



South Staffs Water

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Supplementary Guidance Consultation,
Retail Market Opening Programme,
Ofwat,
21 Bloomsbury Street,
London,
WC1B 3HF.

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

7th April 2016.

Dear Ofwat,

We welcome the opportunity to respond to the consultation on supplementary eligibility guidance.

Our key observation is that any new guidance issued after the consultation should be in the form of a full replacement for the August 2015 guidance, leaving absolutely no doubt that there is one definitive guidance document for eligibility. We note that there is now a further consultation released on 4th April on eligibility which is again another document to consider. A definitive document should include the original WIA91 components if they remain relevant.

In answer to the specific questions in the consultation:

1. The descriptions are generally reflective of the problems.
2. There is inconsistency, hence the need for one definitive document.
3. The proposals are broadly reasonable but we make the following observations:
 - The principle applied to university halls of residence will cause some parts of a college or university portfolio to be outside of the market, which may not be what the customer wants. We suggest university halls of residence are all eligible, as are university owned houses for students.
 - We agree that short term lets are businesses not homes, but identifying these may be challenging especially as use may change on a regular basis. We suggest that such properties should be eligible but no specific effort be required to identify them.

Yours sincerely,

Philip Saynor
Director of Finance and Regulation