

The Consumer Council for Water’s Forward Work Programme 2018-21

This document outlines the comments we received about our draft Forward Work Programme, which was issued for consultation in November 2017. 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. Other comments we have considered either as changes to the FWP or to clarify our position are:

- To outline more our view on how water companies should be approaching the issue of [consumer] debt or how consumers expect to be dealt with if they fall into this area.
- Whether our quarterly reporting requirements [from companies] should be more aligned with what Ofwat want.
- To clarify how CCWater intends to influence the development of the customer measure of experience (C-Mex)
- To consider the request for recognition of problems retailers have with wholesalers and on data issues
- To consider the request by Natural England to put consumers’ views on the environment higher on our agenda
- To participate in greater collaboration with Waterwise on a number of ideas
- To have a more joined up local media approach with local companies
- To reflect on a respondent’s view that” as a clear majority of citizens favour public ownership of the water sector”, we should reflect this more in communications
- To take full part in corporate greed discussions.

Links to respondents below:

Names of respondents

1. Affinity Water	13. Southern Water
2. Auriga Services	14. South Staffordshire Water and Cambridge Water
3. Bristol Water	15. South West Water and Bournemouth Water
4. Business Stream	16. Simon Sperryn
5. Consumer Council for Northern Ireland	17. Thames Water
6. Deryck Hall Associates	18. UNISON

<ul style="list-style-type: none">7. Home Builders Federation8. Institute of Customer Services9. MOSL10. Natural England11. Northumbrian, Essex & Suffolk Water12. Portsmouth Water	<ul style="list-style-type: none">19. United Utilities20. Waterwise21. Welsh Water22. Wessex Water23. Yorkshire Water
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	Date received	Stakeholder	Comments Made	CCWater Response
1	4/1/18	Simon Sperryn CCG Chair	<p>My overall impression is of a well thought out programme with no surprises. Whilst I could debate the prioritising, or the targeting of some objectives, no doubt people much closer to it all than I am have argued out each section.</p> <p>However I would like to suggest a new area of work which I don't think appears anywhere, and which could help customers directly and quite radically, whilst having a significant impact on the future supply/demand balance. It is to lobby for, facilitate, draw attention to, or in any way stimulate, the introduction of water efficient developments using shared facilities for collecting and using rain water in place of drinking water.</p> <p>I have observed support for this idea coming up, unprompted, in discussions with both customers and developers as part of the current customer engagement programme leading up to PR19. It seems to be uncontroversial, and self evident to all parties, that water efficiency should be a requirement of future developments and an expectation of customers buying new homes. However, without regulatory change, customers are denied these benefits and consumption of treated drinking water continues rises unnecessarily, and the time for large investment in new sources for water-stressed regions like this one, gets ever closer. The timing for the topic could not be better with political focus on a step change in levels of house-building.</p> <p>Developers seem as keen as customers and water companies, but unless public policy, either at national level or at the level of local and regional planning decisions, is changed, developers are unable to introduce such benefits to their</p>	<p>We agree with the point here and what you are calling for. We raise these points in our responses to both governments, regulators and company plans, but it will normally be for the water company to deal with a specific developer or site solution. Where companies are proposing to do more to encourage rainwater harvesting, we are very supportive.</p>

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			<p>customers, to the community at large, and to the next generation, because the added cost to the development will not be recovered in higher house prices. If they all had to do it, the problem goes away and the door is unlocked to something customers want and the wider society needs.</p> <p>I imagine CCWater may face constraints around its freedom to campaign. Even so, much can be done to stimulate others, to be the thought leaders, to assemble knowledge of the subject, to act as independent host for the relevant sector bodies, to do research that reinforces the case or identifies the solution. Who else is there to speak up for customers whom the market is failing, and who are faced with non-availability of something they want, which suppliers would happily provide as long as the competitive disadvantage were removed?</p>	
2	5/1/18	Welsh Water	<p>We share the view that engaging with customers at every stage of a Price Review is of paramount importance. We want to ensure that our plan is based upon our customers' views and strikes the right balance between affordability for today's customers and tackling the needs of future generations.</p>	
			<p>In terms of key strategies (for example, such as Consumer Protection and ensuring that customers pay a fair price for services), we note the measures proposed that are relevant to Wales and the recognition that there are particular factors which need to be taken into consideration when implementing the strategic priorities outlined in the consultation document. We are pleased to see your recognition of the approach that applies in Wales. It is supportive that you have a comprehensive plan to deliver consumer insight through research and that you will, where</p>	

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			appropriate, work with companies on areas of joint interest, promoting partnering where relevant. This should ensure that important decisions are properly evidenced.	
			<p>Many of the comments made last year have equal application, and in preparing this response we have focused on the key changes set out in the consultation document. The merger of water and sewerage issues (where there are broad similarities) makes perfect sense and we can also see merit in taking a longer term perspective. In the context of longer term planning, you will be aware that in May 2017 we published our consultation document ‘Welsh Water 2050’ and are currently working on producing our final ‘Welsh Water 2050’ plan which will be published in early 2018. The adoption of longer term planning resonates with our own approach and ensures that the appropriate balance is struck between current and future generations of customers.</p>	
			<p>Strategic Priority 1 - Advocate for affordable charges that all current and future consumers see as fair and value for money</p> <ul style="list-style-type: none"> • We fully support this strategy, which recognises the importance of tackling affordability and value for money. We note the express reference to providing effective support to vulnerable customers which is also at the forefront of our own plans. Developing and enhancing social tariffs will continue to be a priority and we welcome the prominence given to this in the consultation document. • We also welcome your commitment to work with companies throughout this period and the express reference to the Wales PR19 Forum is reassuring. • We also recognise that CCWater has an important role to play in making sure that good practice 	<p>We agree and are looking to companies to do more to contribute to the funding of social</p>

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			<p>amongst water companies is shared in tackling the problem of customers who struggle to pay their bills. Introducing a long term social tariff funding model would achieve some of the desired outcomes but it is important that this is fully explored and that any such model strikes the right balance between supporting customers that genuinely struggle to pay their bills and the generality of customers upon whom the burden of funding such a model would fall. This may be of greater relevance to other companies who are structured differently to Welsh Water.</p>	<p>tariffs. We know from our customer research that customers are more likely to be willing to contribute more where they can see companies are also playing their part.</p>
			<p>Strategic Priority 2 - Challenge companies to provide their service right first time, protect household and business consumers when things go wrong and provide easy-to access service for all</p> <ul style="list-style-type: none"> • Our attention has focussed on getting our service to customers' right first time, tackling the source of problems and thereby avoiding complaints. We are committed to reducing complaints and unwanted contacts and will continue to set challenging targets. We note that you will be pressing for poor performing companies to improve the services they provide. • We also note that you will be monitoring the non-household market in Wales which is what we would expect. • We welcome your focus on promoting resilience and in particular addressing community vulnerability when things go wrong. This is an integral part of our strategy for ensuring that our plans deal with all eventualities and, with a few to ensuring the appropriateness of our emergency plans we are happy to share with and discuss with you the measures we 	

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			<p>have in place to tackle local issues and to ensure that the customer interests are protected.</p> <ul style="list-style-type: none"> We are fully engaged in the working groups already in place reviewing the C-Mex (and D-Mex) and understand the importance of CCWater working with companies to make sure that the transition is smooth and that it achieved the desired outcome of improving customer service and delivering benefits for customers. 	
			<p>Strategic Priority 3 - Press companies for safe, reliable water and wastewater services that all consumers can trust now and in the long term</p> <ul style="list-style-type: none"> Providing a safe, reliable water and wastewater services that all consumers can trust is a fundamental objective and one we fully support. We note your aspiration to influence and support activity to help customers use water wisely and to encourage leakage control. You have identified the emphasis given in Wales on the resilience of natural resources and enhancement of the natural environment and we agree that this will be an important element in determining how customer interests are prioritised. CCWater's role in representing the interests of customers is acknowledged. Likewise, the Welsh Government's challenge to identify drainage solutions which will help mitigate the risk of flooding in Wales, as well as the impact of new legislation effecting Wales are given the prominence they deserve and we recognise that CCWater will play a key role in achieving the overall wastewater objectives listed. 	<p>* Our recent research: Saving Water: Helping Customers See the Bigger Picture provided some interesting insight as how our (and others') messaging on using water wisely can be improved to encourage customers and consumers to use water wisely. We will continue to pursue our activities in this area.</p>

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			<ul style="list-style-type: none"> There remains a great deal of uncertainty with regards the cost and benefits of transferring ownership of privately owned supply pipes to companies operating in Wales. We nevertheless recognise the value of collaboration and using joint research to understand the customer's responses to the potential scenarios and identifying the costs and benefits of transferring ownership. We are heartened to see that you will continue to engage as the Welsh Government develops its policy in this area. 	
			<p>Strategic Priority 4 - Shape the water sector by informing and engaging all consumers so that consumers' voices are acted upon by decision makers and the industry</p> <ul style="list-style-type: none"> We have already made representations on potential boundary changes and the potential impact on customers. If such changes progress then we would expect and welcome CCWater's close involvement. In the context of championing fairness and encouraging customers to be involved in considering how any financial rewards are used we have already taken steps in this direction. For example, our annual results in June 2017 showed we were in a good position and that we announced a £34million investment. We asked our consumers to provide feedback on how this £34million should be spent. We note that CCWater will continue to engage and challenge in this area. 	
3	8/1/18	Home Builders Federation (HBF)	<p>It has been possible to assess the above Consultation and although the email on 13th January 2017 was not about this Consultation it however remains pertinent to the future.</p> <p>With house building being a major issue for this and future</p>	<p>We agree that we should work with developers. In our fair charges section and our speaking up for consumers section, we have added 'and developers' to reflect that we do consider the point of view of developers.</p>

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			<p>administrations this Consultation do not seem any connection between CCWater and our Industry going forward.</p> <p>We are undergoing some of the most momentous changes in the relationship between Companies and the house building sector. Not only with the introduction of the Charging Rules but also with the move towards a wholesale and retail market, yet none of this seems to be on the radar of CCWater.</p> <p>It would be true to say that we see some immense challenges going forward in relation to the Charging Rules from 1st February 2018 where we will need the voice of CCWater to support the developer customer.</p> <p>We would have hoped that the future would have created the opportunity to have greater links between our two organisations.</p>	<p>“Represent water consumers’ and developers interests in charging matters to water companies, regulators and Governments, and share good practice.”</p> <p>We have a history of working with HBF and working on issues where we have a common understanding. We plan to continue to develop this relationship in the future.</p>
4	8/1/18	Yorkshire Water	<p>We strongly support your strategic priorities and are pleased to see that they align with our own. We look forward to your increased involvement in the upcoming Price Review and to working closely with your teams, especially at a regional level, as we develop our plans for the next five-year period.</p>	
			<p>The summary of what you delivered during 2016-17 shows the value of what you provide for consumers and what can be achieved when we work together, the development of financial help through social tariffs being a key success.</p>	
			<p>With regard to your Strategic Priority 2, we note that you propose to monitor and publish an annual Complaints and Unwanted Contacts Report beyond 2020. We support the</p>	<p>We agree. After 2020 our publication will focus on telephone complaints not ‘unwanted contacts’.</p>

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			<p>publication of complaint numbers in the absence reporting through C-MeX. However, reporting of unwanted calls beyond 2020 is unnecessary. Assuring the volumes of calls received against Ofwat’s definition of ‘unwanted’ requires significant effort. Our preference is to report all complaints received, which includes telephone, written and other methods such as social media. This is a more accurate reflection of volume of dissatisfied customers.</p>	<p>The Forward Work Programme has changed to say: <u>Demanding complaints numbers are reduced by pressuring poor performers</u> Complaints and unwanted contacts are currently one of the key measurements of customer service delivered by water companies. We will be working to ensure the industry brings the numbers of complaints and contacts down, which will reflect well on the industry and have a reputational incentive on water companies and non-household retailers. After 2020 this focus will change from ‘unwanted contacts’ to telephone complaints in line with the planned industry changes.</p> <p>Also we have said in the tables: Publish an annual Complaints and Unwanted (post 2020 telephone) Contacts Report highlighting poor performers, and press for improvements.</p>
			<p>In general, we welcome CCWater’s proposals for its Forward Work Programme for 2018-21 and look forward to continuing to work with you.</p>	
5	8/1/18	South West Water & Bournemouth Water	<p>Over the past 15 months we have worked closely with CCWater as part of the WaterFuture Customer Panel (South West Water’s Customer Challenge Group) to ensure that as we develop the plan for 2020-25 it reflects the views of our current and future customers and what is important to them, and we look forward to continuing to work closely with you throughout the remainder of the process.</p>	

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			<p>We note that CCWater will continue to press companies to share their financial success with customers in a timely manner. As you are aware from our responses to previous Draft Forward Work Programmes, as part of our business plan for 2015-2020 we introduced 'WaterShare', a performance sharing and reporting framework and mechanism to share potential gains with our customers. Alongside other Regulators and community representatives, CCWater continue to have an active role on the independent panel which oversees 'WaterShare'. Following the first year of the business plan period £3.1m was re-invested in service improvements for customers. In year two of the framework £6.1m was available. Following consultation with customers part of this £6.1m will be applied to bills for 2018-19 and the remainder has been deferred to smooth bills in future years.</p>	
			<p>We support CCWater's position as an advocate for affordable charges, however any approach should be mindful that balance is required between current charges and investment in future services to ensure that as an industry we are not storing up problems for the future. South West Water continues to take customer views into consideration in terms of both the timing of and what investment is needed in order to address this balance between providing assistance around affordability while continuing to invest in services for all current and future customers.</p>	<p>We welcome your focus on future consumers. Our emphasis on current and future consumers is reflected in our new aim: "Our aim is to secure the best outcomes for all water consumers, present and future."</p>
			<p>South West Water has a good reputation in the industry in ensuring our levels of spend are efficient, and we continue to target further cost efficiencies. In keeping our costs down we are able to support all customers in the affordability of bills. We believe that CCWater has a role in enhancing the provision of services for customers in vulnerable</p>	

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			circumstances, particularly through the sharing of best practice and we are pleased that you will be working with the industry to deliver the benefits of data sharing under the Digital Economy Act.	
			We support the strategic priority to press companies for safe, reliable water and wastewater services, particularly through working with companies to influence and promote activities to help consumers use water wisely, an approach which customers tell us is important to them for long term resilience of water resources.	Our recent research: Saving Water: Helping Customers See the Bigger Picture provided some interesting insight as how our (and others') messaging on using water wisely can be improved to encourage customers and consumers to use water wisely. We will continue to pursue our activities in this area.
			I hope our comments have been useful. We believe that CCWater have a role to play in assisting the industry to meet consumers' priorities through considering the challenges ahead, supporting innovation, and promoting best practice approaches to meeting future challenges, and we look forward to continuing to work with you at both a local and national level in order to achieve this.	Thank you for your response and helpful comments.
6	8/1/18	Southern Water	<p>Overview</p> <p>In our two previous responses to its forward work programme, we have encouraged CCW to make the most of its unique position at the centre of the sector to share best practice and learning. We welcome the progress CCW has made but believe it could do more. This could include in-depth research into customers' values across the UK and the geographic regions CCW covers. It could use its unique cross-boundary and nationwide position to help companies understand the needs of their shared customers. This would provide a valuable baseline for future research and will be extremely useful as the sector, collectively, moves towards greater collaboration and co-creation and as consumers</p>	We would welcome further discussion with Southern Water on this point so that we can consider whether this should be added into future research plans.

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			move from passive customers to active participants.	
			In our previous response, we asked CCW to look outside of the water sector and share best practice. We would welcome an understanding of what CCW is doing in this area, what it has found and what it could share with water companies. This cross-sector understanding should be extended to comparing water company performance with other utilities.	<p>CCWater commissioned Sheffield Hallam University to identify best practice in the delivery of financial assistance across sectors. The report from that work was shared with companies and can be found here.</p> <p>The findings, and lessons from other sources, were highlighted to companies at the affordability seminars held by CCWater in November 2017. We will continue our work to identify and disseminate such information. We have made a wording change to make this more explicit.</p> <p>We held a Vulnerability workshop, to which companies were invited in February 2018 where we looked at (cross sector) priority services and shared good practice on tackling consumer vulnerability and safeguarding.</p> <p>CCWater is also a member of the Utilities safeguarding forum which includes water, energy and broadband and telecoms.</p> <p>In the lead up to the retail market for non-household customers, we also commissioned a cross-sectoral ‘lessons learnt’ study by PwC [here].</p>
			While the sectoral league table does have value, we believe this is limited. The UK Customer Services Institute compares	We will consider the trend in complaint performance in other sectors and make

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			customer service performance and improvements across a wide range of sectors. The Water Matters survey also compares attitudes towards water companies with other utility providers for customer satisfaction and value for money. CCW should consider how to compare complaints data with other utility providers to give customers a holistic comparison of company performance.	comparisons. However using direct comparison with complaint numbers would not be practical as we would not be comparing like for like.
			Cross-sector working and understanding is becoming increasingly important. The interdependencies between sectors is recognised in the work of the National Infrastructure Commission and in our Water Futures research. Making the most of the data-sharing provisions in the Digital Economy Act will require understanding, collaboration and commonality between sectors.	We agreed and are involved in data sharing development groups.
			We believe CCW should consider setting more measurable improvement targets. For example, where a deliverable has a possible quantitative measure - “more customers rate their water and sewerage bill as value for money and satisfaction increases in our Water Matters survey” - this should be accompanied by a numerical target. CCW should consult on these measures as part of its forward work programme to give companies and, more importantly, consumers opportunity to challenge and shape them. This point applies to all strategic themes, whether specifically referenced under each heading or not.	We have added the measures we will be using in a footnote. As the consultation phase of this Forward Work Programme has passed, we are not able to do this. We have used the number that appears in our Water Matters survey, and our Stakeholder Survey as the measure.
			Advocate for affordable charges that all current and future consumers see as fair and value for money Intergenerational fairness is integral to all companies' Business Plans and it is right CCW includes this as a priority. Bills are expected to fall in real-terms over the course of the	

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		<p>next AMP and companies, working with CCWater, have dramatically increased the amount of support they provide to customers in vulnerable circumstances. So far this AMP, we have contacted over 210,000 customers with tailored advice on tackling their debt and help paying their bills. This is far above our target of just over 161,000 by this point.¹</p>	
		<p>Sharing best practice between companies - and sectors - will help companies better support customers who are struggling to pay. As above, cross-sector working will be vital to ensuring the greatest benefits are achieved from the provisions in the Digital Economy Act. Southern Water asked for the water industry to be included in the provisions, highlighting the link between water and energy efficiency, and welcomes CCW taking a prominent role in ensuring the provisions are effective. This could be supported by research into links between fuel and water poverty and possible strategies to alleviate them both. This is another area where CCW leading cross-sector work could really add value for companies and customers.</p> <p>The emphasis on future customers is particularly important. CCW should ensure it is truly forward looking with a focus on what customer services and engagement in the future could look like rather than primarily on reviewing what should have been done or achieved.</p>	<p>Water and energy affordability issues sit within very different contexts. Our research to date has focussed on those areas where there is a useful read across between the sectors. However we will bear this point in mind as we consider our future research programme.</p> <p>We agree and that is our intention. For example, while the two points are linked in the table, in reality the ‘review of customer challenge groups’ would be part of the work that feed into the following year’s ‘consider the future of consumer engagement in price reviews’ work.</p>
		<p>Challenge companies to provide their service right first time, protect household and business consumers when things go wrong and provide an easy-to-access service for all</p>	

¹ Figure from our [interim annual report](#) – published November 2017

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			We broadly agree with this strategic priority and work hard to provide our services right first time. Ensuring our services are easy to access for all of our customers is a core part of our PR19 retail workstream. Our Business Plan will be published in early 2018, and we look forward to sharing more detail with CCW.	
			CCW's work in this area so far has delivered benefits to vulnerable customers and has helped inform companies' plans and strategies. However, there is scope for CCW to deliver more and be more ambitious. It is crucial the definition of vulnerability is not limited to customers who struggle to afford their bills - and that the two aspects are linked. Work to alleviate water poverty should align and support work to support vulnerable customers and vice versa.	There is no question of CCWater limiting its approach to vulnerability to financial vulnerability. We have separate work plans for each area. For example we have, this year, held separate seminars on affordability and vulnerability. However our work in these areas is joined up recognising that for some customers both will be an issue and that there are shared challenges for companies in communicating with customers on both issues.
			Encouraging all companies to use "priority services" will help standardise services for customers of multiple companies. However, CCW could add value in this area by working to develop a broader understanding of vulnerability and focussing on sharing best practice. CCW could - and should - use its position at the centre of the sector to share best practice and encourage collaboration and alignment. This is another area which would benefit from cross-sector collaboration.	We held a Vulnerability workshop, to which companies were invited in February 2018 where we looked at our review of priority services and shared good practice on tackling consumer vulnerability and safeguarding. CCWater is also a member of the Energy and Water working together on priority services group which includes water and energy at present but has scope to expand once embedded in these two sectors.
			When CCW investigates how comprehensive companies' emergency plans are, it should also take the opportunity to understand what plans and strategies they have in place to support customers in vulnerable circumstances. CCW could use this opportunity to share best practice across the sector.	We are exploring this as part of our community vulnerability work; our vulnerability workshop in February 2018 included an interactive session on how companies can proactively plan how to react in an incident.

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			This will be especially useful for companies who share large amounts of customers.	
			<p>Press companies for safe, reliable water and wastewater services that all consumers can trust now, and in the long term</p> <p>Water companies provide safe, reliable water and wastewater services and have done for decades. Public health, environmental protection and resilience underpin all water company investments and operations. Companies are - rightly - heavily regulated by Ofwat, the Drinking Water Inspectorate and the Environment Agency to achieve these objectives.</p>	<p>Our recent research: Saving Water: Helping Customers See the Bigger Picture provided some interesting insight as how our (and others') messaging on using water wisely can be improved to encourage customers and consumers to use water wisely in the context of resilience.</p> <p>We will continue to pursue our activities in this area.</p>
			Through companies' Water Resources Management Plans (WRMP) we already plan for the future. Our upcoming WRMP looks to a 50-year horizon and includes a mixture of demand management and new source to secure water supplies. We look forward to sharing this with CCW in due course.	We look forward to learning about Southern Water's plans to secure water supplies.
			CCW can add value in this area by continuing to work with companies on education campaigns such as our very successful Unflushables campaign and providing additional insight and guidance into customer engagement. In our Business Plan and WRMP we will launch Target 100 - our ambition to reduce per capita consumption to 100 litres per person per day by 2040. CCW's support for both the idea and its delivery will be invaluable.	<p>We welcome the T100 initiative and wish to support this and other company initiatives to encourage water efficiency and avoid sewer misuse.</p> <p>As we note in the draft of the Forward Work Programme we want to continue work in this area and:</p> <p>"Raise consumer awareness of the misuse of sewers, such as flushing wet wipes down the toilet, or putting oils and fats down the drain, and help them understand the impact of this behaviour."</p>
			We welcome the inclusion of quantitative measures against this strategic priority. CCW's support for innovative	

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			approaches such as catchment management is also welcome.	
			<p>Shape the water sector by informing and engaging all consumers so that consumers' voices are acted upon by decision makers and the industry</p> <p>We welcome the inclusion of a specific target under this strategic priority, but believe it could be improved. Firstly, CCW should aim significantly closer to its impressive 2016-17 achievement of potentially reaching 168 million consumers. Increased customer awareness will be extremely important as companies publish, consult on and develop their Drought Plans, WRMPs and Business Plans. With potential challenges from water resources over the coming years, CCW should be ambitious in the amount of customers that hear its messages and become more aware of water resources situations and help available.</p>	<p>The Forward Work Plan target refers to the visibility of our messages in the media and some other publications and we intend to retain as a minimum the 100m OTS (opportunities to see our message) target for these channels in 2018-19. In addition, within the same resources we have now, we have plans to increase our visibility through other channels of communications, including new and existing social media channels. We will report on this additional reach and visibility and, of course, the increase in levels of engagement through our social media channels will be visible by likes, shares and follows. We expect these channels to assist us in engaging with more individuals and with a more diverse range of audiences in relation to issues that customers tell us are most important.</p>
			<p>Secondly, it would be beneficial to understand how this reach is measured and how many customers are reached in each CCW region. In addition to customers hearing CCW's messages, it would be beneficial to measure how customers' awareness of CCW changes.</p> <p>In addition to pressuring companies who are underperforming, CCW should inform customers of the positive work companies do. CCW does this already and works alongside companies on a number of campaigns and issues. This should be reflected in CCW's forward work programme. Informing customers of the positive, innovative work companies do will help improve consumer trust in the</p>	<p>During the past year we have regularly promoted educational initiatives and good or improving performance by water companies, in addition to encouraging and challenging poorer performing companies to improve. We have worked in tandem to develop, endorse and/or promote many industry or company campaigns through media releases, comment and our own social media channels. We will continue to appropriately highlight good performance and have amended the FWP to make this clearer. As the Water Watchdog, solely responsible for representing water</p>

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			sector, as well as encouraging engagement.	<p>customers, we will continue to focus our communication effort on matters that most impact water customers now and in the future, including highlighting our successes for customers. Water and sewage companies have extensive communication and customer engagement resource and must lead on communicating their innovation, customer focus, campaigns and priorities. The current measure we have provides for a national (England and Wales) figure for opportunities to see our messages. It is not collated at a lower level and it would take additional resource to do so. However, we are looking to increase regional publicity and awareness and will consider what additional qualitative or quantitative metrics might be available in the future.</p> <p>We measure customers' awareness of CCWater. It was through stand alone report this year [here], but previously has been part of our Water Matters research with household customers. We intend to continue to highlight good performance within the industry and have amended the wording in the FWP to make this clearer.</p>
			<p>Research priorities</p> <p>CCW's research to prepare for PR24 should include an understanding of changing demographics and attitudes. This could be done at both a national and regional level. This</p>	<p>We intend to consider this type of research for our future plans in the lead up to PR24 and would welcome further discussion on what</p>

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			<p>would give companies a high-level understanding of customers' priorities and ensure their voice is heard from the beginning of the next price review. This research should build on Ofwat's Tapped In and develop an idea of what innovative customer engagement could - or should - look like in five years. This would provide the sector with a useful starting point for customer engagement at PR24.</p> <p>Alongside conducting research into future demographics and attitudes, CCW could use this opportunity to undertake another, thorough study of its priorities. Companies refresh their priorities every five years through their Business Plans and we have seen customers priorities change. It is important that CCW reflects the voice, needs and expectations of customers.</p>	<p>companies would consider most beneficial.</p> <p>We agree that it is important for us and the industry to fully understand customers' changing priorities for the sector and the service that they receive. We will factor this into our future research plans.</p>
7	8/1/18	Consumer Council for Northern Ireland	<p>I write in response to CC Water's consultation on its draft Forward Work Programme 2018-2021.</p> <p>CC Water's draft Programme clearly sets out its priorities for the period. We believe these are the right priorities, focussing on bringing beneficial impact in the areas that matter most to consumers - service, resilience and value for money. We also feel that the balance between these priorities is correct to deliver for consumers over the lifetime of the Forward Work Programme.</p> <p>I look forward to continuing to work with you and colleagues at CC Water to share learning, improve our representative roles and deliver ongoing and sustainable improvements for water consumers across our respective jurisdictions.</p>	
8	9/1/18	South Staffs and	Overall we welcome CCWater's ongoing customer focus, see	

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		Cambridge Water	<p>opportunities to use the customer engagement and research, helping us to shape our plans and business and provide opportunities to enhance our service delivery. Below are some more specific observations and questions relating to the document:</p> <ul style="list-style-type: none"> • Page 4 & 14 - “CCWater will make the case to OFWAT that Water companies should only be rewarded for exceptional Service” What definition is CCWater using to define exceptional? • Page 14 - refers to “challenge on behalf of future consumers” How will / does CCWater get an understanding of the needs/expectations of future consumers esp. the younger generation? What if anything is included in the research programme to reflect future consumers? • Much is mentioned about affordability / vulnerability / social tariffs....there is some reference to Debt. Does CCWater have a view on how water companies should be approaching the issue of debt or how consumers expect to be dealt with if they fall into this area. 	<p>In our response to Ofwat’s draft methodology we defined “exceptional” performance as being at a level “<i>higher than the current performance level of the best performing company</i>” and representing a stretching target for the company. It is also important that companies provide evidence of customer support for any outperformance payment</p> <p>In the lead up to PR24 we consider that it will be necessary to undertake work to fully understand future customers and the impact of changing population, economies and technology may mean to customers. We are considering what work will need to be done in this area and will factor it into our future research plans.</p> <p>CCWater is continuing with its cyclical debt assessments where we assess how companies are performing against the Ofwat guidelines.</p> <p>There must be a balance between recovering debt, in the interest of all customers, and dealing sensitively with customers who find themselves in financial difficulty.</p> <p>Companies should also be more proactive in</p>

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			<p>Page 23 - CCWater outline their targets ref complaints -how have CCWater arrived at “61% satisfied with complaint outcome” (and should this be higher?)</p> <ul style="list-style-type: none"> • As part of their research programme - what else is included for house-hold consumers? 	<p>attempting to engage with customers who fall into debt as early as possible, and at all stages of the debt management process.</p> <p>The figure comes from our continuous Customer Satisfaction Survey, and we compare well to other similar organisations. The survey is performed by a MRS registered organisation, a random sample of CCWater customers are asked how satisfied they are with the outcome of their case following CCWater’s involvement. 61% of respondents said they were satisfied or very satisfied. Whilst we would of course like all customers to be happy with the outcome of their case we need to set targets taking into account that outcomes are not directly within CCWater’s gift - we can recommend a reasonable and proportionate outcome but companies have to agree to it.</p> <p>We will be undertaking two substantial pieces of research with household customers in 2018-19:</p> <ul style="list-style-type: none"> • Water Matters - our annual satisfaction tracker; and • Preliminary work into the acceptability of draft determinations. <p>Additional research may be added to the programme if and when the need arises during the year.</p>
9	9/1/18	Deryck Hall	Thank you for the opportunity to comment on the above	We agree that there is a chance that further

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			<p>an equal sharing of the benefits of extra profits.”</p> <p>Secondly, I also agree with CCWater’s view that water companies must strike the right balance between current and future customers while providing stable bills in the long-term. This is built upon in Chapter 6 where you refer to Defra’s challenge to companies in England to plan and invest in a way which offers best value for money.</p> <p>A discordant note is, however, struck where you state “one of the ways we’ll help keep bills as low as possible is by challenging over its cost of capital.” This sentence also suggests other means. Increased efficiency and greater innovation are referenced later in the draft foreword (which may not necessarily be read by those in senior positions), but other conclusions could also be drawn.</p> <p>For example, this statement could be misconstrued by those seeking to portray CCWater as an organisation that seeks low bills rather than bills that are fair, represent value for money and are acceptable to customers. This is a regular refrain from those environmental groups with whom CCWater does not have close working relationships.</p> <p>Recently I have had two conversations with consultancies where I have had to correct such misunderstandings.</p> <p>It may, therefore be better if you redrafted this sentence to reflect the other means. Alternatively, referring to fair or fairer bills rather than bills as low possible would accord</p>	<p>We agree and changed the wording to state that we are in favour of fair bills rather than stating we are looking for bills to be as low as possible is a better way of reflecting CCWater’s approach to PR19.</p>

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			<p>with your wider objectives.</p> <p>I hope that these two comments are helpful as you begin to finalise the Forward Work Programme.</p>	
10	9/1/18	Thames Water	<p>Thank you for the opportunity to comment on CCWater's forward work programme.</p> <p>We read the document with interest and agree with your assessment of the key issues and priorities for customers from 2018-2021. We look forward to continuing to work with CCWater to deliver the right outcomes for customers.</p> <p>Our detailed response to the specific points raised under each of the Key Strategic Priorities in the consultation document can be found in Annex A to this letter.</p> <p>A few topics we would like to highlight include:</p> <ul style="list-style-type: none"> • Influencing the development of the new customer measure of experience metric (C-MeX). • Reviewing the content of company quarterly reports. 	
			<p>General comments</p> <p>The consultation refers to reporting performance in a number of places (p17, 25, 27, 31). We would welcome CCWater taking an opportunity to review and revise its reporting requirements for AMP7, to be in line with Ofwat's AMP7 common performance measures. Ideally, if CCWater deem the measures that Thames Water currently reports in its Additional Information (that accompanies each quarterly report) to be important then we suggest that they are added to the reporting template so that all companies can report against them. We would support any improvement to increased consistency of reporting and removed duplication of effort in compiling these statistical updates - for current as well as future reporting. We would be happy to help</p>	<p>We are mindful of the changes to the performance commitments in the next AMP and welcome the change to make improvements to the comparability of information that is available. We consider that changes will be required to some of our reporting definitions to bring them in line with the new common performance commitments. However, we will also need to be mindful that a result of doing this too soon would be a loss of comparable year on year data. We will discuss this with the wider industry. After 2020 our complaints report focus will change from 'unwanted</p>

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			CCWater in any such review.	contacts' to telephone complaints in line with the planned industry changes.
			<p>Strategic Priority 1 - Advocate for affordable charges that all current and future consumers see as fair and value for money</p> <p>We positively support the work theme of helping customers in vulnerable circumstances. Thames Water are fully involved in the Energy/Water Priority Services data sharing programme facilitated by Water UK. We welcome the opportunity to harmonise needs codes, sharing data at scale with explicit consent from customers and creating a more consistent view of services with consistent vocabulary for customers across utilities.</p>	
			<p>Strategic Priority 2 - Challenge companies to provide their service right first time, protect household and business consumers when things go wrong and provide an easy-to-access service for all</p> <p>We would welcome more specific information on how CCWater intends to influence the development of the customer measure of experience (C-MeX). It is important that the metric is configured to measure the difference in performance between companies, rather than reflect differences in demographics between companies. One consideration is to ensure that the non-contact element of the survey has a standard demographic profile.</p>	<p>Ofwat are engaging with us and other stakeholders on how to design the C-MeX surveys. This includes the possible use of our 'Water Matters' survey for the non contact element of C-MeX.</p> <p>Customer samples or reporting of the results are identified and addressed before it goes 'live'. This means that the design of the surveys to be used to measure contact and non-contact customer satisfaction needs to ensure that</p> <ul style="list-style-type: none"> • Its representative of a company's customer base • Comparisons can be made with the results • Differences in companies performance can be easily seen and the reason for it can be identified and addressed.
			<p>Consumer research</p> <p>We welcome CCWater's current approach to working in partnership with water companies and other organisations to understand consumer views and promote good consumer</p>	

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			engagement, and hope this will continue.	
11	9/1/18	Institute of Customer Services	<p>The Institute of Customer Service welcomes the opportunity to respond to the Consumer Council for Water’s draft forward work programme. In particular, The Institute welcomes the focus that the draft places on customer service.</p> <p>Performance of the utilities sector</p> <p>Data from The Institute’s UK Customer Satisfaction Index (UKCSI) shows that, despite some improvements, the utilities sector as a whole is behind the UK average on customer service metrics.</p> <p>The UKCSI provides a unique insight into the quality of customer service in the UK. It is based on a six-monthly online survey of customers which is demographically representative, and the latest dataset is based on responses provided from over 10,000 customers.</p> <p>The UKCSI shows that the utilities sector as a whole has a satisfaction score of 75.1 out of 100. This has improved by 1.8 points in twelve months, which is to be welcomed, but remains 3.1 points below the UK average.</p> <p>76.8% of customer say everything was right the first time when they most recently contacted a utilities provider. This is 3.9% below the UK average. As the Council acknowledges, it is important for companies to get things right the first time.</p> <p>Our research shows that customer satisfaction rises from 54% to 81% when a customer receives a “right first time” experience, and that satisfaction is linked to trust. This demonstrates the benefits that companies can derive from providing a consistently good level of service.</p> <p>One way providers could improve and maintain high</p>	<p>The ICS will be aware that we have purchased water specific information from it which has allowed us to consider the water industry’s performance in the context of utilities and overall performance. This was a useful exercise and we have requested this information when you publish the wider data in July.</p> <p>The information complemented our Water Matters research, and we considered both sources of information together when formulating our Forward Work Programme, including your right first time point, as we mention in the introduction to strategic priority 2.</p> <p>“The Institute of Customer Services² found that the strongest performing organisations tend to be effective not just in complaint handling but in proactively preventing problems from occurring.”</p> <p>We welcome companies achieving any</p>

² Institute of Customer Services’ UK Customer Satisfaction Index. Link [here](#)

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			<p>standards of customer service is through acquiring the ServiceMark accreditation.</p> <p>ServiceMark is awarded based on customer satisfaction feedback and an assessment of employee engagement with an organisation's customer service strategy.</p> <p>It helps companies understand how effective their customer service strategy is, and identifies areas for improvement. It is worth noting Ofwat have agreed that companies achieving this accreditation should be recognised for attaining nationally recognised standards that others should follow.</p> <p>Undergoing ServiceMark accreditation is an opportunity for organisations - of all sizes and sectors - to demonstrate how good their customer service really is and to demonstrate an ongoing commitment to service, and find ways of developing further.</p>	<p>recognised accreditation for good customer service and encourage them to do so. If it drives the right company behaviour, improves service and reduces complaints then it is a step in the right direction.</p>
			<p>Linking decision-making to customer preferences</p> <p>The Council's plans to challenge providers to take decisions based on sound evidence of customers' priorities is, in The Institute's view, the correct approach.</p> <p>We also welcome the Council's call for Ofwat to link any financial incentive rewards directly to tangible benefits for customers.</p>	
			<p>Providing data to allow customers to compare providers</p> <p>The Institute also strongly endorses the Council's proposals to use comparative data in Customer Challenge Groups, to allow customers to consider their water company's performance relative to others. The UKCSI and The Institute's Business Benchmarking survey provides a powerful tool to inform organisations about the impact of their customer service strategy, enabling them to focus on the areas that deliver the best return on investment by highlighting strengths, weaknesses and areas for</p>	

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			<p>improvement from the customers' perspective. Providing comparative data will help customers establish expectations for the level of service they should receive from a provider, and improve customers' levels of trust where they can see standards are being met. We suggest that the Council should specify, and consult, on what types of data it plans to ask providers for. The metrics that companies provide should be based on the issues that matter most to customers, and we are pleased to see the Council acknowledge this. The UKCSI, for example, covers staff professionalism; quality and efficiency; ease of doing business; timeliness; problem solving; complaint handling; and attitudes towards trust and reputation. In all, The Institute uses over 30 metrics of customer experience and these are also replicated in Business Benchmarking surveys which consider the views of organisation-specific customers. These metrics reflect the priorities customers have identified as the most important attributes of customer experience</p>	<p>We are already collecting the data after previously consulting on it. Further work in this area will not lead to an additional data burden on companies.</p>
12	9/1/18	<p>Auriga Services</p> <p>The full response is available on request.</p>	<p>Potential Future Pressures</p> <p>We fully agree with the consumer led pressures you have listed. Of the 29,000 people who applied for help to the three water trust funds we managed in 2016/17, 61% had other debts in addition to their unpaid water charges. This level of debt is a significant indicator that reinforces what you have put forward in your Work Programme, stating that the growing levels of household debt may be a long-term consumer led pressure on the sector.</p>	

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			<p>Of all of the applications we received in 2016/17, only 13% of applicants were aged 60 or over. When looking into the reasons for this low proportion of pension-age applicants, we know that for some within the elderly population, there is some stigma believed to be attached to seeking financial help.</p> <p>With the vast number of applicants being aged between 30 and 50, we agree that in the next 25 years, an ageing population may provide pressures for the industry. However, at this point in time, we are finding that families with young children and those of working age are the most likely to apply for help with their water bills.</p> <p>We therefore suggest that, whilst being wary of the long-term pressures on the industry, it is also important to ensure we also look after those who need the most help now.</p>	<p>We are keen to ensure support is available for all customer groups and that all are taking it up. In doing so we recognise that some groups are less likely to engage with companies and to seek help. In our work with companies we ensure that they are taking steps to overcome these barriers.</p>
			<p>We are pleased to support DEFRA's strategic priorities for OFWAT, as discussed in Chapter 11 of CCW's Work Programme. We particularly agree with DEFRA's suggestion that companies should improve the availability, quality, promotion and uptake of support to low income and other vulnerable household customers and to go further to identify and meet the needs of customers who are struggling to afford their charges.</p> <p>We suggest that for water companies to follow this advice, a multi-faceted approach is required, to</p>	

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			<p>include:</p> <ul style="list-style-type: none"> ★ Openness and transparency of available help ★ Sharing good practice with collaborative industry partnerships ★ Excellent communication with customers ★ One single point of contact ★ Supporting consumers to change habits ★ Schemes for all, ensuring that every single consumer is looked after in England and Wales ★ Continual improvement and championing previous accomplishments. 	
			<p>One-Stop-Shop Phone Line You suggest in Chapter 3 of your Work Programme that providing an easy to access service will ensure customers are treated right, first time. This is part of your plan to secure the best outcomes for all water consumers past and present. We agree with and support this plan.</p> <p>Auriga currently have dedicated phone lines for applicants to contact us with any queries or concerns. Within working hours, trained staff always answer the phone, offering a sympathetic, respectful approach.</p> <p>We have found this method to be very effective. By listening to customers and understanding their circumstances we build trust and offer solutions.</p> <p>Our suggestion is that a ‘One-Stop-Shop’ phone line</p>	<p>Telephone calls are the preferred method of contact for many customers and we encourage companies to ensure this is a positive experience for the customer.</p> <p>Our own staff already offer advice to customers of all companies who contact us. This is part of our service although many customers prefer other methods of contact. In many instances, especially complaints we have to communicate with the company to seek resolution for the customer.</p>

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			<p>solution is implemented, allowing customers of all companies to ring up with queries about their company or the industry as a whole. In our experience, having a phone line like this provides significantly positive outcomes including:</p> <ul style="list-style-type: none"> ★ Satisfied customers ★ Reduced call backs ★ Instant conclusions ★ Positive reputation for the company and the industry. <p>We would be happy to advise CCW how such a service could be provided if required.</p>	
			<p>Long Term Social Tariff Funding We agree with CCW’s agenda to continue championing inclusive design and delivery of services. You mention in Chapter 6 that a priority aim is to press for a long-term social tariff funding model, and that you will be working to identify the best methods of implementing this model.</p> <p>We feel that this particular aim would be best put to a working group, in order to compare and collate best practice from throughout the utility sector. A collaborative partnership would be a good platform to allow discussion and innovation to thrive and learnings to develop. This will help to ultimately deliver your aim for consumer protection.</p>	
			<p>Priority Services Register In Chapter 7, describing your plans to help consumers in</p>	<p>Priority services is the terminology we have asked companies to use instead of “special</p>

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			<p>vulnerable circumstances, you mention your aim to encourage all companies to use the phrase ‘priority services’ to describe their assistance schemes.</p> <p>With this in mind, we ask CCW to ensure that vulnerable customers are still able to access information on the Priority Services Register (PSR). As the terminology is similar, yet the schemes are different, we put forward the request to consult with both consumers and water companies to ensure information about the PSR is widely available and accessible.</p> <p>Auriga has been working with kidney dialysis patients since 2016, providing money, welfare benefits and debt advice at their bedside. We ensure that all kidney dialysis patients are put on the Priority Services Register (PSR) and feedback from our patients has proven that in times of emergency, being on this register has been incredibly important to maintain their health and wellbeing.</p> <p>We want everyone in a vulnerable situation requiring additional support to be put on the PSR. We believe the collaborative, best practice sharing environment of a utility-wide working group would allow all water companies to demonstrate how they make information about the PSR available to their customers, ensuring everyone who is eligible, is put on the register.</p>	<p>assistance or other non financial vulnerability scheme names”. This allows us to use the same terminology as the energy sector, and reduce confusion for consumers. Customers in vulnerable circumstances will therefore be able to sign up for these services (the register) however because vulnerability can be transient some customers may need the support only temporarily.</p> <p>By using the terminology “priority services”, it means that information about PSR will be more widely available as it is a consistent name for both water and energy and this is allowing us to progress the data sharing of priority services through the “energy and water working together on priority services group” sponsored by Water UK.</p>
			<p>Changing Habits</p>	

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			<p>We've found that providing holistic support is key when giving welfare benefit and debt advice:</p> <ul style="list-style-type: none"> • Firstly, advisers ensure that individuals are getting all of the benefits they're entitled to and then work with the individuals to get those entitlements realised • Secondly, they provide advice about managing money and maximising income to increase the person's financial capability. <p>This two-fold approach ensures that once help has been given, the right additional advice is provided to allow individuals to change their habits going forward. We've found that changing people's perceptions and habits is the most effective way of changing their lives.</p> <p>We therefore agree with CCW's ambition to explain why it is important to use water wisely. In Chapter 8, you discuss the desire to lead and encourage efforts to raise awareness of the challenges the sector faces and what is being done to address the challenges. We feel this is very important and would be keen to discuss with CCW what we can do to support this programme.</p> <p>We suggest that a national 'Using Water Wisely' campaign would be beneficial to the environment, the industry as a whole, and each individual consumer. We have experience in this area and would be happy to advise further if required.</p>	<p>Our recent research: Saving Water: Helping Customers See the Bigger Picture provided some interesting insight as how our (and others') messaging on using water wisely can be improved to encourage customers and</p>

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				<p>consumers to use water wisely. We will continue to pursue our activities in this area.</p>
			<p>Measuring the Impact</p> <p>We fully support CCW's Work Programme for 2018 - 2021 and would like to be of assistance in further helping consumers throughout England and Wales. We believe that your plans will be particularly successful if best practice, good news stories, lessons learned, and advice is shared throughout the industry.</p> <p>In order to measure the impact and success of your work, we agree with the metrics you have suggested, in particular:</p> <ul style="list-style-type: none"> ★ The number of consumers who find their bill affordable increases in your 2018 Water Matters survey ★ More customers become aware of the additional help (priority services) available from companies as reported in your 2018 Water Matters survey ★ You meet your strategic priorities, including being an advocate for affordable charges that all current and future consumers see as fair and value for money ★ The industry begins to meet consumer expectations, 	<p>We agree and work to share best practice, such as through our Affordability workshop in November 2017 and our Vulnerability workshop in February 2018.</p>

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			<p>including getting good service from water companies and having someone to stand up for them and inform them.</p> <p>We would also expect more people to be aware of social tariffs including trust funds/assistance funds, and ultimately more customers supported with financial assistance from the trust funds we manage.</p> <p>We would be delighted to share statistics about trust fund applications with you, to provide further evidence of the success of your Work Programme, if this is something you'd be interested in receiving.</p>	We appreciate this offer and will bear it in mind.
			Due to the length of the response, the entirety of it is not shown here. The full response is available on request and has been shared with the lead on social policy.	
13	9/1/18	MOSL	<p>We support the Forward Work Programme and the activities set out under the strategic priorities, particularly with respect to the non-household retail market. We believe that CC Water has an important role to play in the evolution of the non-household retail market. We continue to believe that CC Water's work and approach can maximise the benefits of competition for end customers by taking actions that drive the demand for better services.</p> <p>It remains important for MOSL and CC Water to work closely together, employing joint working practices to avoid duplication in considering, for example, customer complaints and retailer performance monitoring so as to maximise customer benefits and market improvements. We therefore welcome the references in the Forward Work Plan to CC Water's plans to engage with MOSL, and remain committed to supporting CC Water in areas that fall within our remit. We also welcome CC Water's continued</p>	

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			engagement as an affiliated member of the market codes Panel.	
14	9/1/18	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. There is quite rightly a heavy focus on PR19 particularly in the coming year and influencing the best outcomes on bills and service.</p> <p>We think the strategic priorities set out in Chapter 3 are sensible including the merger of water and sewerage. We also feel the changes made to the FWP set out in Chapter 4 seem very sensible.</p>	
			<p>1. In Strategic Priority 1 under consumer protection (data sharing) or in Strategic Priority 2 helping consumers in vulnerable circumstances it may be helpful to specifically reference a commitment for CCWater to play a part in the working group developing the national data sharing between water and energy sectors for the benefit of vulnerable customers. CCWater monitor numbers on Priority Services so will have a vested interest in the success of this project.</p>	CCWater are members of the “Energy and Water working together on priority services group”.
			<p>2. We are pleased that CCWater are playing an integral role on companies’ challenge groups and challenging customer engagement in particular. In terms of acceptability and affordability of business plans, we would urge CCWater to set out very quickly if they have an expectation in mind for both of these indicators when testing business plans. We would also like further information on the item “Acceptability test draft determinations with each company’s consumers” set out in the timeline table.</p>	<p>We believe companies should be achieving acceptability levels of 80% and above when testing their business plans with customers. This compares with the upper quartile of companies at PR14 (86%) but nevertheless would indicate that a fifth of customers found plans unacceptable and companies would need to find out why.</p> <p>Affordability of plans will be determined not just by the overall price of customers’ bills but by the amount of help that is available to those who are struggling to pay. One of our PR19 objectives is to see a doubling of the number of customers who struggle with affordability issues receiving meaningful support.</p>

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				<p>Our local teams will be happy to share with you our overall objectives for PR19.</p> <p>We intend to carry out our own acceptability testing of Ofwat’s draft determinations as we did at PR14.</p>
			<p>3. As mentioned in our response to the previous FWP, we are disappointed there is no mention 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.</p>	<p>As highlighted in our response to the FWP comments last year we have been highlighting this to companies since 2014 when it formed part of the recommendations of our “living with water poverty” work.</p>
			<p>4. It is good that CCWater have set targets for their own service in terms of handling complaints and satisfaction but we do believe these could be more challenging particularly as CCWater place great emphasis on driving up company performance. The proposed targets remain considerably below those expected, and generally achieved by, water companies.</p>	<p>Our targets reflect our performance solely on the complaints we deal with against water companies. We know from the SIM surveys that satisfaction scores from customers who say their contact is a complaint is lower than the overall satisfaction measure.</p> <p>We benchmark ourselves against similar organisations and compare well.</p>
			<p>5. It is helpful to see an outline of CCWater’s research programme but we would encourage you to share more detail of this as early as possible. There may be opportunities for CCWater and companies to work together to engage with customers.</p>	<p>As in previous years, once the research programme has been agreed by the CCWater Board, we will share further details locally with companies.</p>
15	9/1/18	Northumbrian, Essex & Suffolk Water	<p>Thank you for seeking our views on CCWater’s draft Forward Work Programme for 2018 to 2021. In broad terms we are very supportive of the draft Programme and value the positive contribution CCWater makes to the water sector on many levels.</p> <p>We are particularly appreciative of the constructive challenge and insights we receive in our Northumbrian and Essex & Suffolk operating areas from our local consumer advocates,</p>	

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			Regional CCWater Chairs and CCWater employees.	
			<p>Strategic Priority 1 Advocate for affordable charges that all current and future consumers see as fair and value for money We fully support bills being affordable for all customers, now and in the future, and particularly a focus on ensuring vulnerable customers receive help wherever possible. We strongly advocate the sharing of good practice when it comes to companies' approaches to how they help customers who are struggling to pay, having long believed that on this particular subject the sector should collaborate rather than compete.</p> <p>We believe keeping bills stable for customers is essential and innovation can play a key role in ensuring companies are as efficient as possible. Innovation is also required to leverage the opportunities the Digital Economy Act brings with regards data sharing in order to benefit customers. CCWater has an important role to play in this.</p> <p>Customer engagement and participation is playing a significant role in our work to understand customers' priorities and ensure our Business Plan for 2020 to 2025 focuses on the things that matter most to our customers. CCWater representatives are invited to many of our engagement and participation events and we welcome the challenge, insight and contribution they make.</p>	<p>We agree and work to share best practice, such as through our Affordability workshop in November 2017 and our Vulnerability workshop in February 2018.</p> <p>We are participating in the relevant working groups.</p>
			<p>Strategic Priority 2 Challenge companies to provide their service right first time, protect household and business consumers when things go wrong and provide an easy-to-access service for all. We have long been a champion of providing customer service</p>	

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			<p>right first time and use a range of indicators to monitor our performance when it comes to failure demand. Our Unrivalled Customer Experience Strategy sets out a proactive approach to delivering service and our people are encouraged to take accountability for customer issues. We constantly strive to reduce customer complaints and to derive actionable insights from customer feedback in order to improve service and experience - this was reflected in our leading SIM performance in 2016/17. We believe complaint reduction is an area CCWater must continue to focus on and press companies to deliver ongoing reductions. This is important for the sector's reputation and its future legitimacy.</p> <p>We support inclusive design and delivery of service having recently developed our inclusivity strategy with a range of customers, including those who are living with vulnerabilities. Our customer engagement has told us it is important to design policies and services sensitively and CCWater can play a key role in challenging companies to make sure this is happening.</p>	<p>Agreed.</p>
			<p>Strategic Priority 3 Press companies for safe, reliable water and wastewater services that all consumers can trust now and in the long term.</p> <p>We agree CCWater should continuously press companies for safe reliable water and wastewater services, and our own research and engagement shows our customers now take this as a given.</p> <p>CCWater can also act as a conduit for companies to share best practice and learning, and work more collaboratively. This can be particularly effective when it comes to water efficiency or 'love your drain' type campaigns where CCWater will have an understanding of what is taking place nationally to</p>	<p>We agree that sharing good practice is vital for the industry, especially on common causes that have a huge impact on individual customers such as sewer flooding. We have been working with WaSCS on Sewer Misuse issues for many</p>

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			encourage changes in customers' habits and behaviours.	years and we have recently actively supported Southern water in their award winning videos for social media. We are also part of the Water UK 21 st Century Drainage Board and active on the Sewer Misuse work stream, which has been so successful in sharing good practice, agreeing common messages (e.g. the 3 P's), pooling resources to raise awareness and a consistent industry developing a strategy. On the water side of the strategic priorities, we conducted our Saving Water 'helping customers see the big picture' research in 2017 [link here]. This is intended to help us all communicate water efficiency issues more effectively.
			Strategic Priority 4 Shape the water sector by informing and engaging all consumers so that consumers' voices are acted upon by decision makers and the industry. We are fully supportive of this strategic priority and see it as a key objective for CCWater.	
			Delivering consumer insight through research We believe CCWater's research programme is hugely valuable in helping the sector understand and consider customers' views on a range of topics. The research and broader reports CCWater produces offer rich insights into what matters most to customers and form a valuable source of challenge which helps shape our future policies and approaches. We very much support their continuation.	
16	10/1/18	Affinity Water	Thank you for providing us with the opportunity to comment on your draft forward programme. Whilst we have no specific comments to make on the	

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			information set out within the document, we wish to confirm our support of your proposals. Our own priorities are aligned with those set out within your programme and we look forward to continuing to work with you during the next period.	
17	10/1/18	Business Stream	Business Stream's interests are currently confined to the NHH market and hence our comments are focused on CCWater's proposals in this area. There are three particular areas on which we have commented: PR19; complaints and monitoring; and operation of the NHH market.	
			<p>1. PR19</p> <p>Our experience in the NHH market has demonstrated that in some market segments, particularly SME customers, the allowed retail margins are inadequate to fund customer's discounts, switching incentives or service enhancements, as well as cover the cost of operating in the new market. We want to ensure that all customers get the best value for their water services and have access to the best possible discounts. Currently around 94% of NHH charging represents wholesale costs. If downward pressure could be applied to the wholesale costs, this could create more capacity for customer discounts, and innovation of service enhancements.</p> <p>Hence we would support CCWater's position that downward pressure must be put on the wholesale companies allowed cost of capital. We also believe that a more accurate reflection of the risk and cost borne by wholesalers compared to retailers (e.g. payment risk) would help to reduce the wholesalers' revenue requirements.</p>	<p>As the majority of non-household customers' charges reflect wholesale costs, we agree that it is important that the cost of capital allowance set by Ofwat encourages efficient financing and is not overly generous at customers' expense. As such, we support Ofwat's lower Weighted Average Cost of Capital of 2.4% for the 2020-25 period, as this is consistent with independent recommendations made by Economic Consulting Associates, who analysed the markets and recent regulatory precedents for CCWater in November 2017.</p> <p>This should form part of a wider assessment for risks and associated costs carried by retailers and wholesalers during the 2019 price review. We will be looking to Ofwat to demonstrate that its PR19 decisions achieve the right balance.</p>
			<p>2. Complaints monitoring</p> <p>We recognise the importance of CCWater's role in monitoring and comparing the level of complaints received by each</p>	<p>The level of information to allow customers to choose between retailers is low at the moment. With market engagement still relatively low,</p>

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			<p>retailer. However, if CCWater is planning to use this information to help customers make switching decisions, it will be important that customers also understand the role that wholesalers play in relation to a retailer's performance. CCW has recognised the difference between wholesaler and retailer-driven complaints, but may need to help customers understand the differences. A service problem driven by poor market data or inaccurately applied wholesale tariffs for example would not be resolved by a customer switching to a new retailer</p>	<p>any information we produce at this point is unlikely to translate into significant market switching, although inevitably some customers may in fact switch to better performers as a result. Our key focus at this point will be to encourage poorer performers to improve and bring the industry average up. We recognise that there are still data and procedural challenges in the market whereby retailers have to take the hit for wholesaler failures. We will give this appropriate context in our report.</p>
			<p>3. NHH market Operation In chapter 9, the consultation refers to CCWater's commitment to help SME customers to access the competitive market and to highlight where the market is not working for customers. There are a number of key market issues that we consider are making it difficult for SME customers to access competitive offers. These are not simple issues, and most (if not all) will require Ofwat intervention to resolve, but CCWater could be influential in raising awareness of them on behalf of customers.</p>	<p>We recognise a number of market issues that affect how SMEs interact with the market. To ensure we are feeding in issues customers are experiencing, we are members of several working groups on the new market.</p>
			<p><u>Complexity of wholesale charges.</u> As you may be aware, because of the financial risks involved, retailers have little option but to follow the structure of wholesale charges when developing customer prices. However, there is no consistency across the charging structures of the WASC and WOC wholesalers. Each wholesaler has different tariff bandings; allocates fixed and variable costs in different proportions to different tariff bands and to different services; and employs different methods of charging for the same services. Consequently, there are more than 11,000 wholesale pricing elements in CMOS for the</p>	

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			<p>English market. In addition, the different pricing approaches adopted by each of the incumbent retailers to set their 'default' tariffs, means that there will also be different levels of margin available on the same services across regions. In the absence of a common charging methodology or even commonly applied principles, wholesale pricing across the English market is hugely complex, opaque and difficult to navigate. Complexity creates risk and cost for retailers which has a consequential impact for customers. It is bound to manifest in a lack of transparency for customers as well as being a deterrent to retailers.</p> <p>We have suggested to Ofwat that their Pricing guidance should be used to prescribe greater consistency in tariff structures and cost allocation across the industry, perhaps in parallel with PR19.</p>	<p>We would support calls from retailers on the regulator that made it easier to provide clearer information to customers about the prices that they'll pay for services.</p>
			<p><u>Data quality</u> The quality of data in CMOS is very mixed, with both gaps and inaccuracies across the whole market. Issues that we have encountered already include:</p> <ul style="list-style-type: none"> • wrong services associated with a SPID; • missing meter history, meter coordinates or meter serial numbers; • unpaired or inconsistent market data between water and wastewater SPIDS • missing SPIDs; and • customers on the wrong tariff and/or tariffs being applied incorrectly. <p>All of these issues can result in inaccurate quotations and bills for customers and require corrective action by the retailer. For</p>	

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			<p>SME customers in particular, where the annual gross margin may be only £60-£70 (and smaller for microbusinesses), the cost to the retailer of resolving a single data inaccuracy could be greater than the total margin available. Hence, the potential risk of a data problem could deter retailers from targeting the certain customer segment (particularly SME customers).</p> <p>At this stage there is no quick fix for the range of data quality issues which are emerging. As the industry develops a better understanding of the magnitude of the issues, we may need an industry-wide project to tackle some of them, in much the same way as happened in Scotland after market-opening. In the meantime, it would be helpful if CCWater could encourage Ofwat and MOSL to continue to put pressure on the wholesalers to fill data gaps and to quickly address individual issues as they are identified.</p>	<p>Our ongoing work with MOSL and the codes panel is the right forum to do this. We responded to MOSL's consultation to say that we thought there should be market penalties on wholesalers.</p>
			<p><u>Meter reading costs</u> In addition to the price and data quality risks highlighted above, there is a particular challenge in relation to meter reading costs which can be prohibitive in relation to SME customers in geographies where retailers do not have a high customer density. Where the allowance in the retail price controls (and hence the default tariffs) is around £2 per meter read, the actual costs can be significantly greater than this (we have been quoted up to £40 per cyclic reading depending on the region), with transfer reads being substantially more expensive, as they have to be taken on an ad hoc basis, meaning that the cost of carrying out a switch can amount to an entire year's margin for a small customer. This is clearly not viable. In some areas, the wholesaler is making reads available at lower rates, but this is inconsistent across the market.</p>	<p>We recognise the disparity in meter reading costs depending on a customer's location.</p> <p>We would like to see all non-household customers have access to the market, and would not like to see customers excluded if they have a higher cost to serve. We note that Ofwat is looking at this issue in the context of some wholesalers offering lower meter reading costs.</p>

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			<p>We have recently engaged with Ofwat about this issue and believe that Ofwat is now reviewing it. Nevertheless, it is important that CCWater is aware of the impact this issue could have on customers (who are likely to be unaware of it).</p>	
			<p><u>Impact of these factors</u> The combination of these factors (complexity of charges, data quality and meter reading costs) means that in many regions, some customer segments (particularly SME customers) are not viable for retailers. These customers are least likely to be able to access competitive offerings in wholesale regions where pricing structures expose retailers to greatest risk and where retailers are deterred by the poor quality of customer data and high meter reading costs. We need to create a viable NHH market that benefits all customers, not just the large ones.</p> <p>As indicated in your consultation paper, CCWater has an important role to play in raising issues in the NNH market with Ofwat and MOSL. We believe the issues we've highlighted above are adversely affecting SME customers and would be pleased to discuss any of the issues further with you if this would be helpful.</p>	<p>We have set up good relationships with retailers and we feel we can go beyond simple talking about complaints. We are keen to engage with all retailers, and encourage them to contact us if there are specific issues to raise about the market.</p>
18	10/1/18	Natural England	<p>Natural England's purpose as outlined in the Act is: 'to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development'.</p> <ul style="list-style-type: none"> • The health of the water environment is crucial to the long term sustainability of the natural environment. Natural England wishes to work with water companies to achieve both statutory outcomes for designated wildlife sites as well as wider biodiversity and other ecosystem benefits in 	

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			<p>catchments. In line with our Conservation Strategy 'Conservation 21: Natural England's conservation strategy for the 21st century' Natural England is increasingly focussing effort at catchment and landscape scale and wishes also to meet ambitious additional environmental outcomes where these have customer and stakeholder support. Given CCW's ambitions for securing the best outcomes for customers from companies, including in influencing the way customer priorities are judged and then taken into account, we offer some comments on the environmental dimension to this.</p>	
			<p>Our main shared interest with CCW is the planning for PR19. Natural England is both an adviser and regulator in helping set expectations and requirements from water companies during PR19.</p> <ul style="list-style-type: none"> □ In both these capacities, we emphasise the importance of the Periodic Review process for Natural England's outcomes for biodiversity, ecosystem services and natural capital. We strongly support the adoption of measures that can have multiple benefits (particularly where catchment level measures are involved). We have set out our obligations and expectations of water companies under PR19 in our joint document with EA - Water Industry Strategic Environmental Requirements (WISER). □ In WISER we highlight the links with our Conservation 21 strategy document, setting out how we will support the government's ambition for a healthy natural environment on land and at sea that benefits people and the economy. Underpinned by our focus on delivering better long term outcomes for the environment by working towards shared visions with partners, Conservation 21's three guiding principles are: 1) creating resilient landscapes and seas; 2) putting people at the heart of the environment; and 3) growing 	<p>*We aim to gather and reflect the broad</p>

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			<p>natural capital.</p> <p><input type="checkbox"/> The second strand of Conservation 21 ‘putting people at the heart of the environment’ is clearly especially pertinent to CCW’s Forward Work Programme and your ambition for “Securing the best outcomes for all water consumers - present and future”. We think it is important that your Forward Work Programme should consider how CCW can fully represent the environmental aspects of consumers’ expectations and aspirations.</p>	<p>spectrum of customer views and in our work with companies/CCGs wish to see companies consulting their customers on all the key issues and challenges so that their views can be taken into account. Research shows that when presented with more information about the environmental issues customers do wish to see the environment protected but it also shows that many people still do not make the connection between the services they receive and the natural environment. So there is still much for the sector to do in terms of raising this awareness. We want to see all spectrums of opinion and interest represented at PR19 which is why we insist that companies’ research is truly representative of their customer base. It is also why we have produced guidance on triangulation to try to ensure that any particular interests are appropriately balanced.</p>
			<p>Whilst we recognise that much of CCW’s focus is on affordability for customers, we wish to see due weight given to investment in the environment, especially for biodiversity. This includes activity beyond statutory obligations where there is customer support for this. We believe there is considerable customer support for this that CCW should legitimately also be promoting. For example, Anglian Water’s ‘Outcomes in Detail’ document, prepared as part of its regulatory submission to Ofwat for PR14, includes “Reducing pollution and improving rivers and canals for wildlife is customers’ top priority for improving the local water environment”.</p>	<p>We want to see customers’ priorities address, so if this includes activity beyond statutory obligations and customers are willing to pay for it and find it acceptable, then we would support such an activity.</p>
			<p><input type="checkbox"/> ‘Chapter 5: Looking long term at the issues that could affect the water sector’: We would like to see this chapter strengthened in support of the environmental expectations of</p>	<p>We have added a reference to biodiversity in the Forward Work Programme at this point.</p>

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			<p>consumers. We suggest extending the reference to 'Pressures of climate change' by adding to it 'including on biodiversity'. As set out in WISER, previous water company investment has helped restore protected sites that companies own and manage and has increased the resilience of other special freshwater, wetland and coastal habitats.</p>	
			<p>□ 'Chapter 9: Strategic Priority 4 – Shape the water sector by informing and engaging all consumers so that consumers' voices are acted upon by decision makers and the industry'. This section references Natural England as an audience for your advocacy work and we would be interested to explore any opportunities for such advocacy to include wider biodiversity and environmental messages. Possible areas for discussion and collaboration might perhaps include:</p> <ul style="list-style-type: none"> ○ Opportunities for CCW support in ensuring the right questions are asked by water companies of customer preference for non statutory environmental outcomes. In past Periodic Reviews, customer Willingness to Pay (WTP) survey work has supported customer investment in environmental protection / improvement. It would be helpful to explore how CCW will represent customers' interests in the widest sense, which includes concern for adequate protection and investment in the environment (not just keeping bills to a minimum). ○ Opportunities to collaborate in the work of Customer Challenge Groups on consideration of environmental views of customers, including support for bespoke environmental performance commitments. ○ Considering the scope for CCW to take a broad view of 	<p>See comments * above. We are keen to see customer priorities delivered as evidenced by good quality customer research. If supported we would wish to see any additional investment representing best value for customers. In our experience some of the most successful environmental improvement plans have come from successful collaborative working between the company, regulators, local community and interest groups. NE has been instrumental in sharing good practice. We would be keen to work with them on awareness raising and in challenging companies to meet their customers' expectations. We have changed the reference about keeping bills as low as possible in the Foreword as we want to see value for money for customers and service improvements.</p> <p>We will want to work with you on CCGs.</p>

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			<p>customers, to recognise the wider societal benefits of water company investment in the natural environment (beyond the local bill payer).</p> <ul style="list-style-type: none"> ○ Exploring further the scope for CCW support to environmental resilience from a biodiversity perspective. In the document this could be captured under the 2019 Price Review action row ‘Influence 2020-25 business plans so commitments are based on evidence of the needs and expectations of different consumer groups and secure longer term resilience for consumers’ by the addition of ‘and the environment the sector depends and impacts upon’. ○ Exploring links to our work to maintain the evidence base on how people use the natural environment and the benefits they gain from this (including through the Monitor of Engagement with the Natural Environment (MENE) surveys). □ We would welcome discussion on our above comments, perhaps at Defra’s PR19 Strategy Group (where we are both represented). 	<p>We have added your suggestion. The line in the table now reads: “Influence 2020-25 business plans so commitments are based on evidence of the needs and expectations of different consumer groups and secure longer term resilience for consumers and the environment the sector depends and impacts upon.”</p> <p>We would be interested in exploring this idea with Natural England.</p>
19	1/1/18	United Utilities	<p>1. Summary UJW welcomes the opportunity to respond to the Consumer Council for Water’s (CCWater) draft consultation on its forward work programme. 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 agree that the four key strategic priorities you have developed provide a solid framework for CCWater to work within.</p> <p>We will support the activities highlighted in the</p>	

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			<p>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>	
			<p>1. 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 efforts to ensure that consumer views are at the heart of the development of companies' business plans for 2020-25 and we welcome the role CCWater representatives are undertaking as part of the UU Customer Challenge Group for PR19.</p> <p>We wholly support, and indeed, are already implementing CCWater's suggestions that a wide range of communication tools are used in order to obtain customers' views on our proposals for PR19.</p> <p>We aim to keep bills as low as possible in our PR19 submission whilst at the same time aiming to find the right balance between tackling the needs of current and future generations. We recognise that it is important that the ODI regime commands the support</p>	

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			<p>of customers, ensuring that rewards are only available where companies are genuinely delivering on services for customers.</p> <p>With the market opening for the non-household market in April 2017 it is absolutely right that a key element of CCWater’s work continues to ensure that this delivers price and service benefits to customers. As a wholesale service provider we have a continuing role in ensuring the success of the Non HH Retail market.</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 foundations currently in place. All companies can do more to ensure that customers who need support are able to easily access the help available.</p> <p>We recognise the importance of companies making financial assistance available to those customers who struggle to pay. UU’s social tariff is just one aspect of our basket of assistance available to customers. Other mechanisms such as our re-start scheme, win-win tariff and trust fund also provide substantial levels of financial support to customers. UU is amongst the sector leaders for the level of direct financial support above that provided by customers for those who are struggling to pay.</p> <p>CCWater have played an important role in ensuring</p>	

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			<p>companies get things right first time and we welcome the continued focus in this area. We support the continued publication of the annual complaints report and welcome the broadening of this to take account of all customer channels. UU commits to working with CCWater in helping you develop your methodology in this area.</p>	
			<p>1. Comments on CCWater Forward Work Programme 2018 - 21</p> <p>Strategic Priority 1 - Advocate for affordable charges that all current and future customers see as fair and value for money</p> <p>For the 2019 Price Review, CCWater is pressing for acceptable and affordable bills with effective support for vulnerable customers. We wholeheartedly support this approach.</p> <p>We support the challenging of 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 (e.g. rant and</p>	

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			<p>rave feedback, complaints etc.) as well as, dedicated research studies.</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 customers in need of help. We also recognise the need for better sharing of best practice to support these customers appropriately across the industry.</p> <p>UU and the industry have available a strong foundation of schemes and initiatives in place to support customers. 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. We agree that potential opportunity to improve levels of data sharing provided by the digital economy act could prove to be extremely promising with regards to assisting companies in getting help to those customers that need it. We would welcome the opportunity to work with CCWater and other stakeholders in order to</p>	

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			<p>help progress this initiative.</p> <p>We generally support the activity outlined for this strategic priority and the associated timings provided. However, given CCWater concerns around the exhaustion of existing social tariff support, we would encourage CCWater to undertake the consumer engagement relating to what the next generation of social tariffs should look like before 2020/21.</p>	<p>We agree with this observation. Our work to identify what the next generation of social tariffs may look like is ongoing. We have amended the FWP to reflect this.</p>
			<p>Strategic Priority 2 - Challenge companies to provide their service right first time, protect household and business customers when things go wrong and provide an easy to access service for all</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 will continue to share good practice when identified from our complaint and debt assessments.</p> <p>For consistency in company complaint handling we have successfully pressed all companies to have no more than a two stage complaint procedure.</p> <p>Where we see issues with inconsistency in reporting we will raise it with the company in question and Ofwat.</p>

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			<p>We welcome CCWater championing inclusive design and delivery of services. UU has been instrumental in moving the industry towards the introduction of the Priority Service brand and is leading the cross-industry collaboration activity with the energy sector.</p> <p>The importance of companies having comprehensive emergency plans is well recognised by UU. We believe that our experiences and learnings taken from the Lancashire Water Quality incident have helped us dramatically improve our resilience to another such incident and welcome CCWater’s focus in this area.</p> <p>We support the activity outlined for this strategic priority and the associated timings provided.</p>	
			<p>Strategic Priority 3 - Press companies for safe reliable water and wastewater services that all customers can trust now and in the long term.</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.</p> <p>We support the activity outlined for this strategic priority and the associated timings provided.</p>	
			<p>Strategic Priority 4 - Shape the water sector by informing and engaging all consumers so that consumers’ voices are acted upon by decision makers</p>	

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			<p>and the industry</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 continuing to work closely with CCWater throughout the PR19 process, both through direct engagement and via the UU Customer Challenge Group.</p>	
			<p>CCWater's plans to deliver consumer insight through customer research</p> <p>We support the suggested programme</p>	
			<p>What CCWater cost</p> <p>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.</p>	<p>Since we were set up in 2005, we have demonstrated that we are committed to providing value for money and minimising our costs to water consumers through real-term cost reductions. CCWater is committed to keeping costs to a minimum, and has a good track record of this. On average, our licence fee has increased by less than inflation rate, and is 35% less than if RPI had been applied each year.</p> <p>Since 2011-12 the cost of our licence fee has</p>

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				<p>remained at 21p per water bill, as we have absorbed inflationary cost increases. Due to more detail on our IT projects cost since the consultation, we are now able to keep our costs of 21p per water bill, despite an increase in the licence fee.</p> <p>For 2018-19, our licence fee is £5.527m, an increase from £5.24m, as a result of inflationary pressures, workload associated with the 2019 Price Review and investment in ICT network infrastructure and systems. Our budget is £5.6m.</p>
20	10/1/18	Waterwise	<p>Waterwise is pleased to respond to the CCWater's draft Forward Work Programme for 2018 to 2021 Consultation. Waterwise was founded in 2005 and is the leading authority on water efficiency in the UK and Europe. We are an independent, not for profit organisation, receiving funding from supporters across and beyond the water sector, wider sponsorship and research projects. We like to be at the front, leading and supporting innovative efforts to realise our mission; that water will be used wisely, every day, everywhere.</p>	
			<p>Water efficiency is a key contributor to resilience, and water companies are currently carrying out large-scale retrofitting and customer engagement programmes. Defra has asked Ofwat to "promote ambitious action to reduce leakage and per capita consumption". This will have key benefits for household customers. Waterwise can support CCWater's delivery of several of your proposed actions that also relate to water efficiency in several ways that I will outline below.</p>	
			<p>The National Platform for Water Efficiency : On the area of</p>	

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			<p>‘Using Water Wisely’, Waterwise is the expert in the UK. We agree that a focus on the ‘bigger picture’ is important for explaining to consumers why water efficiency is vital now and in the future, as well as what they can do to help. We are pleased to see that CCWater intend to work with the Welsh Government and others on developing consistent messaging. Waterwise has, through the Water Efficiency Strategy for the UK (link), promoted the idea of a national platform for water efficiency messaging. We would welcome further collaboration with CCWater on research underpinning this development of a communication platform as well as implementation.</p>	<p>Our recent research: Saving Water: Helping Customers See the Bigger Picture provided some interesting insight as how our (and others’) messaging on using water wisely can be improved to encourage customers and consumers to use water wisely.</p> <p>We will continue to pursue our activities in this area and will look into working with other stakeholders.</p> <p>We welcome opportunity to discuss the comms platform with you.</p>
			<p>We too have been advocates of the fact that Water Companies need to use social media to gain a better understanding of what matters most to consumers and support this through our own social media use. We see social media as a place for Water Companies to not only promote water saving behaviours but to engage with customers in order to find out how best they can support them in water efficiency. Social media can also be used as a platform to raise consumers’ awareness of the challenges the sector faces, what is being done to address these challenges and explain the reasons why it is important for everyone to use water wisely. We currently do this through our own social media accounts, as well as by promoting water companies when they also do the above. The national</p>	

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			platform is one way in which we can encourage better use of social media but we also welcome additional collaborative projects that further these aims. As part of our national strategy we will also develop communications/water efficiency messages targeted at micro-businesses and SMEs.	We welcome this approach.
			Waterwise Retail Forum: Waterwise has set up a Leadership Group on Water Efficiency and Customer Participation (link to overview) for Chief Customer Officers of the UK wholesale water companies - as an action of its Water Efficiency Strategy. This group is a safe space in which wholesale companies can discuss and deliver ambition on water efficiency and improved customer service. A similar group focused on water efficiency in retail competition could help improve both the volume of water savings across non-household customers and the service offering to customers of water retailers. This would ensure business and other non-household customers in England and Wales receive good or improved services from their retailers or wholesalers. We'd welcome the opportunity to collaborate with CCWater through forum.	We welcome the proposals to create the Waterwise Retail Forum, as it would help to promote water efficiency activity amongst NHH customers and deliver water savings. We look forward to discussing how this collaboration can take place in the near future. There are cross-over areas where CCWater and Waterwise can work together to ensure that NHH customers know what services are available, whether related to general customer service, or water efficiency, they can expect or should be asking for.
			Water efficiency league table for retailers: Customers don't currently have information available to them to choose water efficiency services, even though, according to our research, many SMEs and larger corporates are asking for these. Market incentives could help to drive retailers towards delivering water efficiency, however these need to be combined with greater transparency and reliability of water savings estimated and measured. We propose a league table as a suitable intervention and that this would be best placed coming from an independent organisation such as Waterwise and CCWater. A league table would help customers identify water efficiency services ensure that	This is an interesting idea for Waterwise to take forward. To make it work retailers should do more to add clarity to and promote their offering in terms of water efficiency.

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			companies challenge themselves to deliver performance that compares well to other companies.	
			<p>Encouraging water companies to listen to the consumer and think long-term : We have worked closely with several water companies on their business plans and water resource management plans, and are in an excellent position to support these companies in ensuring that customers are engaged with the development of their WRMPs and drought plans and that resilience is at the heart of these plans. We would like to collaborate with CCWater on updating and reviewing the Waterwise evidence base to support future WRMPs and PR business plans.</p>	<p>We are encouraging water companies to listen to the consumer and think long-term through the CCGs.</p> <p>We have our research plan outlined in the plan. If Waterwise see opportunities to collaborate with CCWater on those projects, we would be happy to discuss further.</p>
			<p>Review joint water and energy efficiency programmes in England, Wales and Scotland . This is an action from the national strategy for water efficiency proposed as a www.waterwise.org.uk stepping stone towards water efficiency being included in fuel poverty retrofit and energy efficiency campaigns. It will involve Water companies, Energy Saving Trust, CCWater, SaveWater South East and Waterwise.</p>	<p>We acknowledge the links between hot water efficiency and energy efficiency and would support/encourage the inclusion of water efficiency in any future fuel poverty programmes or campaigns. We look forward to understanding how this work will be developed and how CCWater could usefully get involved.</p>
			<p>Implement variable infrastructure developer charges for new developments to encourage water efficiency measures. We would appreciate CCWater’s helps on this action of the national strategy, in particular compiling a list of approaches being developed by water companies. Incentives linked to developer charges can play an important role in water companies reducing demand for water in new developments and supporting the new household customers that will live within them.</p>	<p>We are interested in discussing this with you CCWater will be monitoring the new connection charges regime with a view to assessing the evidence about the effectiveness of any incentives that are implemented.</p>
			<p>Advising on Compulsory Metering : Waterwise can provide advice and evidence on this based on previous projects we have worked on. We would like to work with CCWater on</p>	<p>We would like to discuss this with you further so we can understand where we might be able to add value and insight.</p>

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			researching the wider costs and benefits of customer participation and water efficiency linked to greater data availability from smart metering, which will underpin the fitting of water meters in the majority of homes in England and Wales by 2030, supported by tariffs to protect vulnerable customers. We would welcome the chance to discuss areas where we can work together further.	
21	10/1/18	Portsmouth Water	Thank you for inviting us to comment on your proposals. Having reviewed the draft Forward Work Programme we are fully supportive of your priorities and timescales for delivery. We look forward to working with you on the delivery of your programme.	
22	1/11/18	Bristol Water	Thank you for the invitation to comment on your forward work programme. We understand why you have chosen the four strategic priorities 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. We have provided feedback under the four priorities below.	
			<p>Strategic priority one: Advocate for affordable charges that all current and future customers see as fair and value for money</p> <ul style="list-style-type: none"> <input type="checkbox"/> It is positive that you are planning to continue to press for acceptable and affordable bills and effective support for vulnerable customers. We understand your concern that ‘the pot of funding’ is drying up and would welcome your support in future cross subsidy research, however funding to support our debt advice partners not only continues but has increased since last previous year. <input type="checkbox"/> We would hope to understand more about the independent review to Ofwat on companies cost of capital as this is crucial to our Business Plan. <input type="checkbox"/> We welcome the continued priority to advocate for stable bills, our recent research suggests that this is what our 	<p>We are continuing to work with companies as they test customer willingness to increase the funding provided for social tariff schemes. We also welcome companies increasing their contribution to the funding provided across the range of affordability and debt assistance measures.</p> <p>The conclusions of an independent study commissioned by CCWater recommended that Ofwat set a Weighted Average Cost of Capital</p>

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			<p>customers want. We are also pleased to see that you will continue to review company charging proposals.</p> <ul style="list-style-type: none"> <input type="checkbox"/> It is positive that you are promoting performance commitments that are based on customer priorities; as our recent research suggests that some of Ofwat's performance commitments are the least prioritised by customers, for example they did not value performance commitments focused on reducing short-term disruption and the customer experience of developers. <input type="checkbox"/> We understand CCWater's intention to demand that financial rewards are only paid to reward exceptional performance. However in a specific set of focus groups which explored customer attitudes towards incentives, customers mostly expressed a preference for financial incentives due to the lack of open market competition and choice available to customers. <input type="checkbox"/> We welcome your plans to consider lessons learnt from the 2019 price review from a customer perspective. It would be great to see CCWater engaging with customers to understand their views. We would particularly like to see CCWater advocating for Ofwat to encourage a more joined up approach between companies as there has been recent success here ie. social tariffs and there are other opportunities. 	<p>(WACC) between 1.8% and 2.5%. The study is on our website here.</p>
			<p>Good practice workshops on how companies help customers struggling to pay have been extremely useful for companies and a great opportunity to share lessons learned. We are pleased you will continue to facilitate these sessions and would hope sessions on supporting customers to pay would be more linked to helping customers in vulnerable circumstances through the Priority Services Register as often, these needs go hand in hand.</p> <ul style="list-style-type: none"> <input type="checkbox"/> It is encouraging that you will work with government and 	<p>Feedback on our workshops and seminars has been extremely positive. We are pleased attendees have found these useful and will continue to hold such events at regular intervals, subject to other workload demands.</p>

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			<p>other stakeholders and we anticipate that you will act as the voice of the customer when plans for new data sharing provisions are in place.</p>	
			<p>Strategic priority two: Challenge companies to provide their service right first time, protect household and business consumers when things go wrong and provide and easy-to-access service for all</p> <ul style="list-style-type: none"> <input type="checkbox"/> We agree that you should be demanding complaint numbers to be reduced by pressuring poor performers. We would like to see more narrative around the numbers reported as comparisons to previous years' performance is not always straight forward. It would also be positive to focus more around the cause of complaints rather than the actual year end numbers which, at times, do not tell the full story. <input type="checkbox"/> 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. <input type="checkbox"/> We welcome the addition to publish information about retailers' complaints report. <input type="checkbox"/> Universal adoption of the 'priority services' register is welcome. We expect this to be a strong focus given a key priority of Ofwat and WaterUK & hope to see CCWater continuing to advocate using the moments of change approach and making every contact count for identifying customers in need of additional support. <input type="checkbox"/> It is positive to see that a CCWater will be investigating companys' emergency plans. After our recent supply interruption at Willsbridge we shared the response and case study with our local community advocates and received positive feedback and suggestions to improve which we will carry forward. 	<p>Higher complaint numbers provide a good reflection of company performance. We recognise there are causes for these increases and where possible we will include these reasons in the annual report to give a fuller picture.</p> <p>We agree and have added wording to clarify our intent to continue advocating those approaches.</p>

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			<p>Strategic priority three: Press companies for safe, reliable water and waste water services that all consumers can trust now and in the long term</p> <ul style="list-style-type: none"> <input type="checkbox"/> We agree with CCWater’s approach to the PR19 Price Review and our customer research & priorities shows that you are planning to place challenge in the appropriate areas. <input type="checkbox"/> Influencing and promoting activity to help consumers use water wisely is important and we would be interested to see how this develops from the work you have done previously. <input type="checkbox"/> It is encouraging that you will continue to advise companies and customers on compulsory metering. We have found the support we have had over the previous year, during our first year of compulsory metering on change of occupier, has been good and fair. <input type="checkbox"/> It is positive that you plan to review different metering approaches and lessons learned from these. We would be very interested to be involved in this in 2020-21. <input type="checkbox"/> We agree that you challenging poor performers due to high leakage levels. However, as per our previous comments, we would like to see more narrative around the numbers reported as comparisons to previous years’ performance is not always straight forward. 	<p>We would intend to involve and share findings with the sector and wider stakeholders.</p> <p>We will continue to let companies have early sight of any performance reports that we publish, which will allow for discussions should companies feel that year on year comparisons are not straight forward.</p>
			<p>Strategic priority four: Shape the water sector by informing and engaging all consumers so that consumers’ voices are acted upon by decision makers and the industry</p> <ul style="list-style-type: none"> <input type="checkbox"/> We fully support your plans for PR19 to review commitments to ensure they are based on evidence of the needs and expectations of different customer groups. <input type="checkbox"/> We agree with your work to continue to highlight where the market is succeeding and failing business customers however 	<p>If there is a systemic issue, we will raise it as a customer concern. We will want to them work</p>

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			<p>think that there would also be benefit from involving the market participants in responding to any systemic problems found.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Increasing the media pressure locally is positive and we would appreciate CCWater working jointly with water companies involving us in key messages and campaigns to enable a more joined up approach. In the interest of customer transparency we welcome honest scrutiny and would like the opportunity to have foresight of any negative issues to ensure the customer is receiving the most transparent information. <input type="checkbox"/> We support your plans to continue to inform customers by providing them with information to judge value for money. If Water Matters continues to be the prime source of this information, we would hope to see all sample sizes increased in order to make fair comparisons and would also like CCWater to look to companies own research to compliment results. <input type="checkbox"/> We would like the opportunity to comment on Water Matters before publication. 	<p>with retailers and wholesalers on their concerns, as we have done to date.</p> <p>We will continue to work using a ‘no surprises’ policy for local media press releases, as we do with all existing media announcements. We will also actively seek opportunities to collaborate with and endorse water company campaigns that support our consumer agenda.</p> <p>We will continue to offer all companies the opportunity to boost their sample size for Water Matters and would welcome discussion about how company’s own research could be used to compliment our results.</p> <p>We are reviewing our approach to reporting on the Water Matters data and will consider this request as part of that review.</p>
23	11/1/18	UNISON	<p>Comments from UNISON</p> <p>UNISON, which represents more workers within the water sector than any other union, is pleased to contribute these thoughts to CC Water’s consultation on its programme of work and research for the 2018-21 period. This document has been produced by its Water Industry Sector Committee, which brings together senior representatives from branches in all the largest water companies. UNISON also has over 1.2 million members working in other sectors of the economy, all across the UK, who are consumers of water services and</p>	

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			<p>are keenly interested in the service provided; and this response also draws on inputs from them.</p> <p>Introduction UNISON values the work of CCWater extremely highly. CCWater has a critical role in ensuring that companies and the Government are aware of the views of citizens and organisations who receive water and waste services. Industrial logic, existing patterns of infrastructure development and ownership, and consumer preference mean that understanding the views of water users is complicated, as these are not expressed through switching to and from suppliers based on their level of service delivery. But it is critical to enabling well-based policy and to counteract the ideological position of OFWAT, promoting extending competition and marketisation regardless of impact and costs or citizen preferences. CCWater needs to be a voice of evidence-based, reasoned debate. CCWater also has a critical role in ensuring that water companies have consistent practice in treating their customers well, in particular vulnerable customers.</p> <p>PR2019 We support the strong emphasis on this in CCWater work in 2018. We are glad to see that price is not the overwhelming priority for CCWater; the outcome of this exercise needs to be a fair framework, enabling reasonable prices for water users and facilitating sufficient investment for the future. For this, a</p>	<p>We agree that the Cost of Capital needs to be set at a level that allows for companies to finance their activities but must not be set too high as we have seen in the past. We welcome</p>

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			<p>reasonable assumption on cost of capital is critical. We agree that previous OFWAT assumptions have been too high, so welcome CCWater's pressing for an accurate figure this time. This needs to avoid the opposite error of being unreasonably low to support the other strongly expressed CCWater priority of ensuring resilience. This needs investment in physical assets, in systems, and in the workforce.</p>	<p>the recent Ofwat announcement on the WACC which was within the range of the report we commissioned from ECA.</p>
			<p>Understanding the impact of large-user competition We strongly support the emphasis placed in the research programme upon understanding the impact of the retail market. This a critical area of activity, and we also support the particular emphasis on understanding the experience of SME and small organisation water users. This needs to concentrate as much on those who choose not to change suppliers as those who do, and to fully understand the opportunity costs for all users of the creation of market arrangements which then require the engagement and time of business owners in understanding options and making a choice.</p>	<p>We are also considering how the market has affected SMEs who are not switching.</p>
			<p>Helping vulnerable customers Companies in the sector have done a great deal to develop programmes helping customers who struggle to pay their bills or have particular vulnerabilities. However, it is not clear to us why each of the firms has developed bespoke arrangements and we do not see clear evidence that they are learning from each other, identifying and adopting best practice developed across the network. So the work proposed to enable best</p>	

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			<p>practice to be shared and adopted is very welcome. We strongly support the priority CCWater identifies of working with the firms to extend the coverage of schemes and to develop ideas for a durable, consistent funding model enabling support into the future.</p>	
			<p>Market structure and corporate behaviour Opinion polling and our own work with members who consume water has consistently shown that a clear majority of citizens favour public ownership of the water sector. These are also a clear majority of water consumers. We encourage CCWater to represent this clear majority view in its public communications. Additionally, citizens are strongly exercised by what they consider to be corporate malpractice and greed. We therefore encourage CCWater to take a full part in public debates on boardroom salaries, corporate structures designed to minimise tax liabilities, extraction of resources from consumers for owners based overseas, and like issues. In particular, we believe that the local monopolies companies enjoy carry a responsibility to show exemplary corporate behaviour within their localities they serve. We ask that CCWater conduct research on whether customers believe that companies should obtain living wage accreditation as an expression of this involvement in the local economy.</p>	<p>We conduct research in order to understand and represent customer opinion across a wide range of issues, including pricing, profit and reward, future investment and ‘right first time’ customer service to name just a few. We agree that all water companies should strive to operate in an exemplary manner at all times and be open, honest and accountable and we have highlighted concerns when they have arisen. Competition in the non-household market in England has been opened up and we will report on the first year performance of that market in mid-2018. Water users have a diverse range of views on most matters and we seek to reflect that diversity in our engagement and communications. We want what is best for the consumer, to ensure that water users are protected and receive a good and affordable service both now and in the future. We will continue our work to ensure that the customers’ voice is heard and is placed at the heart of whatever water and sewerage service is in place.</p> <p>We have long been concerned that the structure and financing arrangements of water company - including tax arrangements - lack</p>

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				<p>transparency. Ofwat agree, and with our support Ofwat has introduced governance principles to ensure company Boards are more transparent in the future.</p> <p>We believe that it would be more appropriate for individual companies to consult with their customers about living wage accreditation.</p>
			<p>Work in Wales We are pleased that CCWater clearly identifies the need for a different approach in Wales reflecting the different legislative and commercial environment in that nation. CCWater’s close understanding of the customer experience in Wales and in England should enable it to draw robust conclusions about how different arrangements promote the interests of citizens in accessing water and dealing with waste.</p>	