

# Vulnerability Strategy 2025



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## 1 – Introduction

Welcome to this update on our strategy for supporting vulnerable customers. When we first published our vulnerability strategy, back in 2021, we committed to refreshing it in 2025 to make sure that we are still delivering the right outcomes for the households we serve. This document is the result of that work.

Like the original strategy, this update has been informed by our customers, stakeholders<sup>1</sup>, trusted partners, and our frontline colleagues – it has been shaped by evidence, data, and insight.

That rigorous research has reinforced for us that, while we are confident the fundamental goals of our strategy are still the right ones, the way we deliver those outcomes has had to change, because the challenges facing our vulnerable customers have changed too. Today, we estimate that the customers we serve include:

- 2.1 million customers in, or at risk of, fuel poverty
- 3.3 million customers eligible for the Priority Services Register (PSR)
- 167,257 people registered on the PSR under the medical needs code, representing those reliant on medical equipment and others with health-related vulnerabilities, many of whom face higher energy costs and have lower than average income due to their health conditions



This report sets out how changes in the energy market and the wider economy, and even the weather, have affected the customers we serve, and how we plan to respond, directly and through our trusted partners. It also describes what we have achieved for our vulnerable customers in the past two years, and why vulnerability is one of our strategic priorities as an organisation.

Supporting vulnerable customers is at the heart of how we work at UK Power Networks. For us, it is a moral obligation as well as a business imperative.

I hope you find this report helpful, and my colleagues and I would be delighted to hear what you think about it.

**Matthew White**

Head of Customer Service and Innovation

## 2 – Vulnerability and our role in addressing it

### Why do we support vulnerable customers?

At UK Power Networks, we are responsible for the safe and reliable transport of electricity to more than 20 million people in the South East of England, the East of England and London. As a Distribution Network Operator (DNO), we provide an essential service and understand that electricity is critical to every aspect of modern life. From powering our kettles and phones to fuelling public services, business and industrial centres, electricity is the lifeblood of our society.

Given the essential nature of electricity, it is vital that individuals, families, and businesses do not face unnecessary barriers to accessing it – from being able to afford their bills to understanding and benefiting from low-carbon technologies. A lack of electricity can cause significant detriment, particularly for vulnerable customers. When a power outage occurs, it is therefore critical that we restore supply as quickly as possible, especially for those whose circumstances make them more reliant on electricity. We are also responsible for delivering electricity to homes and businesses. This role comes with both a critical operational responsibility and a moral duty to ensure electricity is accessible, safe, and reliable for all, with particular care for those most at risk of detriment.

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<sup>1</sup> We define stakeholders as any individual or organisations that is impacted by our business and is engaged to provide independent, informed or expert views on a matter that does not involve their opinion as a connected customer of UK Power Networks or any other distribution network. Stakeholders are defined separately from customers throughout the document.

## What is vulnerability?

We define 'vulnerability' as a situation that can arise when aspects of the energy market combine with someone's personal circumstances or characteristics to create conditions where they are more likely to suffer detriment. In other words, it is not the fact that someone is blind (to take just one example) that makes them vulnerable: but if one of their utility companies fails to recognise that they need letters in braille and an accessible smart meter monitor and respond accordingly, that is when vulnerability can be created. Our definition builds on Ofgem's definition, as we also consider businesses and communities. It has been shaped by engagement with hundreds of partners and key stakeholders over recent years.

Vulnerability can occur for a wide range of reasons. Any of us can be vulnerable in certain contexts: it is hard to make important decisions involving complex information if you are going through a life-changing event such as bereavement or having a newborn baby. Vulnerability can also arise from an individual's personal circumstances, such as a temporary health issue or a long-term physical or mental disability. As a result, it is not possible to have a single, prescribed definition of vulnerability – it is multidimensional, context-specific, and continuously changing as society evolves.

Please note that in this document, we use the terms 'people and communities in vulnerable situations', 'vulnerable people' and 'vulnerable consumers' interchangeably to refer to the same group of individuals and organisations. We understand and empathise with the sensitivities of labelling individuals as 'vulnerable' and only do so in this strategy for the sake of clarity of presentation.

## Our role in addressing vulnerability

At UK Power Networks, we focus on vulnerability issues that are directly related to the energy sector. This focus reflects our expertise, our ability to influence certain aspects of the market, and our alignment with the overarching regulatory remit set out by Ofgem. Our programmes of delivery are supported and shaped by insight from both customers and expert stakeholders.

As outlined in our original strategy, we recognise four key factors that can place a customer in vulnerable circumstances when considering their energy needs. This understanding draws on insights from stakeholders and customers, is guided by Ofgem's frameworks for programme delivery, and reflects our experience of supporting customers first-hand.

These factors are often interrelated and can influence one another:

### Life situations

The permanent and temporary forms of vulnerability linked to mental or physical ill health, disability, bereavement, relationship problems, hospital treatment, looking after a child under five, or living independently for the first time.

### Socio-economic drivers

Such as the increasing number of people on low incomes, and our ageing population.

### Ability to engage with energy

Perhaps owing to learning difficulties, cognitive decline due to dementia and other conditions, poor or no English language skills, limited digital skills, or not having a computer or smartphone.

### Access

The kind of barriers that renters face in adopting low carbon technologies, along with people in remote rural communities that are off the gas grid and have poor digital connectivity.

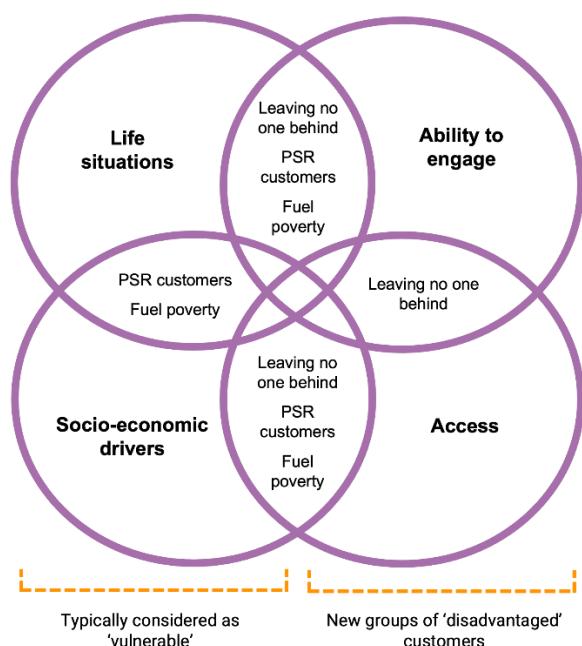


Figure 1. Vulnerability risk factors and the barriers they create.

Using these drivers of vulnerability as a base, we have developed four key outcomes for our customers. These are driven by our company-wide vision, our values and guidance from our customers and stakeholders:

- **Fair and appropriate access** to the opportunities presented by the energy market;
- **Affordability of the energy supply** above and beyond our impact on bills;
- **Protection and safeguarding from detriment** stemming from aspects of the energy market;
- **Wider social value** beyond electricity through supporting customers in fuel poverty and ensuring no one is left behind in the energy transition<sup>2</sup>.

Our stakeholder engagement has emphasised that while these outcomes are still relevant today, the ways in which we achieve them may need rethinking. This does not mean we walk away from aspects of vulnerability that we have less control over; we work closely with a wide range of partners, to help customers and communities get the support they need from those best placed to deliver it.

We have consequently updated examples of how these overarching barriers may interplay with our ability to achieve the outcomes we set for supporting vulnerable households in our original strategy.

*Table 1. Examples of how vulnerability risk factors prevent customers from enjoying the outcomes we want to achieve.*

Vulnerability risk factors	Outcomes we want to achieve for the people and communities we serve				
	Examples	Protection and safeguarding	Affordability of the electricity supply	Fair and appropriate access	Wider social value
Life situations	People may be more at risk during a power cut due to temporary situations such as having a newborn baby	People with mental health conditions may experience higher anxiety at the increasing cost of energy	People with disabilities may not be able to benefit from education materials or offerings if not accessible	Cognitive health conditions may make it more difficult for people to engage with digital skill training	
Socio-economic drivers	With an aging population, more people may be at risk of scams	Increasing numbers of households are facing deficit budgets and are in energy debt	Cultural barriers may prevent certain communities from participating in emerging opportunities of the energy market	Low-income households may not be able to manage conversations beyond immediate affordability	
Ability to engage	People living with sight or hearing loss may be unable to sign up for the PSR if information is not provided in an accessible way	When people are dealing with an immediate budget crisis, they may lack capacity to engage with more complex energy saving opportunities	Lack of digital skills may be a barrier for people to sign up to online flexibility offerings	Marginalised communities may miss out on green solutions due to negative perceptions of Net Zero	
Access	People living in rural off gas grid areas may be more at risk during a power cut if they fully rely on electricity as their only source of energy	People living in private rented properties may feel unable to have a smart meter installed and therefore miss out on the cost saving benefits of smart technology	People living in blocks of flats cannot access the flexibility market if they cannot install their own technologies (batteries, solar panels, charge points)	Living in a community without EV charging infrastructure may result in worse air quality compared to other areas in the future	

To deliver the outcomes outlined above, we are guided by a set of core principles that shape how we act and make decisions in pursuit of our goals. As set out in our original strategy, we remain committed to delivering our plans in line with the principles of being **Inclusive, Collaborative, Innovative, Agile, and Impactful**.

Using a range of insights, the following sections explore how vulnerability has evolved across RIIO-ED2 and how these changes have shaped the support required by customers within our network.

<sup>2</sup> The energy transition refers to the global shift from fossil fuel-based energy systems to cleaner, low-carbon sources such as renewables, supported by improved efficiency and smart technologies.

## 3 – Vulnerability issues faced by our customers and how they have changed over RIIO-ED2

### External landscape

Although we have made a lot of progress in addressing consumer vulnerability during the first half of RIIO-ED2, new challenges, and new ways for our customers to experience detriment, continue to arise. These challenges emerge from a combination of customers' personal circumstances and the changing energy market.

The biggest single challenge our customers have faced since we launched our current strategy in 2023 has been the extraordinary cost of living crisis, and in particular energy bills that are still higher as a proportion of household income than at any time since the oil crisis of the 1970s. At the time of writing this document, the energy bill for a typical household is nearly 30% higher than it was in October 2021, before the energy crisis began – an increase of around £500 a year during a period when many people's incomes have been struggling to keep pace with inflation<sup>3</sup>. A recent report by the Resolution Foundation found that consumer debt generally has been declining over the past decade – but energy debt has been going in the opposite direction, with the number of energy customers in debt tripling and average debt increasing from under £500 to around £1,500<sup>4</sup>. One in five households in the UK is in relative poverty, and 13% of English households are in fuel poverty. Almost one child in 10 is dependent on food banks. Choosing between heating and eating – or even not being able to afford to do either – is now a reality for many of the households we serve.

Local authorities and charities have also seen funding cuts, putting a further strain on the support services available to vulnerable households in our region. Between 2010 and 2024, local authorities in England saw their core spending fall by over 18%, with councils in the most deprived areas seeing the highest cut in real terms, at nearly 27%<sup>5</sup>. UK Power Networks serves some of the most deprived communities in the country, from the village of Jaywick in Essex, which often tops the Index of Multiple Deprivations, to the city of London, which has the highest rate of people in poverty in the country, at one in four<sup>6</sup>. Charities saw funding from central government cut by 33% between 2022 and 2023, leading to widespread cuts in services and job losses<sup>7</sup>.

The period since our strategy was first published has also been marked by considerable change and uncertainty across the policy landscape, with four Prime Ministers holding office and a change of Government. We have seen increasing calls for the Government to row back on its Net Zero targets, potentially creating uncertainty about low carbon technology among some of our customers most at risk of being left behind. Our customers have also been impacted by storms and other extreme weather events, such as sudden heavy downpours causing flooding. Storm Ciara, in November 2023, saw wind gusts comparable to the Great Storm of 1987. Just short of 50,000 households in our region lost power due to the storm, and thousands more lost their water supply when power was cut off at three water treatment plants in the area.

As well as helping our customers to manage these evolving challenges today, we also need to look forward and consider how best to support them through the energy system transition, consisting of a move to low carbon technologies and better use of smart data over the second half of this decade.

### Building an evidence-led vulnerability strategy

As detailed above, since our last vulnerability strategy was published, the external landscape has shifted significantly. To ensure our approach remains responsive, we need to understand how many customers are eligible for support, where they are located, and the types of support they need; this allows us to scale our services effectively to meet demand. We triangulate insights from experts across four key strands:

- **Evidence from the frontline** – We engage closely with both our people and our delivery partners, capturing real-time feedback on customer sentiment and needs. Their lived experience helps us identify emerging pressures early and adapt our services accordingly.
- **Stakeholder engagement** – We work hand-in-hand with industry experts, policy leaders, and sector stakeholders. Their perspectives, combined with robust market research from within our sector and beyond, enable us to design and target services that are both relevant and effective.

<sup>3</sup> <https://www.nea.org.uk/news/price-cap-to-rise-in-october-with-people-in-desperate-circumstances/>

<sup>4</sup> <https://www.resolutionfoundation.org/publications/money-on-my-mind/>

<sup>5</sup> <https://www.themj.co.uk/14-winners-losers>

<sup>6</sup> <https://trustforlondon.org.uk/news/borough-level-poverty-2025/>

<sup>7</sup> [https://acf.org.uk/acf/ACF/Blog/2024/CEO\\_blog\\_funding\\_crisis.aspx](https://acf.org.uk/acf/ACF/Blog/2024/CEO_blog_funding_crisis.aspx)

- **Horizon scanning and benchmarking** – We are committed to learning from others. Through systematic horizon scanning and benchmarking, we identify best practice, assess innovations both within and beyond the energy sector, and translate these lessons into improvements for our own services.
- **Data analysis** – Data remains a cornerstone of our decision-making. By harnessing customer, operational, and wider market data, we can track evolving trends, measure impact, and make informed choices that strengthen both strategic direction and our day-to-day operations.

These perspectives combined, help to give us a view of what vulnerability looks like for our customers and communities, and therefore enable us to design services to meet their needs.

## Evidence from the frontline

We remain in constant dialogue with our people and delivery partners, who are engaging with customers every day. Their first-hand experiences provide a vital lens on how external pressures are shaping the lives of our customers and the communities we serve.

We continually bring together our partners, frontline customer service teams and wider industry experts to participate in collaborative forums and events. On top of our regular weekly partner meetings, we have also hosted roundtables and partnership days to bring together experts and voices from across our region.

Our forums foster a culture of collaboration and shared learning across a diverse network of partners. By creating space to discuss challenges, exchange insights, and co-design solutions, we are building a connected and supportive community that helps identify emerging issues early and enhances the collective impact for customers in vulnerable circumstances.



Figure 2. Examples of our frontline engagement.

## Key insights from frontline engagement

When we asked our delivery partners how vulnerability looks today compared to when our RIIO-ED2 vulnerability strategy was first published, they highlighted several significant shifts:

- **Rising demand** – More people than ever are turning to frontline services for support. Our partners have noted that some of the stigma traditionally associated with seeking income support has lessened, as the widespread nature of financial pressures, and their visibility in the media, has made these challenges more openly recognised.
- **Crisis-driven engagement** – Frontline organisations are seeing an increase in customers seeking help when they reach breaking point.
- **Changing demographics** – A wider range of people are looking for support, including those in full-time employment who do not meet traditional income-based eligibility criteria.
- **Short-term survival over long-term planning** – With so many customers in crisis, there is limited capacity or willingness to consider longer-term sustainable options, such as participation in the Net Zero transition.

## Stakeholder engagement

In addition to regular engagement with our frontline teams and partners, we actively seek the views of experts. The development of our original RIIO-ED2 vulnerability strategy was built on a bespoke stakeholder engagement programme, which we are committed to continuing. Stakeholder engagement remains central to how we operate at UK Power Networks, providing the insight that enables us to continually review, refine, and enhance the way we deliver for our customers and other stakeholder groups.

Through market research, focus groups, and direct collaboration with customers to test new programmes and services, we actively seek expert stakeholder feedback to shape our programmes. Our ongoing engagement provides crucial insight into how the external landscape is affecting our customers and the communities we serve, allowing us to adapt our approach with confidence.

Since the beginning of RIIO-ED2, we have undertaken a range of targeted engagement activities to ensure our strategy remains grounded in evidence and lived experience.

Examples of targeted engagement activities:

- **Fuel poverty roundtable** – We convened a roundtable with a diverse group of stakeholders, including charities, local authorities, and Ofgem, to discuss the challenges of fuel poverty and opportunities for collaborative solutions.
- **Bespoke research with the Centre for Sustainable Energy (CSE)** – Working with CSE, we commissioned tailored research to identify key needs and challenges, build a deeper understanding of the demographic profile of vulnerable customers in the context of the Net Zero transition, and assess the effectiveness of current support services.
- **Outside In programme with Three Hands** – We took part in Three Hands' Outside In programme, which brought together customers and experts to apply a lived-experience perspective to four key topics: the PSR and disclosure, communication, inclusive design, and a fair transition to net zero.
- **Reviewing digital products and services with customers** – Through our trusted partners, we engaged directly with customers to test and review our digital tools that are being built to help people navigate the energy transition. Their feedback has been instrumental in refining these services and improving customer experience.

## Key insights from stakeholder engagement

Drawing on the broad range of stakeholder engagement undertaken, we have identified several recurring themes that reflect the evolving nature of vulnerability across the regions we serve:

- **Digital services** are in higher demand than ever. However, some customer groups still face barriers to accessing digital offerings. A blended model that combines digital channels with face-to-face support is essential for effective service delivery.
- **Private and social renters** face persistent challenges in joining the Net Zero transition owing to the perceived and actual lack of agency in decision-making for their homes. Our regions index higher than other network licence areas for people living in the rental sector.
- **Support is needed year-round**, not just during the winter months, as vulnerability and energy-related challenges now persist throughout the year.
- **Overrepresented vulnerable groups** in UK Power Network's regions include young families, those who are digitally excluded, and people for whom English is not a first language.
- **Demand for local services** is higher than ever, underscoring the importance of accessible, hyper-local community-based solutions.

These insights, drawn directly from the experiences and perspectives of stakeholders, continue to shape the way we refine our strategy and ensure that our services remain relevant, inclusive, and responsive to the needs of the communities we serve. For the remainder of RIIO-ED2, we have a series of stakeholder engagement activities planned to build on the insights we have uncovered to date, digging deeper into the needs and challenges of different customer and stakeholder groups to ensure our strategy remains evidence-led.

## Horizon scanning and benchmarking

**Industry benchmarking of Annual Vulnerability Reports** - Following the submission of our Annual Vulnerability Report (AVR) to Ofgem, we commissioned an independent benchmark to assess our performance against other DNOs in the interest of driving continuous improvement in this regulatory submission and our service delivery for the remainder of the RIIO-ED2 period.

As Ofgem does not formally score AVRs, the benchmark applied the Consumer Vulnerability Incentive (CVI) guidance as a framework for assessment. The review evaluated performance across more than 30 quantitative and qualitative measures, covering both the scale and impact of delivery. Quantitative analysis considered metrics such as service volumes, Net Present Value (NPV), and customer satisfaction, while qualitative measures examined the range of customer support services, use of data and insight, stakeholder engagement, partnerships, and outreach activity.

To ensure a comprehensive comparison, the benchmark also incorporated additional themes not covered by the CVI guidance, such as energy efficiency, innovation, and vulnerability within DSO activities, reflecting emerging areas of focus across the industry. Some of the key insights from this exercise are included below:

### Areas of top performance:

- UK Power Networks supported more customers than any other network in the first two years of RIIO-ED2 under both our Tackling fuel poverty and Leaving no one behind programmes.
- UK Power Networks achieved the highest customer satisfaction for PSR customers, with an average score across our licence areas of 93.4%.
- UK Power Networks has more innovation projects focused on consumer vulnerability than any other network, boasting 10 projects in the first two years of RIIO-ED2, more than double the number of projects than any other network.

### Opportunities for improvement:

- UK Power Networks' range of Tackling fuel poverty and Leaving no one behind support services is not as broad as other networks. To ensure we address this, new partnerships are already in place to expand support and strengthen outreach to marginalised groups.

**Cross-sector benchmarking of vulnerability commitments** - In addition, we commissioned a broader assessment of best practice outside of our immediate sector. To ensure continued ambition and alignment with best practice across the wider energy sector we benchmarked our RIIO-ED2 vulnerability commitments against those set out in the Gas Distribution Networks' RIIO-GD3 business plans. The assessment compared ambition, scale, and impact across key indicators including funding allocation, customer reach, Social Return on Investment, and PSR coverage.

The insights from this exercise will inform the development of our RIIO-ED3 business plan, ensuring that our future commitments reflect the evolving expectations of both Ofgem and our customers. By understanding where the gas networks have set new benchmarks for ambition and delivery, we can identify opportunities to further strengthen our own approach - maintaining our position as a leading, forward-looking network in supporting vulnerable customers.

## Data analysis

Our longstanding work with individuals experiencing vulnerability has enabled us to develop and continually refine a rigorous, data-driven methodology. This approach provides a real-time view of the challenges our customers face, the volume of households impacted, and where they are located ensuring we remain responsive to emerging needs.

Data not only guides operational decisions in supporting vulnerable customers but also serves as a foundation for shaping our strategic direction and informing future priorities. At the heart of this methodology is our continued use of large datasets and introduction of additional advanced geospatial tools, which allow us to generate deep insights, identify patterns, and target support where it is needed most.

Our primary data sources are from our PSR database and within Spotlight, our pioneering vulnerability data analysis innovation tool.

## PSR database

Growing and maintaining the PSR remains a central priority in how we understand and respond to consumer vulnerability. Having customers registered not only ensures that we know who may need extra support but also helps us identify broader patterns of vulnerability across our regions. The data we hold enables us to identify where specific needs are concentrated and to design targeted services and partnerships that deliver the right help at the right time.

PSR data plays a critical role in shaping our approach to vulnerability. It tells us not just who needs support, but why; capturing details about health, accessibility, and communication needs that help us tailor our response. This insight enables proactive welfare contact during power interruptions and guides where additional outreach, such as medical equipment support or language-specific communication, is most needed.

To ensure accuracy, we operate a 12-month verification cycle, prioritising contact with customers who have not been reached in the previous year. We also conduct a full annual refresh on our data quality framework and a monthly PSR data completeness audit to maintain reliability across all licence areas.

We have continued to lead the way on data sharing. During RIIO-ED2, we developed automated data links with other utility providers, enabling the secure flow of customer information across essential services. This ensures that those who register once are automatically recognised by all participating organisations, receiving consistent, coordinated support. Our integrated approach provides a seamless experience for customers while enhancing operational efficiency and resilience across the broader network.

## Spotlight

Spotlight is our innovative data analysis tool which ingests household-level data to enhance our understanding of where customers may be living in fuel poverty, eligible for the PSR, or at risk of being left behind in the energy transition. Developed over the last year, Spotlight now underpins our refreshed approach to understanding and addressing vulnerability, a capability that was not yet available when defining our ED2 Vulnerability Strategy in 2021.

The tool was developed in recognition of (i) the power of data in understanding customer needs at a more granular level, (ii) the growing availability of data, and (iii) to pull together disparate approaches to vulnerability data analysis into one comprehensive and powerful tool for analysis.

Spotlight taps into a range of diverse data sources such as demographics, education levels, migration, disabilities, health, and racial inequalities, it captures indicators that are often overlooked in traditional vulnerability mapping or green transition analysis. We recognise that fuel poverty and the need for priority services do not depend solely on income, but on a complex mix of social, physical, and economic factors. The tool ingests multiple datasets and applies machine learning to map vulnerability across our regions with increasing precision over time, presenting insights at the DNO, postcode area, district and sector levels. Spotlight ensures a robust, evidence-based foundation for our ongoing vulnerability strategy and partnership work.

**Priority services and campaign analysis** – Spotlight uses advanced data analytics to identify households that may be eligible for the PSR. By combining demographic, health, mobility, and communication data with insights on language and technology access, the tool builds a detailed picture of customer needs across our regions. Each data source is then assigned a confidence score, indicating the reliability and accuracy of the underlying data.

The model groups customers into broader needs code categories, including families with young children, people over 65, individuals with medical, communication or language needs, and individuals with mobility challenges. This helps us to target support more intelligently and design services that reach those who need them most.

To enhance the effectiveness of our outreach, we partnered with a behavioural science agency to analyse which customer segments respond best to different communication methods. The findings are built into the Spotlight model, allowing it to recommend the most effective campaign types and engagement channels for each demographic. This ensures our messages are both inclusive and impactful, helping more customers access the support available to them.

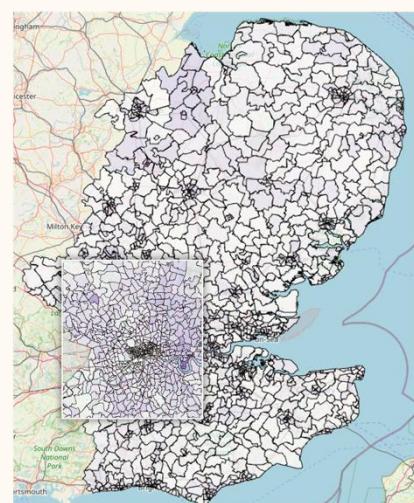


Figure 3. PSR contacts identified.

**Tackling fuel poverty analysis** – For fuel poverty analysis, Spotlight ingests socioeconomic, housing, and energy performance data to model the likelihood of households experiencing affordability challenges. This includes income data from HMRC and DWP, housing tenure and social housing statistics, Energy Performance Certificate ratings, demographic profiles, and education data such as eligibility for free school meals. Health datasets are also used to capture conditions that increase sensitivity to cold homes, while consumption and tariff data provide insight into household energy use.

Using these datasets, Spotlight produces a probability score showing how likely a household or community is to be in fuel poverty. This model was tested through a large-scale trial with thousands of households, achieving a 99% accuracy rate with 99% confidence. In addition to identifying at-risk households, Spotlight highlights which local charities and community organisations operate nearby to provide practical support. The results allow us to target support to the areas which are most at risk, prioritising outreach and partnership interventions where they will have the greatest impact.

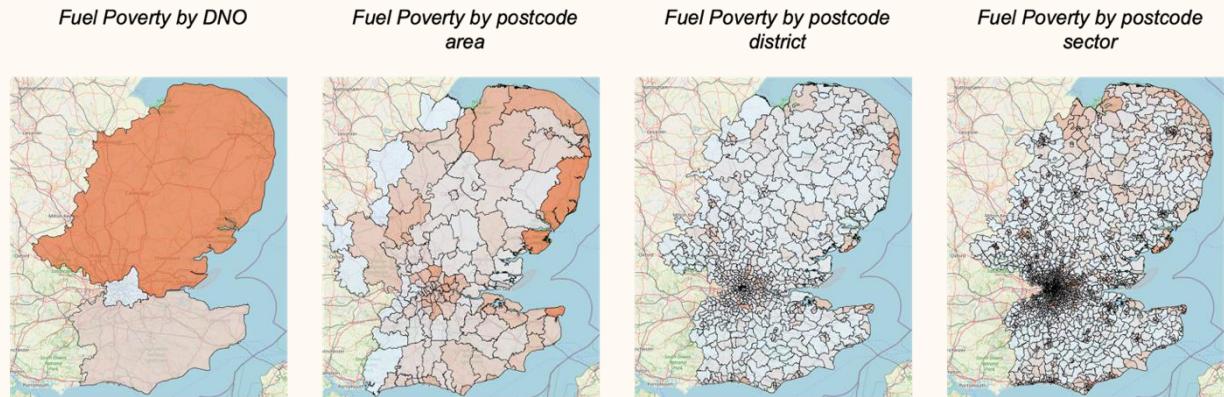


Figure 4. Snapshots from Spotlight, showing probability of fuel poverty at the DNO, postcode area, district, and sector levels.

**Leaving no one behind analysis** – To map those who may be at risk of being left behind in the energy transition, Spotlight uses machine learning to map the multiple dimensions of social and digital exclusion. It blends data on deprivation, healthcare access, education levels, smart meters, and low carbon technology (LCT) uptake to pinpoint areas where customers may be at risk of falling behind. The model then categorises different forms of exclusion, such as a lack of technology, understanding, or finance, offering a nuanced view of vulnerability that goes beyond energy affordability and usage alone. This innovative approach enables us to anticipate emerging risks and design more inclusive pathways into the low-carbon future.

By combining this analytical power with behavioural insights, Spotlight helps us tailor our engagement and outreach. Together, this analysis helps us to target support where it will have the greatest impact, improve data accuracy, and design services that are both impactful and inclusive. The following sections explore some of the insights we have gained from Spotlight and illustrate how we have acted upon our learnings.

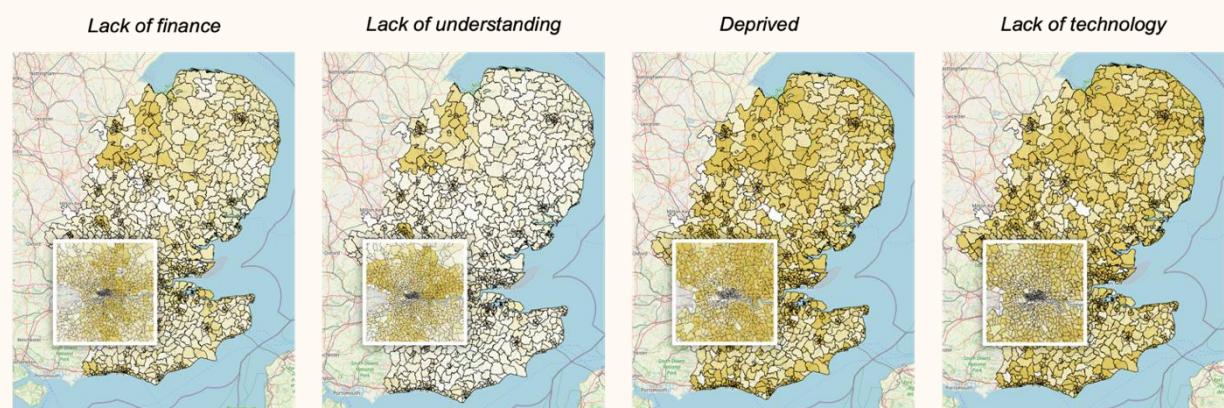


Figure 5. Snapshots from Spotlight, showing probability of being left behind based on different factors.

## 4 – Vulnerability in our region

The nature of vulnerability across our regions has evolved significantly since the start of RIIO-ED2. As described previously, a volatile external environment - marked by a sustained cost-of-living crisis, rising energy prices, and mounting pressure on local services - has reshaped how our customers experience detriment. For many, vulnerability is no longer a temporary or seasonal reality, but a sustained condition shaped by the interplay between financial strain, housing insecurity, and broader social factors.

Our evidence-led approach strengthened by ongoing stakeholder and frontline engagement ensures that we understand these shifts in real time. Drawing on data analysis from bespoke research conducted with the CSE, and tools such as Spotlight, we now have a clearer picture of who is most affected, where they are located, and what forms of support they require. This evidence base confirms that vulnerability is far more diverse and complex than it was at the start of RIIO-ED2, with an increasing overlap between social, financial, and digital disadvantage.

### Bespoke CSE research

Research conducted with the CSE has shown that within our licence areas, certain groups are overrepresented among those at risk. These include private and social renters, families with young children, and non-English-speaking communities, particularly in London and suburban districts. Renters, who now make up over two in five households in our regions, often lack control over their home's energy performance, leaving them exposed to high bills and inefficient heating systems. Younger families, especially those with children under five, face rising household energy use alongside tightening disposable income, amplifying their exposure to fuel poverty. Meanwhile, language barriers and digital exclusion limit access to advice, affordable tariffs, and energy-saving measures, deepening inequalities in access to support.

### Spotlight

Spotlight analysis provides a richer understanding of how vulnerability varies across our three licence areas: the East (EPN), London (LPN), and the South East (SPN). Using advanced modelling, the tool estimates the probability of customers in each region experiencing different types of vulnerability, from fuel poverty to communication or digital access needs. These insights reveal that the likelihood and nature of vulnerability differ significantly across our regions.

In EPN, the model shows the highest probability of customers experiencing fuel poverty across our network. This reflects the region's rural geography, higher heating costs in off-gas areas, and older housing stock. EPN also shows the greatest likelihood of customers having communication-related needs (around 11%, compared with 7% in SPN and 2% in LPN) and limited digital access (6% of customers). These indicators highlight that rural isolation, accessibility barriers, and lower digital connectivity are key drivers of vulnerability in the East.

In contrast, LPN displays the most complex and diverse urban vulnerability profile, with a high probability of deprivation (18.5%) and affordability pressures. The region also records higher levels of language barriers (22%), which are closely linked to a greater proportion of customers with limited understanding of the low carbon transition (40.3%, compared with 23.4% in EPN and 15.5% in SPN). Together, these factors compound one another, intensifying the challenges faced by households and deepening the overall impact of vulnerability across London, driven by affordability pressures and cultural and linguistic diversity.

SPN presents a more balanced and resilient profile overall. The model suggests a moderate probability of fuel poverty, particularly in rural and coastal areas with seasonal heating demands. At the same time, SPN shows the lowest probability of customers lacking understanding of the low carbon transition. This indicates greater awareness and readiness to engage with energy-saving and decarbonisation initiatives. While rural isolation remains a factor in parts of the region, SPN's overall profile suggests that consistent, whole-system support and proactive education campaigns would be highly effective here.

This analysis reinforces that vulnerability is not uniform across our regions and highlights that vulnerability today is now more than ever multi-faceted, overlapping, and fluid. This evolving picture has directly shaped how we design and deliver support. For many customers, these vulnerabilities intersect, creating compounding challenges that cannot be addressed in isolation. Evidence shows that customers increasingly need services that are holistic, accessible, and tailored to their circumstances. Our RIIO-ED2 strategy therefore focuses on three key workstreams: **Tackling fuel poverty, Leaving no one behind, and Registering and supporting PSR customers**, ensuring every customer can access the right support at the right time.

The following sections detail how these insights have informed our updated programme, detailing the specific needs identified and the targeted services and partnerships now in place to address them.

## 5 – Understanding the needs of customers in vulnerable circumstances

Building on our understanding of how vulnerability is changing, we now turn to what our customers need from us. Evidence from research, stakeholder engagement, and frontline delivery partners shows that customer needs have evolved substantially since the start of RIIO-ED2. The cost-of-living crisis, sustained energy price volatility, and the growing complexity of energy systems mean that many households now require more immediate, hands-on, and sustained forms of support. Across our regions, customers face overlapping challenges from financial hardship to poor-quality housing and language barriers, each shaping how and when they need help from us.

### Providing immediate support

For households facing fuel poverty, the need for immediate crisis support remains clear. Customers often require real-time assistance to manage unaffordable energy costs, with many turning to fuel vouchers, income maximisation, or emergency financial assistance to meet their essential needs. Our partners continue to report rising demand for short-term interventions such as budgeting support and benefit checks, ensuring that households can stay warm, safe, and financially stable during periods of acute stress. The importance of fast, compassionate assistance, particularly in moments of crisis, has been repeatedly reinforced by stakeholders and partners, who view our ability to respond quickly as a vital part of our vulnerability strategy.

### Supporting customers through the energy transition

For those at risk of being left behind in the energy transition, trust and timing are key. Stakeholders emphasised that engagement must start with practical, relatable conversations around saving money and improving comfort. By focusing first on energy efficiency and affordability, we can help customers stabilise their finances and build the confidence needed to explore cleaner technologies such as heat pumps and solar panels. This staged approach ensures that customers are not overwhelmed by technical or financial complexity, allowing them to make informed choices that align with their specific circumstances.

### Community-driven support

A recurring theme from our engagement is the importance of localised, community-based delivery. Many households prefer to receive advice from trusted local organisations that understand their lived realities and can offer culturally sensitive support. Our partnership network plays a critical role in reaching customers who might not otherwise engage with formal energy services. These relationships enable us to identify vulnerability earlier, tailor interventions more effectively, and establish the trust necessary to deliver a lasting impact.

### Digital access and inclusion

Digital access and inclusion remain critical to ensuring no one is left behind. While there is growing demand for digital services, many households experience limited digital confidence, language challenges, poor connectivity, and accessibility needs. Stakeholders told us that customers appreciate assistance when navigating digital platforms. Through initiatives like Kent Digital, we have combined device setup, online skills, and energy advice to help households safely access and use online tools. This programme has provided one-to-one coaching, enabling customers to set up email accounts, access energy supplier portals, and compare tariffs online. For many participants, this was their first sustained digital learning experience, helping them overcome confidence barriers and engage with wider online services.

### Year-round support

The need for year-round support has become increasingly evident. Historically, much of our activity centred around the winter period; however, customers and partners alike have reported that financial strain, poor housing quality, and energy affordability are now constant, not seasonal. Many households continue to carry arrears from the previous winter, often only catching up on bills by late summer before facing renewed pressures as colder weather returns. This ongoing cycle underscores the persistence of affordability challenges throughout the year, requiring continuous engagement rather than seasonal campaigns.

Taken together, these insights show that our customers' needs are immediate, practical, and deeply interconnected. They require timely, local, and inclusive support that resolves the crisis in front of them while building long-term resilience and participation in a fair energy future. By continually analysing how vulnerability is evolving and engaging with customers, partners, and stakeholders, we are proactively refining our support programme to ensure it remains agile, targeted, and impactful.

## 6 – Delivering a strategy that meets the needs of our customers

Our approach to delivering support for customers in vulnerable circumstances turns understanding into action. It connects the insights gathered from our ongoing engagement and data analysis to the programmes, partnerships, and innovations that deliver real-world impact.

The diagram below details our innovative and collaborative approach to delivery, illustrating how we translate our customers' needs (detailed in section 5) into outcomes through a structured framework built upon strategic delivery pillars, key workstreams, and an agile delivery model.

### Our approach to delivering support

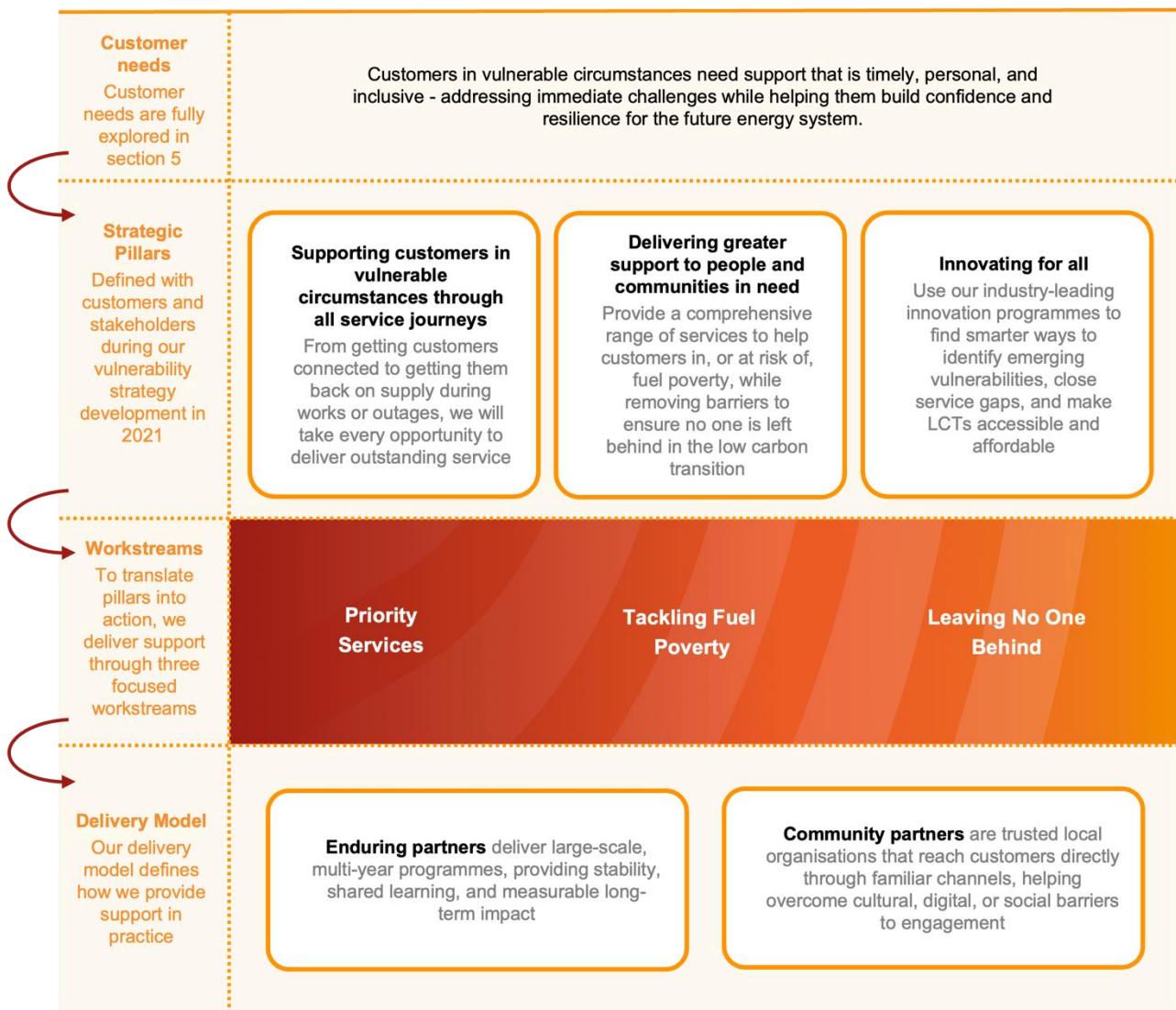


Figure 6. Our approach to delivering support.

This framework creates a clear connection between understanding customer needs and providing meaningful, coordinated support. By integrating insight, collaboration, and innovation, we have developed a unified, data-driven approach that guarantees customers receive timely, personalised assistance tailored to their individual circumstances. Our strengthened network of enduring and community partners provides stability, consistency, and trust, allowing us to deliver high-quality support where it makes the most difference. At the same time, our evidence-based methods enable the early detection of emerging needs and more effective resource targeting. Together, these elements ensure that our services remain inclusive, accessible, and adaptable, evolving with customers' circumstances while maintaining resilience amid changing social and economic conditions.

The following sections evidence how our customer needs and stakeholder feedback has shaped our delivery, structured by each of our three workstreams.

## 7 – Delivering support in RIIO-ED2

Our vulnerability strategy translates into action through three delivery workstreams: **Tackling fuel poverty, Leaving no one behind, and Registering and supporting PSR customers.**

Each workstream reflects a distinct area of focus, while collectively contributing to our strategic pillars: **Supporting customers in vulnerable circumstances through all service journeys; Delivering greater support to people and communities in need; and Innovating for all.** Together, they ensure that every customer, regardless of circumstance, has access to the support they need to live safely, comfortably, and confidently.

### Tackling fuel poverty

Over the first two years of RIIO-ED2, we have supported 59,965 customers through 177,303 in-depth services under our Tackling fuel poverty programme, as well as provided lighter-touch support to 191,313 customers. While only the in-depth services are eligible for incentive reporting, both forms of support play an essential role in helping customers through hardship, from immediate crisis intervention to early prevention that reduces the need for future emergency help. Our in-depth support generated £25.67 million in social value and achieved a cumulative customer satisfaction (CSAT) score of 9.2 across Years 1 and 2. This reflects consistent growth across both years of delivery, underpinned by strong partner collaboration and an evidence-led approach to identifying and supporting households in crisis.

The programme has evolved in direct response to the cost-of-living crisis, transitioning from seasonal winter interventions to a year-round framework that combines immediate relief with long-term resilience. Multi-year enduring partnership contracts have also strengthened reach and delivery stability, enabling our programme to focus on investing in sustained outcomes for communities and individuals.

### Our core services

- **Income maximisation:** Helping customers access unclaimed benefits and increase household income.
- **Energy efficiency measures:** Providing tailored advice to help households reduce energy consumption and costs.
- **Behavioural change:** Encouraging everyday actions that improve comfort and lower bills.
- **Water efficiency advice:** Promoting efficient water use and linking customers to social water tariffs.
- **Social water tariff:** Supporting access to affordable water schemes for eligible customers.
- **Fuel voucher provision:** Issuing emergency vouchers to support customers in crisis.
- **Debt support:** Helping households manage energy debt and establish sustainable repayment plans.
- **Smart meter advice:** Guiding customers on the benefits and use of smart meters for energy management.

### Key developments

- **Crisis response:** In the first two years of RIIO-ED2, our partners have supported nearly **39,000 customers with advice on income maximisation, and have issued 2,700 fuel vouchers**, providing essential relief during moments of financial strain. Income maximisation work has helped customers access unclaimed benefits, reduce energy debt, and secure hardship funding through national and local schemes, supporting financial stability.
- **Integrated casework:** Each crisis referral triggers follow-up income and energy advice, ensuring short-term support leads to long-term stability.
- **Expanding reach:** Our Enduring Partners network and consistent delivery model have enabled continuous year-round support, helping households across all licence areas to access the help they need.
- **Digital upskilling:** Through our partners over **4,300 customers received advice on digital skills**, helping participants safely access online grants, identify trustworthy information, and avoid energy-related scams.

## Adapting delivery

Table 2. How we have adapted our Tackling fuel poverty services based on stakeholder feedback.

Area	What our stakeholders have told us	Our response
<b>Scalability and standardisation of partnerships</b>	Short-term annual contracts with over 14 partners limited consistency in reporting, created resource challenges, and made long-term planning difficult.	We have introduced a new partnership model with four core, long-term partners under five-year contracts. This provides funding certainty, helping partners plan effectively, retain skilled staff, and deliver a consistent, high-quality standard of support across our regions. As well as introducing common reporting templates across all partners to ensure consistent measurement of outcomes and comparability across regions.
<b>Seasonal changes in support vs consistency of service delivery</b>	Historically, support such as income maximisation or energy efficiency advice was previously sought ahead of seasonal “pinch points” like winter or back-to-school periods.	We no longer adjust or scale support based on the time of year for specific types of support. We have transitioned from seasonal winter campaigns to year-round affordability support, recognising that cost pressures persist across all months.
<b>Delivery channel diversification</b>	Different customer groups prefer varied engagement methods, ranging from in-person to phone and online support. Accessibility for all remains a key priority.	We maintain a balance of digital, telephone, and in-person support to ensure that all customers can access support through a channel that is convenient and comfortable for them.

## Smart Heat and Intelligent Energy in Low-Income Districts (SHIELD)

SHIELD is one of our award-winning flagship innovations, developed with Citizens Advice Essex, Eastlight Community Homes, Essex County Council, Kensa, Power Circle, Thermify, and UK Community Works, the initiative provides affordable, zero-carbon heating using waste heat captured from data centres.

Thermify's HeatHub technology recycles heat from computer data processing and channels it into homes via Kensa's ground-source heat pumps. Each property also benefits from solar generation, battery storage, and smart controls, enabling residents to manage their own renewable energy, lower their bills, and avoid price volatility through a fixed, low-cost model.

The next phase will see 300 social housing tenants take part in a four-year trial to measure the long-term financial and environmental benefits, informing a future scale-up to 100,000 homes per year by 2030. Early results indicate potential bill reductions of 20-40% and carbon savings exceeding 90%.

“My bungalow is as warm as it has ever been. The low fixed monthly fee for heating has offered peace of mind, and the solar power system has helped reduce reliance on external energy suppliers.”

- Terry Bridges, SHIELD customer and tenant at Eastlight Community Homes.

## Leaving no one behind

Over the first two years of RIIO-ED2, we have supported 36,403 customers through 145,077 in-depth services under our Leaving no one behind programme and delivered wider light-touch support to 217,783 customers. Our in-depth support generated £8.88 million in social value and achieved a cumulative CSAT score of 8.9 at the end of Year 2. Our CSAT score for this programme was initially lower than expected due to early challenges with new partners who were unfamiliar with regulated energy services. However, by incorporating feedback from both customers and partners, we have improved delivery and, at the time of writing this report, increased our Year 3 year-to-date score to 9.3. This reflects our commitment to ensuring customers facing financial, digital, or social barriers are not excluded from the energy transition.

The programme has evolved from an RIIO-ED1 pilot focused on Net Zero awareness into a core framework centred on affordability, inclusion, and empowerment. During RIIO-ED1, activities primarily focused on education and engagement; however, many customers perceived Net Zero as distant or inaccessible due to financial constraints and digital exclusion. In RIIO-ED2, we have shifted our approach to start with practical conversations about saving money and increasing comfort, introducing low-carbon solutions only once customers feel secure and confident.

## Our core services

- **Income maximisation:** Supporting customers to access financial entitlements that improve affordability.
- **Energy efficiency measures:** Advising on insulation, retrofit, and measures to enhance home comfort.
- **Behavioural change:** Promoting sustainable habits to reduce energy use and costs.
- **Damp and mould awareness:** Providing practical advice to reduce damp and improve health.
- **Flexibility advice:** Educating customers about flexible energy use and time-of-use tariffs.
- **Solar PV advice:** Supporting households to understand and access solar energy options.
- **Home Battery Pack advice:** Helping customers explore storage to maximise low-cost energy use.
- **EV tariff:** Offering guidance on affordable electric vehicle tariffs and charging options.

## Key developments

- **Expanded community reach:** Our partnerships across the **Citizens Advice network have supported over 16,900 customers** to access advice on benefits, budgeting, and energy efficiency, alongside guidance on low-carbon technologies.
- **Accessing LCT grants:** Our partners have helped over **26,000 customers through recommending and supporting applications for LCT grants**.
- **Home energy surveys:** We offer unique services not seen elsewhere in the industry through our Leaving no one behind programme, such as thermal imaging assessments to identify insulation and heating improvements that reduce heat loss and manage damp issues, delivered by our partners Energy Action Redhill and Reigate and Community Energy Pathways.
- **Social housing collaboration:** Through the Socially Green and Flex Direct projects, we initiated testing of new commercial models with housing providers to incentivise retrofit and promote smarter, lower-cost energy use during peak times, resulting in tangible savings on customers' energy bills.

## Adapting delivery

Table 3. How we have adapted our Leaving no one behind services based on stakeholder feedback.

Area	What our stakeholders have told us	Our response
Regionally personified advice	Partners identified a need for region-specific, culturally sensitive support to build trust and comfort among customers. Partners emphasised that trusted local voices are most effective in building credibility. There is also a risk that larger-scale programmes miss certain marginalised groups.	We partner with local organisations to enable tailored support aligned to regional vulnerabilities and community values, delivered by trusted local partners and peer-to-peer champions. We are also developing partnerships to support marginalised groups such as refugees, families impacted by cancer, and people transitioning from hospital to home.
Affordability first	Customer feedback showed Net Zero was "not a priority" unless it was linked to cost savings.	Where relevant, we prioritise crisis support, followed by long-term financial recovery and low-carbon advice, all of which are framed within narratives of affordability and warmth.
Self-service online support	Accessibility and a lack of understanding are barriers to participation in the low carbon transition and uptake of LCTs.	We launched Home Energy Saver, a digital self-service tool that makes low carbon advice accessible and inclusive for all customers, allowing them to explore personalised plans at their own pace without needing to speak to an advisor.
Digital inclusion and upskilling	Digital exclusion remains a barrier for many vulnerable customers.	We formed a digital inclusion partnership with Kent County Council to deliver skills training and device support, enabling access to online energy schemes.
Evidence-led improvement	During customer testing, we heard that our online advice was not tailored enough. However, we had already launched version 1 of our self-service tool.	We introduced a continuous improvement framework embedding customer testing into service and tool design to ensure relevance and value ahead of launching new initiatives.

## Home Energy Saver - Digital innovation to support our customers

Digital innovation plays an increasingly important role in how we reach and support customers who may otherwise be excluded from traditional engagement channels. Our approach uses technology to complement, not replace, personal interaction, combining data insights with accessibility to make support simpler, smarter, and more inclusive.

The Home Energy Saver online tool sits at the heart of this approach, offering a user-friendly platform for customers to explore ways to improve their home's energy efficiency and lower their bills. Early customer feedback told us that our initial digital offering did not fully meet their needs or expectations. In response, we worked closely with customer groups to redesign the service from the ground up, ensuring that customers shaped every stage of development, influencing the layout, navigation, and functionality of the tool. This process has resulted in a fully tested, customer-led product that has been designed for customers, by customers, helping them to access clear, tailored information in ways that suit their needs and confidence levels.

## Locally delivered support

Community Energy Pathways play a key role in our Leaving no one behind programme, utilising local knowledge and trusted networks to deliver fair and inclusive support. By working together, we have expanded Net Zero support through 20 community groups across our licence areas, reaching more than 13,500 customers through energy cafés, home visits, and community events. The initiative provides tailored guidance on energy efficiency, behaviour change, and access to retrofit funding.

Community Energy Pathways also delivers Energy Champion training, supporting 74 local residents to become trusted advisers equipped to share practical advice and promote Net Zero awareness within their communities. This approach builds local capability, creates jobs, and ensures customers receive consistent and relatable support from peers they know and trust.

*One customer, Ethal\*, aged 82, attended an energy café in distress over rising bills despite having solar panels installed. Following a home visit arranged through the programme, it was discovered that her export meter had been incorrectly recording usage. With support from an Energy Champion, Ethal's supplier refunded the overpayment and corrected the readings - easing financial pressure and restoring confidence in managing her energy use.*

\* Name changed to protect anonymity

## Registering and supporting PSR customers

The PSR continues to expand and modernise, supporting customers with additional service needs while embedding resilience within core operations. By the end of year 2, 3.1 million households were registered - covering 93.5% of eligible customers and surpassing our RIIO-ED2 target ahead of schedule. The PSR remains central to how we identify and support customers in vulnerable circumstances, ensuring tailored assistance during both planned and unplanned interruptions. Our strong performance was reflected in a CSAT score of 9.33, surpassing the regulatory target. Enhanced AI-driven targeting through our Spotlight tool continues to identify eligible customers who might otherwise remain unregistered.

## Our core services

- **On-site welfare support during outages:** Providing direct, practical assistance during power interruptions.
- **Proactive contact:** Communicating with PSR customers before, during, and after planned or unplanned outages.
- **Battery packs for medically dependent customers:** Providing portable battery packs to medically dependent customers during power cuts lasting more than four hours.
- **Food vouchers:** Offering emergency food vouchers for customers in prolonged or critical situations.
- **Cold packs for medication:** Supplying cold storage packs to maintain essential medication at safe temperatures.
- **Phone charging/power banks:** Providing power sources to maintain communication during outages.
- **Warm spaces:** Connecting customers to community spaces offering warmth and safety during supply interruptions.

## Key developments

- **Pioneering automated data sharing:** We were the first UK network operator to implement automated two-way data sharing with several water companies. This initiative has added over 107,915 new registrations. Moving forward, we have actively shared our automated data sharing approach with the wider industry via the ENA to help establish nationwide automated data sharing between all DNOs and water companies.
- **Digital accessibility:** Redesigned and simplified our online registration form based on feedback from direct user testing, leading to 40,000 digital registrations in Year 2, a 194.5% year-on-year increase.
- **Health sector collaboration:** Partnered with the National Pharmacy Association, distributing 250,000 printed PSR guides through 5,000 pharmacies, launching a patient website with 1.5 million readers, and engaging 7,000 NHS staff and social prescribers.
- **Targeted outreach:** Collaborated with Mumsnet, Peanut, Asthma and Lung UK, and Kidney Care UK to address gaps in PSR coverage - leading to an 11.8% increase in sign-ups for families with children under five and a 15.1% rise for medically dependent customers.
- **Storm support:** In the first two years of RIIO-ED2, we have supported customers during storms by sending out community support vans, providing 2,575 meals via delivery services such as Deliveroo and distributing nearly 16,000 items such as torches and mobile power banks.

## Adapting delivery

Table 4. How we have adapted our PSR services based on stakeholder feedback.

Area	What our stakeholders have told us	Our response
Digital PSR registration	Digital analytics revealed that customers were abandoning online registration due to complex navigation and unclear guidance.	We simplified our online registration process for mobile users and integrated guidance tools, which improved completion and success rates.
Cross-utility priority services	Customers previously had to register separately for energy and water PSRs, resulting in administrative burdens and data discrepancies.	We developed a cross-sector data sharing agreement with water companies for a 'tell-us-once' registration experience.
Inclusion of SMEs in priority services	Initially, we prioritised registering vulnerable domestic customers for the PSR. Now that PSR coverage exceeds 90%, our focus is expanding to include business customers who provide essential community services, recognising that continuity of supply during outages is critical beyond domestic households.	We expanded PSR eligibility to include small and medium-sized enterprises (SMEs) providing essential community services.
PSR data analysis	Analysis of our current PSR data identified underrepresented groups in PSR registration.	We established tailored partnerships and outreach towards marginalised groups to fill the gaps that exist in our PSR, e.g. Peanut and Mumsnet targeting expectant mothers and families with young children.

## Power Protect - Storm Resilience in Action

Power Protect was developed in response to customer and partner feedback following severe weather events early in RIIO-ED2. The programme involves delivering and installing portable battery packs to medically dependent customers during power cuts lasting more than four hours, ensuring they remain safe and supported. Working with Local Resilience Forums and local authorities, we have supplied 247 customers with portable battery packs to keep essential medical equipment operational. Additionally, we have conducted over 40,630 proactive welfare contacts before, during, and after storms. This coordinated approach offers reassurance, maintains continuity, and provides practical support when customers need it most. These outcomes demonstrate how integrated PSR data, operational systems, and cross-sector collaboration now enable real-time, targeted assistance. Through Power Protect, the PSR continues to develop from a static register into a dynamic, data-driven care network providing proactive protection for vulnerable households.

## 8 – Our key commitments

In our RIIO-ED2 Business Plan, we outlined 11 commitments. The table below summarises our progress against these commitments to date:

*Table 5. Our key commitments and how we have performed so far.*

Vulnerability strategy commitment	Description and expected outcome	How we have performed so far
<b>VS1</b>	We will continue to improve satisfaction of our PSR registered customers over our RIIO-ED1 baseline. We will target to be the #1 DNO Group as measured by PSR customer satisfaction or at least delivering 93% scores on average across our networks in each year of RIIO-ED2 (vs. 91.5% average achieved in RIIO-ED1) - whichever is higher.	<ul style="list-style-type: none"> <li>– 93.4% customer satisfaction score for year 2.</li> <li>– 100% of our staff have been provided with training. This includes in-depth vulnerability training for all customer-facing staff and contractors.</li> </ul>
<b>VS2</b>	We will expand the scope and reach of our Priority Services Register, delivering an overall 30% increase in registrations from the end of RIIO-ED1 in those categories that are most impacted by our service by the end of RIIO-ED2. We will target 3m households and 600,000 businesses registered.	<ul style="list-style-type: none"> <li>– 3.09m eligible customers registered on PSR, an increase of 26.5% from the start of RIIO-ED2.</li> <li>– We currently have 81,000 businesses registered on our Business PSR.</li> </ul>
<b>VS3</b>	We will keep our PSR data up to date to maintain the relevance of our service, ensuring that we contact customers to update their PSR data and refresh our understanding of their needs every 18 months. In addition, we will conduct proactive data quality checks on 100% of our PSR records every 12 months throughout RIIO-ED2.	<ul style="list-style-type: none"> <li>– We operate a 12-month cycle for customer data, targeting those we have not spoken to in last year's cycle.</li> <li>– We also operate an annual refresh on data quality framework and carry out a PSR data completeness review every month.</li> </ul>
<b>VS4</b>	Our customers will only need to register to a PSR once. We will develop automated data links by 2024 (at the latest) with other utility companies so that customers will automatically receive enhanced service from us and other organisations providing essential services.	<ul style="list-style-type: none"> <li>– We have developed data links, which means that our customers now need to register only once and will automatically be registered with other utility companies.</li> </ul>
<b>VS5</b>	We will help all medically dependent PSR customers realise the benefits of having a smart meter by sharing targeted advice every two years throughout RIIO-ED2. For example, we will utilise smart meters to establish new arrangements so that carers are automatically notified of power cuts by 2024.	<ul style="list-style-type: none"> <li>– We have implemented a biannual smart meter targeted advice campaign for medically dependent PSR customers.</li> </ul>
<b>VS6</b>	We will offer increased support for our medically dependent PSR customers by dispatching battery banks to customers who are at risk of being without power for more than 4 hours between 2024 and 2028.	<ul style="list-style-type: none"> <li>– We rolled this out as part of our BAU process in March 2025 and are currently working on the reporting of the use of the batteries so we can learn and improve the support we offer.</li> </ul>
<b>VS7</b>	In collaboration with regional partners, we aim to provide targeted support to a total of 500,000 fuel poor customers over RIIO-ED2, investing £18m to support over 200,000 directly and 300,000 through partnership programmes, delivering £67m of benefits by 2028. Additionally, we will provide fuel poverty information to 800,000 customers each year, working with trusted partners.	<ul style="list-style-type: none"> <li>– Supported 251,278 fuel poverty customers over the first two years of RIIO-ED2, delivering over £11.59m of benefits.</li> <li>– In year 2, we provided over 997,418 customers with information in the form of leaflets and emails, exceeding our target of 800,000 per year.</li> </ul>
<b>VS8</b>	We will provide information and help to 500,000 vulnerable customers over RIIO-ED2 to ensure no one is left behind in the changing energy system, at no cost to customers. As part of this, we will also co-fund grants towards the installation of low carbon technology systems (LCT) via the UK Power Networks foundation.	<ul style="list-style-type: none"> <li>– Information and help provided to 254,186 customers over the first two years of RIIO-ED2.</li> <li>– Co-funding grants for LCT installations is currently on hold while we reassess its alignment with Ofgem's guidance to avoid market mechanisms distortion for LCT deployment.</li> </ul>

VS9	We will establish an annual cycle of research and engagement; to shape our vulnerability plans as our understanding in this area develops and the priorities of our customers change. We will use this to inform the publication of an updated RIIO-ED2 Vulnerability strategy in 2025 and 2027.	– This document is the published updated RIIO-ED2 Vulnerability Strategy which has been informed based on stakeholder feedback and data analysis. This document will be refreshed again in 2027.
VS10	We will deliver industry-leading innovations to improve support to disadvantaged and vulnerable customers, ringfencing £5m of our Network Innovation Allowance (NIA) investment over the RIIO-ED2 period to focus on these areas.	– £2.82m of our NIA expenditure since the start of RIIO-ED2 was on innovation projects focused on supporting consumers in vulnerable circumstances.
VS11	We will collaborate with other organisations to ensure at least 50% of our vulnerability innovation initiatives in RIIO-ED2 are delivered in partnership with other utilities and will attract £750,000 funding from these partnerships across the period.	– We have secured £535,146 funding from various partnerships of vulnerability innovation initiatives.

While these commitments remain in place, we have refined aspects of their delivery to reflect the evolving nature of vulnerability since the start of RIIO-ED2. For example:

- **VS2:** We are now scoping and introducing the auto-enrolment of businesses with identified vulnerabilities onto our Business PSR. Early analysis indicates that this approach will support the delivery of our targets.
- **VS5:** In addition to the biannual smart meter campaign targeting medically dependent customers, we have introduced notifications of single-premise faults to carers of medically dependent PSR customers with smart meters.
- **VS7:** To better meet the needs of customers in fuel poverty, we have evolved the services we offer. For instance, our delivery model now provides year-round support, recognising that many customers require assistance beyond the winter months (see section 7 for more information).

As we enter the second half of RIIO-ED2, we will continue to adapt the delivery of our 11 commitments to ensure they remain responsive to the needs of customers across our network.

### A thank you to our delivery partners

We are proud to work alongside a network of dedicated partners who play a vital role in supporting customers in vulnerable circumstances. Their expertise, compassion, and commitment enable us to deliver a wide range of meaningful support across our regions. Our progress against our vulnerability commitments and our ability to continue delivering impact throughout ED2 and beyond would not be possible without them. We extend our sincere thanks for their continued collaboration, for helping us reach those most in need, and for strengthening our strategy for the future.

- **Enduring partners:** Citizens Advice Arundel & Chichester, Citizens Advice Essex, National Energy Foundation, We Are Group
- **Wider activities and local partners:** Advice4Renters, Age UK East London, Brighton & Hove Council, Children and Families, Community Energy Pathways, Energy Action Redhill and Reigate, IE Hub, Imago, Independent Age, Kent County Council, Peterborough Environment City Trust, Scope, Social Enterprise Kent, YES Energy Solutions

## 9 – Ensuring our strategy remains fit for purpose for the rest of RIIO-ED2

Stakeholder engagement is central to how we run UK Power Networks – it is part of our DNA. Feedback from our stakeholders shapes our strategy, investment decisions, and daily actions – from our CEO to the frontline. Consumer vulnerability has become an even more critical focus for engagement today than when this strategy was first written, reflecting the fast-changing challenges our customers face. Listening to stakeholders, including customers, community representatives, and our own employees and contractors, and feeding back those insights into the way we train our people and develop our services and policies, is at the heart of our approach for keeping our consumer vulnerability strategy focused.

Stakeholder engagement played a vital role in the development of our original vulnerability strategy, it has been key to shaping this refreshed version of the strategy, and it will continue to do so over the remainder of RIIO-ED2. This is a dynamic and ongoing process. As we begin preparing for our next business plan for RIIO-ED3 (2028-2033), the stakeholder insight we gather will be used to review our current strategy and ensure we are focussing on the right outcomes. We will also continue to tailor our stakeholder engagement to ensure that we fully understand new and emerging drivers of vulnerability.

When we published our current strategy in 2021, the COVID pandemic was still front of mind and the energy crisis a relatively new phenomenon. We were still exploring the challenges of digital exclusion and business vulnerability. Today the energy price crisis and increasing questioning of the need for Net Zero are among the key challenges we need to face into.

### Our stakeholder engagement strategy

Our goal is to ensure that everyone's voice is heard. We will continue to engage directly with those most affected by vulnerability to understand their specific needs, concerns, and perspectives, and to ensure they are aware of, and can access, the support available to them. We will tailor our engagement to reach marginalised communities and collaborate with experts to ensure our strategy remains inclusive and evidence based. To achieve this, we will:

- Run a comprehensive, ongoing engagement programme each year to obtain meaningful insights to help improve our activities and decisions.
- Identify the right stakeholders to engage, from a cross-section of groups that bring to the table different perspectives on the issue at hand.
- Tailor our engagement methods by providing flexible options for our stakeholders to share their views.
- Record, triangulate and assess stakeholder feedback to produce a clear picture of their needs, preferences and views.
- Embed learnings in our ways of working and measuring their impact to develop the ideas that generate the most benefit for our customers.

Our ongoing research and engagement will inform the publication of the next updated Vulnerability Strategy in 2027.

We are currently developing our vulnerability plan for RIIO-ED3. If you would like to join our vulnerability stakeholder expert forum and help us shape the future of our vulnerability programmes, please contact us at [stakeholder.engagement@ukpowernetworks.co.uk](mailto:stakeholder.engagement@ukpowernetworks.co.uk).

## 10 – Conclusion

Addressing consumer vulnerability continues to be one of our top priorities as we go into the second half of RIIO-ED2. This focus on vulnerable households is driven by our culture and, most importantly, our customers, who have told us that they place addressing vulnerability among the top three priorities for UK Power Networks, and our stakeholders, who have made it clear that we should play a leadership role in addressing this issue.

A lot has changed since we originally wrote our current vulnerability strategy. As the preceding sections made clear, energy prices that have remained higher than we have seen in half a century and a continuing cost-of-living crisis have created unprecedented challenges for many of the households we serve – challenges that we did not foresee when we wrote our original strategy.

We based our original vulnerability strategy on three pillars designed to be stretching, in each of which we aim to be industry-leading:

- **Supporting our customers in vulnerable circumstances through all our service journeys**
- **Delivering greater support to our people and communities in need**
- **Innovating for all**

These pillars have been tested with our key stakeholders, who told us that they are still the right ones to focus on. However, the way that we deliver them needs to change to reflect the new realities that our customers face and be flexible enough to adapt when circumstances change again. We have developed three main workstreams to deliver these strategic pillars: **Tackling fuel poverty, Leaving no one behind, Registering and supporting PSR customers.**

We are already adjusting these delivery streams to address the challenges our customers are facing, working with our trusted partners to identify more customers in vulnerable circumstances and deliver year-round support, targeted at households and communities in greatest need. We are also continuing to ensure that no one is left behind by recognising that for many of the customers we serve, short-term survival is a greater priority than long-term planning, so we need to find new ways to engage with them about the low-carbon transition and opportunities to save money and energy through smart technology and time-of-use tariffs.

We have achieved a lot for our customers in the first half of RIIO-ED2 - we have supported over a quarter of a million customers in fuel poverty, provided information and advice on energy efficiency to as many customers again to help ensure no one is left behind, and grown our PSR by over 20 percentage points. We know there is more to be done. We are committed to continuously improving our support for vulnerable households based on evidence-led insight from our stakeholders and customers.

### Looking ahead

As we move into the second half of RIIO-ED2, we have four key priorities to ensure we continue meeting the evolving needs of our customers:

- (1) **Broaden our stakeholder engagement** – expanding into new sectors to learn from best practice and bring fresh insights back into our programmes. We have already started to collaborate with stakeholders in the finance and housing sectors.
- (2) **Test innovations with customers** – ensuring all new products and services are rigorously tested with customers, particularly those with lived experience of vulnerability, so that solutions are practical, inclusive, and effective.
- (3) **Reach underserved and marginalised groups** – rather than focusing purely on NPV targets, to ensure our programmes actively support communities who may struggle to engage, we are working with partners who represent refugees and asylum seekers, families affected by cancer, and people transitioning from hospital care.
- (4) **Measuring and understanding CSAT** – we will continue to explore alternative ways to capture feedback and satisfaction to accurately reflect customer sentiment in the channels of their choice, beyond the current mandated phone-only option. We will share our findings with the wider industry to help ensure every customer has a voice in shaping our services.

More broadly, as we look further ahead in our transition to a DSO, we are collaborating with colleagues and partners to explore how flexibility and new products can enable vulnerable households across our region to take part in and benefit from the energy transition.

