

### Introduction

United Utilities Water welcomes the opportunity to comment on Ofwat's consultation on "Supplementary guidance: assessing whether non-household customers in England and Wales are eligible to switch their water and wastewater retailer."

We are generally supportive of and welcome the clarification that would be provided through the guidance as set out in this consultation document. The only area of concern relates to the guidance for university halls of residence and accommodation, as set out in our comments below.

**We would be grateful for consultation responses on the draft supplementary guidance. In particular, we would welcome responses on whether respondents consider:**

#### **1. the descriptions in the examples not to be reflective of the types of issues encountered; and/or**

We consider that the descriptions in the examples tend to be reflective of the issues encountered.

The only example which we consider to be problematic is the example provided in paragraph 1.4.1 "University halls of residence and accommodation." We have set out further comments below.

#### **2. there may be any inconsistency between our draft supplementary guidance and the relevant legislation; and/or**

We are not aware of any inconsistency issues.

#### **3. the proposals in our supplementary guidance are unreasonable.**

The proposals seem reasonable in most instances. However, please see our comments below regarding university halls of residence and accommodation.

**If stakeholders do answer 'yes' to any of the questions above, we would also welcome what alternative interpretation should be made and why?**

#### University halls of residence and accommodation

When originally considering these properties for eligibility our interpretation was that any university halls of residence or accommodation for which the university was liable for the water bill would be assumed to be dependent on the university and therefore eligible.

The additional guidance which introduces the concept of dependency based on food and wider services being provided has the potential to cause confusion and inconvenience for customers. Many universities provide a variety of accommodation, some of which will and some of which will not provide food and wider services (eg: halls of residence versus university owned housing.) Nevertheless, we anticipate that the universities will want one supplier for their portfolio of properties, in common with other multi-site customers. In addition, it is not practicable for the Wholesaler to ascertain the level of "dependency" based on the suggested criteria when assessing eligibility.

Whilst the guidance provided on dependency is useful for some other properties that are owned and operated by third parties, we believe that this additional level of clarification should not apply if the university is the named bill payer.