



Forward Programme Consultation  
Corporate Communications  
Ofwat  
Centre City Tower  
7 Hill Street  
Birmingham B5 4UA

**05 February 2015**

Dear Sir

**RE: Forward Programme 2015-16 consultation**

Thank you for inviting us to comment on Ofwat's forward programme for 2015-16.

We welcome Ofwat's publication of a draft forward programme and find the approach you have taken to be helpful and transparent in terms of your proposed deliverables and what you are aiming to achieve.

We recognise that 2015-16 is an important year with PR14 largely complete and the start of AMP6 ahead of us and that this is a good time for Ofwat to set out its revised strategy. We are keen to be active participants in the dialogue you plan to undertake over the next 12 months. We would like to contribute to the independent group you have established to consider resilience issues by becoming members of the group. Given the long term nature of many of the key issues facing the sector we think that an indicative view of work programmes beyond 2015-16 would be helpful and we would like to work with Ofwat to look at priorities beyond the next 12 months so this could be provided in the 2016-17 forward programme.

Where work is planned to start in the next few months, on complex issues in relation to upstream reform and the role of the RCV, it will be important that this work is not left incomplete and allowed to drift. If Ofwat can provide deadlines for completing this work then this could help to mitigate the potential for regulatory uncertainty in the eyes of investment community.



As we have highlighted in previous years we think that while all the key work programmes and strategic priorities are clearly described, the draft programme makes no distinction about the relative importance of each, unless we assume they are listed in a prioritised order. It would be helpful if the final forward programme set out your prioritised list of work components and the costs and resources needed to deliver each of them. We think signalling the relative importance of each programme of work that you plan to carry out in 2015-16 will be very important to industry investors who may well regard the 2015-16 forward programme as very ambitious.

We hope that these comments help with the development of the framework and look forward to seeing the final forward programme.

Yours sincerely,

**Christopher Offer**  
**Head of Regulation**