

Introduction

United Utilities Water (Uuw) welcomes the opportunity to provide a response to the Ofwat consultation on the proposed code for adoption agreements.

1) Do you agree with our preferred approach in terms of the content and scope of our Code? Please explain your answer.

Yes. The proposals will allow a consistent approach to adoption services across the sector.

2) Do you agree with our proposed code principles and their definitions? Please explain your answer.

Yes. These principles will align with current values already adopted by Uuw.

3) Do you think our proposed minimum information and publication requirements are appropriate and sufficient?

Yes. Once Sector Documents and Model Agreements are agreed, this will inform companies approach to any further reportable measures against commitments for publication.

4) Do you agree with our proposed approach of requiring companies to develop Sector Documents and Model Adoption Agreements in consultation with Developer Service Customers, according to a set of minimum requirements?

Yes. Uuw currently have available or contribute to the production of many of these documents. The industry design guidance (for wastewater assets) is currently under review (with customer involvement) but is not expected to be completed until early 2018. These new requirements (The Codes) will affect the scope of this work and the forecast deadline. The current scope of this work does not include Model Adoption Agreements.

These principles will align with the current approach already adopted by Uuw for consultation with customers in continuing to improve ways of working.

5) Do you agree with our proposed minimum requirements? Please explain your answer.

We agree with the proposed list of minimum requirements and recommend that this Code aligns with other industry guidance on Adoptions when this is finalised, (e.g. Sewers for Adoption and Self-Lay codes of practice), and covers all aspects without duplicating.

6) Do you agree with our proposed approach to deviations? Please explain your answer.

We agree that this is a sensible approach to deviations. If there is a deviation from the model agreement, the revised agreement must comply with the principles of the adoption code and the reasons for deviation must be documented and reported. This information would help the panel understand if improvements needed to be made to the standard agreement for common deviations.

United Utilities response to the Ofwat consultation:

Proposed code for Adoption Agreements

7) Do you have any comments on our proposed approach to governing the initial approval of and subsequent changes to the Sector Documents and Model Adoption Agreements?

We consider there may be benefit in the industry or Ofwat developing guidance which the Model Adoption Agreements will adhere to. This should ultimately make the process of developing the initial Sector Documents and Model Adoption Agreements simpler.

8) Do you consider the proposed timeline for submitting the Sector Documents and Model Adoption Agreements to us for approval to be realistic and achievable? If not, what would you consider to be a suitable timeline?

Whilst we are very supportive of the introduction of the Code we recognise that there is considerable ongoing stakeholder consultation across the industry. Therefore, we recognise there may be a benefit of deferring this change to 2019 once other industry changes (which are also being consulted on) have been delivered, to ensure stakeholders are able to fully engage with these changes.

9) Do you have any comments on the assurances the sector will be required to provide to us when submitting the Sector Documents and Model Adoption Agreements to us for approval?

In principle the requirements are acceptable. We recognise that it is important to develop the Sector Documents and Model Adoption Agreements in consultation with customers. We recognise additional consultation with customers may place additional burden on this customer group and recognise there may be a benefit of deferring this change to 2019 once other industry changes-which are also being consulted on- have been delivered.

10) Do you have any comments on our proposed transitional arrangements to enable companies to comply with the Sector Documents and Model Adoption Agreements?

A period of 3 to 6 months transition would be more reflective of the level of work involved to deliver the changes anticipated.