

**From:** Steve Arthur  
**To:** [MarketMonitoringConsultation](#)  
**Cc:** [Rebecca Lamb](#)  
**Subject:** Wessex Water wholesale response - Market monitoring  
**Date:** 10 February 2017 13:20:02

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Dear sir/madam

See below for Wessex Water wholesale response to the market monitoring consultation. We would flag some overarching issues & responses in addition to some question specific answer.

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We would agree with Ofwat's statement regarding the unpredictability of how the market will develop (s2.3). We would expect this unpredictability to be reflected in a flexible approach to monitoring the market. We would like to see a clear framework for the governance and scope of the monitoring approach and for how this framework could facilitate regular reviews of its efficacy and relevance as the market develops.

We would like to see Ofwat's proposals for assessing one of the programme success criteria, namely "All eligible non-household customers have a choice *and know how to exercise that choice*. They are in a position to negotiate better targeted, more efficient and more cost-effective services." . Key to this criterion is how Ofwat plans to measure customer awareness and levels of customer knowledge in engaging with the market.

We would wholly agree with the emphasis on customer experience and quality of service and would be interested to see Ofwat's proposals for monitoring the activity of third party intermediaries in the new market. Q3 – Market operator data.

We would note that there needs to be improved clarity on trade effluent data sets and their efficacy for monitoring market performance. Appendix A currently lacks detail in this area.

We agree that use of SIC code would not allow a full comparison due to different use/coverage of this code. Continuing the theme of customer experience we would note that operational standards reported to MOSL capture timeliness of customer complaint response which could be built on to provide some insight into complaint volumes and satisfaction.

Q6 Third Party Intermediaries. There is a balance to be struck here in accepting that TPI's do not fall under any licencing arrangements and therefore will be more difficult to be aware of, engage with and monitor their impact & customer service levels. We would suggest that these be picked up in the informal approach to monitoring and that market participants are encouraged to assist in building relationships and awareness of the role of Ofwat, MOSL and other stakeholders in monitoring the market performance.

On a final point, we would note the absence of wholesalers as a direct stakeholder in the monitoring framework. Whilst we accept that much of the information gathered by MOSL involves wholesaler performance and metrics (be that Market Performance Standards or Operational Performance Standards) we would seek clarification from Ofwat on the role they feel wholesale companies have to play in ensuring the monitoring framework and data sets are customer and service-centric.

Regards

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