

Ofwat Consultation on supplementary guidance: assessing whether non-household customers in England and Wales are eligible to switch their water and wastewater retailer

Business Stream response

We are in general agreement with much of what is proposed in the draft supplementary guidance. There are three specific areas, however, where we would recommend a different approach, as follows:

1.4.1 University halls of residence and accommodation

While we understand the logic behind the proposed principle, we are concerned that it could prove difficult to implement in practice. It could potentially take extensive investigation to establish the exact nature of the services provided at a given site, and it is likely there would be many grey areas eg where very limited kitchen facilities were provided or whether students could pick and choose whether to receive additional services such as catering. Since the primary purpose of halls of accommodation is as domestic residence we believe that all of these should be considered household properties and therefore not included within the market.

1.4.8 Car parks and garages

We broadly agree with the principle established here, but it is not clear whether car parks and garages that do not have water or sewerage services (ie are drainage only) should be treated as individual supply points. We think this point should be clarified, and would suggest that they should not be treated as such, given that the very low level of charges involved would be uneconomic to collect.

1.4.10 Allotments

While allotments are clearly not residential, they are also non-commercial and we would argue that they are in effect for domestic use. In addition, they are not given a rating by the VOA. On the basis of both those things we do not think it makes sense to include them within the market.