

Consultation on the Wholesale Retail Code

Southern Water's Response

December 2016



Southern Water's response to Ofwat's consultation on the Wholesale Retail Code

We are pleased to provide you with our response to your consultation on the Wholesale Retail Code (WRC).

Southern Water have been involved through-out the development of the Wholesale Retail Code over the last three years, participating in numerous workshops and working sub-groups of the ICP, and have provided feedback to earlier iterations of the Market Architecture Plan and the WRC. Following review of the latest WRC issued in the November 2016 consultation, we have not identified any issues critical to the functioning of the market.

We do continue to have some concerns regarding the trade effluent processes, which we believe have some ambiguity and are open to interpretation. However, we do not believe these are critical to the functioning of the market and will continue to raise such change proposals through the Interim Code Panel or the enduring Panel once established.

As such, we have no material objections or critical changes required to the WRC ahead of market opening and will continue to raise specific amendments, such as trade effluent changes, through either the ICP or enduring Panel.

Should you have any queries regarding our response, or would like to discuss any aspect of it with us, please contact our Market Reform Manager, Dylan Freeman, on 01903 272351 or by email dylan.freeman@southernwater.co.uk