

Updated Eligibility Guidance Consultation

Southern Water's Response

May 2016



Southern Water's response to the updated eligibility guidance consultation

We welcome the opportunity to respond to the guidance on assessing whether customers in England and Wales are eligible to switch their water and wastewater retailer. We have not identified any inconsistencies with the supplementary guidance but have several suggestions to ensure both documents are aligned and further clarity is provided.

We would recommend that:

- The principles for assessing eligibility in section 1.3 of the supplementary guidance are reflected in chapter 4 concerning the definition of household and non-household premises. Whilst they are not inconsistent, it would be beneficial to align the documents.
- Whilst premises not liable for either Council Tax or business rates may require further information in order to assess principal use, it would remain beneficial to retain the statement that 'a first approximation would ordinarily be non-household premises' to ensure a light touch assessment is possible.
- Further clarity is provided regarding where a single set of premises would be redefined as several premises. An example would be beneficial, such as a campus site, which is currently considered a single set of premises under WSL and would be disaggregated into several premises based on supply points and business rates.

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