

## Publishing information collected from water and sewerage companies - A CCWater consultation: Table of responses

### Overview

In June 2016, we consulted with the industry about publishing information collected from water and sewerage companies. We received 11 responses, all from water and/or sewerage companies: Affinity, Dŵr Cymru, Northumbrian, Portsmouth, Severn Trent, Southern, South East, South Staffs, South West, Thames, and Wessex.

In summary, companies:

- Are supportive of our plans to continue to collect comparative data, and make this publically available;
- Are supportive of our proposals to monitor comparative, customer facing and high reward performance commitments; and
- Stressed the need for caution to be taken when comparing performance commitments as they are not always like for like.

The table below summarises questions raised by companies about our proposals. For reasons of space we have not included supportive comments in the table, but nevertheless thank those companies for their views.

Company	Comments	CCWater response
<b>Question one: Do you agree with the principle of continuing to collect information on a quarterly basis? If not, why?</b>		
Dŵr Cymru	<p>Yes we agree with the principle. However, some of the information is currently provided every six months instead of quarterly, for example the leakage and sewerage figures. We would recommend that this information continues to be collected half yearly. For example, when looking at leakage figures, performance in a given quarter may give a misleading impression of performance, and a longer 'reference period' than a single quarter would be better.</p> <p>We would like the timetable for providing the information to be the same as in 2015/16, i.e. submission is due by the end of the following month after each quarter.</p> <p>The 'Supporting Comments' field should only be used for</p>	<p>We are not proposing the information collected six monthly such as leakage and sewer flooding is collected quarterly in the future. The timings for submissions will remain the same.</p> <p>Yes, the timings for submissions will remain the same as in previous years (i.e. the end of April, July, October and January).</p> <p>We agree that it is logical for the supporting comments</p>

	<p>companies to comment on the data included. Other specific issues such as additional questions relating to the topic area should be presented separately to avoid the tables becoming cluttered and unclear.</p> <p>If CCWater want additional information this should be discussed at the local liaison meetings to ensure there is consistency of information provided by all companies in the quarterly report.</p>	<p>to relate to the information submitted. If DCWW have identified a potential problem, we are happy to discuss this locally.</p> <p>Whilst it is not our intention to collect any additional information from companies should this change in the future:</p> <ul style="list-style-type: none"> <li>• Additional company specific data will be agreed locally; and</li> <li>• Companies will be consulted if industry wide additional information is required.</li> </ul>
Southern	<p>We believe the communication around the collection process could be improved. We feel it would be beneficial if water companies were made aware well in advance of the dates CCWater intends to ask for data and the timetable for publications. This would give companies sufficient notice to collate, check and prepare the data.</p>	<p>We can confirm:</p> <ul style="list-style-type: none"> <li>• that the timings of the quarterly submissions will not change i.e. one month after the end of the quarter the report relates to.</li> <li>• we understand that we will not receive end of year AUDITED data until July.</li> <li>• <i>Delving into Water</i> will be published in November.</li> <li>• we are currently in discussion with Ofwat about the most appropriate time to publish any comparative information in relation to performance commitments.</li> </ul>
South Staffs	<p>We accept the quarterly reporting principle, although the main point is that at the quarterly reporting stage the information has not been audited and is therefore subject to change. This also applies to the April quarterly report at the end of each reporting year, when at this stage the numbers reported will be year-end values but not audited at that point.</p> <p>Last year we compiled an annual year end update for CCWater and we have repeated that process this year. This ensures that</p>	<p>We are mindful that information companies share with us during the year is subject to change. This is why we have committed that we will only publish audited information and we work alongside companies when drafting our <i>Delving into Water</i> report.</p> <p>We expect to receive the final year end audited figures at the end of July each year.</p>

	after the end of each financial year CCWater are provided with our audited year end numbers.	
South West	<p>We believe that CCWater should consider opportunities to use information which is available from other sources, such as company reporting on Performance Commitments. CCWater should consider whether it is still necessary to collect this information on a quarterly basis through the operational report, or whether, in order to reduce the administrative burden on companies, it would be more appropriate to obtain the information on a different timescale in line with other reporting commitments. This is particularly applicable in respect of leakage data where reporting leakage on a six-monthly basis without completion of complex water balance gap calculations and detailed assurance may be misleading.</p> <p>Additionally, we note that the reporting of leakage figures to CCWater is based on a financial year whereas South West Water's performance commitment for leakage is on a calendar year basis as such we feel that quarterly reporting should be sufficiently flexible to allow for varying timeframes around companies' performance commitments.</p>	<p>The difficulty that we have in collecting the quarterly information from other sources (such as the annual performance report) is that each company will have different definitions for the data. South West Water has indicated that their leakage data is on a calendar rather than financial year basis. This means that comparability across companies would be lost.</p> <p>After speaking separately with South West Water, we understand that our data requirements do not place an unreasonable administrative burden, and so to ensure that metrics can be compared, we would propose that they are still collected on our templates, following our definitions.</p> <p>However, we are open to the potential of using the Discover Water dashboard as a data source once it is fully live, but we would point out that CCWater provides around one-third of the data used in the dashboard.</p>
Thames Water	<p>Our quarterly performance report to CCWater provides a useful reconciliation of data at the end of each quarter and a good basis for discussion at the corresponding performance meeting.</p> <p>We gain valuable insight on the performance of other water companies from the annual report and we also value seeing the performance reports of the other water companies within our region each quarter. We would suggest this quarterly data share could be extended to all the water companies.</p> <p>We would welcome feedback from CCWater on how useful it finds the information and if the volume of information could be</p>	<p>Whilst we are committed to being open and transparent, and sharing best practice, we have some concerns about a quarterly information share. Many companies have indicated that they would not be willing for unaudited data to be placed in the public domain for comparative purposes, and we made a commitment to companies that we would not do this. However, this may be something that can be agreed regionally with other companies.</p> <p>The local team find the additional information provided very helpful as it provides useful insight and</p>

	reduced to remove any that is not used.	background. We are more than happy to discuss and review the scope and amount of information submitted and whether the timing (through the quarterly submissions) remains the appropriate frequency and channel to share this with us.
Wessex Water	We are happy to continue to provide a quarterly report as long as CCWater continue with the current reporting frequency for each data item. For example complaints are reported each quarter while sewer flooding is 6 monthly.	We are pleased that Wessex Water agrees with the principle and can confirm that we are not proposing any changes to the current frequency of reporting.
<b>Question two: Do you have any concerns about any of the data which we are currently collecting? In particular, do these pose a problem in light of companies' specific performance commitments?</b>		
Affinity Water	<p>Information we provide in the quarterly returns is provisional and subject to year-end audit and correction. Items that are elements of the water balance (i.e. leakage and water demand) do not lend themselves to quarterly or half-yearly reporting; the water balance being a full year calculation carried out after year end. However, we believe CCWater understand these factors and use the information with appropriate caution.</p> <p>As mentioned already, companies' performance commitment measures may be highly specific. Whilst all companies have at least one supply interruption performance commitment, these are not identical - e.g. Affinity Water does not have a commitment based on average hours per property served. Similarly, water demand (per capita consumption) is included as a reported item in your quarterly return and we also have a performance commitment for average water use. However, these measures are not identical, as the performance commitment measure includes an adjustment for normalisation under normal year conditions.</p>	<p>We are mindful that information companies share with us during the year is subject to change. This is why we have committed that we will only publish audited information and we work alongside companies when drafting our <i>Delving into Water</i> report. We still find that the in-year data provides a useful overview of company performance, and is used by local teams during bilateral discussions.</p> <p>We note the concerns that there are many variations in performance commitments across the industry. This is why we see so much value in retaining the quarterly reporting, so that all companies provide the same information in relation to areas that are of most interest to customers.</p>
Dŵr Cymru Welsh Water	No. However, we believe that some of the information that is requested may be more suitable for annual reporting - for	We have reviewed this internally and would suggest that Dŵr Cymru continue with the AMP report

	<p>example Capital Water and Sewerage schemes.</p>	<p>annually. However, we still find the internal monthly management reports of use and would like these to continue to be provided monthly. Additionally, the Wales team would like to see an ODI report scorecard introduced to inform CCG and other stakeholders (as discussed at the CCG). This should include commentary on performance on ODIs, key challenges and impacts on customers. This report should cover the half year through the year and be reported on by 31 October.</p>
<p>Severn Trent Water</p>	<p>Yes we have some concerns in relation to sewer flooding performance data, which is not available as this AMP's Performance Commitment (PC) has significantly changed from a register of customers affected to number of incidents. It should be noted that if a customer is affected by multiple incidents each one is included in the new PC.</p> <p>The form and frequency of the current quarterly submission, in all other respects is acceptable.</p>	<p>We are grateful that Severn Trent has worked with us throughout the year on this matter and work will continue to ensure that <i>Delving into Water</i> explains this variation.</p>
<p>Southern Water</p>	<p>We are broadly happy with the data currently collected by CCWater, but would like reassurance the data will provide a useful, accurate, comparison for customers.</p> <p>If the data will be used for comparative purposes, it is important the data being collected, particularly relating to performance targets, is measured in a way which can be accurately compared.</p> <p>Using leakage targets as an example, companies have different targets, measured in different ways and whether or not a company meets its target does not necessarily provide customers a true comparison of company performance. A company may miss its leakage target but still have reduced leakage by more than a company which met its target.</p>	<p>The universal definitions given to the information required on the quarterly returns means that this information can be compared across the companies. We agree that this is not the case for performance commitment information and so care will be taken where comparisons. We will only make comparisons where the information is like for like, namely:</p> <ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwats horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p>

Our performance target is to reduce leakage to 86 million litres per day by 2020, Severn Trent's target is to reduce leakage by 6 per cent by 2020 and United Utilities is to "maintain leakage levels...which are at or below the sustainable economic level". Comparing our target with United Utilities' is difficult because of the difference in starting point, ambition and success measure.

To make a more accurate comparison of leakage it needs to be reported differently, this could be in relation to length of water main or as water lost per property per day.

The sector recognises that performance targets require context to accurately compare between companies and Water UK is looking at their comparability.

The difference in targets should not be seen negatively. Companies' targets are based on their customers' priorities. This means targets vary depending on the needs of the region and feedback from customers.

We would welcome guidance on consistent metrics and the chance to comment on them. These metrics should be meaningful for customers and take the mandate given to water companies by their customers into account. This would ensure the data provides a genuinely useful point of comparison for customers, stakeholders and the sector.

When submitting information we provide a commentary and supplementary pack to add context. It would be useful to know how this additional information is used by CCWater and if other companies provide something similar. We would welcome feedback on how useful the pack is, whether it is required and what is useful to include. It would also be useful to share these supplementary packs with the sector.

For *Delving into Water* 2015-16, we plan to report leakage on a litres per property per day basis.

We will reissue our guidance to Southern Water.

All companies in the L&SE region provide supplementary information which is used by the local team and is not currently shared more widely. It provides useful context and background so we would wish this to continue - we would however need agreement from all the companies to share this.

<p>South East Water</p>	<p>We support CCW's current reporting of company performance information. However, the comparison of company performance in CCW's annual complaints report should be improved.</p> <p>Connected-property data is inconsistent, distorting the comparison and we would propose the report be modified as follows:</p> <ul style="list-style-type: none"> <li>• Water supply complaints - normalised by number of water supply connections</li> <li>• Sewerage Complaints - normalised by number of sewerage connections</li> <li>• Billing complaints - normalised by the number of connections directly-billed by the company (i.e. water supply connections, unless no billing agreements)</li> <li>• Metering Complaints - normalised by the number of metered connections</li> <li>• Other Complaints - normalised by water supply connections.</li> <li>• Overall complaints - normalised by water supply connections.</li> </ul> <p>We would also propose that, rather than comparing WOCs against WASCs, the report compares overall industry performance excluding sewerage, and then including sewerage.</p>	<p>We will review the suggestions made for our complaints report. Our preliminary thoughts are that we can change the information as suggested, but may have to change the terminology of the report (to make it clear that we are looking at billed properties etc). We will inform companies of any changes that we make.</p>
<p>South Staffs Water</p>	<p>We do not generally have any concerns with any of the collected data. We note that some of the data on the submission template does not require quarterly completion, and perhaps the template could be simplified in this case by removing these, especially as they are available on company end of year ODIs.</p> <p>It could be worth discussing the separation of our quarterly reporting data by region further with you. In this AMP, from 2015-16 onwards, we are reporting financial and performance</p>	<p>The risk in doing this is that not all companies have the same ODIs and so removal from the standardised template may mean this useful comparative information is lost.</p> <p>In the light of assurances given at the time of the South Staffs and Cambridge Water merger, the difference in customer experience from those in Walsall and in</p>

	<p>information as a combined company with the exception of leakage, which remains separated by region. Data that we submit to Ofwat for future TOTEX modelling in August will also be fully combined, as will the annual data share that we provide to Water UK&gt; Although we can still provide regionally separated information to you, it may not be useful if this approach is not consistent with other reporting.</p>	<p>Cambridge, and the changes in the way the merged company relates to customers in Cambridge, we would prefer to see separate data for the two companies until the end of the AMP.</p>
South West Water	<p>With the exception of leakage figures and the issue regarding timeframes around performance commitments as detailed above, we have no concerns regarding the data currently collected by CCWater.</p> <p>However, CCWater will need to consider their approach to collecting contact and complaint data relating to non-household customers following market opening. Post April 2017, ‘unwanted contacts’ from non-household customers may go via the retailer regardless of whether the purpose of the contact is a retail or wholesale issue. Where the retailer can resolve a customer contact in relation to a wholesale service, they may do so. Therefore South West Water will not necessarily have a complete picture of contacts from non-household customers in respect to our services. CCWater will need to ensure that retailers provide information not just retail contacts, but also any wholesale contacts which have not been passed through to the wholesaler. CCWater will also need to ensure that where the retailer has passed contacts onto the wholesaler they are not double counted, i.e. that they are not reported to CCWater by both the retailer and the wholesaler.</p>	<p>Please see response to question one.</p> <p>We have identified that further consideration is needed with regards to how we collect information about business customers after April 2017 and have already entered into discussions with retailers.</p>
Thames Water	<p>We do not have any specific comments on the measures being collected, but consider there are two points important to the data collection: (i) where companies are compared, performance data should be truly comparable; and (ii) the administrative burden of the data collection should be minimised as far as possible.</p>	<p>We agree that these are important points, the guidance that we have issued to companies on our quarterly returns means that this information is comparable. We are seeking views through this consultation about the administrative burden this places on companies.</p>

Most AMP6 performance commitments are specific to each company, with different forms of measure and targets for each company. This means direct comparisons between companies may not be meaningful without the relevant context (e.g. how performance compares to the company target or reasons for good/poor performance).

For the purpose of reporting on comparative performance, we therefore welcome the proposal for CCWater to work with Ofwat on comparative reporting and to align reporting with the strategic dashboard, provided the dashboard contains consistent and comparable measures that have been agreed with companies. This will promote the consistency of data reported, thereby reducing the administrative burden and avoiding stakeholder confusion.

Water UK has been working recently at reviewing a subset of performance measures (supply interruptions, leakage, sewer flooding) to identify and resolve issues with consistency in companies' reporting. Further work is needed in this area and it will be important that any recommended changes are reflected in key reports such as Ofwat's strategic dashboard and CCWater quarterly reporting.

We agree and care will be taken where comparisons are made using the performance commitment information. We will only make comparisons where the information is like for like, namely:

- The data that we collect from the quarterly returns; and
- PCs that have the same definitions (i.e. those that were subject to Ofwat's horizontal review.

We may also be able to make broad comparisons e.g. "all companies have a performance commitment relating to leakage, and xx companies have met their targets."

We are open to the potential of using the Water UK dashboard as a data source once it is fully live.

Whilst we have not been involved in this project, we are aware of it and would welcome a consistent definition for these measures. However, we would urge the industry to ensure that past data can be calculated based on the new definitions, so that trend data is not lost.

Wessex Water	<p>We remain disappointed that CCWater continue to focus very heavily on sewer flooding risk rather than the ‘customer service’ perspective. There are 10 lines on various flood risk statistics which are more of ‘regulatory’ interest than ‘customer’ interest and only two lines on actual incidents.</p> <p>We are also surprised that CCWater do not want to understand more about the cause of incidents by collecting this information from all companies in the standardised template.</p> <p>We remain of the view that leakage should only be reported annually. Six monthly leakage values can only be estimated because of the delay in obtaining billing data - in particular from customers whose meters are read on a 6 monthly basis. We would prefer companies to make their own regional CCWater teams aware of any potential issues with leakage if they arise rather than use the template to do so.</p>	<p>We note your comments. However, we reviewed the information that we collect from companies to ensure that it was still fit for purpose. Sewer flooding is of interest to us not only in terms of incidents but also how companies are working towards mitigating risk. This information will continue to be reported.</p> <p>We would be more than happy for Wessex Water to provide this additional information.</p> <p>We note the concerns that in-year leakage figures are not accurate. However, we want to be able to collect information on leakage to understand how this fluctuates between winter and summer months.</p>
<p><b>Question three: Does any of the information we collect on a quarterly basis pose any unreasonable administrative burden on your company? If so, please explain.</b></p>		
Portsmouth Water	<p>No. We collect and report most data on a monthly basis internally.</p> <p>You will wish to consider the data collected for non-household complaints as of April 2017. In particular any complaint must be responded to by the retailer, irrespective of whether the issue relates to the retail service or the wholesale service.</p>	<p>We note that there is no additional administrative burden.</p> <p>We have identified that further consideration is needed with regards to how we collect information about business customers after April 2017 and have already entered into discussions with retailers.</p>
South West Water	<p>Providing information to CCWater on a quarterly basis is manageable and does not currently place an unreasonable administrative burden on the Company. However, the administrative burden could be eased through a more flexible approach to quarterly reporting where company performance</p>	<p>The difficulty that we have in collecting the quarterly information from other sources (such as the annual performance report) is that each company will have different definitions for the data. South West Water has indicated that their leakage data is on a calendar year,</p>

	timeframes are taken into consideration.	<p>rather than financial. This means that comparability across companies would be lost. After speaking separately with South West Water, we understand that our data requirements do not place an unreasonable administrative burden, and so to ensure that metrics can be compared, we would propose that they are still collected on our templates, following our definitions.</p> <p>We are open to the potential of using the Water UK dashboard as a data source once it is fully live.</p>
Thames Water	Collecting the data on a quarterly basis does not cause us an unreasonable administrative burden. CCWater will appreciate that our internal governance checks can occasionally cause pressure in certain areas of the business.	We note that there is no additional administrative burden and will continue to work with the company if internal governance checks cause pressure.
<p><b>Question four: Do you agree with the three broad categories of performance commitment information that we intend to monitor? If not, please explain.</b></p>		
Affinity Water	The categories of collections seem reasonable. The only concern is whether the measures are defined in the same way. Conclusions should not be drawn if the actual figures are not comparable.	<p>We agree and care will be taken where comparisons are made using the performance commitment information. We will only make comparisons where the information is like for like, namely:</p> <ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwats horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p>
Dŵr Cymru Welsh Water	Yes. However, to be able to compare performance of companies there needs to be consistency of reporting for all	We agree and care will be taken where comparisons are made using the performance commitment information.

	<p>companies, for instance do all companies measure ‘accurate billing’ and ‘consumer perception’ and if so, are they measured consistently?</p>	<p>We will only make comparisons where the information is like for like, namely:</p> <ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwats horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p>
<p>Portsmouth Water</p>	<p>We would need to understand in more detail what you mean by low pressure. There is a group of customers at risk of low pressure, largely due to geography which are well understood, but low pressure is also a potential consequence of a burst main. Where a burst main causes low pressure we will not have a precise record of the number of customers impacted and the individual losses in pressure given that these generally relate to short term unplanned works.</p> <p>Further we would be interested in understanding how you will monitor “accurate billing” and “customer perceptions”?</p> <p>Finally, please note that the water quality measures of contacts and compliance are recorded on a calendar year basis. Our preference would be that year to date data is reported relative to the relevant regulatory year.</p>	<p>As Portsmouth Water do not have a performance commitment relating to low pressure, we would not monitor this for the company. We are not proposing that you submit any more data than you currently do. For those companies that have a low pressure performance commitment, the definition is broadly similar to that of the old DG2 measure.</p> <p>Similarly, Portsmouth Water do not have a performance commitment relating to accurate billing, but the work that you are doing on the satisfaction survey would fall into the ‘customer perceptions’ category and therefore, we would monitor this.</p> <p>We will use the information from your annual performance reports to monitor this.</p>
<p>Severn Trent Water</p>	<p>Comparator Performance: agree in principle. Customer facing Performance: agree in principle.</p> <p>Query relating to High Reward information, as this will be included in Comparator Performance information.</p>	<p>We note that there will be some overlap between categories.</p>

	<p>Query whether this will be available and/or reliable particularly with reference to SIM.</p>	<p>We note Severn Trent Waters concerns that industry positioning with respect to SIM will not be available until all SIM data is published. We expect that this will be included in all company performance reports and available on 15<sup>th</sup> July annually.</p>
<p>Southern Water</p>	<p>We broadly agree with the three categories of performance commitment information.</p> <p>It is important to recognise that the high reward performance commitments have been developed as a result of clear feedback from customers and success against these commitments, and the subsequent reward to companies for achieving them, should be reported positively.</p> <p>For example, our customers told us improving bathing water quality is important to them. If we over perform against our targets we could receive a reward which customers agreed was appropriate. The full reward is only applied if we achieve a very ambitious target which is highly valued by our customers.</p>	<p>We are pleased that Southern Water broadly agrees with the approach and note the comments in relation to high reward performance commitments.</p>
<p>South East Water</p>	<p>We are comfortable with the three categories, and we welcome CCW's assurance that only information that is publicly available is proposed to be collected.</p> <p>Our support reflects CCW's overarching commitment to publishing information that is fit for comparative purposes, and assumes that any/all individual performance measures within these categories are already established within the industry, with agreed and unambiguous definitions.</p> <p>Information published by individual companies may not be comparable at an industry level, and we are unable to support the development of new (or existing) measures, due to the issue</p>	<p>To clarify, the performance commitments within these categories will vary between companies and not all companies will have commitments in all of the areas. Consequently, care will need to be taken where comparisons are made using the performance commitment information. We will only make comparisons where the information is like for like, namely:</p>

	<p>of overcrowding of reputational incentives as expressed within our covering letter.</p>	<ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwats horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p>
<p>South Staffs Water</p>	<p>The categories appear pragmatic. We believe that we have full coverage on the list items that are relevant to water only companies. We note that ‘complaint handling’ is also included in SIM so would appear to be double counting. We are also not sure what is meant by ‘accurate billing’ and how this will be measured.</p> <p>It would be worth ensuring that all the measures are defined, for example what are the comparative denominators for each measure that will be used to normalise the information?</p>	<p>We are only proposing to monitor ‘complaint handling’ performance commitments if companies have one over and above what is included in the SIM. Similarly as South Staffs Water do not have a performance commitment relating to ‘accurate billing’, we would not monitor this for the company. We are not proposing that you submit any more data than you currently do.</p> <p>We note the difficulties in comparing performance commitments and so care will be taken where comparisons are made using this information. We will only make comparisons where the information is like for like, namely:</p> <ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwats horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p>

<p>South West Water</p>	<p>Although we agree that these categories are representative of customer facing performance commitments, we do have concerns regarding the use of the term “comparator performance commitments”. In this context “comparative” can be a misleading term as, although many companies may have similar performance commitments, the methodologies by which performance is assessed and reported may be different.</p>	<p>We agree and care will be taken where comparisons are made using the performance commitment information. We will only make comparisons where the information is like for like, namely:</p> <ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwat's horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p>
<p>Thames Water</p>	<p>We believe it is reasonable to concentrate on priority areas for customers and where there are the largest customer impacts.</p> <p>We would welcome more clarity on some of the proposed categories of performance commitments, the topics within them and how they have been chosen. For example, we would like to understand the definitions of ‘accurate billing’, ‘water restrictions’ and ‘customer perceptions’ and how they would be measured in a standardised way.</p> <p>We would suggest that as well as performance commitments with large rewards, those with large penalties are also included, although many of these should be covered by the measures listed.</p> <p>As set out in our response to Question 2, we believe it is very important that the industry-wide data CCWater publishes are truly comparable.</p>	<p>We assessed the performance commitments and proposed that those which would have an impact on customers. These were categorised broadly into the areas outlined in the consultation. The definitions will be dependant on individual companies’ performance commitments. We are happy to share with Thames Water the performance commitments that we intend to monitor.</p> <p>We consider that this is only relevant where there would be a significant customer impact due to failure. If this is the case, the performance commitment would be included in the ‘customer facing’ category.</p>

**Question five: Do you agree with our proposal to gather information relating to performance commitments through Ofwat, information that is publically available, or through what companies intend to share with us, rather than being prescriptive in the format of reporting? If not, what would you propose?**

Affinity Water	Yes, we agree with the use of information collected through Ofwat and that this is made available for customers. We are uncertain as to exactly what you have in mind for other 'information that is publically available'. Again, we would be concerned as to whether this information is collected with consistent rigour and reported using consistent methodologies.	For clarity, 'information that is publically available' largely relates to information published by companies in their annual performance reports and would therefore be subject to companies own data assurance.
Portsmouth Water	Our preference would be that you use our annual ODI report, which this year was expanded to include some metrics that CCWater were specifically interested in through this report. The advantage of this approach is that all data is audited.	We would hope to discuss progress during the year at our Quarterly meetings (and at the CCG meetings).
Severn Trent Water	Preference is Ofwat PCs which are publically available on an annual basis through Ofwat. This is to ensure that the PC data is consistent with what is available in the public domain only.	For clarity, 'information that is publically available' largely relates to information published by companies in their annual performance reports and would therefore be subject to companies own data assurance.
Southern Water	<p>We agree CCWater should not seek additional information from companies and should not be prescriptive.</p> <p>We believe CCWater should only use audited and verified sources such as company annual reports or data from Ofwat to gather this information.</p> <p>We are open to the idea of discussing progress against performance commitments with CCW through quarterly meetings to keep them informed, and would be willing to explore how we incorporate this into our meeting programme.</p>	<p>We are pleased that Southern Water is supportive of the proposals.</p> <p>This is our intention.</p> <p>We welcome this and will be happy to discuss this further with the company at our next Quarterly meeting.</p>
South East Water	We are supportive of CCW's collecting information that is fit for comparative purposes, and is publically available. To be comparable, we would expect a measure to be established	As stated above, care will be taken where comparisons are made using the performance commitment information. We will only make comparisons where the

	<p>within the industry, with agreed and unambiguous definitions. The table included in section 4.2.2 includes a range of measures that do not meet that criterion, e.g. accurate billing, customer expectations, complaint handling.</p>	<p>information is like for like, namely:</p> <ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwat’s horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p>
Wessex Water	<p>We are happy for CCWater to gather information from publicly available sources be that company websites or Ofwat. We report on all of our performance commitments and our performance is challenged by the Wessex Water Partnership of which CCWater is a member.</p> <p>However there are a wide range of performance commitments across the industry agreed between companies and their customers and stakeholders. Companies will have different performance commitments in each of the sub-categories you list and companies may not have a performance commitment in each sub-category.</p> <p>We are, therefore, unclear how CCWater will be able to accurately compare companies without asking for additional reporting which we believe will add unnecessary regulatory burden.</p>	<p>We are pleased that Wessex Water is supportive of the proposals.</p> <p>We only propose to monitor a company’s performance against performance commitments in these areas if they have one. Where possible, we will make comparisons, but care will be taken where comparisons are made using the performance commitment information. We will only make comparisons where the information is like for like, namely:</p> <ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwats horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p>

Question six: Do you have any comments on our proposed approach to publishing information in relation to progress against performance commitments?		
Dŵr Cymru Welsh Water	<p>We support your approach and agree it is relevant to include links to Ofwat information. The information published for customers' needs to be "customer friendly" so that the message is clear for customers.</p> <p>We recognise that you are not proposing to collect any more information than is currently being gathered and that a key objective is not to increase the administrative burden. On this basis, we are comfortable with the measures you have suggested but if at some time in the future you contemplate undertaking a review of the comparative measures, an area which may be considered suitable for inclusion in any suite, is assistance offered to vulnerable customers.</p>	<p>We are pleased that Dŵr Cymru Welsh Water is supportive of the proposals.</p> <p>Any amendments to the information that we collect will be made in consultation with companies.</p>
Severn Trent Water	<p>Our preference is as stated in our response to question 5.</p> <p>With our PCs reported externally, there is a post year end dependency on our internal and external assurance sign-offs and board approval.</p> <p>Therefore, for clarity, published once approved by our Regulatory auditors and once submitted to OfWat.</p>	<p>It is our intention that any information relating to progress made against performance commitments will be sourced either from Ofwat publications, or companies own annual performance report.</p>
Southern Water	<p>We agree CCWater should not duplicate information Ofwat publishes on performance commitments. We would be keen to understand how performance commitments will be used in the Delving into Water report.</p> <p>We agree that if CCWater does reference performance commitment information it should refer to sources such as the strategic dashboard as much as possible. When publishing comparative data against performance targets, CCWater should provide context by explaining that companies' targets are determined through working with their customers and can differ</p>	<p>In terms of using performance commitment information in the Delving into Water report, we may suggest that a company has performed poorly in comparison to others, but has met their performance commitment in that area, or visa versa.</p> <p>We note your comments.</p>

	<p>as a result. This will help customers understand the difference in performance levels and targets between companies.</p> <p>We welcome CCWater’s approach to notifying companies and Ofwat if it identifies a specific area it wishes to investigate and would welcome a transparent process or set of criteria that will be used to make such a decision.</p> <p>It is important that in such circumstances, the company, Ofwat and CCWater work collaboratively to determine if there is an issue to be addressed and, if so, how best to address it.</p>	
<p>South East Water</p>	<p>CCW’s reporting and comparison of company performance has played an important role in the improving level of services being delivered to customers across the industry.</p> <p>We are supportive of the proposed developments in CCW’s reporting, but would caution that it does not undermine the clarity of reporting already developed by companies through engagement with their customers and stakeholders.</p> <p>When designing the report CCW should consider two factors not considered in the proposal.</p> <p>Firstly, that published data inevitably acts as a reputational incentive and having too many reputational incentives by the addition of ones not included within companies own plans inevitably weakens the strength of all the reputational incentives due to information crowding. We say this from a position of having over 20 water supply PCs the highest for in the industry. This reduction in the incentive power of having too many measures drives our reluctance to support the addition of new ones rather than any concern about the increase to the regulatory burden.</p>	<p>We are pleased that South East Water is supportive of the proposals.</p> <p>Any benchmarking we might do is likely to be limited and will focus on the things that matter to customers. We will try to ensure that we don’t add to the already extensive list of South East’s reputational incentives.</p> <p>At present, the Water UK dashboard sources a lot of its information from data provided from CCWater. However, once the dashboard is fully live, we will take the opportunity to see if there is any way that we can use this to reduce the information that we ask of companies quarterly.</p>

	<p>The second point relates to the WaterUK industry dashboard project. Much of the data proposed will form part of the dashboard and the current intention is the data shown in the dashboard will be refreshed regularly. Consideration should be given to the possible approach of using the dashboard to create the CCWater report rather than the data feeds the dashboard as proposed. This will ensure publicly available information has a consistent source and that the regulatory burden is minimised. We would prefer that the dashboard be used as the source for much of this information.</p> <p>It will also be important that companies are given the opportunity to explain the context of their relative performance and outline any specific issues that are relevant to their circumstances or any atypical events in the year that have affected performance.</p> <p>The CCW report should also include an appendix that provides a link to each company's annual performance report so that customers can find out more information, should they wish to.</p>	<p>We will continue to work with companies on any published reports, so that they can check the accuracy of the information.</p> <p>We will link to companies websites where applicable.</p>
<p>South Staffs Water</p>	<p>We are supportive of the overall approach, and we have historically found the CCWater publication to be useful and good for customers.</p> <p>We note however that the consultation does not discuss the timing of the report. With ODI reporting now being part of Ofwat's APR, which is published by companies in mid-July each year, it will be important to ensure that CCWater's publication is timed so that it can collect the data it needs from these sources. In our case the final end of year data would not be available any sooner due to the requirements to audit and obtain Board sign off. For the same reason we would also not be able to provide final end of year data on CCWater's quarterly template until this date.</p>	<p>We can confirm that the timings of the quarterly submissions will not change i.e. one month after the end of the quarter the report relates to. We understand that we will not receive end of year AUDITED data until July. Delving into Water will be published in November. We are currently in discussion with Ofwat about the most appropriate time to publish any comparative information in relation to performance commitments.</p>

<p>South West Water</p>	<p>We agree that CCWater should not be duplicating the information published by Ofwat. We also support the proposed approach to reference performance commitment information via links to Ofwat, company or strategic dashboard websites.</p> <p>Our customers have told us that they would welcome comparative data to help assess our performance, particularly in terms of value for money where they have difficulty determining what other services they could compare water/wastewater services with. However, for comparative information to be of value to customers it must not be misleading or ambiguous. Therefore, when referencing performance commitment information in the <i>Delving into Water</i> report or other customer focussed publications, care should be taken to avoid creating undue confusion for customers in instances where companies' performance commitments are similar, but reported or measured differently - failing to provide detailed explanation of those differences may result in such information being of little value to customers.</p> <p>Where companies have performance commitments which are reported and measured in the same way, different starting points and targets for the period should be recognised. Providing information on those performance commitments in absolute terms may also lead to confusion for customers. Therefore, we suggest reporting information on company progress against its performance commitments may be more appropriately expressed in terms of variance to target or glide path.</p> <p>Where a company's performance commitment is to reach a target by the end of the period, CCWater should avoid making assumptions or judgements around how the company chooses to glide path to target where this information is not provided in the price control determination.</p>	<p>We agree, and care will be taken where comparisons are made using the performance commitment information. We will only make comparisons where the information is like for like, namely:</p> <ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwats horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p> <p>In our <i>Delving into Water</i> report we will show leakage on a litres per property per day basis to provide a degree of comparability.</p>
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To demonstrate some of the issues involved, the table below shows performance commitments in relation to leakage for five companies.

Company	Performance Commitment	Measurement
South West	Flat annual target across the period of 84ML/d	Annually - calendar year
Bournemouth	Target to reach 20ML/d by March 2020 - no set glide path	Annual review of progress towards March 2020 target
Anglian	Three-year average of 192ML/d across period	Three-year average assessed annually
Northumbrian	139ML/d 2015-16 137ML/d each remaining year of period	Assessed on company's regulatory year reporting
Severn Trent	444ML/d 2015-16, 439ML/d 2016-17, 434ML/d 2017-18, 429ML/d 2018-19, 424ML/d 2019-20	annually

Not only do these companies have different starting points, targets, glide paths and reporting requirements, but leakage is expressed in absolute terms and not in relation to the size of the network and is therefore not helpful for customers trying to compare the performance of their WaSC or WoC against others.

Thames Water

We agree with the proposal to not publish the same information as Ofwat and to link to the Ofwat website where appropriate.

In light of the points we have raised above about comparability of data and the company-specific nature of the performance commitments, we would welcome more clarity on the information CCWater intends to publish about progress against performance commitments.

Care will be taken where comparisons are made using the performance commitment information. We will only make comparisons where the information is like for like, namely:

	<p>We would also welcome more information on the analysis CCWater intends to carry out and if it intends to publish the results. We would welcome the opportunity to discuss progress against our performance commitments and to brief CCWater on the discussions with our Customer Challenge Group regarding this topic.</p>	<ul style="list-style-type: none"> <li>• The data that we collect from the quarterly returns; and</li> <li>• PCs that have the same definitions (i.e. those that were subject to Ofwats horizontal review.</li> </ul> <p>We may also be able to make broad comparisons e.g. all companies have a performance commitment relating to leakage, and xx companies have met their targets.</p> <p>We will work with companies in relation to any future publications relating to performance commitments.</p>
Wessex Water	<p>Company challenge groups monitor company performance and challenge the company accordingly. As CCWater sit on all company challenge groups we feel this would be the most appropriate vehicle to raise any concerns about performance against agreed performance commitments as opposed to CCWater investigating independently.</p> <p>We have no objection to CCWater referencing performance commitments in the Delving into water report via links to the Ofwat, company or strategic dashboard websites.</p>	<p>How and when companies chose to share additional information about their progress against performance commitments is an issue which will need to be discussed and agreed locally. However, we would stress that CCWater and the company meet more frequently than the CCG. Our company meetings can be more directed to any issues that arise, whereas CCG agendas can sometimes be very busy.</p>
<b>Additional Comments</b>		
Affinity Water	<p>We are happy with the information you collect on a quarterly basis. We see this as being informative to CCWater in their monitoring of individual companies on behalf of customers and are happy that the information is used in discussions with the company at quarterly forums.</p> <p>We do have concerns about your desire to publish comparative</p>	<p>We are pleased that Affinity Water is supportive of the proposals.</p> <p>We note the concerns about publishing comparative</p>

	<p>information on companies; the concern being whether the information is truly comparative. The performance measures agreed individually by companies with Ofwat at PR14 are in general highly specific to that company. Even where it may appear two companies have an identical measure, there may be important differences in how the relevant numbers are calculated.</p> <p>With the June Return Ofwat worked hard to achieve information that was comparable across companies through:</p> <ul style="list-style-type: none"> <li>• Detailed formal guidance, updated and reissued each year;</li> <li>• Audits against the guidance by Ofwat approved Reporters;</li> <li>• Company commentaries scrutinised by Ofwat;</li> <li>• A query process that allowed companies/reporters to seek clarification on the guidance.</li> </ul> <p>As CCWater will be aware, the above arrangements have not been in place since 2011. Currently only the Service Incentive Mechanism has been subject to updated detailed guidance. Even with subjects that were as well defined as DG3 supply interruptions, companies may have deviated from the 2011 guidance, particularly with the introduction of company specific performance commitments at PR14.</p> <p>In summary, we are less concerned with exactly what metrics are to be reported, rather that the measures have detailed and comprehensive guidance on how they are to be calculated.</p>	<p>information about performance commitments and our responses is covered question four.</p>
<p>Severn Trent Water</p>	<p>There is a need to discuss customer related measures (other than SIM components) and our Wholesale PCs (other than those already reported quarterly).</p>	<p>Severn Trent has confirmed that this comment relates to the introduction of new measures. It is not our intention to add to existing data requirements. Should this transpire in future, we will consult with companies.</p>

	<p>We have a concern over the Comparator PCs as there are differences across the companies relating to definitions and methodologies. There is no scope to alter or amend our PC designs and methodologies to provide industry wide comparators. This has the potential to lead to mis-information and unwarranted challenge by our key stakeholders.</p> <p>Our response is in relation to Retail Household only as Non Household is subject to market reform in 2017.</p>	<p>We are not proposing that companies should alter or amend their performance commitments or definitions. Where possible, it is likely that only broad comparisons will be able to be made.</p> <p>We have identified that further consideration is needed with regards to how we collect information about business customers after April 2017 and have already entered into discussions with retailers.</p>
Southern Water	<p>Transparency and openness are crucial to maintaining the legitimacy of the water sector. Customers are at the heart of companies' decision making and their views have shaped the performance commitments the companies have made. It is important customers can see how companies perform against their promises.</p> <p>We recognise the need for comparative data on common performance measures to be available for customers, but it is also important to recognise that different companies have very different performance commitments, based on what is important to their customers. The way these are reported and compared needs to be well thought through and it is vital it reflects the differences in priorities of customers served by different companies.</p> <p>We believe CCWater could add value to the data by sharing knowledge and best practice across the industry. Eleven water companies have entered a data sharing agreement on certain customer service metrics. CCWater could share the data it collects quarterly with all water companies to encourage comparison and highlight areas of potential collaboration to improve services for all our customers.</p>	<p>Where possible, it is likely that only broad comparisons will be able to be made in relation to performance commitments. This is where the information that we collect from companies quarterly is important, as it provides comparative information i.e. common definitions are used by all companies.</p> <p>Many companies have indicated that they would be unwilling for unaudited data to be placed in the public domain, and we made a commitment to companies that we would not do this. However, this may be something that can be agreed regionally with other companies.</p>