



**RIIO-ED2 Vulnerability  
ODI Assessment – Y3  
Covering Letter – SSEN**

**02/07/2026**

# 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 the 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 2 July 2026.

**Table 5 (SSEH)**

| Metric                          | No. | Value                                                            | Actual        |
|---------------------------------|-----|------------------------------------------------------------------|---------------|
| PSR reach                       | 1   | PSR reach %                                                      | 91.60%        |
|                                 | 2   | % of PSR households DNO has attempted to data check in 24 months | 100.00%       |
| Value of FP services delivered  | 3   | £NPV value                                                       | £2,041,303.27 |
| Value of LCT services delivered | 4   | £NPV value                                                       | £220,625.09   |

**Table 5 (SSES)**

| Metric                          | No. | Value                                                            | Actual        |
|---------------------------------|-----|------------------------------------------------------------------|---------------|
| PSR reach                       | 1   | PSR reach %                                                      | 79.80%        |
|                                 | 2   | % of PSR households DNO has attempted to data check in 24 months | 100.00%       |
| Value of FP services delivered  | 3   | £NPV value                                                       | £4,942,483.23 |
| Value of LCT services delivered | 4   | £NPV value                                                       | £699,643.26   |

## 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 Y3 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 11.06.26' shared by SSEN on 11 June 2026.

### 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 11.06.26' shared by SSEN on 11 June 2026.

### 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:

- **Optimism Bias**
  - Optimism Bias in cell T33 changed from 10% to 15% in line with the rulebook ('2\_Proxy Guidance' tab).
- **Research Year**
  - Research Year in cell V33 changed from 2019 to 2022 in line with the rulebook ('2\_Proxy Guidance' tab).

- **Proxy Value**

- Proxy Value in cell G12 was multiplied by the number of weeks the customer receives the benefit per annum, in line with the rulebook ('2\_Proxy Guidance' tab).
- Proxy Value calculations were aligned with corresponding proxy descriptions in rows 3, 6, 18, 21 and 22 of column I ('2\_Proxy Guidance' tab).
- Proxy Value calculations and proxy descriptions were updated to ensure correct conversion from months/years to weeks in rows 3, 6, 7, 10, 12, 16, 17, 18, 21 and 22 of columns G and I ('2\_Proxy Guidance' tab).
- Proxy Value calculation in cell G34 was aligned with the corresponding proxy description in cell I34 ('2\_Proxy Guidance' tab).
- Proxy Value calculation in cell G54 was aligned with the corresponding proxy description in cell I54 ('2\_Proxy Guidance' tab).

- **Success Rate**

- Success Rate calculations in cells K58 and K59 were aligned with corresponding success rate descriptions in cells L58 and L59 ('2\_Proxy Guidance' tab).
- Success Rate calculations in cells K79, K80, K81, K82, K123 and K128 were aligned with corresponding success rate descriptions in column L ('2\_Proxy Guidance' tab).
- Descriptions in cells L97, L98, L101, L102 and L106 were updated to include the additional 75% assumption, ensuring alignment with the corresponding formulae in column K ('2\_Proxy Guidance' tab).
- The description and Success Rate formula for the carbon benefit in row 112 were aligned with the corresponding financial benefit in row 111 ('2\_Proxy Guidance' tab).

- **Scope**

- Three benefits linked to the activity 'enabling works for LCTs' in rows 117, 118 and 119 were removed ('2\_Proxy Guidance' tab).



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