and reported in line with the common Social Value Framework methodology |
| Value of LCT services delivered | Assurance that performance against the targets has been calculated and reported in line with the common Social Value Framework methodology |

Herein lies the final assessment for Scottish and Southern Electricity Networks (SSEN). The remainder of this document is broken down as follows:

- **Template submitted by DNO:** A populated template of Table 5, as presented in the 'Vulnerability Assessor – Scope of Works' document and submitted by each DNO.
- **Overview of final assessment:** A populated template of Table 6, as presented in the 'Vulnerability Assessor – Scope of Works' document.

The above are complemented by an appendix, containing the following:

- **Assessment of PSR performance:** Findings from the assessment of the PSR reach metric.
- **Assessment of SROI performance:** Findings from the assessment of the value of FP services delivered and the value of LCT services delivered metrics.

# Template submitted by DNO

In alignment with the directions set in the 'Vulnerability Assessor – Scope of Works' document, each DNO was to submit the template below (Table 5) in advance of the assessor checks being completed. The final version of this was submitted by SSEN on 27 June 2025.

**Table 5 (SSEH)\***

| Metric                          | No. | Value                                                            | Actual        |
|---------------------------------|-----|------------------------------------------------------------------|---------------|
| PSR reach                       | 1   | PSR reach %                                                      | 73.60%        |
|                                 | 2   | % of PSR households DNO has attempted to data check in 24 months | 100.00%       |
| Value of FP services delivered  | 3   | £NPV value                                                       | £1,094,244.44 |
| Value of LCT services delivered | 4   | £NPV value                                                       | £83,911.10    |

**Table 5 (SSES)\***

| Metric                          | No. | Value                                                            | Actual        |
|---------------------------------|-----|------------------------------------------------------------------|---------------|
| PSR reach                       | 1   | PSR reach %                                                      | 63.5%         |
|                                 | 2   | % of PSR households DNO has attempted to data check in 24 months | 100.00%       |
| Value of FP services delivered  | 3   | £NPV value                                                       | £2,756,431.75 |
| Value of LCT services delivered | 4   | £NPV value                                                       | £376,912.88   |

\*Please note that the cumulative RY2 NPV figures presented in the tables above include revised RY1 values, updated as part of this year's modelling changes to reflect the DNO Rulebook update. While these RY1 figures have not been separately assured, the underlying models were reviewed, and the values have been implicitly assured as part of the cumulative (RY1 + RY2) total.

## Overview of final assessment

In alignment with Table 6, located in the 'Vulnerability Assessor – Scope of Works' document.

**Table 6**

| Metric    | No. | Minimum requirement category                                    | Minimum requirement criteria                                                                                                                    | Has the criteria been met? (Y/N) |
|-----------|-----|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| PSR reach | 1   | PSR reach has been reported in line with the common methodology | The PSR reach actual performance is calculated in line with the agreed methodology and data provided by the Centre for Sustainable Energy (CSE) | Y                                |

|                                 |   |                                                                                                                                            |                                                                                                                                                                                                                |   |
|---------------------------------|---|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|
|                                 | 2 | Confirmation that the licensee has attempted to contact 100% of its registered PSR customers to verify their data every 24 months          | Has the licensee attempted to contact 100% of its registered PSR customers to verify their data every 24 months?                                                                                               | Y |
| Value of FP services delivered  | 3 | Assurance that performance against the targets has been calculated and reported in line with the common Social Value Framework methodology | The £NPV value calculated is in line with the common Social Value Framework Rulebook                                                                                                                           | Y |
|                                 |   |                                                                                                                                            | The £NPV value calculated is attributed to the value of Fuel Poverty Services delivered and the scope of the metric set out within Chapter 2 of the RIIO-ED2 Consumer Vulnerability Guidance document          | Y |
|                                 |   |                                                                                                                                            | The values reported are accurate from the calculations in the relevant SROI model                                                                                                                              | Y |
| Value of LCT services delivered | 4 | Assurance that performance against the targets has been calculated and reported in line with the common Social Value Framework methodology | The £NPV value calculated is in line with the common Social Value Framework Rulebook                                                                                                                           | Y |
|                                 |   |                                                                                                                                            | The £NPV value calculated is attributed to the value of Low Carbon Transition Services delivered and the scope of the metric set out within Chapter 2 of the RIIO-ED2 Consumer Vulnerability Guidance Document | Y |
|                                 |   |                                                                                                                                            | The values reported are accurate from the calculations in the relevant SROI model                                                                                                                              | Y |

Based on the above, we are pleased to confirm alignment with the agreed-upon criteria for the Y2 AVR element of SSEN's RIIO-ED2 Vulnerability ODI.

Sincerely,

Alessio Villanacci

Director, Sirio



# Appendix

## Assessment of PSR performance

The PSR performance information below is based on 'SSEN Vulnerability ODI Assessment 27.06.2025' shared by SSEN on 27 June 2025.

### PSR reach

| Assurance activity | Question                                                                                                                                                          | Y/N |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 1                  | Do you confirm the % of eligible households registered on your PSR is calculated according to the volume of eligible customers most recently provided by the CSE? | Y   |

### PSR two-year cleanse

| Assurance activity | Question                                                                                                                                                                                    | Y/N |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 2                  | Do you confirm that the % of PSR households you have attempted to contact over the past 24 months was calculated in line with the method set out in Table 3 of the scope of works document? | Y   |

## Assessment of SROI performance

The SROI performance information below is based on 'SSEN Vulnerability ODI Assessment 27.06.2025' shared by SSEN on 27 June 2025.

### Scope verification

| Assurance activity | Question                                                                                                                            | Y/N |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------|-----|
| 3 and 4            | Do you confirm that all modelled Fuel Poverty and Low Carbon Technology initiatives are in scope according to the checklists below? | Y   |

|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Value of FP services delivered | <p><b>Description</b></p> <p>The questions below aim to clarify whether the Fuel Poverty services and initiatives measured and reported by the DNO are in line with (i) the scope of the metric set out within Chapter 2 of the RIIO-ED2 Consumer Vulnerability Guidance Document, (ii) the Assessor checks defined by Table 4 of the 'Vulnerability Assessor - Scope of Works' document, and (iii) the DNO Rulebook.</p> <p><b>Action</b></p> <p>Please state whether the criteria presented in the 'description' column below match with or apply to the activities you have measured and reported via the SROI models submitted to the assurance process.</p> |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| Source                                                                                                                                                 | Description                                                                                                                                                                                                                                                                                                  | Y/N |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| Vulnerability Assessor<br>Scope of Works<br>(page 5, Table 4)                                                                                          | Networks have only measured the value of services or initiatives delivered to customers (and not forecasted, or based on partial delivery of outcomes). <i>See original wording in the comment.</i>                                                                                                          | Y   |
| Vulnerability Assessor<br>Scope of Works<br>(page 5, Table 4)                                                                                          | "Services delivered are defined as a service provided or a job completed which is of benefit to the customer in a vulnerable situation."                                                                                                                                                                     | Y   |
| Vulnerability Assessor<br>Scope of Works<br>(page 5, Table 4)                                                                                          | "The service provided should not fall into any other category within BMCS (Broader Measure of Customer Service) or Major Connections."                                                                                                                                                                       | Y   |
| RIIO-ED2 Consumer<br>Vulnerability Guidance<br>Document<br>(page 9, section 2.14)<br><br>Vulnerability Assessor<br>Scope of Works<br>(page 5, Table 4) | "The contact measured by these two metrics [Fuel Poverty Services and LCT Services] should be an individual interaction and must not include large scale messaging such as, but not restricted to, mass broadcasts, leaflet drops or awareness campaigns."                                                   | Y   |
| Vulnerability Assessor<br>Scope of Works<br>(page 5, Table 4)                                                                                          | [Customers in scope] "Customers in circumstances such as: Any customers who indicate they are struggling or are at risk of struggling with their bills."                                                                                                                                                     | Y   |
| DNO Rulebook<br>(page 8, section 3.5)                                                                                                                  | "All measures / initiatives must be aimed at alleviating fuel poverty in customers. A measure cannot simply include support for fuel poor customers for wider benefits."                                                                                                                                     | Y   |
| DNO Rulebook<br>(page 8, section 3.6)                                                                                                                  | The service provided does not consist of the direct installation of measures funded by a DNO. If a situation arises in which measures are being installed, this has been completed via advice / handholding support (provided by a DNO) that results in a customer having a measure installed in their home. | Y   |

|                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Value of LCT services delivered | <p><b>Description</b></p> <p>The questions below aim to clarify whether the LCT services and initiatives measured and reported by the DNO are in line with (i) the scope of the metric set out within Chapter 2 of the RIIO-ED2 Consumer Vulnerability Guidance Document, (ii) the Assessor checks defined by Table 4 of the 'Vulnerability Assessor - Scope of Works' document, and (iii) the DNO Rulebook.</p> <p><b>Action</b></p> <p>Please state whether the criteria presented in the 'description' column below match with or apply to the activities you have measured and reported via the SROI models submitted to the assurance process.</p> |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| Source                                                                                                                                                 | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Y/N |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| Vulnerability Assessor<br>Scope of Works<br>(page 5, Table 4)                                                                                          | Networks have only measured the value of services or initiatives delivered to customers (and not forecasted, or based on partial delivery of outcomes). <i>See original wording in the comment.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Y   |
| Vulnerability Assessor<br>Scope of Works<br>(page 5, Table 4)                                                                                          | "Services delivered are defined as a service provided or a job completed which is of benefit to the customer in a vulnerable situation."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Y   |
| Vulnerability Assessor<br>Scope of Works<br>(page 5, Table 4)                                                                                          | "The service provided should not fall into any other category within BMCS (Broader Measure of Customer Service) or Major Connections."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Y   |
| RIIO-ED2 Consumer<br>Vulnerability Guidance<br>Document<br>(page 9, section 2.14)<br><br>Vulnerability Assessor<br>Scope of Works<br>(page 5, Table 4) | "The contact measured by these two metrics [Fuel Poverty Services and LCT Services] should be an individual interaction and must not include large scale messaging such as, but not restricted to, mass broadcasts, leaflet drops or awareness campaigns."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Y   |
| DNO Rulebook<br>(page 8, section 3.5)                                                                                                                  | [Customers in scope] "Customers who fall in scope of these services should align with the definition of 'vulnerable situation'. These customers may be in circumstances such as:<br><ul style="list-style-type: none"> <li>• Being eligible for, or registered on the Priority Services Register</li> <li>• Being digitally excluded [in respect of participating in the energy system], limiting ability to take up opportunities which will support either financially and / or allow participation in the Net Zero transition</li> <li>• Financial vulnerability</li> <li>• Living in areas of deprivation</li> <li>• Having a lack of opportunity to participate</li> <li>• Lack of willingness to take risks on new technology</li> <li>• Lack of understanding of new technology</li> <li>• Lack of knowledge of new technology"</li> </ul> | Y   |

### Value of FP and LCT services delivered

There are no comments on SROI rulebook alignment for FP or LCT services, following the below actions taken after the provisional assessment:

- **CA Arun and Chichester 2024.25**
  - Remodelled to extend the formula in cell P22, to Q22, R22 and S22 to avoid negative Y3 GPV from blank cells (CA Arun & Chichester Model tab).
  - Success Rates in column I were recalculated using the correct number of total customers (Proxy Guidance tab).

- Success Rate Descriptions in Column J were updated to reflect the correct number of total customers (Proxy Guidance tab).
- **CA Home and Well 2024.25**
  - Success rates recalculated using the correct number of total customers in cells I3, I4, I5, I6, I7, I8, I11 and I13 (Proxy Guidance tab).
- **CA Scotland 2024.25**
  - Success rates were recalculated using the correct number of total customers in cells I6, I7, I8, I9, I10 and I11 (Proxy Guidance tab).
  - Success Rate formulae in cells I12 and I13 were updated to align with the calculation presented in the corresponding Success Rate Description cells (Proxy Guidance tab).
- **YES Energy Solutions 2024.25**
  - Remodelled to extend the formula in cell P22, to Q22, R22 and S22 to avoid negative Y3 GPV from blank cells (YES NPV Model tab).
  - Success rates were recalculated using the correct number of total customers in cells I3, I4, I5, I6, I7, I8, I11, I12, I13 and I14 (Proxy Guidance tab).



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