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03 April 2018

Dear Ms Clougher,

Proposal by Ofwat to revise the application process for Water Supply and Sewerage Licences limited to self-supply

Thank you for giving us the opportunity to provide comments on the above proposal.

Yorkshire Water Business Services (the Condition R4 “NHH Retail Business” division of Yorkshire Water Services Limited) supports the principles and objectives detailed in the above proposal.

Having reviewed the documents, we believe the modifications to both the draft self-supply guidance document and the version 1 application form are successful in achieving the proportionate and targeted outcome set out by Ofwat in its proposal document.

We would however, given the industry model of operation which appears to be developing, question whether greater emphasis should be placed on establishing the capability of any sub-contracted provider of the services. Question D1 of the form and its associated guidance in both the main guidance document and the additional guidance at the end of the form seeks only limited information regarding any contracted provider of the services. If the sub-contractor is to be responsible for providing the technical competency under section C of the form, some means of establishing the capability of this provider should be explicitly required.

I trust the above comments are of assistance, however should you have any queries, please don't hesitate to contact Ralph Lock at ralph.lock@ywbusinessservices.co.uk or myself.

Yours sincerely,



Andy Clark
Head of Non-Household Retail
Yorkshire Water