

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

Southern Water's Response

April 2016



Southern Water's response to the supplementary guidance on eligibility

We welcome the opportunity to respond to the supplementary guidance on assessing whether non-household customers are eligible to switch their water and wastewater retailer. The supplementary guidance has been very useful to clarify specific issues and scenarios in order to apply the general principles on eligibility in a standard way. On the whole, the specific guidance is reflective of the issues we have encountered and the clarifications appear reasonable and appropriate. However, we do have two minor comments:

- The university halls of residence guidance, appears overly complex and burdensome. The data to assess whether university accommodation has self contained units or is self catered is not readily available and some halls offer both communal kitchen facilities on each floor, as well as the provision of food and wider services. The customer may also be bemused that some on-site halls of residence are included in the market, whilst others are excluded. We believe that it may be beneficial to include all university halls of residence in the market, as a first approximation, and only where it is clear that the accommodation is off campus and self contained/catered, or is liable for council tax, would it be considered household.
- The information required to apply the specific guidance on serviced apartments is also difficult to ascertain. The use of an apartment may vary between short term and longer term tenancies and the assessment of whether the accommodation is used as an alternative to a hotel is subjective. As such, we propose that such serviced apartments are not included in the non-household market unless the premises is liable for business rates.

We accept that the remainder of the additional scenarios are very clear and reasonable and we welcome the publication of the updated eligibility guidance to reflect this supplementary advice.

Should you have any queries regarding our response, or would like to discuss any aspect of it with us, please contact our Market Reform Manager, Dylan Freeman, on 01903 272351 or by email dylan.freeman@southernwater.co.uk