

United Utilities's response to the Ofwat consultation:

Retail market transition arrangements

Introduction

United Utilities welcomes the opportunity to comment on the Ofwat consultation: Retail market transition arrangements. The smooth transition of the activities covered within this consultation are key to minimising potential disruption to the opening of the non-household retail market. We support these efforts particularly where they aim to simplify the transition between the old and new processes.

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 fully support this proposed moratorium on switches in the run up to market opening. 20 days is mentioned within the consultation as an appropriate length of time, however we would suggest that 30 working days would be a better option. 30 working days is the maximum length of time a switch can take under the CTP. The aim of this proposal should be to ensure that there are no switches undertaken across the transition between the 2nd and 3rd of April at go live. Without this moratorium there is the potential for switches to partially occur in the old process and then falter as that process becomes defunct. We believe this moratorium will help ensure that customers know when a switch will occur and that errors or delays in switching are avoided wherever possible.

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)?

The use of a schedule 11 transition scheme to revoke all WSL's whilst simultaneously activating the related WSSL seems to be a reasonable approach, therefore we support this proposal.

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

We believe it is a reasonable approach to use schedule 11 powers, and would look to support Ofwat in ensuring a smooth transition from old s66D agreements to the new wholesale contracts and 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 not identified any further issues to raise within this response.

END OF QUESTIONS