

## Guidance on eligibility – a consultation – Portsmouth Water Response

Q1. Do you have any comments or concerns in relation to our proposed guidance on the threshold requirements?

Ans. No – we have no comments or concerns regarding thresholds.

Q2. Do you have any comments or concerns in relation to our proposed guidance on what constitutes a single set of premises?

Ans. We have real concerns about the proposed approach, particularly in respect of disaggregation.

1. On both a measured and unmeasured basis we have a number of premises described as shop and flat. These premises typically have a single shared water supply and a single bill. Currently we do not know the tax status or which flats are occupied by the shop keeper or, indeed, whether access to the flat is internal via the shop or a separate entrance exists.

Disaggregating these premises with measured supplies would normally mean that a second supply would need to be laid and internal plumbing altered. Historically, this has only been done at the customer's request and expense.

For unmeasured supplies this would mean replacing the existing single RV charge. In this situation, based on our current Scheme of Charges, two licence charges would become payable, one for the shop and one for the flat – this could mean an increase in charges for the customer.

2. We have a number of sites supplied by a bulk meter. Such sites can be wholly non-household, wholly household or a mixture. In these cases our responsibility for pipework ends at the meter, with the pipework thereafter being privately owned. In these situation we have no record within our billing system of what premises are supplied or any occupier's details. We raise a single bill to a management company who administer matters beyond that point. We cannot see that it is either practical or desirable to change these arrangements.
3. Where a site is supplied by a number of meters we (and often the customer) will not know which parts of the site are supplied by which meter. It would, therefore, be difficult to know whether separate premises could be disaggregated without considerable effort.

To avoid issue 1 and 2 above the inclusion, as per Scotland, of a statement that the rules apply only where separate supplies exist would be helpful. For sites that have a single occupier and multiple supplies (as point 3 above) we favour your alternative approach in bullet point 2 'Requiring companies to engage with customers on this point, so that the degree of aggregation depends on what best suits customers and companies'.

Q3. Which factors are relevant when deciding whether or not the principal use of a mixed use premises is as a home.

Ans. We are happy that mixed use are assumed to be eligible. For simplicity we would favour customer (occupier) choice in determining that the premise is mainly residential if they wish, they then paying household charges. Interestingly, prior to 2017, non-household bills are higher than household, given the costs of the market being added to bills, so a non-household classification may not be desirable in the short term.

Q4. Do you have any comments on our proposed guidance on the definition of eligible non-household premises?

Ans. We like the simplicity of figure 1: Flow chart of customer eligibility for switching. However, we have two comments:-

1. If used in isolation a residential care home would be eligible in the new market but not within your guidance. We are surprised by this exclusion as we see a care home as principally a business with protection from disconnection given the nature of the occupiers.
2. The issue of exempt premises – for example places of worship, church halls etc do not appear to be covered – are these intended to be in or out? For our business plan we counted them as non-household.

Q5. Do you have any further comments or concerns in relation to the proposed changes we are making to this guidance?

Ans. No further comments

In event of queries regarding this response, please contact Paul Barfoot, Head of Retail, Portsmouth Water Ltd. Direct Line 023 92 249200. E-mail [p.barfoot@portsmouthwater.co.uk](mailto:p.barfoot@portsmouthwater.co.uk)