

September 2016

Trust in water

# Agreements for water and sewerage companies to adopt infrastructure – a discussion paper

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## About this document

This paper discusses changes to legislation that will require Ofwat to issue codes with respect to the agreements water and sewerage companies enter into in order to adopt infrastructure for new connections that has been provided by other parties. We are seeking interested parties' views on what they consider the codes should and should not cover and why this is important.

Where a customer (usually a developer) chooses to provide new water or sewerage connections itself, the Water Industry Act 1991 (WIA91) includes provisions by which the customer either must or may transfer ownership of certain infrastructure to the local appointed water or sewerage company by way of an 'adoption agreement'. The Adoption Agreement sets out the terms on which the local appointed water or sewerage company will take on responsibility for the new infrastructure. Following the adoption of the new infrastructure at an agreed date it becomes part of the local appointed water or sewerage company's network and their responsibility to maintain on an on-going basis.

The Water Act 2014 made amendments to the WIA91 that will require Ofwat to issue codes with respect to the agreements water and sewerage companies enter into in order to adopt infrastructure for new connections that has been provided by other parties.

- Section 51A WIA91 deals with agreements for the adoption of water mains and service pipes.
- Section 51CA requires us to issue a code in relation to such agreements.
- Section 104 WIA91 deals with agreements for sewers, drains or sewage disposal works.
- Section 105ZC requires us to issue a code in respect of such agreements.

The provisions requiring us to issue codes have not yet come into effect. For water and sewerage companies operating wholly or mainly in England, it is currently expected that the UK Government will commence the provisions by April 2017, bringing them into effect at a date to be determined after that. The Welsh Government has not yet indicated when it intends bringing these provisions into effect for water and sewerage companies operating wholly or mainly in Wales.

Stakeholders' views will inform our thinking on the development of the codes, alongside other factors such as our [regulatory approach](#). In due course, we will publish a formal consultation on the proposed codes, ahead of them being finalised and taking effect.

We hope that this initial discussion paper will also help to further progress conversations between water and sewerage companies and their developer services customers about what is important to each other under the current arrangements for adoption agreements and why. This is a valuable opportunity to further strengthen this customer relationship and to find ways to continue to improve service delivery for all customers.

## Contents

Responding to this discussion	4
1. Background	5
2. The Water Act 2014	9
3. Developing the codes	14
4. Next steps	19
5. More information	20

## Responding to this discussion

We welcome stakeholders' responses to this discussion paper by 31 October 2016. We would particularly welcome your views in response to the ten questions we have highlighted throughout chapter 3.

### In submitting your response, please identify:

- **which question number(s) your comments are in response to; and**
- **whether your comments are in relation to adoption agreements for water and/or sewerage infrastructure.**

You can email your response to [AdoptionCodes@ofwat.gsi.gov.uk](mailto:AdoptionCodes@ofwat.gsi.gov.uk)

You can also submit your response by post to:

Casework – Adoption Codes Discussion  
Ofwat  
Centre City Tower  
7 Hill Street  
Birmingham B5 4UA

Information provided in response to this discussion paper, including personal information, may be published or disclosed in accordance with access to information legislation – primarily the Freedom of Information Act 2000 (FoIA), the Data Protection Act 1988 and the Environment Information Regulations 2004.

If you would like the information you provide in your response to be treated as confidential, please be aware that, under the FoIA, there is a statutory 'Code of Practice' with which public authorities must comply and which deals, among other things, with obligations of confidence.

In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that we can maintain confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system or a blanket request for confidentiality will not, in itself, be regarded as binding on Ofwat.

# 1. Background

## 1.1 Trust and confidence in water

As the economic regulator for the water sector in England and Wales, our vision for the sector is one where customers and wider society have trust and confidence in vital public water and wastewater services. Amongst other things, this includes trust and confidence in:

- the quality of our drinking water;
- the resilience of our water and wastewater services;
- our wastewater being taken away and treated safely;
- good customer service and fair dealing; and
- an effective and efficient regulatory framework.

To achieve trust and confidence, water companies must listen to their customers and deliver the outcomes they and wider society want. They must also have strong, open and honest relationships across the water cycle supply chain, listening and communicating openly and clearly to build confidence amongst customers and in each other.

As the economic regulator of the water sector in England and Wales, our role is to help the sector build trust and confidence with customers and wider society. This means:

- provoking, challenging and, where appropriate, leading the sector to ensure it has clarity on what customers and society expects;
- seeking assurance that service providers are acting efficiently, on the basis of good information and a good understanding of the responsibilities and relationships they have;
- being ready to step in if service providers fall short;
- using the right tools from our available regulatory toolkit to achieve the best results; and
- acting clearly and predictably.

In implementing our regulatory tools we are moving away from a “one-size-fits-all” approach, whereby we take a very interventionist approach to prescribing in detail what water companies should do. Instead we are increasingly using a framework-based approach, that sets out key underlying principles and expectations for what we want water companies to deliver, and encourages water companies to develop strong relationships with their customers to understand and deliver what is important

for them within this framework. This proportionate approach is risk-based, and therefore still allows for more detailed, targeted intervention where it can be demonstrated that this is required to protect the interests of customers. The flexibility of this model allows for innovation, recognising that there can be different ways to deliver the same outcome for customers.

## **1.2 Adoption Agreements**

Providing new water connections is currently one of only a few areas of the sector where customers in England and Wales can, for certain services, choose their service provider or provide the service themselves, rather than having to buy the service from the local appointed water or sewerage company.

Where customers (usually developers) choose to use an alternative provider for the provision of water connections to supply water for domestic purposes (i.e. appoint a suitably accredited self-lay organisation to provide new service connections and/or water mains), this infrastructure must be adopted by the local appointed water company before it is able to provide a water supply through it. Under section 51A WIA91 a water company may agree with any person constructing or proposing to construct a water main or service pipe, that, if the main / pipe is constructed in accordance with the terms of the agreement, the water company will take on responsibility for (“adopt”) the pipework at a specified date.

The adoption of new sewerage connections is currently approached differently in England and Wales. Customers (usually developers) of sewerage companies operating wholly or mainly in England can provide their own sewerage infrastructure (both sewers and pumping stations) and choose whether to ask the local appointed sewerage company to adopt these. Customers of sewerage companies operating wholly or mainly in Wales, can provide their own sewerage infrastructure, but all new lateral drains and sewers that connect to a public sewer must be adopted by the local appointed sewerage company<sup>1</sup>. In both England and Wales section 104 WIA91 enables a sewerage company to agree with any person constructing or proposing to construct sewers, drains and/or sewage disposal works, that if they are constructed

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<sup>11</sup> This is because the Welsh Government has brought into force section 42 of the Flood and Water Management Act 2010 which requires mandatory sewer adoption for all new lateral drains and public sewers that connect to a public sewer. Section 42 has not yet been brought into force in England.

in line with the terms of the agreement, the sewerage company will take on responsibility for them at a specified date.

The exception to the above scenarios is when the customer chooses to have the new connections infrastructure provided by a **new appointee**. In these circumstances the new infrastructure is not adopted by the original local appointed water or sewerage company. The new appointee will retain ownership of the new infrastructure and provide the development's water and/or sewerage services on an on-going basis as the new local appointed company. Once appointed the new appointee will become the local appointed water or sewerage company and be subject to the same statutory provisions regarding the provision and/or adoption of new connections infrastructure set out above.

### **1.3 A fair and efficient market for all customers**

As customers, developers can benefit from the choice that these markets offer. It lets them choose a service provider that best suits their needs, and can act as a driver for more customer-focused, efficient and innovative services.

While customers have a choice in who provides the new connections, if they are required or wish to have the new infrastructure adopted under the provisions of the WIA91, it is only the local appointed water or sewerage company that can legally adopt it. Therefore in order to exercise their choice in the markets for new water and sewerage connections, the customer remains reliant on some non-contestable services from the water or sewerage undertaker. Such services include:

- applying for and agreeing the terms of an adoption agreement; and
- gaining the water or sewerage company's approval for the works provided by the alternative provider so that the final adoption can take place.

The timely, efficient and fair delivery of these non-contestable services by the water or sewerage company is key to the customer's ability to fully benefit from having a choice in its provider of the new connections. It is also an important factor in the developer and/or alternative provider being able to successfully deliver its own business and in enabling housing growth.

In addition, the non-contestable services that a water or sewerage company provides in relation to adoption agreements is vital to its ability to provide effective and efficient services to the customers it supplies through its network. This includes both the new customers the new connections will serve and existing customers already being supplied by the network. This is because the terms of adoption agreements

can play a fundamental role in ensuring that any new infrastructure adopted by the water or sewerage company is safe and fit for purpose. This enables the water or sewerage company to fulfil its statutory obligations in relation to the security of supply and quality of water and sewerage services. Appropriate handling of adoption agreements also ensures customers (both developers and bill payers) are not paying for unnecessary costs of over burdensome administration or remedial works to address defects in the adopted infrastructure.

## 2. The Water Act 2014

### 2.1 Changes the Water Act 2014 makes in relation to adoption agreements

The Water Act 2014 amended sections of the WIA91 by replacing some of the existing provisions and introducing some new provisions. Some of these changes have already come into effect and some have not.

In relation to the adoption of water mains or service pipes, section 10 of the Water Act 2014 amends section 51A WIA91. It also replaces sections 51B (appeals with respect to adoption) and section 51C (financial conditions of compliance) of the WIA91, which apply when a person refers a dispute to Ofwat for determination. These sections will be replaced (or have been replaced) with:

- section 51B (adoption at a future date: orders by Authority);
- section 51C (variation and termination of section 51A agreements);
- section 51CA (codes in respect of section 51A agreements);
- section 51CB (codes under section 51CA: procedure);
- section 51CC (codes under section 51CA: minor or urgent revisions);
- section 51CD (rules about charges in connections with a section 51A agreement);
- section 51CE (rules under section 51CD: procedure);
- section 51CF (rules under section 51CD: minor or urgent revisions); and
- section 51CG (rules under section 51CD: guidance)<sup>2</sup>.

In relation to the adoption of sewers, drains or sewage disposal works section 11 of the Water Act 2014 amends section 104 WIA91. It also inserts the following sections after the current section 105 (appeals with respect to adoption):

- section 105ZA (adoption at a future date: orders by Authority);
- section 105ZB (variation and termination of section 104 agreements);
- section 105ZC (codes in respect of section 104 agreements);
- section 105ZD (codes under section 105ZC: procedure);
- section 105ZE (codes under section 105ZC: minor or urgent revisions);

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<sup>2</sup> The new sections 51CD; 51CE; 51CF and most of 51CG came into effect on 18 December 2015.

- section 105ZF (rules about charges in connections with a section 104 agreement);
- section 105ZG (rules under section 105ZF: procedure);
- section 105ZH (rules under section 105ZF: minor or urgent revisions); and
- section 105ZI (rules under section 51CD: guidance).<sup>3</sup>

This discussion paper relates to the provisions within the Water Act 2014 for Ofwat to produce codes in respect of adoption agreements (sections 51CA – 51CC and sections 105ZC – 105ZE WIA91). The provisions for Ofwat to produce [charging rules for new connections](#) is being addressed separately.

## **2.2 What the codes Ofwat will be required to produce might include**

In relation to the codes Ofwat must produce in respect of adoption agreements made under section 51A or 104 WIA91, sections 51CA(2) and 105ZC(2) WIA91 set out what the codes may make provision for:

- a) procedures in connection with making an agreement under section 51A / section 104;
- b) procedures in connection with varying or terminating a section 51A / section 104 agreement;
- c) procedures to be followed by Ofwat in determining whether to make an order under section 51B(4) or section 51C(1)<sup>4</sup> / section 105ZA(4) or 105ZB(1)<sup>5</sup>;
- d) the circumstance in which it is, or is not, appropriate for work to be done by a person other than a water undertaker<sup>6</sup>;

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<sup>3</sup> Of these provisions, sections 105ZF; 105ZG; 105ZH and most of 105ZI WIA91 came into effect on 18 December 2015. The other provisions have not yet come into effect.

<sup>4</sup> Section 51CA(3) WIA91 states that this may in particular require Ofwat to consult the Drinking Water Inspectorate

<sup>5</sup> Sections 51B(4) and 104ZA(4) WIA91 enable Ofwat to order the water company to enter into an adoption agreement and to specify the terms of that agreement; Sections 51C(1) and 105ZB(1) WIA91 enable Ofwat to order the variation or termination of an adoption agreement.

<sup>6</sup> Section 51CA(4) and section 105ZC(3) WIA91 state that this may include in particular provision about circumstances relating to the nature of the work; and the kind of premises supplied or to be supplied

- e) the terms and conditions of a section 51A<sup>7</sup> / section 104 agreement<sup>8</sup>;
- f) principles for determining the terms and conditions that should or should not be incorporated into a section 51A / section 104 agreement; and
- g) the steps to be taken by Ofwat in determining whether a person is complying with the code.

The explanatory notes for the Water Act 2014 highlight that as a result the codes may set out:

- standard or specific terms and conditions between the parties which may be mandatory or not;
- principles for determining what terms and conditions are suitable for particular section 51A /104 agreements, or more generally;
- the circumstances in which it is appropriate for the person seeking adoption to carry out works instead of the water or sewerage company; and
- the procedures for when a request to agree an adoption agreement is received by a water or sewerage company and steps to be taken to reach, amend or terminate an agreement.

Sections 51CA(9) and 105ZC(8) WIA91 state that the code may make different provision for different persons or descriptions of person.

### **2.3 Ofwat's powers with respect to compliance with the codes**

Sections 51CA(6) and 105ZC(5) WIA91 state that if Ofwat considers that a water or sewerage company is not acting as required by the code, Ofwat may issue a direction for the water or sewerage company to do, or not to do, a particular thing specified in the direction. Sections 51CA(8) and 105ZC(7) WIA91 state that it is the duty of the water or sewerage company to comply with such a direction and this duty

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<sup>7</sup> Section 51CA(5) WIA91 states that this may include in particular provision about terms and conditions about: constructing associated infrastructure; vesting associated infrastructure in a water undertaker; constructing water mains so as to meet additional supply requirements; connecting new water mains or service pipes to the existing supply system of a water undertaker; complying with requirements of the kind referred to in section 47(2) WIA91 [see footnote 15]; and the duration of a section 51A agreement.

<sup>8</sup> Section 105ZC(4) WIA91 states that this may include in particular provision about terms and conditions about: constructing associated infrastructure; vesting associated infrastructure in a sewerage undertaker; and making a communication with public sewers.

is enforceable by Ofwat under section 18 WIA91. Ofwat may not give a direction requiring a person to enter into, vary or terminate an agreement<sup>9</sup>.

## **2.4 The process Ofwat must follow to produce and revise the codes**

Sections 51CB and 105ZD WIA91 set out the procedures Ofwat must follow before issuing codes with respect to adoption agreements for water and sewerage infrastructure.

Unlike the Water Act 2014's provision regarding the development of charging rules for new connections, Ofwat's production of codes with respect to adoption agreements is not subject to guidance from the Secretary of State or Welsh Ministers. However Ofwat is required to prepare and consult relevant persons about a draft of the proposed codes<sup>10</sup>. For adoption agreements for water infrastructure, consultees must include the Drinking Water Inspectorate.

Within 28 days of the end of Ofwat's consultation period and before Ofwat issues its first code with respect to water or sewerage infrastructure under section 51CA or section 105ZC WIA91, the Secretary of State or Welsh Ministers may direct Ofwat to not issue the code, or to issue it with specified modifications<sup>11</sup>. Ofwat may not issue the code until that 28-day period has expired.

Sections 51CA(10) and 105ZC(9) WIA91 state that Ofwat must from time to time review the codes and, if appropriate, issue a revised code. A revised code may include provision for retrospectively applying any of its revisions to section 51A / 104 agreements made before the revised code comes into force<sup>12</sup>.

The Water Act 2014 also makes provision for Ofwat to make minor or urgent revisions to the codes where it considers the proposed revision(s) to be a revision for which consultation is unnecessary, or a revision that it is necessary or desirable to make without delay<sup>13</sup>. In such circumstances Ofwat would not need to consult on the proposed revision(s). However once Ofwat has issued the revised code, as soon as reasonably practicable, it must notify those persons it considers appropriate that the

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<sup>9</sup> Sections 51CA(7) and 105ZC(6) WIA91.

<sup>10</sup> Sections 51CB(1) and 105ZD(1) WIA91.

<sup>11</sup> Section 51CB(4) and 105ZD(3) WIA91.

<sup>12</sup> Sections 51CA(11) and 105ZC(10) WIA91.

<sup>13</sup> Sections 51CC and 105ZE WIA91.

revised code has been issued. In this notification Ofwat must indicate whether there was no consultation because this was not considered necessary, or because it was considered to be urgent. Revisions that are made without consultation for reasons of urgency will only be effective for six months.

## 3. Developing the codes

### 3.1 Introduction

As set out in section 2.2 above, the Water Act 2014 provides an indication of what the codes may make provision for. In line with our regulatory model (see section 1.4 above), it is unlikely that in developing the codes we would look to set out prescribed, detailed requirements in all of these areas. We consider such an approach would be overly burdensome for all involved in the process and risk constraining innovation and customer-focus in water and sewerage companies' service delivery. However, we also need to strike an appropriate balance in terms of the codes providing greater certainty in order to protect customers and ensure outcomes are being delivered efficiently and effectively. The codes in particular could play an important role in providing clarity on expectations in areas that could otherwise result in lengthy and costly delays or negotiations between the parties to the agreement.

We recognise that the water sector has been working with its customers to improve service delivery for developer services. Past and current collaborative work relevant to adoption agreements includes the technical guidance provided by [Sewers for Adoption](#); drafting of a template self-lay agreement; and work to refresh the code of practice for self-laying water mains and service pipes. We intend our development of the codes for adoption agreements to build upon and add value to this progress, rather than duplicate or disregard it. In developing the codes we will seek to encourage the sector to discuss and agree with its customers what the codes should include, ahead of this being formalised by a codes issued by Ofwat. We believe this approach will further strengthen this customer relationship. Where a common position cannot be reached, Ofwat will set out its expectations in the codes.

To help inform early work on the development of the codes, we are inviting stakeholders' views on what it would be particularly important and beneficial to include in the codes and why. This will enable us to target regulatory requirements appropriately in order to achieve protections and benefits for customers. Both this discussion paper and our subsequent work with the sector and its customers in developing the codes, will also enable water and sewerage companies and their customers to better understand and respond to each others' needs when entering into adoption agreements. This should make the process smoother and quicker for all concerned and deliver better outcomes for customers and society.

The following section considers each of the headline areas outlined in section 2.2 above and seeks stakeholders' views on these.

## 3.2 Procedures

The end-to-end process for an adoption agreement includes a number of stages from application to final adoption. So the procedures involved in making an agreement under section 51A / section 104 WIA91 could potentially include, amongst other things, those with respect to:

- obtaining and submitting an application form for an adoption agreement;
- the technical and supporting information the person constructing the new water or sewerage connection(s) must provide with their application;
- the water or sewerage company's assessment of the application, including its handling of incomplete applications;
- the means by which the parties negotiate the terms and conditions of the agreement, including any terms relating to charges or any security and/or bond requirements;
- how a customer seeking an adoption agreement can raise concerns about the terms or conditions being offered by the water or sewerage company
- the water or sewerage company's final inspection and vesting of works.
- varying the terms of an adoption agreement; and
- terminating an adoption agreement.

### Questions

- Q1. Which parts of the procedures for making an adoption agreement under section 51A or section 104 WIA91 should be included in the code(s)? These might include or differ from those set out above. For each, please explain why and what benefit its inclusion in the code(s) could deliver.
- Q2. Which parts of the procedures for making an adoption agreement under section 51A or section 104 WIA91 should not be, or are unnecessary to be included in the code(s) and why?
- Q3. Should the code(s) set out a common procedure applicable to all water and sewerage companies, or should it set out key principles that companies' own processes and procedures should comply with? Why?

Sections 51B(4) and 105ZA WIA91 provide that Ofwat can order a water or sewerage company to enter into an adoption agreement or impose particular terms and conditions in such an agreement if we are satisfied that:

- the work proposed to be done by a person other than the water or sewerage company is appropriate to be done; and
- if that person and the water and sewerage company cannot reach an agreement within a reasonable period of time.

Sections 51CA(4) and 105ZC WIA91 state that the code may include provision about the circumstances in which it is, or is not, appropriate for work to be done by a person other than a water or sewerage company. This may include provision about the nature of the work and the kind of premises supplied or to be supplied.

Sections 51C(1) and 105ZB(1) WIA91 provide that in certain circumstances<sup>14</sup> Ofwat can by order vary or terminate an adoption agreement following a request to do so by a party to the agreement.

### Questions

- Q4. If the code(s) were to include details of the procedures to be followed by Ofwat in issuing an order for a water or sewerage company to enter, vary or terminate an adoption agreement, what in particular would it be useful for the code to include?
- Q5. To what extent would it be helpful for the code(s) to set out details of what type of works it is or is not appropriate to be done by a person other than the water or sewerage company? Are there particular types of work where such clarification would be beneficial?

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<sup>14</sup> If it appears to us that it is necessary or expedient that the agreement should be varied or terminated; if we are satisfied, in the case of an application to vary the agreement, that it is appropriate for work proposed to be done by a person other than the water / sewerage company to be so done; and if we are satisfied that variation or termination cannot be achieved by agreement within a reasonable time.

### 3.3 Agreement terms and conditions

Adoption agreements typically include terms and conditions setting out a series of obligations on both the person constructing the infrastructure to be adopted and the water or sewerage company that will be adopting the infrastructure.

With respect to adoption agreements for water infrastructure, section 51CA(5) WIA91 states that such terms and conditions may include in particular provision regarding:

- a) constructing associated infrastructure;
- b) vesting associated infrastructure in a water company;
- c) constructing water mains so as to meet additional supply requirements;
- d) connecting new water mains or service pipes to the existing supply system of the water company;
- e) complying with requirements of the kind referred to in section 47(2) WIA91<sup>15</sup>; and
- f) the duration of the adoption agreement.

With respect to adoption agreements for sewerage infrastructure, section 105ZC(4) WIA91 states that such terms and conditions may include in particular provision regarding:

- a) constructing associated infrastructure;
- b) vesting associated infrastructure in a sewerage company; and
- c) making a communication with public sewers.

#### Questions

Q6. Are there certain terms or conditions that should be mandatory for all water and/or sewerage adoption agreements? Please outline which and why.

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<sup>15</sup> Section 47(2) WIA91 includes a number of requirements, including the payment of security; the installation of a meter; and a requirement that the plumbing of the premises complies with the water company's specifications.

- Q7. Are there particular areas in which it would be unnecessary or unhelpful for the codes to set out mandatory terms and conditions? Please outline which and why.
- Q8. Are there certain areas where it would be useful to have standard terms and conditions for adoption agreements, even if they were not mandatory? Please outline which and why.
- Q9. Are there particular areas in which it would be unnecessary or unhelpful for the codes to set out standard terms and conditions? Please outline which and why.

### **3.4 Application of the code**

Sections 51CA(9) and 105ZC(8) WIA91 state that the codes may make different provision for different persons or descriptions of person.

#### **Question**

- Q10. Are there circumstances in which the code(s) should make different provision for different persons? If so, please outline in what circumstances and why.

## 4. Next steps

We welcome responses to this paper by 31 October 2016.

We will consider all of the responses that we receive. They will inform our and the wider sector's thinking on the development of the codes. Subject to considering any confidentiality requests, we hope to publish all of the responses we receive to this discussion paper. We believe this will support transparency and future discussions on the issues that matter to customers and water and sewerage companies, which in turn will help improve service delivery for all customers (both developers and bill payers).

Following our consideration of the responses we will progress more detailed discussions with the sector and its customers to consider the key issues raised by the responses, and to develop the draft codes.

In due course, and as required by the new provisions in the WIA91, we will publish a formal consultation on the proposed codes, ahead of them being finalised and taking effect.

## 5. More information

[Self-lay provision of new connections](#), web page, Ofwat

[New appointees](#), web page, Ofwat

[Improving services for customers on new connections](#), Information Notice 14/16

[Providing new connections](#), Ofwat

[Enabling effective competition in the provision of new connections](#), Ofwat

[Sewers for Adoption](#), WRc plc

[Water Industry Act 1991](#), legislation.gov.uk

[Water Act 2014](#), legislation.gov.uk

[Department for Environment, Food and Rural Affairs](#), web page, Defra

[Formal investigation under Competition Act 1998 concerning the price and non-price terms Bristol Water applies when providing services to self-lay organisations](#), web-page, Ofwat archive