



Retail Market Opening Programme
Ofwat
21 Bloomsbury Street
London
WC1B 3HF

05 September 2016

Dear Sirs,

Retail Market Transition Arrangements: a consultation

Thank you for the opportunity to comment on your proposals for the retail market transition arrangements. Our response to each of the questions raised is set out below.

Q1 Do you agree with our proposal to mandate that there can be no customer switches under the existing Customer Transfer Protocol during the last [x] days before market opening?

We support these proposals and agree that the timing of this 'freeze' should align with the current CTP switch period of 20 working days.

Q2 Do you agree with our proposal to use a Schedule 11 transition scheme to revoke all WSLs (including CSLs – subject to alternative provisions being put in place)?

We agree with your proposal to use a Schedule 11 transition scheme.

Q3 Should the proposed Schedule 11 transition scheme make provision for what should happen to any existing wholesale contracts?

We support the inclusion in the transition scheme of a provision which will terminate any existing contracts between WSLs and Appointees and replace them with wholesale contracts under the Wholesale-Retail Code (WRC). This will ensure that companies are not left with a legacy of managing any existing contracts on different terms to those in the WRC.

Q4 Are there any other elements of the current arrangements that should be included in the proposed Schedule 11 transition scheme (either to revoke or terminate them, or to make provision for them to continue in some form, if that is consistent with the provisions of the Act)?

We have no further additions to your proposals.



If you have any further questions regarding our response, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'C Offer', written over a light blue horizontal line.

Christopher Offer
Director of Regulation