

The Consumer Council for Water's Forward Work Programme 2017-20

Comments received on the draft Forward Work Programme that was issued for consultation in November 2016. The tables below note the views of those who responded to the consultation and CCWater's explanation or action resulting from those comments.

Overall, respondents were supportive of our programme and work plans. Specific overall themes were:

- What monitoring CCWater would be doing on the new non-household market, including on linkage between wholesalers and retailers;
- How Delving into Water would look now Discover Water was 'live';
- Our plans if household competition went ahead;
- The importance of CCWater being on company's customer challenge groups;
- Supporting work with vulnerable consumers and sharing of good practice;
- How social media contacts would be considered as we looked at customer contacts to the companies.

Links to respondents below:

1. [Anglian Water](#)
2. [Bristol Water](#)
3. [House Builders Federation](#)
4. [MOSL](#)
5. [Natural Resources Wales](#)
6. [Northumbrian Water](#)
7. [Ofwat](#)
8. [Portsmouth Water](#)
9. [Severn Trent](#)
10. [Severn Trent Connect](#)
11. [South East Water](#)
12. [Southern Water](#)
13. [South Staffordshire Water](#)
14. [South West Water](#)
15. [Thames Water](#)
16. [The Water Bureau Limited](#)
17. [UNISON](#)
18. [United Utilities](#)
19. [Utilities Intermediaries Association](#)
20. [WaterPlus](#)
21. [Welsh Water](#)
22. [Wessex Water](#)

	Date received	Stakeholder	Comments Made	CCWater Response
1	28/12/16	Anglia Water	<p>Your listed key priorities are consistent with your focus to date.</p> <p>CCGs: We firmly agree on the proposed activities and appreciate the support you are providing as a key member of our consumer challenge group. Your challenge of our rationale, methodologies and thinking will be invaluable as we develop our customer engagement strategies and subsequent business plan.</p> <p>New market in England: As new retailers enter the non household market we would welcome the opportunity to provide any assistance we can in order to help create a meaningful and comparable suite of service measures.</p> <p>We also welcome your support for the sharing of emergency contact details from retailers to wholesalers, ensuring operational incidents are managed effectively and service to the non household customer is not adversely affected.</p> <p>Resilience: Your thoughts on resilience are welcomed, we believe the comments you have made to be relevant. This is a topic where we would</p>	<p>We are pleased to note the positive comments.</p> <p>CCWater offered in its introduction letter to retailers that it would work with retailers to help create a good customer service-oriented market.</p> <p>We would also expect that Ofwat will be involved in driving market monitoring and may be more likely to create a comparable suite of service measures. Our monitoring will revolve around complaints initially, and evolve as necessary. We issued a consultation on our plans in February 2017.</p> <p>CCWater has been vocal about its concerns that customers may be at risk where operational problems require coordination between retailers and wholesalers. We have pressed MOSL to organise more testing of operational issue scenarios ahead of opening. We would be supportive of the idea of collaborative sharing of any information that prevents customer detriment. To be clear about our plans, we have added the following to the FWP: <i>We will maintain a dialogue with retailers so customers' issues can be resolved.</i></p>

		<p>certainly welcome your contribution and role in engaging with all parties.</p> <p>We expect you will hold both ourselves and Ofwat accountable for resilience, and look forward to working with you as we continue to develop our plans.</p>	<p>We expect to as well, and to make this clearer we have made a change to the Future Consumers section. We have changed the language to ‘hold accountable’ when we outline our priorities when companies and Ofwat consider future consumers.</p>
		<p>Comparable Information: Improving the information available to our customers remains vital in enhancing their perception of not only us but the industry as whole. Discover Water will hopefully become a much used source of data for our customers. To ensure the information available does not become confusing we are happy to continue working with you, ensuring it is reported accurately and on a like for like basis.</p>	<p>We agree that information available to customers should be clear and we will continue to work with the industry to ensure that all published information is reported accurately.</p> <p>Our reports provide the insight, analysis and commentary that customers and the industry cannot get from the Discover Water website alone. We plan to restructure our annual reporting to produce a suite of focussed reports that provide a more rounded picture of company performance in the past year, customers' views of that performance (through research and complaints), and a forward look at what may be required over the longer term.</p>
		<p>Your listed key priorities are consistent with your focus to date.</p>	

	Date Received	Stakeholder	Comments Made	CCWater Response
2	04/01/17	The Water Bureau Limited	<p>As an author of UKWIR's Wastewater Education Strategy project report, I have looked at the Forward Work Programme from the perspective of how customer behaviour change can be achieved concerning sewer misuse.</p> <p>I am very encouraged to see that your document makes specific mention of CCW working with the water industry to ensure there is consistent messaging for consumers about company and consumer responsibilities, and specific mention of working with the 21st Century Drainage Programmes Board and its Sewer Misuse sub-group. It is also very encouraging to see it stated that CCW supports the water industry's position on 'flushable' products and its FOG campaigns.</p> <p>Our work emphasised the need for the water industry to put out consistent national messages e.g. on the 3Ps (pee, poo, paper) and what not to flush, including promoting use of the do not flush logo by manufacturers and retailers.</p> <p>I think the wording in the Forward Work Programme adequately covers CCWs engagement with the issues.</p> <p>Perhaps you could add a reference to the International Flushability Statement to your sentence about supporting the water industry position. I know Rachel Dyson who chairs the Water UK SNAP Group is keen to get it widely known.</p>	<p>We have retained the references and added an International Flushability Statement reference.</p> <p>Noted - we will continue to support the industry's campaign on 'flushable' products and promote messages on the 3ps.</p> <p>We have added the reference to the fact that we are signed up to the International Flushability Statement</p>

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3	04/01/17	Portsmouth Water	<p>Thank you for inviting comments on your draft programme for 2017-2020. The document is very comprehensive and we generally support your programme and believe it addresses your goals on the major issues.</p> <p>We do, however, have two observations</p> <p>There is little direct reference to Ofwat's consultation on ODI's. I realise that this was probably published too late for your Draft programme, but there were significant elements in this consultation which will probably require much input from CCW. Whilst the table showing the timetable for delivering for Priority 1 refers to the Ofwat methodology, there is nothing in text preceding it. I would expect CCW to specifically refer to influencing Ofwat's proposals for ODI's, changes to rewards and penalties and development of the SIM. In relation to the proposals for rewards and penalties, CCW's views are of great importance given its research in the last price review which suggested that customers do not understand the need for rewards. Although there is a reference to developing the SIM on page 26 under Priority 3, I suggest that this is given more prominence under Priority 1. The ultimate mechanism will be the key measure of customer service and it is important we get it right.</p> <p>We note that a small increase in fees is required in 2017 and 2018 to accommodate work on the Price Review. It would be helpful to have a commitment on fees for the following year where the price review work is more or less completed.</p>	<p>As you suggest, we have added the following information on this:</p> <p><i>We will also work with Ofwat to help ensure that its detailed methodology for the price review can deliver the best outcomes for consumers. This will include how companies' performance commitments for 2020-25 and any incentives to drive their delivery are based on sound evidence of consumers' priorities and have evidence of consumer support.</i></p> <p>As CCWater is funded by consumers via the licence fee, we always strive to minimise our costs. Following five years of maintaining our licence fee, absorbing inflationary and other cost pressures through savings, we have had to increase our fee in 2017-18 and 2018-19 to deal with the workload associated with non-household retail competition and the price review. In future years, we will strive to maintain the 2018-19 fee for as long as possible, although we can't give guarantees as it depends on the nature of the cost pressures we might face from market opening or possibly the introduction of household competition.</p>

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4	5/1/17	Severn Trent Connect	We have reviewed the draft forward work programme and are fully supportive of your plan. As a general observation we would ask that CCW give due consideration, where applicable, to the impact on NAVs of any new proposals generated from your work programme.	Our work considers the implications for consumers of NAVs. This work-area is lead by a Policy Manager. We have included a reference to NAVs in the final version of the FWP.

	Date Received	Stakeholder	Comments Made	CCWater Response
5	6/1/17	Bristol Water	<p>Thank you for the invitation to comment on your forward work programme. We understand why you have chosen the five key strands to focus your work on over the next 3 years. We do not believe there is anything of significance missing and agree with the majority of the content.</p> <p>Speaking up for and informing household and business consumers</p> <ul style="list-style-type: none"> ▫ The contribution to the CCG is valuable and we are pleased it continues to be a priority. ▫ It is positive that you are planning to continue to help raise awareness to business customers of the retail market changes and that you are planning to help add protection to the different risks associated with this change. ▫ It would be good to understand what your role will be between the retailer and the wholesaler, as the retailer becomes the wholesaler's customer, specifically in relation to ADR. ▫ We would hope you would promote a balanced view on switching and be clear to the customers when it may or may not be better for them. ▫ It is positive that all sizes of businesses will be represented; we agree that the small business may be more vulnerable in this market. ▫ The Delving into Water report is useful to compare our performance and is often discussed with stakeholders. We feel there is an opportunity to engage with more customers on the report, possibly by refreshing the presentation to include more infographics and to be more balanced between positive and negative messages. It would be helpful if it was more in line with Discover Water. 	<p>No response required</p> <p>Noted.</p> <p>We will liaise with both wholesalers and retailers and are making changes to our TAP contact system to allow us to record complaints in a way that can track if an issue has originated with a wholesaler. We believe that NHH customers should have access to an ADR scheme in the same way as all water companies' customers currently do.</p> <p>We have changed to text to talk about the pros and cons of switching rather than the benefits alone.</p> <p>We plan to restructure our annual reporting to produce a suite of focussed reports that provide a rounded picture of company performance in the past year, customers' views of that performance (through research and complaints), and a forward look at what may be required over the longer term.</p> <p>The reports can use infographics. We will</p>

				continue to work with companies whilst drafting the report to ensure that we balance the focus between both good and poorer performance. Companies will now report their data direct to Discover Water. We will feed in our consumer data from our Water Matters research and our annual Complaints Report.
			<p>Pressing for fair, value for money charges that are affordable in the long-term</p> <ul style="list-style-type: none"> ▫ We agree with your approach to the PR19 Price Review and agree that you are planning to place challenge in the appropriate areas. ▫ Consumer Protection, we agree with using the ‘moments of change’ approach to understanding customer needs regarding social tariffs and we think this can be expanded to metering; this is a process we already use. <p>Social Tariffs, we are fully committed to having a continuous review of our approach, uptake and offering of social tariffs. We have governance to support this approach and agree with your forward plan in this area and welcome any further support you can offer.</p> <ul style="list-style-type: none"> ▫ Fair charges, we understand the importance of discussing potential tariff increases with CCWater and thank you for the feedback you have provided in this area. This is especially important during any period of high inflation and therefore agree that this should continue to be a key focus. 	<p>We have included metering in the section on social tariffs as help for some consumers during points of change in their life.</p> <p>Noted.</p> <p>Our Chair has added a reference to high inflation in his introduction.</p>
			<p>Encourage water companies to provide services that are easy to access, right first time and sort out problems quickly and without hassle.</p> <ul style="list-style-type: none"> ▫ We have found the approach to complaint performance supportive and constructive over the last 12 months. The plans in this document outline a similar approach going forward which we support. 	Noted.
			<p>A resilient, sustainable, good quality water supply for now and in the future that consumers value and use wisely.</p> <ul style="list-style-type: none"> ▫ The forward plans cover all areas that seem appropriate for 	Noted.

			<p>CCWater to provide challenge on in this area and look forward to discussing the issues with CCWater over the next few months.</p> <p>Speaking up for and informing household and business consumers</p> <ul style="list-style-type: none"> ▫ The contribution to the CCG is valuable and we are pleased it continues to be a priority. ▫ It is positive that you are planning to continue to help raise awareness to business customers of the retail market changes and that you are planning to help add protection to the different risks associated with this change. ▫ It would be good to understand what your role will be between the retailer and the wholesaler, as the retailer becomes the wholesaler’s customer, specifically in relation to ADR. ▫ We would hope you would promote a balanced view on switching and be clear to the customers when it may or may not be better for them. ▫ It is positive that all sizes of businesses will be represented; we agree that the small business may be more vulnerable in this market. ▫ The Delving into Water report is useful to compare our performance and is often discussed with stakeholders. We feel there is an opportunity to engage with more customers on the report, possibly by refreshing the presentation to include more infographics and to be more balanced between positive and negative messages. It would be helpful if it was more in line with Discover Water. 	<p>Noted.</p> <p>We will liaise with both wholesalers and retailers and are making changes to our TAP contact system to allow us to record complaints in a way that can track if an issue has originated with a wholesaler. We believe that NHH customers should have access to an ADR scheme in the same way as all water companies’ customers currently do.</p> <p>We have changed to text to talk about the pros and cons of switching rather than the benefits alone.</p> <p>We plan to restructure our annual reporting to produce a suite of focussed reports that provide a rounded picture of company performance in the past year, customers' views of that performance (through research and complaints), and a forward look at what may be required over the longer term.</p> <p>The reports can use infographics. We will continue to work with companies whilst drafting the report to ensure that we balance the focus between both good and poorer performance. Companies will now report their data direct to Discover Water. We will feed in our consumer data from our Water Matters research and our annual Complaints Report.</p>
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	Date Received	Stakeholder	Comments Made	CCWater Response
6	9/1/17	UIA Utilities Intermediaries Association	<p>The CCWater forward plan has been perused by me on behalf of the UIA and seems to cover many of the issues already identified, so thank you for the prompt to consider what would be the key issue that is on our minds.</p> <p>While the opening of the NHH market is almost upon us, and CCWater I am pleased to see in the Draft make much of standing up for the customer, it will be the activities of Retailers and others in the market over the use / misuse of data which will be fundamental to the customer experience.</p> <p>As in the energy Industry, the water industry has accepted that data obtained is the Suppliers, Retailers or Wholesalers.</p> <p>From the mid 80's as markets opened the principle of data owned by the Supplier / Retailer was one that was accepted as being held by principled organisations and therefore managed for the benefit of the customer. The arguments from the Suppliers was that they paid to obtain it so they should own it.</p> <p>The argument, with hind sight, was fallen for. Well, the customer pays all costs so it was in fact the customer who was paying not the Supplier.</p> <p>As time has gone on, the value of data has been recognised by those who would make money from the purchasing and forwarding data to others for their miss use. It is rife and the customer is suffering. I guess everyone in CCWater can tell you a tale of hassle and cold calling.</p> <p>Every day complaints of miss use of data abound and many end in court.</p> <p>The legal 'owner' is not the customer who has every interest in ensuring only those who they wish should have access. It has</p>	<p>Noted.</p> <p>We are aware of the risks of the misuse of data in the market and will monitor the market for evidence of this and take action if necessary.</p> <p>As the retail market opens in England we will develop further our business customer work to inform them about which retailer is getting the least complaints, highlight the pros and cons of switching or re-negotiating, track consumer awareness; and protect customers who have been let down by service failure, such as the misuse of data or if their retailer closes.</p>

		<p>moved to the legal 'owner' being those who have no interest in retaining data for quality purposes in the customers' interest.</p> <p>While the ownership has been determined in the water industry it is not too late to overturn that principle and let change start with the water industry who can make a stand for returning ownership to the one who has the key interest, the consumer / customer.</p> <p>While it is the NHH market that opens in April, I have no doubt the Household market will be next. Bringing clarity to this issue of ownership and placing it back with the consumer now will be so helpful in serving the domestic consumer in the future.</p> <p>With CCWater lobbying to make a difference regarding data ownership the pressure would then be across all industries for the ownership to be placed where it should be with the customer / consumer.</p> <p>As you will understand, for CCWater to not be able to change this situation and then having to deal with the significant fall out of disgruntled customers would be an unfortunate outcome.</p> <p>The UIA trust that CCWater will be able to give this every consideration and support through Ofwat to Defra and on to HMG.</p>	
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7	10/1/2017	Southern Water	<p>Introduction Southern Water welcomes the opportunity to comment on Consumer Council for Water’s (CCW) draft forward work programme. We also appreciate CCW’s continued collaborative and consultative approach and hope to continue to build on our strong working relationship.</p> <p>In our response to CCW’s consultation on its forward work programme for 2016 - 2019 we said we felt CCW “has an important role to play” in “sharing learning and best practice”. We recognise the work CCW has done in this area - including publication of our joint research into the customer experience of metering - and encourage this to continue.</p> <p>Continued collaboration and sharing of best-practice and insight will be essential for both CCW and the water industry to achieve their objectives at a time when the sector is facing challenges from changing regulations and uncertainty over the direction of future government policy. This collaboration should extend beyond the water industry to other sectors such as energy providers - particularly related to supporting customers in vulnerable circumstances.</p> <p>Also, as mentioned in our response to the previous forward work consultation and response to the consultation on using data collected from companies, we believe it is important CCW makes best use of its position to add value for consumers through its research programme and the information it collects.</p>	<p>We will continue to share good practice to help consumers’ benefit from the best ideas in the industry. We will also continue our cross-sector work with Essential Service Access Network (ESAN) and UK Regulators Network (UKRN) regarding supporting customers in vulnerable circumstances.</p>
			<p>Strategic priority 1 - Speaking up for and informing household and business consumers by providing a trustworthy, independent voice that informs consumers about key water issues and ensures Governments, the water industry and other stakeholders understand water consumers’ views</p> <p>We agree CCW hry important role to play in ensuring customers’ views are represented at a national level with regulators and government - particularly as work around PR19 intensifies. We also believe CCW has a role to play in supporting companies’</p>	<p>We want to play an active role and will support you from the consumer perspective during the WRMP and business plan processes.</p>

			<p>efforts to engage with customers as they develop their Business Plans and Water Resources Management Plans.</p> <p>CCW will have a vital role to play in supporting customers as the non-household retail market opens. We believe it is important CCW develops a way of measuring the performance of retailers operating in the non-household market to ensure customers can compare performance easily. This is critical in building consumers' trust in the market, which will encourage greater engagement, particularly in the early stages.</p> <p>CCW has taken an active role in the debate around the opening of the household market and we believe this should continue to ensure any future reforms in this area have consumers at the centre and adequate protections are put in place, particularly for vulnerable customers.</p> <p>In our response to CCW's previous forward work consultation we agreed there was "more CCW could do to increase its profile and reach". We welcome CCW's work over the last year to increase its public profile and have found working together on campaigns and projects to be very successful. We hope this profile-raising effort continues as this will undoubtedly help CCW achieve its aims.</p> <p>With the launch of the Discover Water website in 2016, comparative information on water company performance is much more accessible for customers so it will be important for CCW to ensure its reports on company performance are timely and add value to this. There is little to be gained in producing reports on performance that are already available and often contain more up-to-date information. This is likely to cause confusion for customers, so consideration needs to be given to how its reports build on available data and add value for consumers.</p>	<p>We have amended our FWP text as we will be monitoring the performance of retailers through our annual complaints report and are making changes to our TAP system to allow this to be done more easily. We also consulted on our monitoring plans in late February 2017.</p> <p>We have added a specific reference to vulnerable consumers in the household competition section.</p> <p>Noted - we will continue to raise our profile at a national level and also locally with a specific focus on stakeholder engagement and increased media and social media activity.</p> <p>Our reports provide the insight, analysis and commentary that customers and the industry cannot get from the Discover Water website alone. We plan to restructure our annual reporting to produce a suite of focussed reports that provide a rounded picture of company performance in the past year, customers' views of that performance (through research and complaints), and a forward look at what may be required over the longer term.</p>
			<p>Strategic priority 2 - Pressing for fair, value for money charges that are affordable in the long term.</p> <p>We agree ensuring bills remain affordable for customers is an incredibly important issue, and welcome the work CCW, Ofwat and others have done in this area. Their reports and research are</p>	<p>We have noted your comments.</p>

			<p>invaluable in helping us to shape our approach. As companies develop their business plans for PR19, balancing affordability with the investment needed to ensure long-term resilience of our service will be a major part of the process and we will welcome CCW's engagement in this area.</p> <p>We have expanded our work to reach more customers with affordability support over the last few years - including almost doubling the number of customers signed up to our social tariff in the first six months of this financial year. We include affordability support and information in many of our other programmes including our water efficiency and fat, oil and grease education campaigns. In addition, when we visit a customer to help identify a leak our engineers are trained to look for signs of vulnerability and offer information about the support and assistance we offer.</p> <p>CCW's intention to match in England the approach taken in Wales of ensuring advice agencies have easy, clear access to information about the support water companies offer is welcome. Using recognised, trusted partners to share messages and information will hopefully reach customers that are otherwise difficult to, and make them aware of assistance they could be entitled to. This is similar to the successful approach taken by our community engagement team. They use local networks of advice organisations to identify where information and assistance would be best targeted and work alongside them to reach as many customers as possible.</p>	<p>We have noted your comments.</p>
			<p>We share CCW's concerns about protecting customers in vulnerable circumstances if household competition is introduced. In our response to Ofwat's emerging findings into household competition we warned it could lead to the unravelling of cross-subsidies and said "customers with the least ability to pay are likely to be disadvantaged" by this unwinding.</p> <p>We feel it is important CCW retains its position on company CCG's and is represented in other key stakeholder engagement ahead of PR19.</p>	<p>We have expanded on our intentions in Section 4.</p> <p>Noted and agree.</p> <p>The FWP highlights that we will continue to work with companies on the implementation, improvement and promotion of social tariffs. This includes getting companies to share good practice.</p>

			<p>It's important to recognise the link between CCW's second and third strategic priorities. While many customers may be struggling to pay their bills or need additional support accessing services, many customers in vulnerable circumstances will fit both criteria. The point is expanded on below, but CCW could consider work to align companies' affordability criteria and encouraging data sharing which would help improve companies' ability to support their most vulnerable customers.</p>	<p>We added: <i>We will also support work to secure greater data sharing where that would enable companies to more effectively target support to consumers.</i></p> <p>We already said on the table in this section that we will: <i>Press, where appropriate, for data to be shared to help identify people who will benefit from assistance.</i></p> <p>We continue to support work by the Industry to identify opportunities for greater data sharing where this would be appropriate and benefit customers.</p>
			<p>Strategic priority 3 - Water companies provide services that are easy to access, right first time and sort out problems and complaints quickly and without hassle.</p> <p>The work CCW does to improve service standards across the industry is critical in maintaining the sector's legitimacy. As with other aspects mentioned above, this role will be essential in ensuring the non-household market, and possible household retail competition, are successful.</p> <p>While it is necessary to pressure companies who are underperforming, CCW is in a unique position to share industry-wide best practice for the collective benefit of all customers. We believe CCW can, and does, add value by continuing to share and promote best practice across the industry. We are committed to working closely with CCW to continue to improve our customer services and welcome its insight. We look forward to future collaboration and are happy to share examples of best practice with CCW and industry colleagues.</p>	<p>We will be closely monitoring the performance of the non-household market from the complaints we receive. Any concerns will be raised with stakeholders. We have added text to this effect.</p> <p>Noted.</p>
			<p>We agree CCW has an important role to play in co-ordinating and driving standardisation across the industry around offering assistance to customers who find themselves in vulnerable circumstances. The industry is working with other utilities to develop consistent approaches to vulnerability - CCW could</p>	<p>Our recent review of special assistance offered in the water industry highlighted inconsistencies within the industry. Our report, including our observations and recommendations, can be found on our website</p>

			<p>facilitate co-ordination both within the water industry and with other sectors - such as energy providers - who face similar challenges.</p> <p>Work within the industry could include exploring companies' appetites for aligning their priority service registers and sharing data - including priority service registers - which would allow a more consistent approach to identifying and supporting customers in vulnerable circumstances.</p>	<p>here.</p> <p>We very much agree that a more consistent approach is necessary to help increase awareness and help consumers and/or their representatives easily identify and access the additional help available.</p> <p>UKRN is taking the lead regarding cross-sector information exchange and distribution and further details of this can be found on its website here.</p>
			<p>Strategic priority 4 - A resilient, sustainable, good quality water supply for now and in the future that consumers value and use, and Strategic Priority 5 - A sustainable, resilient sewerage service that works now and in the future and is used responsibly by consumers.</p> <p>Improving and increasing the resilience of our water and wastewater services is fundamental to our current investment programme and planning for PR19 and beyond.</p> <p>Partnership working and sharing best practice and experiences will be crucial to ensure the services we provide are resilient against the challenges of the future. We hope CCW continues to make good use of its unique position to share knowledge and insight.</p> <p>The planned customer research into intergenerational issues and trade-offs will be particularly useful for companies.</p> <p>CCW can play an important role in supporting companies' customer education programmes - in their development, refinement and delivery. We appreciate CCW's support for sharing companies' messaging on social media and hope this will continue.</p> <p>As above, we are happy to share our experiences of compulsory metering to help make the process successful for industry colleagues. We are grateful for CCW's collaboration on research into customers' experience of compulsory metering and hope companies, consumer groups and others find it useful.</p> <p>It is vital the interdependencies between water services, wastewater services and other sectors are recognised and</p>	<p>Noted.</p> <p>We have amended that plan, and have commissioned a consultancy to consider intergenerational equity.</p> <p>We plan to increase our messaging on social media and plan to continue sharing company messages that are useful for consumers.</p> <p>It was a useful piece of research.</p>

			<p>reflected in CCW's work and priorities. Reports such as the National Flood Resilience Review and the work of the National Infrastructure Commission emphasise the importance of addressing resilience challenges holistically - this should be reflected across the sector and in CCW's strategic aims. If not already planning to, it is important CCW considers involvement with the national infrastructure council / forum, proposed by government in the National Flood Resilience Review.</p>	<p>We will consider involvement with the council forum.</p>
			<p>CCW's research priorities CCW's research programme is of great value to the sector and we support its continuation. Southern Water and CCW have undertaken collaborative research on a number of occasions and would welcome the opportunity to do so again in the coming year. To this end, we would welcome the opportunity to contribute to the development of CCW's research priorities and would be happy to provide any useful insight. As an incumbent company exiting the non-household retail market, we would be willing to share our experience for CCW's research into businesses' experience.</p> <p>We would welcome research into the efficacy of additional, customer service measures to help companies improve their services - such as the Net Promoter Score, NetEasy score or first contact resolution. CCW could also consider in-depth research into customers who had contacted water companies, aligning closer with Ofwat's SIM scoring. Both the above would add greater depth to CCW's research, allowing companies to better understand how to improve. As Ofwat looks to refresh the SIM, we hope CCW uses its customer research and experience to support this.</p> <p>As mentioned above, the research into intergenerational issues will be particularly interesting and useful for PR19 planning, as will the research into new methods for testing customers' willingness to pay. Possibly as part of the planned research into customers' attitudes towards willingness to pay or intergenerational fairness, it would be useful to understand customers' knowledge of the water industry's responsibilities and</p>	<p>CCWater's proposed research programme is circulated to companies and is outlined within the final FWP and our Operational Business Plan for 2017-18. We will continue to look for opportunities to work with the industry.</p> <p>We would be happy to discuss these ideas in further detail with Southern Water.</p> <p>Our proposed research on WTP and trade-offs is not likely to consider customers' knowledge of responsibilities. However, there is already evidence that shows customers have low awareness of this. We are also considering what further work we can do in terms of water restrictions, which would build on our 2012</p>

		<p>the impact - both to customers and society - of drought restrictions.</p> <p>It is important the research undertaken is used by organisations outside of the water industry. It is encouraging to see CCW's research being cited in studies such as the National Infrastructure Commission's recent report into the impact of population changes on infrastructure demand. CCW should work to ensure elements of its research programme feed into the work of other bodies, such as the NIC, to share as much insight as possible.</p>	<p>research.</p> <p>We will continue to promote the use of our research by other stakeholders.</p>
		<p>Strategic priority 1 - Speaking up for and informing household and business consumers by providing a trustworthy, independent voice that informs consumers about key water issues and ensures Governments, the water industry and other stakeholders understand water consumers' views</p> <p>We agree CCW has an important role to play in ensuring customers' views are represented at a national level with regulators and government - particularly as work around PR19 intensifies. We also believe CCW has a role to play in supporting companies' efforts to engage with customers as they develop their Business Plans and Water Resources Management Plans.</p> <p>CCW will have a vital role to play in supporting customers as the non-household retail market opens. We believe it is important CCW develops a way of measuring the performance of retailers operating in the non-household market to ensure customers can compare performance easily. This is critical in building consumers' trust in the market, which will encourage greater engagement, particularly in the early stages.</p> <p>CCW has taken an active role in the debate around the opening of the household market and we believe this should continue to ensure any future reforms in this area have consumers at the centre and adequate protections are put in place, particularly for vulnerable customers.</p> <p>In our response to CCW's previous forward work consultation we agreed there was "more CCW could do to increase its profile and</p>	<p>We want to play an active role and will support you from the consumer perspective during the WRMP and business plan processes.</p> <p>We have amended our FWP text as we will be monitoring the performance of retailers through our annual complaints report and are making changes to our TAP system to allow this to be done more easily. We also consulted on our monitoring plans in late February 2017.</p> <p>We have added a specific reference to vulnerable consumers in the household competition section.</p> <p>Noted - we will continue to raise our profile at a national level and also locally with a specific</p>

			<p>reach". We welcome CCW's work over the last year to increase its public profile and have found working together on campaigns and projects to be very successful. We hope this profile-raising effort continues as this will undoubtedly help CCW achieve its aims.</p> <p>With the launch of the Discover Water website in 2016, comparative information on water company performance is much more accessible for customers so it will be important for CCW to ensure its reports on company performance are timely and add value to this. There is little to be gained in producing reports on performance that are already available and often contain more up-to-date information. This is likely to cause confusion for customers, so consideration needs to be given to how its reports build on available data and add value for consumers.</p>	<p>focus on stakeholder engagement and increased media and social media activity.</p> <p>Our reports provide the insight, analysis and commentary that customers and the industry cannot get from the Discover Water website alone. We plan to restructure our annual reporting to produce a suite of focussed reports that provide a rounded picture of company performance in the past year, customers' views of that performance (through research and complaints), and a forward look at what may be required over the longer term.</p>
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	Date Received	Stakeholder	Comments Made	CCWater Response
8	10/1/17	Wessex Water	<p>Thank you for the opportunity to comment on your draft forward work programme. Overall we think this is a very sensible and ambitious programme focussing on areas that matter to consumers.</p> <p>We are pleased that CCWater have sought the views of stakeholders when developing this forward programme and we found the autumn workshop held in Bath to be constructive. We believe you have identified the right key strategic issues which are in line with our own thinking and our own customer research.</p>	Noted.
			<p>We are pleased to see that CCWater intend to play an integral role on companies' challenge groups particularly leading the challenge around customer engagement. We would urge CCWater to set out how they see this working at an individual challenge group level as companies have already got bespoke research projects for PR19 underway or even complete.</p> <p>At PR14 CCWater often led a customer research sub group or involved their national research team in reviewing research materials. There has been no desire from CCWater to work like this so far.</p>	<p>We will work with CCGs and directly with companies to assess engagement plans, including individual research projects. We have commissioned projects to look at ways of improving the way research is carried out at PR19 that we will share with stakeholders when it is complete.</p> <p>We actively participate in reviewing research materials as part of CCGs and within sub-groups where these are being used. We will use national expertise where this is required. If you believe our expertise is not being used, please talk to the local Chair or Policy Manager.</p>
			<p>It is important for consumers to understand how their water company is performing and for CCWater to challenge companies on behalf of consumers on performance. However, it is also key to avoid duplication in reporting and confusion for consumers. Now that Discover Water is in place alongside companies own reporting, it seems sensible for CCWater to review the data they are requesting and independently publishing.</p>	<p>Our reports provide the insight, analysis and commentary that customers and the industry cannot get from the Discover Water website alone. Therefore the information that we request from companies will continue. We plan to restructure our annual reporting to produce a suite of focussed reports that provide a rounded picture of company performance in the past year, customers' views of that performance</p>

				(through research and complaints), and a forward look at what may be required over the longer term.
			<p>We are pleased to see a continued focus on consumer protection including affordability of water charges and the desire to ensure consumers who are financially vulnerable are supported. We welcome the findings of the research undertaken by Sheffield Hallam University. It is right for CCWater to push companies to raise awareness and increase uptake of their affordability assistance. As you are aware we have a very heavy focus on this through delivery of our affordability action plan. However, we believe CCWater themselves have a key role to play in achieving this goal and we would encourage them to do more at both a local and national level to promote affordability assistance and build stronger relationships with advice and support organisations.</p> <p>We would also ask CCWater to do more to lobby for water companies to have access to benefits data and give landlords financial incentives to provide details of their tenants. We are working on a pilot project with the DWP but progress is frustratingly slow.</p>	<p>We have given considerable focus to raising awareness of affordability assistance and building relationships with other advice agencies during the last year and this will continue. We recently produced a quick reference guide for advice agencies in Wales and are currently developing similar materials for use by advice agencies in England.</p> <p><i>We added: We will also support work to secure greater data sharing where that would enable companies to more effectively target support to consumers.</i></p> <p>We had already stated within the tick box section that we would: <i>Press, where appropriate, for data to be shared to help identify people who will benefit from assistance.</i></p> <p>We are monitoring the outcomes associated with the use of the landlord portal in Wales and will use that to inform our work in relation to its potential application in England.</p>
			<p>It is good that CCWater have set targets for aspects of their own service and their commitment to meet and/or exceed these but we do believe these could be more challenging particularly as CCWater place great emphasis in the programme on driving up company performance. The proposed targets are considerably below those expected, and generally achieved by, water companies.</p>	<p>Where possible, CCWater looks to work with the company to resolve the customer's issues as quickly as possible. However, many of the complaints CCWater receive against companies involve long-standing issues and visits by the company which cause delays and are subsequently out of our control as a third party mediator. The current targets ensure we</p>

				continue to focus on outcomes and improve customer satisfaction.
			We are pleased to see a focus on consumer vulnerability although we do still believe this could be stronger in the forward programme. The programme focusses mostly on services that companies offer to those customers who have additional needs registered i.e. Priority Services but misses the opportunity to push companies to improve their overall levels of customer service and customer care, improve accessibility and inclusivity, flexibility in their approach to resolution of problems etc. CCWater are very well placed to encourage companies to improve in all of these wider areas through for example their best practice work.	Our FWP does include the following wording under Key Priority 3: “We also have a duty towards consumers in vulnerable circumstances, which is a role we take seriously. We believe it is important that consumers have easy and convenient access to their water and sewerage services whatever their personal or situational circumstances. To achieve this we want to see companies ensuring inclusivity in the design and delivery of their services, information and policies.”
			We are disappointed there is no mention in this forward programme that CCWater are going to encourage companies to adopt, or benchmark against, the British Standard for inclusive service provision. We achieved this Standard in the spring of 2015 and have retained it since as it is one of our performance commitments.	We have added a reference to it in section 13. Benchmarking against BS18477 was one of our recommendations in 2014 as part of our “living with water poverty” work. We continue to monitor companies’ progress against all the recommendations made.
			We are happy to work with CCWater on community vulnerability. Local Resilience Forums, of which we are a member, take the lead during incidents of this type so we would ask CCWater to take account and complement their work at a local level.	We have noted your comments and passed your response to the local team.

	Date Received	Stakeholder	Comments Made	CCWater Response
9	10/1/17	MOSL	<p>We welcome the opportunity to respond to the consultation on The Consumer Council for Water's 'DRAFT Forward Work Programme for England and Wales 2017 -2020. We broadly support the Forward Work Programme and the activities set out in the key strategic priorities. We believe that CC Water has an important role to play in the ongoing evolution of the competitive retail water market. We look forward to working in collaboration with CC Water, the programme partners and market participants to maximise the benefits created for consumers by competition.</p>	Noted.
			<p>Response to the consultation on The Consumer Council for Water's 'DRAFT Forward Work Programme for England and Wales 2017-2020'</p> <p>MOSL is the market operator for the competitive water market arrangements being introduced in 2017 under the provisions of the Wholesale Retail Code (WRC} and the Market Arrangements Code (MAC}. We welcome the opportunity to comment on The Consumer Council for Water's (CC Water) 'Draft Forward Work Programme'.</p>	
			<p>We support CC Water's Forward Work Programme and the activities set out in its key strategic priorities.</p> <p>We believe that CC Water has an important role to play in the ongoing evolution of a competitive water market. Increased competition in the market will drive efficiency and innovation, which will create improved services at a better value for consumers. CC Water can act to protect and get a better deal for customers, by ensuring its approach embraces market forces, making intervention a truly last resort.</p>	We will have the ability to press retailers and wholesalers to improve practices and policies so that individual customers get a good value for money service. We expect that our interventions on matters of customer service at the complainant level will be compatible with market forces. We will however call for regulatory intervention if our intelligence shows that there is a systemic problem with the market, or complaints are highlighting a problem with a particular retailer.
			<p>Demand better services</p> <p>CCWater can maximise competition and the benefits end customers can experience by taking actions to improve the</p>	We will liaise with both wholesalers and retailers and record complaints in a way that

		<p>performance of wholesalers and retailers. This includes reviewing and reporting on the consistency of process and customer treatment. We believe CC Water should consider sponsoring the development of common ways of working by wholesalers, including a standardised customer journey across wholesalers, on key market processes.</p>	<p>can track if an issue has originated with a wholesaler. This way we can identify issues and then work to resolve them.</p>
		<p>Engagement Increasing non-household customer awareness and understanding of the market will drive retail performance. We encourage CC Water to consider running consumer workshops or similar events to maximise awareness and understanding of the new market and to gather views from consumers, which can be fed into market discussions. We would be happy to support CC Water on the work of MOSL, the Panel and the new arrangements.</p>	<p>Between December 2016 and the end of March 2017 we held 5 workshops with the Open Water programme and delivered a briefing at the British Chambers of Commerce annual conference and regularly hold our business customers meetings. We will continue to work to raise awareness. Our key work has been through business representative bodies such as NFU and the Food and Drink Federation, and by doing so have given 700,000 businesses the opportunity to hear about the new market.</p>
		<p>Consumer voice in market discussions The lack of a consumer voice in the arrangements and governance of the market presents an opportunity for CC Water to champion consumer issues. We would welcome clarity from CC Water on how it plans to engage with the Panel, MOSL and Ofwat.</p>	<p>CCWater is expecting to have a regular presence on the code panel, ensuring that the customer perspective is considered where relevant.</p> <p>We will regularly discuss data trends and issues from our own consumer relations service with Ofwat (through its MOE team) and MOSL (through its PFMs).</p> <p>We understand that MOSL intends to continue to facilitate market participant forums on service delivery good practice and CCWater will continue to offer its knowledge and support in such forums.</p>
		<p>Avoiding Duplication CC Water will have a unique insight into the how the market functions from a consumer perspective. We welcome the opportunity to discuss how CC Water's work might interact with the monitoring regimes operated by MOSL and Ofwat. There</p>	<p>We issued a consultation in February 2017 which outlined our monitoring plans.</p>

			<p>should be some consideration not to duplicate, but to complement and add value to how the market is monitored across programme partners. Such matters might include consideration of how consumers will be affected by bi-lateral processes that are not undertaken in a standardised interface.</p>	
			<p>Issue resolution The transition into the opening of the market presents uncertainty. There is a role for CC Water to proactively work with market participants, consumers and programme partners to identify, prioritise and resolve issues. This should include any potential impact of non-household retail competition on households.</p>	<p>We will be watching the progress of the market and acting on problems or issues that arise from the consumer perspective.</p>
			<p>Water efficiency One of the projected benefits of opening the non-household retail market is increased gains in water efficiency. We encourage CC Water to consider how it will work with wholesalers, retailers and consumers to identify any potential gains made from water efficiency.</p>	<p>CCWater is developing a regular schedule of retailer engagement (meetings, telecons). We expect this will give us an opportunity to speak directly to retailers to determine the effectiveness of their policies and practices on water efficiency.</p>

	Date Received	Stakeholder	Comments Made	CCWater Response
10	10/1/17	South East Water	<p>We believe that CCW's FWP is generally reflective of the areas our customers have told us are a priority to them, and our response to the consultation is set in that positive context and therefore relatively brief.</p>	
			<p>1. Speaking up for and informing consumers. As we embark on the early stages of PR19, we welcome CCW's input to the process at both industry and local levels. A successful Price Review will be dependent on effective engagement with customers, something that we feel was enhanced by CCW's membership of our Customer Challenge Group, and we look forward to relying on that input for PR19 too.</p> <p>Our approach at PR14 was innovative in developing outcomes based on customers' actual satisfaction with the quality and value of the service provided, and we would like to see CCW encouraging greater industry adoption of satisfaction-driven outcomes at PR19.</p> <p>With the opening of the Business Retail market in April 2017, companies that are unable to deliver to their customers' expectations will risk losing those customers to competing retailers. CCW's FWP acknowledges that in the market's first year, there will be teething issues, but we look forward to CCW developing effective comparators of business retailer performance, and developing its role of business customer advocate, whilst also allowing the market to develop and operate.</p>	<p>Noted, CCWater will be represented on all CCGs at PR19.</p> <p>We want to see 'customer satisfaction' as a key overall measure of companies' performance.</p> <p>We will be working with Ofwat, MOSL and companies to monitor the performance of retailers in the new NHH retail market. We issued a consultation on this in February 2017. We have added that we will monitor the <i>complaints we receive and those that go directly to the retailers. We will also consider what other data is useful to inform consumers as the market develops.</i></p>
			<p>2. Fair, value for money charges that are affordable in the long term Effective regulation - ensuring efficient companies are funded to provide the services their customers value - has delivered an average UK Household bill for water and sewerage services in 2016-17 of £389 - just over £1 per day. Research continues to show that the majority of customers perceive this to be good value for money.</p>	<p>Noted.</p>

			<p>As we know, even good-value water services may not be affordable by all households and we welcome the continued focus in the FWP on facilitating a cross-sector approach to addressing support for vulnerable customers.</p> <p>Companies are actively developing their support for their financially vulnerable customers, in an environment where gaining the support from other customers for the required cross subsidies is far from a given. It is very important therefore that any challenge from CCW on the industry's response to affordability and vulnerability is judicious. It must recognise that while VFM and affordability are linked, they are separate issues, and an undermining of the perception of value, may adversely influence broader customer support for the funding of support tariffs. This will be particularly pertinent when the implications of potential market opening for household customers are considered further over the coming months.</p>	<p>This is taken into account in our approach.</p>
			<p>3. Services that are right first time. CCW's reporting of the relative performance of water companies, particularly in respect of customer service, has been successful in highlighting where performance improvement is required. We continue to support this approach. With the opening of the Business Retail market in April, the FWP acknowledges that CCW will need to develop its comparators so that the performance of the Business Retailers, operating in a national market place, are distinguishable from regional Wholesale and Household Retail businesses. This will be particularly important as the Service Incentive Mechanism comes under review, and the sensitivity of allocation of responsibility for service failure across newly disaggregated water and wastewater value chains becomes even more acute.</p>	<p>We have added that we will monitor the <i>complaints we receive and those that go directly to the retailers. We will also consider what other data is useful to inform consumers as the market develops.</i> We will be making changes to our TAP contact system to ensure that we are able to distinguish between wholesaler, household retail and non-household retailer performance. We will continue to communicate with companies on the correct allocation of complaints to the correct parties.</p>
			<p>4. A resilient, sustainable, safe, good quality water supply for now and in the future We welcome the inclusion of an approach to support resilience assessments and activities recognising that service provision is a long term issue in a changing environment. We support this and consider that CCW face a significant challenge in articulating and</p>	<p>Noted. We look forward to working with the companies and regulators on these</p>

		<p>balancing the need for long term affordability alongside long term resilience. We strongly support that more can be done to share resilience across the industry and believe CCW might wish to focus on this element of resilience specifically as it has the greatest opportunity to deliver affordable resilience.</p> <p>We support the need to put customers at the heart of both the Price Review and Water Resource Management Plans and indeed we intend to combine these elements during our engagement to make the story and position more coherent to customers and to continue to strive to keep customer satisfaction as the core outcome.</p>	<p>issues.</p> <p>Noted.</p>
		<p>5. A sustainable, resilient sewerage service that works now and in the future We have no comments on this aspect of CCW's FWP.</p>	

	Date Received	Stakeholder	Comments Made	CCWater Response
11	10/1/17	UNISON	<p>Overall approach of CC Water We very much value the work of CC Water in ensuring that the customer voice and customer concerns are gathered, amplified and reported upon, to improve the responsiveness of water companies to the needs of the communities they serve. CC Water’s approach has been particularly valuable in enabling individuals and companies to resolve service or billing disputes with suppliers. We recognise that this work needs to be properly resourced and so support the proposed increase in the levy upon water bill payers.</p> <p>In addition, CC Water has fulfilled a very valuable role in being outside the “regulatory circle” of the companies and their regulator, representing unvarnished the views and interests of water users. Most water users do not have access to consultations, events and publications, and so CC Water performs a critical role in ensuring that the voices of citizens, organisations and businesses, and in particular poorer citizens and small organisations and businesses are considered as part of policy and regulatory decision-making. We encourage CC Water to build their capacity to better understand what the views of these “hard-to-reach” stakeholders are, both working through organisations that bring them together (as you reference, the FSB and NFU) and through independent efforts to gather evidence. Small businesses have the FSB: poor household customers have no equivalent, so extra effort is required.</p> <p>We believe that this role could be amplified and made more encompassing by greater concentration on the concerns of citizens around corporate behaviour, structure and practice, which the plan as drafted subordinates to technical and service considerations. Citizens have expectations that utility companies will meet decent minimum standards in terms of paying the living wage, including to contractors, employing people on decent contracts, and avoiding corporate and financing structures that are contrived to minimise tax. CC Water should be articulating</p>	<p>We ensure that our research is representative of all customer groups, but acknowledge that some groups can be hard to reach. In addition to our research we also liaise with stakeholders who represent a wide range of household customers, in particular those customers who may be in vulnerable circumstances, such as StepChange and Turn2us.</p> <p>We will be monitoring company financial performance and financial/ownership structures, and will take action if customers are at risk or if a company is making unreasonable gains at customers’ expense. We have had success in the past in getting companies to share the benefits of outperformance with customers.</p>

		<p>these views on their behalf.</p> <p>CC Water’s role in relation to the commercial user market We see dangers in the role that CC Water identifies for itself in relation to the commercial user water market. In particular, we believe that CC Water should not be engaged in promoting awareness or articulating potential benefits of the introduction of competition for commercial users, for two reasons. Firstly, because it will not also promote awareness of the drawbacks - increasing acquisition costs for companies; opportunity costs for customers involved in making decisions on water supply; the certainty that some retailers involved in the market will engage in mis-selling and dubious practices. Promotional activity must be for the companies concerned. CC Water needs to remain the voice of the consumer, neutral on questions of market structure, to reflect its funding through levy on customers whose views on these essentially political questions are not known to it. Secondly, a promotional role would impact on CC Water’s ability to properly represent the customer experience of competition to politicians, regulators, and the supplying companies. Promotional activity would necessarily reduce confidence among citizens in CC Water’s analysis of the extent to which the new arrangements were delivering benefits to customers. It cannot credibly both impartially analyse impacts and be a proponent or promoter of these arrangements, since it would in effect be judging the impact of its own efforts to promote awareness.</p> <p>Household competition We note the essentially passive role that CC Water defines for itself in relation to the decisions expected from Ministers on whether competition should extend to the household sector. We do not think that this is a sensible place for the organisation to be. Instead, it should argue that this decision should not be taken until there is adequate evidence of the impact of the extension of competition to the commercial sector. That will be the point at which a properly-evidenced decision can be taken, and will enable the customer experience of competition to underpin decision-making. Otherwise, the basis for the decision will be analogy and ideology, which cannot be sound or reflect customers’ interests.</p>	<p>We want customers to be able to make an informed decision about whether or not to participate in the new retail market. Part of this means ensuring customers are aware that the market exists. Our research in Scotland found a number of customers who were unaware that a market existed, some eight years after it had opened. This led to customers feeling that they had been deliberately kept in the dark and denied the opportunity to seek a better deal.</p> <p>Amendments to household competition section 4. We have been clear in our responses to Ofwat, the UK Government and in the media on our views about household retail competition proposals. [here] and [here]. We have strengthened our wording as we have played a strong role in representing consumers on this issue to date, and will continue to do so as the debate continues.</p>
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	Date Received	Stakeholder	Comments Made	CCWater Response
12	11/1/17	Severn Trent	<p>Overall comments We believe it is important that CCWater plays a distinctive role in the water industry as the statutory customer representative body. We recognise that one of the challenges of creating a work programme of this nature is that not all of CCWater's strategic objectives are within your direct control to achieve, and relies on companies and other stakeholders to deliver. This is reflected in some of your proposed 2017-18 measures, which could be more specific to CCWater's contribution. For example, "the number of consumers accessing water company tariff schemes, such as WaterSure and social tariffs, increases by 10% by 2018" - which we would expect to be achieved if companies deliver the commitments they have made in their plans and is not necessarily a measure of CCWater's impact in this area (for example, pressing underperforming companies to improve). That said, overall the plan is focused on where CCWater can deliver a distinguishable impact for customers, and we are broadly supportive of it.</p> <p>Detailed comments Our remaining comments relate to more specific elements of the work programme.</p> <ul style="list-style-type: none"> ▫ We welcome CCWater's commitment to work more collaboratively with a broader range of related consumer stakeholders. ▫ Under the section titled 'informing consumers' we note that there are a range of different sources of information, measures and publications cited that could be used to inform customers across the industry. We would welcome the sector as a whole continuing to work to ensure that customers are not confused or baffled by the range of performance measures published. <p>We are supportive of CCWater's commitment to use the insight it has (its research programme and complaint/customer contact data) to highlight and press for where improvements can be made.</p>	<p>We hope that our ongoing work, such as raising awareness of assistance schemes and encouraging companies to share and adopt good practice in the promotion of schemes, will help companies achieve their targets.</p> <p>Noted.</p> <p>We agree that information needs to be presented in a way that makes it accessible and meaningful for customers.</p> <p>We are happy to discuss this proposal further with Severn Trent. We note that prompt publication of the</p>

		<p>It should consider if it has the potential to do more in this area.</p> <p>With regards to the proposed programme of research:</p> <ul style="list-style-type: none"> ▫ it would be helpful to explore how research for PR19 can be used to complement that of companies and address gaps that might not otherwise be filled - for example, presenting a national picture, and ▫ the proposed piece on willingness to pay is welcome, but we believe a number of companies will be undertaking their own research shortly, and prompt publication would be helpful if it is to inform their approach. 	<p>Willingness to Pay research is required do that the findings are timely for the industry to incorporate into their own research with customers.</p>
		<p>As you will be aware, our responsibility for providing retail services to non-household customers has now transferred from us (Severn Trent Water Limited) to Water Plus, so we have not provided any specific comments in relation to areas of the work programme that relate to retail services to business customers. However, we are supportive of CCWater playing a proportionate role that we would expect to evolve with the prevailing conditions of the market.</p>	<p>We have received a response from Water Plus.</p>
		<p>Finally, we have a constructive working relationship with CCWater particularly on local issues and as a dedicated member of our CCG. We look forward to this continuing.</p>	<p>Noted.</p>

	Date Received	Stakeholder	Comments Made	CCWater Response
13	11/1/17	Northumbrian Water	<p>Speaking up for and informing household and business customers</p> <p>We welcome CCWater's active membership of our Water Forum (customer challenge group) for both Northumbrian Water and Essex & Suffolk Water customers. We believe CCWater's experience of previous price reviews and strong customer focus gives Forum members access to invaluable experience and insights that will positively influence services for all consumers.</p>	We intend to play an active role and look forward to the process.
			<p>A key principle of our Unrivalled Customer Experience strategy is co-creation of services with our customers, including those who are vulnerable. We have developed an approach which will bring together our ongoing research work and existing customer feedback alongside new and innovative engagement opportunities to allow us to listen to our customers' views and ensure they shape our 2020 to 2025 business plan, as well as our longer term strategy for water and wastewater services.</p> <p>We believe it is essential to achieve the right balance between PR19 proposals and the longer term so services and assets are safeguarded for future generations. It is our responsibility to ensure funds are invested wisely and that a lasting legacy is in place for consumers of tomorrow.</p>	Our Forward Work Programme is placing an increased emphasis of the importance of long-term planning, resilience and balancing affordability over the long term.
			<p>We believe there should be strong incentives to manage all industry costs and to achieve outperformance. We agree customers should benefit from the sharing of outperformance at the next price review when prices are reset. Many external factors such as inflation, interest rates, debt costs and tax can have both positive and negative impacts on business performance and so companies carry a symmetrical risk/benefit. CCWater should consider the risk-reward mechanism that underpins current and future regulatory settlements and look at this on a balanced and consistent basis across the industry. We would be very happy to discuss this in more detail with CCWater.</p>	We would be happy to discuss Northumbrian Water's ideas about a balanced risk-reward mechanism.
			<p>In relation to business customers, our new retail business NWGB has clear aspirations to deliver excellent services and be the water retailer of choice. We will continue to actively engage our business customers, to understand their expectations and ensure</p>	Noted. We welcome continued engagement with NWGB.

		<p>they have a clear awareness of market opening and the services we will offer. We expect to liaise with CCWater on a regular basis, to ensure as the industry's consumer watchdog you are kept up to speed with, and can influence, our plans related to business customers.</p>	
		<p>In respect of the potential future market opening for household customers, we believe more work must be done to understand the true benefits for customers and the industry versus the cost of doing so. We fully support consumer choice and, in the absence of competition, much more can be done to ensure customers enjoy levels of service and experiences that are at least on par with competitive market places. CCWater should challenge companies to benchmark against those organisations providing the very best service and highest levels of satisfaction for customers in order that greater innovation takes place when it comes to customer experience.</p>	<p>As noted above, our Forward Work Programme is placing an increased emphasis of the importance of long-term planning, resilience and balancing affordability over the long term. We have expanded on our intentions regarding the possibility of household competition in Section 4.</p>
		<p>Fair, value for money charges that are affordable in the long term We agree entirely with CCWater's views that the next price review must genuinely listen to customers' views and use them in a transparent manner to shape plans for investment and future services. We also support the need for strategic plans looking beyond the next 25 years, and as mentioned previously, we recognise the industry's responsibility to invest wisely to ensure a lasting legacy is in place for future generations. The industry should not be constrained by five year price review periods and longer term strategic thinking should be firmly on the agenda. In terms of vulnerable customers and affordability, we believe this is an area CCWater must continue to champion, facilitate regular benchmarking and press for best practice across the industry. We agree support for vulnerable customers should be rebranded industry wide under the 'priority services' banner and have already taken steps to do this.</p>	<p>We have noted your comments.</p>
		<p>Services that are easy to access, right first time Getting things right first time is an ethos we have lived by for many years. We agree CCWater should focus on ensuring a continued reduction in complaints across the industry and would encourage greater ambition in this area. Complaints provide a</p>	<p>We want to build on the improvements to date and consider all forms of customer contact, including social media in future measures. Cross-industry comparisons are useful in</p>

			<p>valuable source of feedback and should be used to develop insights that ensure services are always being improved. There is also a great opportunity to learn from other sectors in this space and CCWater should challenge companies to do this.</p> <p>With regards the future of SIM, we believe the Mechanism has served the industry well with consumers benefiting from significant service improvements. That said, as consumers become more demanding and expect much more, the time is right to make changes to how customer experience and service is measured. We believe complaints and their handling must remain a key element of this. We would also urge CCWater to call for horizontal auditing of SIM and its replacement to ensure a level playing field for customer service and the consistent reporting of performance.</p>	<p>identifying good practice.</p> <p>We have added: We want to see ‘customer satisfaction’ as a key overall measure of companies’ performance. We have said in our response to Ofwat’s consultation that we would like to see contacts surveyed and the wider customer base and social media contacts to be included in the new measure.</p>
			<p>A resilient, sustainable, good quality water supply We are examining how we can become even more resilient in terms of water supply and with regards to climate change, population growth and customer expectations. This must remain a focus for the industry including CCWater. We also support the role CCWater can play when it comes to water use and this too is an area where best practice should be shared. ‘Every Drop Counts’ is our largest ever water saving campaign and takes a truly innovative and wide-reaching approach by offering customers the chance to participate in a range of initiatives that are usually delivered at different times and places throughout the year. It uses a combination of targeted advertising and community based marketing to maximise participation in the wide range of water efficiency projects to help our communities not only save water, but energy and money too. We take a whole-town approach to deliver water efficiency which is proving successful, with the greatest levels of participation and engagement being seen in 2016 in the ward of Wingrove in Newcastle upon Tyne and the town of Lowestoft in Suffolk.</p>	<p>We agree that sharing best practice on encouraging customers to use water wisely should be done more widely. The lessons learned help to understand what has been done, what can be done and how and what can be achieved as a result of targeted campaigns and interventions. We look forward to the outcome and lessons learned from the ‘Every Drop Counts’ campaign.</p>
			<p>A sustainable, resilient sewerage service that works now and in the future We fully advocate your proposed areas of focus for this key strategic objective. We must continue to promote awareness and a change in consumer behaviour when it comes to sewer misuse,</p>	<p>CCWater are a member of the sewer misuse group of the 21st Century Drainage Board and we look forward to working with Northumbrian Water on this group.</p>

			<p>as well as pressing for manufacturers to label products such as wipes and nappies in a responsible manner - CCWater can play a critical and influential role in this.</p> <p>To manage the impact of a growing population and climate change, as well as protecting the environment, and rather than opting for conventional engineering solutions, we must look at innovative drainage methods that call for new ways of working such as partnership approaches. Our award winning work at Brunton Park in Newcastle upon Tyne is a great example of how a different approach to sustainable drainage solutions involving various stakeholders can protect our customers and their homes from flooding while enhancing the environment.</p>	<p>We agree that partnership working and an innovative approach to drainage solutions have real benefits for customers and we will press companies to adopt these techniques.</p>
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	Date Received	Stakeholder	Comments Made	CCWater Response
14	11/1/17	Welsh Water	<p>We are grateful for the opportunity to comment on your forward work programme. Generally, we believe that the programme is an effective one and recognise that it is a key instrument in determining the consumer agenda over the medium term, as part of the regulatory framework. As you know, we are strong advocates of CCWater's work and hope that you find the following observations helpful.</p> <p>In our response to last year's consultation we highlighted the close tie up between what was included in the consultation document and the customer promises contained within our business plan.</p>	
			<p>Please note that we recently revised our customer promises following the completion of our first phase of customer research for PR19. The six revised promises are:</p> <p>Clean, safe water for all; Safeguard our environment for future generations; Put things right if things go wrong; Personal service that's right for you; Fair bills for everyone; and Create a better future for all our communities. We are pleased to note that this alignment still applies.</p>	Noted.
			<p>We are in particular supportive of your commitment to provide input into some of the policies that are relevant to Wales and note that you are committed to ensuring that the agendas outlined will be influenced by research you propose undertaking so that decisions are properly evidenced.</p>	We have a commitment to representing consumers in Wales and retain an office in Cardiff to demonstrate this commitment.
			<p>Your work to date with the Welsh Government is highlighted in the document and we have seen evidence of this in the discussions that have taken place at the various Welsh Government led Wales Water Forum meetings. Of particular importance in the next twelve months will be understanding the cost and benefits associated with transferring ownership of privately owned water supply pipes to water companies. Whilst we recognise that this is in the evidence gathering phase we would welcome the opportunity to work with you to gain an understanding of</p>	<p>We are currently in discussions with the water and/or sewerage companies in Wales and the Welsh Government about the potential for this research. It is included in the table of research priorities.</p> <p>Our restructuring to prepare for market opening is now complete, but we will keep under review any further changes needed in order to stay efficient and effective.</p>

		customer attitudes.	
		Transparency is a key consideration and this will become even more important as the restructuring of the organisation continues and the market reform agenda gathers momentum. The Post April 2017 period will be a critical time and having an effective Forward Programme in place, which determines priorities and sets out clear agendas, is all important.	
		Last year we drew attention to the importance of customer segmentation, commenting that a "one size fits all" for customers is no longer appropriate and calling for detailed research to facilitate and determine the priorities and views of differing segments of customers, especially various groups of vulnerable customers. We acknowledge that this will take some time to achieve but hope that some meaningful progress can be made on this front in the next 12 months.	We agree that different types of customers have different needs and that as far as possible this should be reflected in all research within the industry.
		Collaboration with government, other regulators and companies is rightly identified as being an important element of the programme and we welcome the reference to your membership of the boards and groups established to tackle such matters as resilience and 21st Century drainage. A collaborative approach is essential if objectives are to be achieved and interests of consumers protected. As we have indicated previously, we are committed to working closely with CCWater and others in these areas.	Noted.
		Raising consumer awareness of the value of water and using it more wisely are rightly highlighted alongside reducing the risk of sewer flooding and it is good to see your commitment to using the various tools available to promote these initiatives. We set out below our more detailed comments on each of the five key strategic issues contained within the consultation document:	Noted.
		Speaking up for and informing household and business consumers <ul style="list-style-type: none"> We recognise the importance of your role in market opening and how important it is for customers who are considering switching; to know how retailers are performing and which 	We issued a consultation on how we plan to monitor the new market in February 2017. Leakage is an important issue for consumers. In

			<p>companies are doing well. However, this will only be possible if there are accurate consistent measures across all companies, allowing customers to make meaningful comparisons. An example worth highlighting is leakage performance. We manage leakage at the most economic level but it results in our performance appearing to be lower than that of other companies. We could improve our leakage levels with additional investment, but this would not be a cost effective solution, and could result in an increase in customer bills. Applying the economic level of leakage (ELL) approach means that they key objective of minimising customers' bills is achieved.</p>	<p>Delving into Water we note that the leakage targets are subject to ELL. Where relevant, as well as reporting on overall leakage, we reference how companies are performing in terms of their performance commitments.</p>
			<ul style="list-style-type: none"> • With the opening of the non-household retail market in England we understand the importance of highlighting Market Reform in the programme. The different arrangements applying in Wales are acknowledged and we support the sharing of good practice to and from Wales. Ensuring that business and non-household satisfaction in Wales is a key element of our own business plans and we will work with CCWater and others to make sure that this is achieved. In terms of how messages are delivered and understood by customers you may wish to consider the following: 	<p>We agree that the customers who do not participate in the NHH market - including ineligible customers in Wales - should not suffer detriment as a result. A successful market should deliver benefits to all customers.</p>
			<ul style="list-style-type: none"> • The opening of the business retail market for water and sewerage in "England" could be set out more clearly. You may wish to consider referring to "most of England and parts of Mid Wales". • When referring to "companies wholly or mainly in Wales", it is doubtful that many customers will know which companies these are. It would be clearer to specifically mention Welsh Water (and Dee Valley Water as well), and it would also be helpful to set out the Welsh Government's current policy which is not to extend competition in these areas. • There would appear to be an assumption that the "water service" includes sewerage. From a business retail point of view, the Welsh Government has decided that no 	<p>We have added the following into our reference <i>This currently includes some areas of mid-Wales that are served by Severn Trent.</i></p> <p>While we initially added the company names in response to this comments, the acquisition of Dee Valley makes this more complex, so have chosen to keep with the original text. For information we have a page listing the differences between policies of the two Governments near the end of the document.</p> <p>Noted.</p>

			sewerage services are open for competition in Welsh Water's supply area.	
			<ul style="list-style-type: none"> We recognise the importance of your role as customer advocate and the challenges you have identified in the consultation document continue to be relevant. We appreciate the reference to helping vulnerable customers and would like to see early progress on this front. It is good to see that you have "favoured our approach of directly asking consumers for their views on how the money should be spent". Retail competition in Wales will only apply directly to some 5% of our non-household customers and we would like to reiterate then point made last year, that in your awareness raising activity, it is important that you help make this clear to non-household customers. Otherwise, there is a danger of creating unrealistic expectations amongst our customers. 	<p>We have noted your comments.</p> <p>We agree that ensuring clear messages about eligibility for the new NHH market for customers in Wales is very important.</p>
			<p>Pressing for fair, value for money charges that are affordable in the long-term</p> <ul style="list-style-type: none"> We again fully support this strategy, recognising the importance of tackling affordability and water poverty. We were pleased to see the prominence given to developing and enhancing social tariffs and in particular ensuring that such tariffs "better meet needs across England and Wales". As you know, we are continually promoting our assistance schemes with a view to achieving the ambitious targets set out in our Business Plans but we would welcome any support you can provide in promoting these tariffs and working with other organisations to flag customers who might be eligible. 	<p>Noted.</p>
			<ul style="list-style-type: none"> Whilst we are doing what we can to make sure that vulnerable customers are able to benefit from our affordability schemes, if we are to achieve our targets, flexibility on the part of all parties is essential. For example, some customers on benefits may need to be persuaded to have water meters fitted if they are to be registered on these schemes. We would welcome your support in the need for this flexibility. 	<p>We have noted your comments and would like to discuss this further at our quarterly meetings.</p>

			<ul style="list-style-type: none"> We are fully supportive of obtaining the view of customers in the development of company business plans and note that you mention "the differing needs of water company consumers." We would draw attention to the risk of different measures being implemented for each company which could prove challenging when comparing water companies' respective performance. 	<p>We think there does need to be a level of comparable performance measures, but also support companies having flexibility beyond that to develop measures that correspond with their consumers' priorities.</p>
			<ul style="list-style-type: none"> We agree with your approach that companies need to provide long term plans. As a not for profit company we want to ensure that our customers receive a reliable service for many years to come. We have recently started work on looking ahead to 2050 to ensure that our water and sewerage services remain reliable and sustainable. 	<p>Our Forward Work Programme is placing an increased emphasis of the importance of long-term planning, resilience and balancing affordability over the long term.</p>
			<p>Services that are easy to access, right first time</p> <ul style="list-style-type: none"> We were one of the first companies to implement web-chat services for customers, having signed up to the "keep me posted" initiative. We therefore fully support this objective and agree that all customer contacts should always be dealt with and resolved satisfactorily, whatever the contact methods used. 	<p>Noted.</p>
			<ul style="list-style-type: none"> We suggest that there needs to be careful consideration when comparing companies' performance, and (as mentioned previously), there can only be accurate comparison if there is consistency across all companies. We do not believe comparing the volumes of written complaints is an accurate or useful way to benchmark company performance. There is an absence of consistency and a need for clarity across all companies in this area. The focus on written complaints reflects a time in the past, when customers would contact companies to complain over the phone and only if really dissatisfied, put pen to paper. Customer behaviour has changed and companies have introduced many more contact channels. For this, and other reasons, we consider that customer satisfaction and trust surveys are a much more effective measure of customer service. Internally, we are reporting customer complaints from telephone and written sources currently and will add in Live Chat and Social Media 	<p>Added a line to include written complaints and unwanted telephone contacts written complaints as a long term measure provides a strong incentive for companies to improve. Despite the increase in choices in methods of contact, ten companies saw an increase in 2015/16, some significant.</p> <p>Longer term measures for unwanted telephone contacts was not possible because of reporting changes in the SIM. We will place a stronger emphasis on this measure in future reports when there is household unwanted contact data over a longer period of time.</p>

			<p>next year when we have developed reporting mechanisms. Our aim is to identify customer dissatisfaction from all sources and address the root cause.</p>	
			<p>A resilient, sustainable, good quality water supply</p> <ul style="list-style-type: none"> This objective is laudable and we support this strategy. This reference to the 2019 Price Review, the Water Resource Management Planning and the WFD are to be expected. Of particular relevance to Wales and of great interest to us is the Welsh Government's consideration of the future of private water supplies. CCWater clearly has an important role to play in this review and we look forward to working closely with you and other key stakeholders in this work. 	<p>Noted and welcome the opportunity to work with you.</p>
			<ul style="list-style-type: none"> We note the reference to compulsory metering. As you know, we do not believe that compulsory metering programmes offer the best value to customers. Implementing a compulsory metering programme can be costly and we know that some customers (particularly those low income customers with large families) favour unmeasured bills. Others prefer the certainty of unmeasured bills. Our view is that metering should be a choice for customers and we would like to see this recognised in any implementation review and associated consumer engagement. 	<p>Noted. Our review will be of the programmes in South East England where companies have made an economic case for compulsory metering given the serious water stress in that region.</p>
			<ul style="list-style-type: none"> We would like to note that one of our challenges is leakage on customers private supply pipes and would welcome any support you can give us on this so that customers get these leaks fixed before we have to commence action against the customer. 	<p>We will amplify this message through our media and social media activity, so consumers are informed of their responsibilities and what help is available.</p>
			<p>A sustainable, resilient sewerage service that works now and in the future</p> <ul style="list-style-type: none"> We welcome the commitment to meet with us to discuss the implementation of measures around surface water drainage and the automatic right to connect to private sewers with a view to establishing how the adoption process will work in Wales. The reference to using Sustainable Drainage Systems is welcomed. Sustainable Drainage Systems have an important role to play in reducing and controlling surface water entering 	<p>We would be very happy to offer our support and input. As well as learning valuable lessons from the work DCWW have done so far.</p>

			<p>the sewerage network and we welcome any support CCWater can offer in helping to facilitate this.</p> <ul style="list-style-type: none"> As you know we have in place initiatives (such as the "Stop the Block" campaign) which contribute to the attainment of this objective and we would value any support you can offer in promoting this and other similar campaigns. 	<p>We would also be very happy to work with you again on any media campaigns.</p>
			<p>Finally, with regard to your comments about market opening in England and that the success hinges on the market being able to deliver much larger annual saving than the £4 to £8 predicted by the regulator Ofwat. We feel this message needs careful communication as the majority, 88% of water company costs is in the wholesale business rather than the retail business. It's only fair for customers that a clear and consistent message is given to customers to avoid the impact of customers switching expecting to make considerable savings.</p>	<p>We agree that communication about any move to introduce household competitor must not mislead customers about the potential benefits it could deliver. We have expanded the section on household competition.</p>

	Date Received	Stakeholder	Comments Made	CCWater Response
15	11/1/17	Ofwat	<p>Our own work programme is driven by our long term aspiration for the water sector: that customers and wider society have trust and confidence in vital public water and wastewater services. The CCWater draft forward work programme and our vision are clearly aligned. Your programme very clearly emphasises your role as a voice for water consumers.</p>	Noted.
			<p>Our priorities include working with the sector to improve the customer experience in particular through securing long term resilience, delivering a step change in customer service, and maintaining affordability. We welcome that your forward work programme clearly sets out your role across this priority and others as we work towards the 2019 price review. We continue to value your input as the regulatory framework evolves, such as your response to the recent consultations on the cost of debt that covered one of the key themes highlighted in your forward work programme.</p>	We will continue to contribute to your consultations to allow consumer priorities and/or consequences to be highlighted.
			<p>Your forward work programme last year noted your areas of work with other stakeholders to ensure that market developments in the sector such as the opening of the business retail market were to the benefit of customers. Over the last 12 months we also worked together closely on the customer research that significantly informed our review for government of the costs and benefits of residential retail competition.</p>	Noted.
			<p>We welcome that your work programme will consider publishing information on retailer performance in the business market. You may want to consider how to co- ordinate this information with other stakeholders, including with us in our role in market monitoring. Establishing the context of wholesaler performance to the retailer may also be important, given that at the start of the market most customers in a region will be with the same retailer, even where retail exit by the incumbent has occurred. Your focus on customer protection and market awareness for micro and small businesses in the market aligns with our strategy and we see significant value given our respective roles in continuing to work together on these areas.</p>	This will be an evolving area, that is likely to start at complaints received level, and we consulted on that in February 2017. We want to work with you to ensure there is no duplication of effort. We are developing our TAP contact system to allow us to track complaints in a way that will distinguish between wholesaler and retailer responsibility for issues.
			Your proposed work programme captures many important themes	We responded to this consultation. Our

			<p>for PR19. The future for customer service incentives is being considered as part of our current consultation on the outcomes framework. This includes consideration of the role for comparisons to retail services in other sectors and the issues involved in widening the incentive to fuller measures of customer satisfaction, including value for money. We look forward to your continued contribution through this consultation.</p>	<p>response can be found on our website at: https://www.ccwater.org.uk/wp-content/uploads/2013/12/CCWater-response-to-Ofwats-consultation-on-the-outcomes-framework-for-PR19.pdf</p>
			<p>Looking ahead, you highlight the range of issues around resilience of services and bills to current and future water customers, including financing and outperformance of the water sector as well as affordability. We support your desire for companies to put plans in the context of a long term strategy and these topics would appear to provide a strong focus for your role in Customer Challenge Groups. In this context, you may wish to consider how the research and analysis from the residential retail review can support your role in challenging company customer research on their future plans. In particular, the evidence of a lack of retail innovation by water companies compared to other sectors including apps that help customers pay their bills, leak monitoring and the challenges associated with connected homes are areas you may wish to consider.</p>	<p>We agree that that companies should look to innovative solutions to deliver what their customers want. The research we carried out as part of the residential retail review highlighted areas that CCGs can use to challenge their companies on this.</p>
			<p>We have some other observations that may assist CCWater in finalising the work programme:</p> <ul style="list-style-type: none"> • One of your outcomes for 2017-18 suggests that poor performing companies on complaints would move in line with the industry average by 2018. You may want to clarify the wording on this outcome to avoid it implying that all companies would be at the average in that year. • You may want to re-emphasise in the work programme the important role that your data and input contributes to the transparency of the sectors' performance through the Discover Water website. 	<p>We have removed the reference to the industry average.</p> <p>CCWater's input into Discover Water through our Water Matters research and our complaints report has been highlighted.</p>
			<ul style="list-style-type: none"> • You may wish to consider a link under strategic priority 4 (a resilient, sustainable, good quality water supply for now and in the future that consumers' value and use wisely) to your aims for long term resilient strategies at the 2019 price review and for Water Resource Management Plans. 	<p>The long-term resilient strategies at PR19 and the WRMP actions are work that feed into achieving our Priority 4.</p>

	Date Received	Stakeholder	Comments Made	CCWater Response
16	11/1/17	United Utilities	<p>UUW welcomes the opportunity to respond to the Consumer Council for Water’s (CCWater) draft consultation on its forward work programme.</p> <p>We continue to support the way that you use your customer research and advocacy work to identify the issues that are important to consumers and the five key strands of work you have developed provide a solid framework for CCWater to work within.</p> <p>We will support the activities highlighted in the consultation for each key strategic issue within your Forward Work Programme.</p> <p>We have set out our main observations and areas where we feel it would be helpful to provide further clarity under each of the key strategic issues in Section 3 of our response.</p>	Noted.
			<p>General observations from your consultation</p> <p>We recognise the role that United Utilities plays in supporting CCWater in achieving its objectives.</p> <p>We acknowledge and support the key role that CCWater will play as part of the 2019 Price Review. In particular, we support the approach to ensure that consumer views must be at the heart of the development of companies’ business plans for 2020-25 and agree that the first element of this work is to influence the development of Ofwat’s methodology for PR19</p> <p>With the advent of market opening for the non-household market in April 2017 it is absolutely right that a key element of CCWater’s work is to ensure that this delivers price and service benefits to customers. Raising awareness of market opening is critical and once established, CCWater can play a key role in ensuring the market works by encouraging the introduction of consistent complaint handling processes and that innovation is shared across all retailers.</p>	<p>We will continue to do this during 2017 and up to the publication of Ofwat’s consultation.</p> <p>Answered below.</p>

			<p>CCWater’s continued focus on the affordability / vulnerability agenda is welcomed and we agree that more can be done in the sector to build on the strong foundation in place to ensure that customers who need support are able to easily access the help available - this is entirely consistent with UU’s strategy.</p>	<p>We have noted your comments.</p>
			<p>1. Comments on CCWater Forward Work Programme 2017 - 20</p> <p>Key Strategic Issue 1 - Speaking up for and informing customers</p> <p>The PR19 review process will undoubtedly focus more than ever before on the views and priorities of customers. This is absolutely right and UU supports the key role that CCWater will play in this. Representation of customers by CCWater and the challenge provided at our customer challenge group will be a key element of ensuring that customers’ priorities on spending plans have been reflected in our business plan.</p> <p>We look forward to working closely with CCWater throughout the PR19 process, both through direct engagement and via our Customer Challenge Group, YourVoice.</p> <p>We recognise CCWater has an important role to play in ensuring that upcoming non-household competition delivers price and service benefits to customers. Raising awareness of market opening is critical and once established, CCWater can play a key role in ensuring the market works by encouraging the introduction and publication of consistent complaint handling processes and that innovation and performance is shared across all retailers.</p> <p>Government is currently considering whether or not to pursue domestic retail competition for the water sector. It will be important to ensure that the impacts of opening household retail services to competition are properly assessed. Evidence from other retail markets suggest vulnerable customer groups may</p>	<p>We will be continuing our direct engagement with you, as well as through the CCG.</p> <p>We want to see consistent complaint handling processes and will, where possible, facilitate a sharing of good practice.</p> <p>We have been clear in our responses to Ofwat, the UK Government and in the media on our views about household retail competition</p>

			<p>require extra support in getting their voice heard.</p> <p>As such, when considering the impact of reforming the retail household market it will be important to consider the impact of such reforms on support tariffs and other customer support schemes offered by us and other water companies. Some of the current measures would require reform if they are to continue to operate effectively in a competitive market.</p> <p>We welcome Ofwat’s acknowledgement that any design of a household retail market would need to ensure that such customers are protected. We consider it is important to go beyond recognising the issue and to consider how mitigation of it could be implemented before proceeding to a policy decision on market reform.</p>	<p>proposals. [here] and [here].</p> <p>We have expanded our section on household competition so we are clearer that there need to be protections for vulnerable consumers and consideration of consumers who are on social tariffs or WaterSure, should household competition go ahead.</p> <p>We have expanded on our intentions in Section 4.</p>
			<p>Key Strategic Issue 2 - Pressing for fair, value for money and affordable charges that are acceptable to customers</p> <p>We welcome CCWater’s plans to continue to work with other organisations and the industry to identify vulnerability and provide access to an inclusive service for all water consumers. We see CCWater as having an important role in helping to identify and understand the dimensions of customer vulnerability and routes to identifying these customers and in the sharing of best practice treatments to support these customers appropriately across the industry.</p> <p>UU and the industry have a strong foundation to build on with the range of schemes and initiatives in place to support customers available. We agree that the focus now is to ensure that all eligible customers who need support are able to access the help available. Recent events held by CCWater at both a national level and regional level to encourage the sharing of best practice amongst companies have been well received and UU would support more of this type of work going forward.</p>	<p>We have noted your comments.</p>

			<p>We support the approach of challenging companies to ensure that when preparing their PR19 business plan that they are able to show that these plans are derived from real customer insight and understanding of their needs and priorities. A fundamental aspect of the evidence we will submit in our business plan will be learning and evidence from the wealth of operational data we hold on our customers and the huge amount of feedback we get on our day to day operational activity. Our plan will reflect insight and learning from all data sources including day to day metrics and insight (eg rant and rave feedback, complaints etc) as well as, where required, dedicated research studies.</p> <p>If CCWater plan to carry out any customer research studies, we would again support you in this and would urge you to do more to encourage more companies to supplement your customer sample sizes to ensure the findings are as robust as possible.</p>	<p>We will continue to look for opportunities to work collaboratively with the industry and will give companies the option to boost the size of the customer sample in our Water Matters and Testing the Waters research.</p>
			<p>Key Strategic Issue 3 - Services that are right first time</p> <p>We support CCWater’s aim for a better service and fewer complaints for consumers and we continue to work hard to reduce the volume of complaints we receive. We believe it is important that CCWater continues to utilise its network of contacts to share best practice across the industry to help drive improvements and to ensure that complaints information it receives from water companies is reported in a consistent manner.</p> <p>We will continue to work closely with CCWater and consider recommendations made through the risk based complaint and debt assessments.</p> <p>We understand the need for CCWater to restructure to allow it to deal with nationwide complaints that Market Reform may trigger. We will continue to build the relationship with this team to ensure the fast and effective resolution of any complaints for our customers.</p>	<p>Noted.</p> <p>Noted.</p>

			<p>We believe that it is entirely appropriate for CCWater to work with the industry and Ofwat on the development of a new customer service metric. CCWater will have an important role in shaping a new mechanism, we are keen to work with you to help develop a mechanism that is right for water customers.</p>	<p>We look forward to working with Ofwat and the industry on a new customer experience measure that improves customer service.</p>
			<p>Key strategic Issues 4 and 5- A reliable and resilient service</p> <p>Our own engagements with customers continue to demonstrate the high priority customers place on a safe, reliable and resilient service. We believe there is a role for CCWater to continue to work with companies on the benefits of water efficiency and to help promote behavioural change. We also support your proposals in this area, in particular the focus on how companies respond to sewer flooding events.</p>	<p>We note your comments. We will continue to work with companies and other stakeholders on the benefits of water (and energy) efficiency and help to encourage customers to use water wisely.</p> <p>We are pleased that UU supports our continued focus on sewer flooding and support for customers during and after incidents.</p>
			<p>What CCWater cost</p> <p>Given CCWater’s plans to improve service and levels of satisfaction .We welcome the visibility provided by CCW on future cost projections and believe that it remains crucial that CCWater also gives consideration as to how it might continue to exercise control over its costs in future and also how it would seek to recover costs from new retail entrants to ensure fair cost distribution.</p>	<p>CCWater will continue to identify how best to maximise use of resources, and strive to maintain the licence fee at 2018/19 levels for as long as possible.</p> <p>We have set out our plans for collecting licence fees from retail suppliers alongside Ofwat in their consultation document [link here] Section 3.1.6.</p>

	Date Received	Stakeholder	Comments Made	CCWater Response
17	11/1/17	Thames Water	<p>We read the document with interest and agree with your assessment of the key issues and priorities for customers from 2017-2020. We look forward to continuing to work with CCWater to deliver the right outcomes for customers.</p>	
			<p>General comments We would welcome clarification in the Forward Work Programme on CCWater's plans and activities regarding the UK's proposed separation from the European Union, Defra's expected Environment Strategy and its Strategic Policy Statement.</p>	<p>We will monitor the impacts of any wider economic effects on consumers and on the affordability of water bills. We will work with the UK Government to ensure the environmental and drinking water improvements that have been made over the past 27 years - and for which customers have paid - are not diminished because of Brexit. There may be scope to look afresh at how such improvements are delivered and over what timescale to ensure that they remain acceptable and affordable for consumers. We will work with Defra and other parties on aligning delivery of the Environment Strategy and Strategic Policy Statement with consumers' priorities and expectations.</p>
			<p>Key Strategic Priority 1: Speaking up for and informing Household and Business consumers We welcome CCWater's continued active involvement in our Customer Challenge Group, providing fair and balanced challenge on all aspects of our performance, planning for the future and customer engagement. Following 1 April 2017 when Thames Water will exit the non household retail market, we would be interested in whether or not CCWater intends to promote the establishment of Customer Challenge Groups for the new non-household retailers.</p>	<p>Whether new retailers will have CCGs may depend on how the price reviews change in the light of the new market. At present, only incumbent companies are expected to produce business plans, have performance monitored, and be subject to price regulation. So we expect incumbents to currently have CCGs but it is important that incumbents engage with retailers (both their own associated retailer and others) in terms of gathering evidence on retailers' expectations and the customer evidence retailers may offer. CCGs can then consider this in the 'basket' of evidence that goes into the business planning process, challenging where necessary.</p>
			<p>We note CCWater's intention to continue its work with business</p>	<p>Noted.</p>

			customers to inform them about which retailers are doing well and would like to clarify that from April 2017 we will not be including any non-household retail information in the retail sections of our quarterly CCWater submissions	
			We believe that by 2019/20, influencing 2020-25 business plans should be an ongoing activity for CCWater (currently a red tick in the table on page 19) because any major influencing will need to have been completed prior to this and before water companies submit their draft Business Plans in 2018.	Agreed. Changed tick to green for 2019-20.
			It would be useful to have clarification of the alignment between the performance information sought and published by CCWater for its 'Delving into Water' report and 'How is my company doing' section of the CCWater website and the information included in 'Discover Water'.	All of this information is based on the data that companies submit to us in their audited end of year returns, and on research such as Water Matters. We will submit our Water Matters and Complaints Report data to Water UK for inclusion in the Discover Water site. Discover Water will approach companies for their data. We plan to restructure our annual reporting to produce a suite of focussed reports that provide a rounded picture of company performance in the past year, customers' views of that performance (through research and complaints), and a forward look at what may be required over the longer term.
			<p>Key Strategic Priority 2: Fair, value for money charges that are affordable in the long-term</p> <p>We agree that CCWater's position provides a good platform to support our customers struggling to pay. However, we would like to see CCWater's support expand beyond the water bill in isolation, as many of the water companies are doing now. Social tariffs are a key part of our efforts to help customers struggling to pay bills, but the future focus needs to shift towards better-coordinated cross-sector solutions, and on 'whole-house' financial management. This more efficient approach would lead to greater benefits for customers. We would welcome CCWater joining forces with Ofwat to host discussions on better standardising social tariff options across the sector for PR19, and we would be willing to work with CCWater to achieve this.</p>	<p>We will continue to look at affordability from a holistic approach. During the last year we added a benefits calculator to our website. In its first year of operation this has identified potential annual benefits of around £3.25 million for those customers who have used it.</p> <p>Current Defra and Welsh guidance enables companies to deliver social tariff schemes which are designed to address local affordability circumstances. We have, however, continued to encourage companies to consider the approaches of other companies particularly where customers are shared.</p>

				<p>As outlined in the FWP we will continue to work with companies to ensure good practice is shared and to highlight to the Governments the limitations of what can be delivered through current arrangements for consumer-funded tariffs, and that customer preference is for a national approach.</p>
			<p>All water companies would benefit from CCWater’s support both to increase visibility and access to vulnerable customers. Due to the sensitive nature of customer data it is often hard to approach the right customers and in the right way. Many do not want to acknowledge that they are finding things hard, especially customers who are really struggling but still manage to pay their bills, sometimes sacrificing eating well or heating their homes to do this. So using a traditional ‘one size fits all’ approach to communicate to customers, even if this is via a third party (Citizens Advice, food banks), is not sufficiently tailored to bring customers forward. We would welcome CCWater’s support to gain a better understanding of vulnerability and help develop routes to identify and channel our support to customers who need it the most.</p>	<p>We have noted your comments and we will be progressing the recommendations made to companies as part of our “Special Assistance Review” work and also our “Delivering Affordability Assistance” work.</p>
			<p>The difficulties in sharing data between organisations are also a hindrance, and we would welcome CCWater championing and leading a route to resolve this issue. This could involve CCWater engaging with similar bodies in the energy and financial services industries to seek cross-sector solutions for the same group of vulnerable customers. We would recommend that CCWater combines its efforts on affordability and vulnerability with other key organisations (Ofwat and Water UK) to reduce the burden of double handling/reporting and strengthen the capability to develop solutions.</p>	<p>We are continuing our cross-sector work with Essential Service Access Network (ESAN) and UK Regulators Network (UKRN) regarding supporting customers in vulnerable circumstances.</p> <p>UKRN is taking the lead regarding cross-sector information exchange and distribution. Further details of this can be found on its website here.</p> <p><i>We added: We will also support work to secure greater data sharing where that would enable companies to more effectively target support to consumers.</i></p> <p>We had already stated within the tick box</p>

				section that we would: <i>Press, where appropriate, for data to be shared to help identify people who will benefit from assistance.</i>
			<p>Key Strategic Priority 3: Services that are easy to access and right first time</p> <p>We support CCWater’s role in driving up company performance. In this context it would be useful for CCWater to provide strategic ‘lessons learnt’ reports in the same way that Ofwat does in its casework review.</p> <p>We welcome CCWater’s additional focus on non-household retailers and its intention to publish performance data, including numbers of complaints and potentially additional customer service information.</p>	We have noted your comments and would like to explore this further with a view to our investigations against companies.
			<p>We would welcome more specific information on how CCWater intends to influence the development of the Service Incentive Mechanism (SIM), particularly how the rewards and penalties for SIM will be calculated in future. It will be important that these are calibrated in a way that incentivises companies to do the right thing (and doesn’t penalise the poorest customers). A key concern that came out of recent analysis by Deloitte is that there is a known demographic effect whereby poorer customers give a higher score for a given level of service than wealthy customers. When Ofwat selects the calibration mechanism for SIM (for the current 2015 to 2020 price control period), it will be important to avoid the situation where it results in poorer customers facing a price increase purely because they happen to be poor in the first place.</p> <p>While this demographic effect makes up a small component of overall SIM scores, it has a large impact on the differences in SIM scores that are used to determine the extent to which companies can increase or must reduce prices.</p>	We will work with the industry and Ofwat to ensure a new service measure will encourage companies to improve service and be a fair measure of company performance. We want to see a measure which includes all customers and overall levels of satisfaction with companies encouraged to contact customers. Our response to Ofwat’s consultation is here .
			We welcome CCWater’s guidance for water companies to use the term ‘priority services’ when identifying permanent additional help available to customers, and we will use this term from 1 April	Noted. The main aspect of the work that UKRN is leading on regarding data share encompasses priority services data including category lists.

			<p>2017. We would support CCWater endorsing a standard category list within water companies' priority services registers across water and other utility providers. There has been a huge amount of work done on this by National Grid that would be very useful. If all water companies were to use a standard format for categorising additional customers' needs it would make the future sharing of data much easier.</p>	<p>CCWater is liaising with Ofwat as part of UKRN regarding this.</p>
			<p>Key Strategic Priority 4: A resilient, sustainable, good quality water supply for now and in the future We welcome the recognition of the challenges in balancing supply and demand over the short and longer term and the need to achieve a resilient, sustainable and affordable supply of water. We would welcome CCWater's support in encouraging government to commit to publishing a National Policy Statement on Water as early as possible in 2017, in order to enable water companies to initiate the construction of new water resources with minimum cost and delay. Thames Water is already acting on many of the recommendations in the Water UK Long term water resources planning framework and is one of the leaders in the sector in applying the latest decision support tools to assist the development of our WRMP19. We would be delighted to explore further ways in which we can work with CCWater to help raise customers' awareness of the challenges to maintaining a secure, sustainable and affordable supply of water and the actions that customers can take to help achieve this.</p>	<p>Clear Government direction on a strategic water framework will be welcomed.</p> <p>Welcome opportunity to work collaboratively with company and through WRSE and WRE.</p>
			<p>We started our Progressive Meter Programme (PMP) during AMP6 and we are currently installing AMI smart water meters in London household properties. We currently provide progress updates about the PMP during our regular meetings with CCWater, and will continue to do so. Key areas that we have engaged with CCWater on, relevant to the PMP, include customer engagement and journeys, awareness of metering benefits, managing water bills, affordability and vulnerability services and water efficiency savings. We welcome CCWater's continued interest in the implementation of our metering programme and its ongoing support.</p>	<p>Thank you for your continued engagement. We will want to monitor implementation and emerging issues, and to continue to share good practice among those regional companies with metering programmes.</p>

			<p>Key Strategic Priority 5: A sustainable, resilient sewerage service that works now and in the future We would welcome more detailed information on what is included within each of the activities within this strategic priority (i.e. A34-39). We would also welcome information on whether these activities will need to be supported with reports from water companies and the level of detail required.</p>	<p>Our regional committees will undertake much of the work in monitoring progress to resolve sewer flooding. Any reports to committees will be company specific. We will continue to collect data on a quarterly basis in the agreed format.</p>
			<p>Consumer research We welcome CCWater’s current approach to working in partnership with water companies and other organisations to understand consumer views and promote good consumer engagement, and hope this will continue. We would also welcome CCWater’s support in encouraging more collaborative working across the industry to gain understanding of customer engagement techniques, such as the water industry workshop in November 2016 on customer preferences research.</p>	<p>We will continue to look for opportunities to promote collaborative working.</p>

	Date Received	Stakeholder	Comments Made	CCWater Response
18	11/1/17	South West Water	We are pleased to be able to provide comments on CCWater's consultation paper 'Draft Forward Work Programme'. We are also pleased to see that the priorities listed continue to reflect the priorities of customers.	
			As CCWater are aware, as part of our business plan for 2015-2020 we introduced 'WaterShare' which is a performance sharing and reporting framework and a mechanism to share potential gains in a timely manner with our customers. We are pleased that CCWater are taking an active role on the independent panel which is now in place to oversee 'WaterShare' in order to represent the interests of our customers, alongside other Regulators and community representatives. This year £3.1m has been re-invested on service improvements for customers.	We recognise the value of the company's initiative of using a WaterShare panel and welcome the innovation.
			With regards to CCWater's proposals and views for engaging with the Price Review we are supportive and both the CCWater Regional Chair and LCA's covering South West Water and Bournemouth Water are taking active roles in helping ensure the right outcome for customers. We note CCWater's view on value for money or a similar measure being an incentivised outcome but hope that CCWater are mindful of the research supporting the recent Ofwat PR19 Outcomes consultation.	We noted that Economic Insight's view ¹ was that value for money was <i>more meaningful in an assessment of the full service experience</i> . In our response to Ofwat's consultation we have suggested that a customer experience measure relates to 'satisfaction' as an overall concept - rather than splitting it out into value for money, service, trust etc. Our response is here .
			We support the preparation taken by CCWater in readiness for the non-household retail market in England and its plans to publish information about retailers' performance	You will have noticed our consultation on our monitoring plans in February 2017. We have added that we will monitor the <i>complaints we receive and those that go directly to the retailers. We will also consider what other data is useful to inform consumers as the market develops</i> .
			We note CCWater's role to coordinate and lead in standardising	Noted.

¹ Appendix 5 of Ofwat's outcomes framework consultation, [link here](#).

			<p>access criteria and essential information for vulnerability registers and assistance schemes in the water industry, and confirm that we are carrying out a fundamental review of our schemes. This will include the use of the term 'priority services' for both South West and Bournemouth Water to ensure schemes are more recognisable to consumers and national advice agencies.</p>	
			<p>Along with the tactical activities it is good to see that CCWater continue to recognise the role that they can play at a more strategic level to influence Government on matters that will affect water consumers and are broadly supportive of the activities listed 'under influencing the agenda' in section Key Strategic Issue 1.</p>	Noted.
			<p>We believe it is important for CCWater to be mindful that working together with water companies can deliver real benefits to customers, recognising what companies have delivered for their customers to date is also important and provides a balanced view of the services customers receive alongside where performance is below expected.</p> <p>I hope our comments have been useful, at South West Water, there is a strong determination to deliver value for money and excellent services to our customers and we look forward to continue to work closely with CCWater at both a local and a national level in order to achieve this.</p>	Noted.

	Date Received	Stakeholder	Comments Made	CCWater Response
19	13/1/17	House Builders Federation	<p>As a major business customer of the Water and Sewerage Sector we are conscious of the momentous changes that are taking place in this Sector, not only in respect of the Market Reforms in general but also in relation to the introduction of the New Charging Rules - these changes emanate from the Water Act 2014 and it is fair to say HBF has been actively involved in related discussions and workshops (at a senior executive level) for over three years. However, despite our continued engagement with Ofwat, Defra, Water UK and other Government Departments, together we continue to have a number of serious concerns. Some of these concerns revolve around the diversity of approach (and attitude) that exists from Company to Company. This is particularly so when confronted with respective charging methodologies and the costs that are applied. We would suggest that this would replicate what you are seeing in surface water drainage charges. The range of charges for what is in essence doing the same operation is staggering and what is even more interesting is the fact that there is a north-south divide. The four southern based WaSCs, together with Welsh Water are consistent in their approach to leverage capital contributions from developers for off-site network improvements/reinforcement that are clearly not in consequence. We are more than happy to share our research findings in this area with CCWater.</p> <p>In looking through the CCWater Consultation we see numerous actions in the Forward Programme which relate to Consumers and other Business Customers. However there is little to no mention of what CCWater intends to take forward with regard to the House Building Industry. Considering this is an important issue for Government as well as the Water and Sewerage Sector, the question we would pose to CCWater is whether there is an opportunity to create greater ties between yourselves and the developer community?</p> <p>At present the HBF and CCWater have a somewhat informal relationship which is more centred on being reactive rather than</p>	<p>We have had discussions with the HBF on issues that it has raised at various groups and events. In many cases, however, our role is too limited to enable us to contribute to the wholesale changes that HBF is concerned with. We sit as an observer on the New Connections Working Group, of which HBF is also a member. Once the work of this group has been delivered, we will be in a better place to assess what, if any, further work we can do in this area.</p> <p>We will consider this further as we review our approach this year.</p> <p>Included HBF in Chair's Foreword.</p>

			<p>proactive. We see the possibility of numerous advantages in such a proposal, which we are more than happy to discuss further with CCWater. Moreover, given the Government's objective (and commitment) to significantly increase the output of new housing, in addition to placing greater reliance on off-site modular construction to achieve this policy objective, collaborative working and the sharing of experience and best practice is seen as being essential. Furthermore, the Government is anxious to see greater efficiency in the provision of new homes and whilst we can deliver a new home in a matter of a few weeks, it is still taking around 32 weeks from the time application, to the point when a water meter is fitted and the property handed over.</p>	
			<p>In this latter context, the Water & Sewerage may be complimenting themselves on a modest increase in delivery performance but in reality, they really do have to up their game. In addition, they cannot use the New Charging Rules/Arrangements to subjugate their statutory obligations under the WIA 1991 to provide the necessary infrastructure that is essential to the success of Government Policy. Any demands for developer contributions must be on a fair equitable, transparent and proportionate basis and above all in direct consequence of new development. The unintended consequence of deviating from these essential requirements is compromised project viability leading to reduced new housing provision.</p>	

	Date Received	Stakeholder	Comments Made	CCWater Response
20	12/1/17	Natural Resources Wales	<p>We are grateful for the opportunity to comment on CCWater’s draft Forward Work Programme for 2017 to 2020. We have reviewed the document and have no substantial comments to make. Therefore we are not responding formally.</p> <p>We are pleased to see policy differences between Wales and England clearly presented in the document, in particular the Water Strategy for Wales, Well-being of Future Generations Act and Environment (Wales) Act. The new legislation will provide the context for developing our approach to PR19 and water company planning going forward, and we’re grateful to Bob Gilchrist for his input at the 22 November workshop, which began to explore this issue. We are also grateful for CCWater’s input to the development of area statements.</p> <p>We look forward to continuing to work with you as members of the Wales Water Forum, Dŵr Cymru’s CCG, and River Basin District Liaison Panels. We will continue to support CCWater’s public meetings as appropriate</p>	Noted.

	Date Received	Stakeholder	Comments Made	CCWater Response
21	13/1/17	WaterPlus	<p>General We broadly support the CCW Forward Work Programme for England and Wales 2017/2020 and the objectives set out in the Consultation. Building on what you have set out in the Consultation, we have outlined below few key areas we believe will be important in making the non-household retail market a great success for customers:</p> <ol style="list-style-type: none"> 1. Wholesaler contribution to customer experience 2. Code of Conduct (or similar) for Third Party Intermediaries 3. Robust complaints and mediation processes 4. Standardisation of tariffs and policies across regions 	
			<p>1. Wholesaler contribution to customer experience We agree with CCW's objective to understand how companies perform and the need to provide customers with appropriate information on retailers' performance. It is however important to note the new structure under which the new non-household retail market will be operating from the 1st of April, and in particular the separation between wholesalers and retailers. This means that the wholesaler will in many cases have a significant impact on customer experience (e.g. responsiveness to certain customer queries). Whilst this is in a limited number of areas covered by the Codes, we would strongly support the development of performance data on key areas of wholesale performance which directly impact the non-household retail customer experience. This will ensure that we can quickly identify poor performance and best practice to ensure that customers get the best service. As the largest retailer in the non-household retail market with a national footprint we would be well placed to support such an initiative, and are very open to working with CCW and other key stakeholders to explore how this might be put into place.</p>	<p>We agree that monitoring the impact of wholesaler activity on retailer performance will be important and we would be happy to work with Water Plus on exploring this further. We have added a mention of this into the FWP. We are developing our TAP contact system to allow us to track complaints in a way that will distinguish between wholesaler and retailer responsibility for issues. We also issued a consultation on our monitoring plans in February 2017.</p>
			<p>2. Code of Conduct (or similar) for Third Party Intermediaries It is clear that Third Party Intermediaries (TPIs), will be playing a</p>	<p>We have regular contact with TPI organisations both directly and through our business customer forum. We believe there is support for a TPI</p>

			<p>major role in the non-household retail market, and we therefore support the objective of monitoring how these operate and the service they provide to non-household customers.</p> <p>For example, TPIs will be providing important information to customers on different topics where the customer is not necessarily familiar including how the market will be structured and function, as well as the process and benefits of switching. It is therefore critical that TPIs have an appropriate level of knowledge around how the market operates and the roles and responsibilities of the key participants. The fact that water is a new market for many TPIs (who mostly come from energy) further augments the need for an appropriate level of understanding to enable their customers to make informed choices, set appropriate customer expectations and facilitate the smooth functioning of the market.</p> <p>As mentioned above many TPIs are new to the market and bring with them experience and practices from the energy market. Given that many behaviours from the energy section have been found to be detrimental to the interest of customers, we would strongly support a TPI code of conduct.</p> <p>Overall, we would welcome more details on how CCW plan to monitor customer experience of TPIs, and overall TPI's interaction with customer. We would for example strongly support the development and promotion of a water industry TPI scheme covering for example knowledge of the water market and a code of conduct.</p>	<p>code of conduct scheme and will work with TPIs and Ofwat to determine the most effective way of delivering this.</p> <p>Our response to Ofwat's TPI consultation is here.</p>
			<p>3. Robust complaints and mediation processes</p> <p>Through the Water UK Retail Forum we have been involved in initial discussions regarding the potential expansion of the Water Redress Scheme (WATRS) to the NHHR market. We support this in principle as a practical way of introducing a robust dispute resolution mechanism into the market. However, we believe there are a few areas to work through including for example whether or not such a scheme could also manage disputes between wholesalers and retailers. We would be very open to work with CCW on some of these questions, and help putting a place an effective dispute resolution process for customers and market participants - which will also support the effective operations of</p>	<p>We have been contacting all new WSSL licence holders to explain CCWater's complaint handling role and to offer advice about the most effective complaint handling procedures. We agree there should be consistency across the market.</p>

			<p>the market overall. Furthermore, we strongly support the objective of encouraging the industry to use a consistent high-level approach to complaints e.g. two stage company procedure, CCWater mediation and WATRS. It is important to the customer that these are standards which all retailers adhere to, and we would be very open to working with CCW on exploring how to implement such a scheme. This will not only aid consistent and transparent data on complaints performance, but more importantly ensure that all customers have a robust complaints process available to them, no matter their geographical location or retailer.</p>	
			<p>4. Standardisation of tariffs and policies across regions Today each wholesale region has a unique tariff structure and a unique set of policies which (directly and indirectly) govern the terms of the service provided to the end-customers. That means that for a multi-site customer they may have to understand and manage up to 10 or more wholesale policies at any given point in time. Post April 1st this will still be the case even if a customer consolidates to one retailer, as the retailer has no option but to align critical aspects of their retail policies to the wholesale policy for each area where a customer site is located. We would therefore strongly encourage a practical move towards standardisation across wholesale regions as part of PR19, and would welcome working with CCW and other key participants on this. This will significantly reduce the risk of creating regional (rather than national non-household retail markets) as well as simplify and provide much more clarity to customers in terms of their charges and policies which again could be a potential barrier to switching for some customer groups.</p>	<p>Our primary focus, as reflected in the FWP, is to ensure that charges are fair and reasonable. That includes ensuring customers do not experience significant bill shocks as a result in adjustments to tariffs. We are happy to participate in discussions on the extent to which there is scope to standardise tariffs subject to ensuring this does not result in any such bill shocks.</p>

	Date Received	Stakeholder	Comments Made	CCWater Response
2	16/1/17	South Staffs Water	Thank you for the opportunity to provide our views on CCWater's customer representation plans. We fully support the Forward Plan and find the content very reassuring. I offer the following minor comments for your consideration:	
2			<p>Key strategic issue 1/2</p> <ul style="list-style-type: none"> • Excellent to see clear emphasis being placed on customer feedback and research and learnings of competition roll-out in other sectors such as energy. • It's pleasing to see that working in collaboration with key agencies associated with supporting vulnerable customer is high on your agenda, sharing insight and learning with the industry would be beneficial. • There is a slight concern on how CCWater will have all the information to achieve and promote which retailers are doing well in the newly competitive market. • Pleased to note the importance of collaboration to inform consumers on using water wisely whilst also reflecting the links between water and energy efficiency and encourage extending this to influence and encourage inward investment and the creation of innovation and dynamism within the industry. 	<p>Noted.</p> <p>We will collect complaints information initially and other data, if necessary, but have amended the text in that section. We issued a consultation on our plans in February 2017.</p> <p>Noted.</p>
			<p>Key strategic issue 3</p> <ul style="list-style-type: none"> • Striking a balance of focus of both underperformance and performance which excels is suggested. • To work with companies to deliver a consistent approach and minimum information requirements to customers for the promotion of complaints procedures and WATRS would be advantageous in addition to achieving consistency similar to the recent agreement for the adoption of 'Priority Services Registers' to aid customers. 	<p>We are working with retailers to encourage an efficient and effective complaints process.</p>