

CCW – responses to our draft Forward Work Programme 2020-23

Overview of key comments

Mission

There was support for the Mission.

Strategic Ambitions

There was general support for the three Ambitions.

Two commented on the removal of the previous priority around shaping the water sector by ensuring consumers' voices are at the heart of decision-making, saying there was still a job to be done. This aspect of our work has become business as usual, which is why it has not been highlighted as a stand alone Ambition.

Measures

The lack of measures in the draft consultation caused comment, and respondents were keen to see what they would be. The measures are in the final version of the Forward Work Programme.

Naming and shaming poor performers

Rather than commenting on numbers alone, focus on sharing good practice and aiding those who are poorly performing. We have highlighted sharing good practice in the final version.

Business customers

There should be more references to business customers in the document. This issue has been addressed in the final version.

Complaints Process

Some respondents wanted more clarity on what shortening the complaints process might look like. CCW, Ofwat and Defra have been working on the household complaints process and are gathering information from companies to aid this analysis. So at this point we cannot say what 'shortening the complaints process' might look like.

Cost

- One respondent specifically supports the 2% increase.
- Three are against it, or wish the increase to be under 2%, because of the cuts within the sector as a whole.
- One neutral, but recognises CCW's work to restrict costs.

Changes made to the FWP in response:

- Introduce the measures as planned into the final version.
- Increased focus on sharing good practice, while naming and shaming is part of bigger picture of our work
- More references to business customers or non-household customers.

17 Respondents

Affinity Water Bristol Water Consumer Council for Northern Ireland Deryck Hall Associates MOSL Northumbrian Water Ofwat Portsmouth Water Severn Trent	South East Water South West Water Thames Water UNISON United Utilities Ed Vidler Water2business Wessex Water
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The comments below are not verbatim, and have been cut down in many cases. For the full responses please ask for a copy from Jennifer.suggate@ccwater.org.uk.

Respondent	Key Comments	CCW response
Affinity Water	Firmly support your forward plan	
	Want to continue, and strengthen, our collaborative work with CCW. As part of this, we would like to review alternative proposals to encourage customers to use a more environmentally sustainable level of water and ensure customer preferences are fully considered as part of our strategic regional resource planning process.	<p>We note the comment and would be keen to understand the meaning of 'alternative proposals' to help customers use a more environmentally sustainable level of water.</p> <p>We are happy to work with water companies and others to help customers understand why it is important to save water.</p>
	<p>Core aspect of our AMP7 plan is the deployment of Operational Excellence and LEAN across our organisation, to further enhance our operational ways of working and delivery of quality outputs for customers. Increased training around root cause problem solving will also enable increased performance and a reduction in repeat incidents.</p> <p>As a result of this, our company performance on complaints has improved and is currently down 6% year on year. Whilst complaints from business retailers in the market have increased following market opening, we are committed to ensuring we support and deliver a consistent and high level customer experience to all our customers</p>	
	Welcomed the opportunity to review CCW's acceptability testing for Draft Determinations and we have provided our feedback in December 2018.	We shared the results of our acceptability research at our recent research conference and will be considering ways to better

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	<p>We would encourage CCW to increase further the dialogue across the industry by connecting water companies to share ideas and overcome challenges.</p>	<p>involve the industry in collaborative working in regard to ongoing research as we consider at our lessons learned from PR19 and look forward to PR24.</p>
	<p>Welcome regular feedback on our performance from CCW to help us remove barriers to allow customers to receive the best possible experience. It would be useful if CCW could share the complaint data more frequently (i.e. monthly or at least quarterly), as it would allow companies to collaborate more effectively on leading performance and share lessons learnt. We believe it is essential that we continue to work collaboratively across the market with our peers, social partners and CCGs to share best practice to deliver fair outcomes for our customers.</p>	<p>We are currently developing our approach to the way in which we use our data. A key part of this will centre on how we share our insight with companies in an effective and timely manner.</p>
<p>Bristol Water</p>	<p>Generally supportive with some suggestions – see below:</p> <ul style="list-style-type: none"> • Re: publishing poor performance information to improve service. This approach should aim to aid those companies who show poor performance on these issues. A positive approach to focus more around the causes of this performance may provide more insight and improvements for consumers than reporting numbers alone. • Should be greater opportunities for policy debate between companies and CCW central policy teams to help gather best practice together, and to aid national understanding of what individual companies are aiming to do. • Focusing on the cause of complaints will help understanding of why some companies are poor performers. 	<p>It is our intention to aid companies with examples of what is working, such as in Chapter 3 of our Water for All – affordability report, and in our annual Affordability and Vulnerability Workshop. We have amended the language in the FWP to reflect our intentions.</p> <p>We agree it is useful and try to do this through our workshop mentioned above. This year, we also ran a Billing and Complaints workshop to examine root causes of complaints and share good practice.</p> <p>We hope to understand this better as we look to fix the root causes of complaints and bring down the number of complaints from all types of consumers about billing and charges, which make up around 50% of the complaints we receive.</p>

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	<ul style="list-style-type: none"> <li data-bbox="451 327 967 454">• Strike the right balance between continually pressing for innovation and maintaining excellent customer services. <li data-bbox="451 763 991 898">• Without measures, it is difficult to see how poor performers will be pushed. Suggest linking local engagement to national policy issues <li data-bbox="451 969 948 1032">• Would like to see narrative around leakage, not just numbers. <li data-bbox="451 1339 986 1503">• When promoting consumer awareness around the value of water consider increasing awareness around per capita consumption and water pressure management. 	<p data-bbox="1026 226 1374 689">This is something we agree with. Innovation should not come at the expense of customers, innovation should always be focussed in the areas that can make a real positive impact on customers. Any innovation that is to be implemented, that could impact customers or service levels, should be trialled in the first instance.</p> <p data-bbox="1026 763 1382 927">Measures are now published in our final FWP version. And other one year measures in our Operational Business Plan.</p> <p data-bbox="1026 969 1374 1294">Our Water, Water, Everywhere report aims to go beyond the numbers. Please find here. We ask companies to provide us with the narrative for their performance in the reports they submit to us, to help with compiling these reports.</p> <p data-bbox="1026 1339 1374 1832">We welcome this feedback. Our research (Saving Water: helping customers see the bigger picture) suggests that consumers should be made aware of the 'bigger picture' (i.e. why saving water is important) before giving advice on how to save water. This is an approach we have been championing, and sharing with other interested parties.</p> <p data-bbox="1026 1877 1374 2033">We are happy to work with water companies and others to help customers understand why it is important to save water,</p>

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	<p>Consider adding information on:</p> <ul style="list-style-type: none"> Ensuring that digital services are accessible to all customers, as part of creating excellent, accessible services for all under strategic ambition 2. 	<p>and give them information to do so.</p> <p>C-Mex penalises a company if it does not offer at least 5 communication channels, including 3 online channels, to receive contacts from customers. We are not currently planning anything additional to this.</p>
Consumer Council for Northern Ireland	<ul style="list-style-type: none"> The plan outlines a comprehensive approach to deliver the three strategic ambitions, Keen to get more information on CCW measures to test success agree with the importance placed on consumer insight 	<p>They are now in the final version of the FWP. We can discuss them at our next tripartite meeting in June.</p>
Deryck Hall Associates	<ul style="list-style-type: none"> There is still much to do on the fourth priority in the 19-22 FWP of ‘shaping the water sector...’ There is a lack of references to maintaining consumer trust in the sector. 	<p>We intend to get consumers voice in discussions through our campaigns. So it is not a rejection of the need to shape the sector, just a reshaping of how we approach the issue.</p> <p>As consumers views on fairness and value for money influence trust, and as both those indicators need to improve, we have focused on fairness and value for money rather than trust.</p>
MOSL	<p>Support the Mission and the campaigns and activities outlined in the <i>Draft Forward Work Programme</i> and are keen for CCW to play an active and central role in continuing to shape the water retail market across 2020-2023 for the benefit of customers</p>	
	<p>Our organisations have a joint role in ensuring excellent service for consumers</p>	
	<p>Would like to see greater clarity about the role CCW intends to play in the non-household market – specifically in areas such as NHH customer awareness and the potential benefits available.</p> <p>While customer complaints are a key measure of the customer experience,</p>	<p>In terms of raising NHH customer awareness, this is not an area we are planning to explore further until the retail market in England is working well.</p>

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	there is a potential gap for customers engaging with the market and understanding how they can get a better deal.	
	We think more work needs to be done to ensure that the incentives in the market, both operational and reputational, are aligned to customer outcomes. As we look to develop our three-year strategic roadmap for the Market Performance Framework (MPF) which monitors and reports on wholesaler and retailer performance, we would welcome CCW's input and suggest that we work more closely to ensure the framework effectively holds water companies to account for poor performance and customer complaints.	We would be happy to input to your development work, and can add to our plans to hold retailers and wholesalers to account for poor performance.
	We have access to a vast dataset, which can provide greater insight into key areas of focus for CCW, for example, understanding the root causes of customer complaints, particularly those related to billing and charges. As we continue to work closely with trading parties on their performance, most notably in the areas of vacancy and long unread meters, we would welcome greater collaboration with CCW, to better understand how we might resolve some the market's most ingrained and complex issues.	We would welcome access to the dataset in aiding our aim of tackling the root causes of customer complaints.
	Research undertaken by CCW can support MOSL having greater visibility of the full customer experience.	
Northumbrian Water	<p>CCW has a central role in driving relevant consistency across the sector. This is particularly applicable to consistent customer messaging where companies have common objectives, such as promoting tap water, saving water and the correct disposal of wet wipes, fats, oils and greases etc</p> <ul style="list-style-type: none"> • support your mission of “Securing a safe, reliable service, and a fair deal for water consumers”. • welcome your proposed activities to review how the price review process can be improved, and most importantly how we can continue to ensure that customers' views and priorities are reflected in our plans. <p>One of our ambitious goals is to 'Eradicate water poverty in our operating areas by 2030'. We welcome CCW's</p>	<p>We agree and welcome working collaboratively in these areas where there are common messages to ensure consistency.</p> <p>One of the ways we plan to measure whether we have achieved our</p>

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	<p>expertise and guidance in delivering this goal</p> <p>We will continue to work to deliver an unrivalled customer experience for all our customers. We welcome your planned activities that can support this. We also welcome the consistent and collaborative role that that CCW can bring to improving the customer experience in the Non House Hold retail market in England. We will welcome your involvement, and that of our customers, in developing our Water Resource Management Plan and Drainage Water Management Plan. We support CCW's research work and find that this provides a valuable source of insight across a range of water consumer issues. We are impressed with how your recent research into 'Consumer Expectations and Priorities' has clearly shaped your Forward Programme of Work.</p> <p>Taking a longer term view This is essential in a sector, which is long term and will continue to provide services for generations to come. Taking a strategic view across the range of challenges facing the sector is important and one CCW should be using its remit to fully ensure that this takes place.</p>	<p>Strategic Ambitions is to assess each water company is at least on track to meet their Price Review 2019 commitments on affordability with a view to eradicating water poverty so we welcome your ambition.</p> <p>Taking the long-term view is very important for consumers and therefore us. Both the Water Resource and Drainage Wastewater Management Plans, that you mentioned are an important part, but also embracing an attitude of ensuring a reliable service now and in the future.</p>
<p>Portsmouth Water</p>	<p>1. Customer Research Having just completed the price review process, we believe there could be a greater role for CCW in undertaking a general research programme into, for example, Outcome Deliver Incentives and the associated incentive rates. One of Ofwat's observations is that because companies apply different methodologies to determine these rates, any variations between companies are as likely to be the result of the methodological</p>	<p>CCW has already commissioned a project to look at Better Engagement with customers at price reviews and beyond. We will consider the outputs of this work alongside the views of companies and other stakeholders – with the possibility of national/general research</p>

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	<p>approach as much as customer valuations.</p> <p>Whilst Ofwat have reviewed each company's rates and challenged outliers, we believe if the research were undertaken at the same time, based on the same methodology, any variation would truly reflect customer preference. This would not prevent companies undertaking their own research, but it would ensure consistency between companies on specific topics. We would happily part fund any such research programme as we believe it is likely to reduce the overall industry cost of this exercise.</p>	<p>run by CCW one possible option. We look forward to exploring this possibility further.</p>
	<p>2. Publishing Company performance</p> <p>Think further about context before naming & shaming.</p> <p>For example, "Water for All" report you comment that we have the lowest social tariff discount in the industry (of circa £20) with no reference to the fact that we also have the lowest bill in the industry of circa £100.</p> <p>Similarly, there are comments related to the number of customers on our Watersure tariff. Our measured customer base is very low and unlikely to include relatively high occupancy properties with high water demands.</p> <p>Our general approach to affordability is to keep bills low for all customers rather than significant discounts for some.</p>	<p>This feedback is noted and acknowledged.</p> <p>We did provide companies with an opportunity to comment on the report and highlight any concerns prior to publication.</p>
	<p>Look forward to working with CCW, to shorten the complaints process and fix the root causes of any billing complaints.</p>	<p>We are working with Ofwat and Defra on this piece of work, as well as looking at our complaint process.</p>
	<p>Finally, and in light of the Final Determinations which result in significant reductions in industry revenue, we would ask you to review the proposed increase in the funding and that any increase should be below 2%.</p>	<p>For 2020-21 we raised our licence fee by a modest £116k (2%) in line with the estimated inflation (CPIH). Our licence fee will be £5.898 million in 2020-21. On average, our cost increases have remained below retail price index (RPI) for the past ten years. During the year we anticipate incurring one-off costs relating to office moves to Government hub</p>

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		buildings in Birmingham and Cardiff.
Severn Trent	Support Mission, Strategic Ambitions and Campaigns	
	As well as calling out poor performers CCW could also, very effectively, act as consultative body which promotes best practice in specific problem areas, both from within England & Wales and beyond. This would be particularly beneficial when addressing such areas as affordability challenges and reducing bad debt.	It is our intention to aid companies with examples of what is working, such as in Chapter 3 of our Water for All – affordability report, and in our annual Affordability and Vulnerability Workshop. We have amended the language in the FWP to reflect our intentions.
	Keen to understand how CCW will measure this success, and would recommend that this be done using existing PC/ODs and metrics rather than creating an additional set of performance metrics.	Please see our measures in the final FWP.
	Welcome a conversation with CCW about how a proportional approach could be applied to the review of Severn Trent and Hafren Dyfrdwy performance. We are keen to keep pace when improving performance across both companies however we are conscious that differing customer needs, geographies and company sites can prohibit aligned metrics	We would be happy to have additional discussions about the separate review of performance for the two distinct companies, Hafren Dyfrdwy and Severn Trent Water. We consider it essential that our liaison and performance related engagement distinguishes between the companies. CCW has an essential role in reviewing performance at company level and it will continue to remain a key work area of our Wales and Central & Eastern teams.
	We are not supportive of revisiting the use of incentives. We do not think customers would get value for money from CCW doing a separate piece on the use of incentives and instead we would like to see a greater focus on the outcomes (not the tools).	CCW has already commissioned a project to look at Better Engagement with customers at price reviews and beyond. We will consider the outputs of this work alongside the views of companies and other stakeholders – with the possibility of national/general research run by CCW one possible

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		option. We look forward to exploring this possibility further
	<p>Interaction With Other Industry Stakeholders</p> <p>We believe it would be valuable for CCW to also look at how it can strengthen its engagement with other industry stakeholders, such as Ofwat and the CCGs. Specifically we would welcome CCW becoming more challenging of Ofwat. Having this in place would ensure our customers would know that CCW are holding both the regulator and supplier to account on the same principles.</p> <p>Moving ahead we would like a greater amount stakeholder engagement and specifically the interface between CCW and CCGs.</p>	<p>We recognise developing even stronger relationships with industry stakeholders is a vital component on delivering our priorities for consumers. That's why we have stepped up our engagement through a growing programme of stakeholder events and conferences to share research, good practice and forge stronger partnership working. We intend to continue and expand these opportunities. Our proposed restructure of CCW - which is currently under consultation – will also help us to ensure our scrutiny and challenge of companies and regulators is even-handed and focused on the issues that are of greatest concern to consumers.</p> <p>In terms of our challenge of Ofwat, we believe we do challenge Ofwat. For example our challenges over their generosity over several price reviews around the cost of capital. Relevant to Severn Trent, we opposed Ofwat in relation to your NAV application.</p>
	<p>Customer Insight</p> <p>We would like to see CCW use insight to help water companies understand specific problem areas. Water Matters and Testing the Waters are valuable pieces of research. We would like more of these publications to provide insight into specific problem areas e.g. leakage and supply interruptions.</p>	<p>Over recent years, we have been using the data that we collect in our tracking surveys to provide more insight into customer views. For example, we used data from Water Matters, against operational data provided by companies in our Under</p>

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	<p>CCW consumer community - would welcome any feedback via this forum. We would also like to understand whether it is possible to use this panel as a way to test any new initiatives or gauge customer views on the service we provide.</p> <p>It would be beneficial if CCW could explore areas customers are keen to understand more about e.g. education and biodiversity. We would also welcome understanding how best to share these positive messages with customers.</p>	<p>Pressure report. We are currently refreshing our data strategy, which will allow us to further improve our insights.</p> <p>We are currently piloting our community. We intend to use it to broaden our understanding of customer opinion and to allow quick feedback on some areas. Initially, we anticipate that we will explore industry-wide issues, although there may be scope to look at individual company issues in the future.</p> <p>These may be areas that we can test on the community in the future and would welcome discussion on this point.</p>
	<p>Welcome CCW's active support and engagement in helping to influence positive change in our customers' behaviours in critical areas such as sewer misuse and water efficiency.</p>	<p>We welcome this positive feedback. We will continue to engage with a variety of stakeholders to help to change customers' behaviours in water efficiency and sewer misuse.</p>
	<p>CCW's budget represents a modest amount on our customers' bills. However in an environment where all companies have recently committed to cost reductions over AMP7 we would also like to see a corresponding trend of cost reduction from CCW for the benefit of our customers.</p>	<p>For 2020-21 we raised our licence fee by a modest £116k (2%) in line with the estimated inflation (CPIH). Our licence fee will be £5.898 million in 2020-21. On average, our cost increases have remained below retail price index (RPI) for the past ten years. During the year we anticipate incurring one-off costs relating to office moves to Government hub buildings in Birmingham and Cardiff.</p>
<p>South East Water</p>	<p>Support the programmes mission, 'to secure a safe, reliable service and a fair deal for water consumers'.</p>	

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	<p>An area not addressed relates to the industry's Public Interest Commitment (PIC). As the industry looks to the future, there is a pressing need to reinforce that social contract.</p> <p>CCW should consider taking an active role representing society as well as customers, when working with companies on this subject.</p> <p>Support the four campaigns highlighted to deliver tangible change But suggest consideration of an extra campaign relating to public interest.</p> <p>There is great value in reputational incentives and 'naming/shaming poor performers' to incentivise companies to improve their service, offering and approach. There is greater value provided by the sharing of best practice, the highlighting of great performers and celebrating successes.</p> <p>We welcome the continuation of this work to engage with customers and the contribution towards the 2024 Price Review.</p> <p>The results would need to be available from 2022. We are happy to engage with CCW further in 2020-21, when developing its detailed plans for research.</p>	<p>The industry's commitment within the PIC is a good step. Some of the content and measures within our Forward Work Programme echo the sentiment of the PIC, such as challenging each water company to be at least on track to meet their Price Review 2019 commitments on affordability with a view to eradicating water poverty; 'reducing leakage, and our on-going campaign work to promote the value of tap water. In terms of your specific point that we should represent society, we do take a long-term view and want reliable supplies now and into the future. We also consider consumers' views from research when developing our policy stance.</p> <p>It is our intention to aid companies with examples of what is working, such as in Chapter 3 of our Water for All – affordability report, and in our annual Affordability and Vulnerability Workshop. We have amended the language in the FWP to reflect our intentions.</p> <p>The first phase of our engagement research will be available in the spring and we aim to have the second phase completed by March 2021.</p> <p>We welcome ongoing engagement with water companies on this point.</p>
South West Water	<p>The removal of the fourth ambition as per the 19-22 FWP on shaping</p>	<p>Ensuring consumers' voices are at the heart of</p>

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	<i>the water sector by ensuring consumers' voices are at the heart of decision making</i> - this should be something the CCW are advocating for, as consumer engagement is an ongoing activity.	decision making underpins how we approach our day to day business and has become integral to all we do.
	The measures of success have not yet been developed. As such it is difficult to provide full comments as to whether the activities listed will be effective. We would expect CCW to provide an opportunity for companies to give feedback on any proposed measures of success.	The measures are in the final version of the FWP, now on the website. We are not required to consult on the measures, and we wanted to take additional time to get them right.
	Name/shaming poor performers – CCW should support these companies to make improvements through sharing of best practice to enhance the provision of support for customers who may be experiencing vulnerability.	It is our intention to aid companies with examples of what is working, such as in Chapter 3 of our Water for All – affordability report, and in our annual Affordability and Vulnerability Workshop. We have amended the language in the FWP to reflect our intentions.
	Support CCW's efforts to improve how companies support those who cannot pay and improving debt recovery processes. We are the only company to commit to addressing water poverty by 2025. Our plans to tackle water poverty comprise a range of measures enhancing our existing toolkit ensuring our customers will be able to afford their bills. In 2017 we introduced our Seamless Debt Pathway which enhanced our debt recovery processes and improved our ability to identify and support customers in vulnerable circumstances and those struggling to pay.	We welcome your support on this.
Thames Water	Support Ambitions Measures – would welcome early sight so they compliment what Ofwat is looking for.	The measures are in the FWP, now on the website.
	Current economic regulation needs rebalancing away from the sharp focus on short term performance, to a more appropriate blend of short and long term performance thereby better matching consumers' views of the importance of sustainable and lasting good performance.	We agree with the need for regulation to strike the right balance between both short-term and long-term investment and look forward to working with the industry to explore this further.
	In regard to naming/shaming poor performers on affordability and	We plan to increase the amount of publicity we use

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	vulnerability, we would like to understand how this differs from the approach CC Water take today.	to highlight poor performers, as well as commenting on who is doing well.
	<p>To deliver effective services for all consumers in vulnerable circumstances, we are keen for CCW to play active role in helping companies to identify and sign up customers to the priority services register including influencing local and central government to promote PSR registration within their services.</p> <p>While Water UK are leading the work to implement a workable system, we would welcome CCW leadership on the debate on the most appropriate legal basis for the utility sector as a whole. We believe that the most appropriate legal basis for holding and sharing PSR data is not Explicit Consent but a combination of Substantial Public Interest (SPI) and Legitimate Interest. This would allow us to reach more customers and more easily gain support of the 3rd sector to sign up customers. While opinions are split within the water industry, we welcome the debate and influence of the energy sector in this matter, as consistency is required for consumers among utilities.</p>	<p>We will continue to be an advocate for consumers in vulnerable circumstances in all our liaison.</p> <p>We agree that raising awareness of available support is crucial so that all consumers know how to access help when its needed.</p> <p>We don't consider CCW is best placed to provide legal advice on data protection sharing. This point would be worth considering by UKRN as the Public Accounts Committee - Consumer Protection - 20 May 2019 also raised data sharing.</p>
	<p>SA2</p> <p>We support this strategic priority and CCW's wider focus in this area. We are interested in working with CCW to understand how we can shorten the Complaints process to deliver for customers</p>	<p>We are working with Ofwat and Defra on this area of work, and companies will have received an information request on your complaint's handling. The analysis from this will help us understand how the process could be improved.</p>
	<p>SA3</p> <p>Fully support strategic ambition for a 'safe, reliable service now and for the future' particularly the 'for the future' bit. Whether companies end up accepting them or not, the PR19 Final Determinations are not good news for future generations of UK water consumers. The regulatory process has driven Thames Water to a 'lower cost, lower investment' or 'transitional' plan which might allow us to get by for the next five years, but doesn't allow us to</p>	<p>Noted.</p>

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	undertake increased investment for future generations of consumers.	
	<p>Consumer research</p> <p>We welcome CCW’s ongoing customer research programme, which brings a valuable cross-industry perspective. It is also encouraging to see CCW is making a prompt start to its PR24 research.</p> <p>Interventions from CCW and from Ofwat on approaches to research (including willingness to pay studies, for example) and wider engagement need to come early in the process.</p> <p>Concerned that Ofwat’s considerations on research might come too late in the process making it challenging for CCG’s and companies to respond. CCW could play a key role in working with companies and Ofwat to influence this.</p> <p>Does your consumer research present an opportunity to do some definitive research on behalf of all companies that we can all sign up to in order to avoid duplication of that research for PR24.</p>	<p>CCW has already commissioned a project to look at Better Engagement with customers at price reviews and beyond. We will consider the outputs of this work alongside the views of companies and other stakeholders – with the possibility of national/general research run by CCW one possible option. We look forward to exploring this possibility further.</p>
	<p>Business as usual core functions and statutory responsibilities</p> <p>Note role in monitoring companies’ progress in meeting performance commitments. Would welcome inclusion of the Ofwat defined common performance commitments in your newly issued report template for 2020-21.</p> <p>Would like CCW to play a strong role in responding to Ofwat consultations on its approach to regulation, with a sharp focus on getting Ofwat to promote the long term interests of consumers.</p>	<p>We are currently consulting with companies on revised quarterly templates that include the consumer facing common performance commitments.</p>
UNISON	<p>CCW’s approach has been particularly valuable in enabling individuals and companies to resolve service or billing disputes with suppliers, and applying pressure to improve the responsiveness of water companies to the needs of the communities they serve. This work needs to be properly resourced and so we support the proposed increase in the levy upon water bill payers.</p>	
	<p>Most water users do not have access to corporate events, publications and consultations, and so CCW’s role is essential in ensuring that the voices of citizens, businesses and organisations, (and in particular the poorer citizens and smaller organisations and businesses),</p>	<p>CCW has commissioned a project to look at Better Engagement with customers at price reviews and beyond.</p>

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	are considered as part of regulatory and policy decision-making.	
	CCW could concentrate more on the concerns of citizens around corporate behaviour, structure and practice; the plan as drafted subordinates this to technical, sustainability and service considerations. Citizens expect utility companies to meet decent minimum standards in terms of paying the real living wage, (including to contractors), employing people on decent contracts, and avoiding corporate and financing structures that are contrived to minimise tax. CCW should be articulating these views on their behalf.	We do contribute to discussion – primarily by Ofwat on corporate behaviour. In terms of employee and worker conditions, these could come up on local CCW discussions with companies, when relevant.
	CCW should not be engaged in promoting awareness or articulating the benefits of the introduction of competition into the non-household market	Promoting awareness of the NHH retail market in England is not part of our strategy from 2020, and won't be until we have a well functioning market.
	<p>It would be good if the "Strategy on a page" acknowledged that water company employees are key to the delivery of outstanding services that are right first time.</p> <p>The amount customers are billed has a direct effect on the amount of money that can be made available to pay employees and to keep wages aligned with the cost of living.</p> <p>Very interested in the "Measures to test success" that are under development - we are aware that metrics tend to dictate behaviours and that these could therefore affect our members. We believe that employee engagement, facilitated in part by trade unions and staff councils could provide three metrics: what is the level of employee engagement; is the workforce unionised and the union(s) recognised by the water company; does the company have an active staff council? Additionally, do annual cost of living salary increases keep up with the real rate of inflation.</p>	<p>The 'strategy on a page' is a very focused document, but you are right that without dedicated water company employees who work in all conditions to bring the service to consumers, then the service would be much poorer.</p> <p>The measures are now in our FWP on the website. These are good questions you raise about employee engagement, and we will consider how we can raise these locally in our liaison meetings with the companies.</p>
	It is important that water company employees - who are also water consumers - are better involved in the price setting.	We would encourage all consumers who have an interest to get involved in contributing to the shaping of future price reviews. CCW has recently commissioned a review of

Respondent	Key Comments	CCW response
		current engagement practices in order to identify best practice going forward.
	The expectation is that water consumers should use less - so surely there should be a move to increase bills (for those that can afford to pay) and ensure that the extra money goes into asset maintenance and new asset investments rather than profit for shareholders, when a consumer has excessive use.	Current focus is on customers paying for a bill that doesn't cost any more than it needs to. Future water scarcity conditions could change that approach.
United Utilities	<p>Agree that key ambitions provide a solid framework for CCW Encouraged to see a commitment to review and improve social tariff guidance Agree with need to shorten complaints process, and recognise that it is for companies and regulators to work together to put in place a more streamlined process for managing customer complaints</p> <p>Cost Welcome visibility provided on future cost projections. Recognise that CCW gives careful consideration as to how it might exercise control over its costs, and encourage continuation of this in future.</p>	<p>CCW is working with Ofwat and Defra on this. Following the information request to companies, the analysis will inform potential changes, which will be discussed with the industry.</p> <p>For 2020-21 we raised our licence fee by a modest £116k (2%) in line with the estimated inflation (CPIH). Our licence fee will be £5.898 million in 2020-21. On average, our cost increases have remained below retail price index (RPI) for the past ten years. During the year we anticipate incurring one-off costs relating to office moves to Government hub buildings in Birmingham and Cardiff.</p>
Ed Vidler	You should be more ambitious in your aims.	We were still developing the measures, which is why we did not consult on them. The final FWP has measures in them, that I hope you will find sufficiently ambitious.
Water2Business	<ul style="list-style-type: none"> • Support 3 strategic ambitions • There is little detail around what will be done differently or improved upon for the next period 	The Operational Business Plan offer a little more detail on our plans for next year.

Respondent	Key Comments	CCW response
	<ul style="list-style-type: none"> • Support planned activities: Fixing the Root Causes of billing complaints' and 'Helping to Shorten the Complaints Process' and 'Reviewing GSS'. • <u>Fixing the root cause of complaints</u> – should be a key priority for the Non Household market however the plan offers no measure of success on how delivery will be supported? • Increasing innovation – as above, and as is the case with most market bodies, there is talk about improving innovation but no mention of how? • Speeding up improvements in the NHH market – we consider that CC Water could play a key role in encouraging Ofwat and MOSL to look at imposing greater penalties or incentives for good/bad performance for customer service, however there is very little detail documented? • Publish complaint information, name and shame – whilst we fully support this, the data is poor and without a plan to address the root cause or penalise poor performance no actions taken to address this, will simply become a reporting exercise 	<p>We particularly want to reduce billing complaints, which is a large section of NHH and HH complaints. We'd like to see each water company make at least a 5% reduction in billing complaints in the context of the water company's complaints overall reducing.</p> <p>We want to influence Ofwat's work, so it has a consumer-focused approach.</p> <p>Your specific suggestion is one we will consider. Our plans so far for the next year are to:</p> <ul style="list-style-type: none"> • Challenge poor performing retailers and wholesalers to improve. • Publish our market monitoring evidence to highlight how well the market is serving its customers and what needs to improve. • Challenge the Market Operator and regulator to apply market level improvements to help deliver customers' expectations of the market <p>You are right that an element of this is about reporting performance. We recognise NHH telephone complaints data is particularly poor, and we would not seek to publish that until it was more reliable.</p>

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	<ul style="list-style-type: none"> Plan lacks any new offering whilst asking for a 2% increase in costs for all consumers. Given all water companies are making considerable cuts whilst having to improve all elements of their service – we cannot see any improvement to your current offering which would warrant a cost increase to all consumers when the rest of the industry is cutting back. 	<p>You are right that there is not a new policy offering for the one-off increase. For 2020-21 we raised our licence fee by a modest £116k (2%) in line with the estimated inflation (CPIH). Our licence fee will be £5.898 million in 2020-21. On average, our cost increases have remained below retail price index (RPI) for the past ten years. During the year we anticipate incurring one-off costs relating to office moves to Government hub buildings in Birmingham and Cardiff.</p>
Wessex Water	<ul style="list-style-type: none"> Support ambitious programme. Will be good to see measures in the final version NHH isn't mentioned in Strategic Ambitions and should feature more overall in document CCW should identify good performers and best practice in order to drive improvement across the industry. It isn't appropriate to only focus on the negative. Supportive of a review of GSS, as it is essential the standards align to the outcomes that customers expect. We would want this to be a collaborative piece of work informed by customer insight. Unclear what is meant by shortening the complaints process and whether this is within the company, CCW or WATRS part of the process. It would 	<ul style="list-style-type: none"> They are now in the final version of the FWP. We agree and have increased references to NHH customers. It is our intention to aid companies with examples of what is working, such as in Chapter 3 of our Water for All – affordability report, and in our annual Affordability and Vulnerability Workshop. We have amended the language in the FWP to reflect our intentions. We will continue to press Ofwat to undertake a wider review of GSS and for consumer interests and insights to be central to that. We are currently working with and Ofwat to review the complaint process overall. Ofwat issued an information

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	<p>be helpful for this to be clarified in the final version of the programme.</p> <ul style="list-style-type: none"> • There is reference to fixing the root causes of billing complaints but no mention of operational complaints. • Would like to see detail of research programme as early as possible as companies and CCW may be able to work on issues together • Keen to hear more about the online community and its structure, and include a list of topics to be explored over the 3 years even if high level 	<p>request to companies earlier this year, so we can begin to understand the success of the current approach.</p> <ul style="list-style-type: none"> • We have focused on billing complaints at this point, because it is the largest category of complaints companies and CCW receive. • We share our research programme with companies as soon as it is agreed by our Board, this is usually in March. • At present, we are piloting our research community. However, we anticipate that projects will span across all of our strategic ambitions, as well as our communications and website testing. We would be more than happy to discuss this further.