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By email: customerprotection@ofwat.gsi.gov.uk

Dear Rowaa,

NON-HOUSEHOLD CUSTOMER PROTECTION CONSULTATION

South West Water welcomes the opportunity to respond to the consultation and supports the final proposals for protecting customers in the non-household market. As we have outlined in our previous responses, it is vital that there are appropriate safeguards in place so that customers can have confidence to engage in the market and the benefits of competition can be fully achieved.

We are pleased to see the inclusion of a draft Code of Practice, and consider that it will form an important platform for ensuring customers can expect a consistent and equitable treatment across all retailers. Similarly, we welcome the changes to the proposals resulting from the industry engagement with the previous consultation on protecting non-household customers ('the December consultation') and the wider programme of stakeholder meetings and workshops. For retailers, the changes in requirements for micro-businesses in particular are welcome, as they are more proportionate while still offering robust protection for all non-household customers.

We welcome the commitment to keep the customer protections and the Code of Practice under review as the market develops. Recognising that the market is likely to evolve and change over time will be important to ensuring that the regulatory safeguards are as appropriate as possible throughout the evolution of the market.

We support the current drafting on the Code of Practice, and have minor comments on the specific consultation questions, which are included in Annex 1.

Yours sincerely,



Iain Vosper
Regulatory Director



Annex 1

Q1 Do you agree with our proposed approach to the governance of the code of practice?

We agree with the proposed approach to the governance of the code of practice. Customer protection issues are not the same as those issues covered by the Interim Code Panel and, as such, a similar composition is not required.

It is important however that any licence condition is consistent and fair to both a WSSL or an appointed retailer. It appears sensible therefore that approved parties that wish to raise changes to the code propose these to Ofwat who then consult with the wider industry, taking into account the varying timelines based on urgency, complexity and impacts on Retailers and systems.

Q2 Do you have any views as to whether the code governance and modification should be included in the code or the licence/appointment?

We consider that that the licence condition should be a simple statement ensuring compliance with the code of practise and therefore the governance and modification are better placed within the code itself.

Q3 Who should be able to raise changes to the code of practice?

We consider it is appropriate that all Retailers (MOSL members) participating in the market, Ofwat and Consumer Council for Water should be able to raise changes to the code of practice.