



Chris Daly  
RMOtransition@ofwat.gsi.gov.uk  
Retail Market Opening Programme  
Ofwat  
21 Bloomsbury Street  
London WC1B 3HF

**Anglian Water Services Ltd**  
Lancaster House  
Lancaster Way  
Ermine Business Park  
Huntingdon  
PE29 6YJ

Tel 01480 326063  
www.anglianwater.co.uk  
Our ref

02 September 2016

Dear Chris

**Re: Retail Market transition arrangements: a consultation (12 August 2016)**

We welcome the opportunity to comment on the above consultation. We have reviewed the consultation alongside the recently published 08/06 Open Water programme update note.

It is clear that there are a number of essential activities required to take place between now and April 2017, which involve the co-ordination of input from a range of stakeholders. It is very useful to see the proposed timetable for these activities and would request that further detail is made available at the earliest possibility to enable stakeholders to input in the most timely and effective manner.

Upon reviewing the programme note and consultation, we note there is a minor inconsistency in timing between Defra's requirements for Final Board Assurance letter and MOSL's Programme Update that sets out the requirements for signing Wholesale Contracts and the Accession Agreement.

The programme update sets out that the Accession Agreement and the Wholesale Contracts will be signed in March 2017 however we understand that the requirements for final retail Board assurance letters (due on 3<sup>rd</sup> February) require confirmation that wholesale contracts and Accession agreements have been already been signed and entered into.



THE QUEEN'S AWARDS  
FOR ENTERPRISE:  
SUSTAINABLE DEVELOPMENT  
2015

Registered Office  
Anglian Water Services Ltd  
Lancaster House, Lancaster Way,  
Ermine Business Park, Huntingdon,  
Cambridgeshire. PE29 6YJ  
Registered in England  
No. 2366656.

**an AWG Company**

*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 agree that it is desirable that no switching transactions take place such that they are initiated under the Water Supply Licensing regime but that the switch essentially completes post 3 April 2017 when the Water Services and Sewerage Licensing regime applies.

To achieve this, we support a proposal to mandate that the latest date to start the switching process through the Customer Transfer Protocol is 20 working days before full non-household market opening.

*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)?*

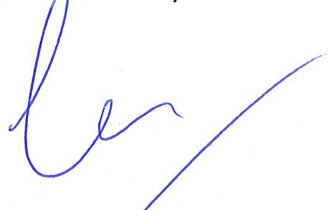
*Q3 - Should the proposed Schedule 11 transition scheme make provision for what should happen to any existing wholesale contracts?*

*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)?*

With regard to questions 2-4, we agree with the proposal to use a Schedule 11 transition scheme and for this to deal with the arrangements affecting existing wholesale contracts. We would support the termination of existing common contracts and realignment to the proposed contractual arrangements in the enduring NHH retail market.

We look forward to commenting further on the transition scheme in due course, however in the meantime if you have any questions on this response, please do not hesitate to contact me.

Yours sincerely



**Claire Russell**  
**Legal Director**