

Anglian Water Business response:

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Do you have any comments or suggestions about the draft application form?

We suggest that Question 6, Section 2 should read "Please confirm whether the applicant intends to apply for or has received MOSL's market entry assurance certification for the use of low or high volume interface with market systems?" This recognises that some applicants will already have market entry assurance certification eg those who already have retail authorisations and are now applying for wholesale or supplementary authorisations.

Does the draft application guidance provide sufficient detail for applicants to apply for a water supply and/or sewerage licence with retail, restricted retail, wholesale and/or supplementary authorisations?

We have one query in relation to Section 2.4 payment of application fees, page 7 of the guidance, where it says that the fee "will be applicable regardless of the type of WSSL or the number of authorisations requested in relation to those WSSL(s) in a single application form." Does that mean that a further fee of £5,250 is payable by retailers who have recently applied and received WSSLs for retail authorisations and wish to apply for wholesale or supplementary authorisations but have been prevented from doing so because the application process is yet to open? A wholesale or supplementary application submitted in November/December 2016 will be largely identical to the retail application submitted just a few weeks previously, therefore Ofwat's processing costs will be substantially reduced. On this basis, we suggest that there is a case for waiving the fee for a wholesale or supplementary authorisation submitted during this transitional period (until market opening) when a retail application has already been made. It would be useful if Ofwat could respond and clarify this point either in the guidance or elsewhere.

Have you any suggestions for elements of guidance that are missing, or alternatively that are not required, in the draft application guidance?

No.

Have you any other comments in response to this consultation?

These comments are submitted on behalf of Anglian Water Business.