

Trading and Procurement Codes Guidance Review  
Ofwat  
Centre City Tower  
7 Hill Street  
Birmingham  
B5 4UA

29 March 2018

Dear Sirs

**Trading and procurement codes – consultation on updating our guidance**

Thank you for providing us with the opportunity to comment on the updated guidance for company trading and procurement codes.

**Q1: Do you support the new requirements or principles we have set out in section 2.2?**

Yes, we support the proposed changes set out in Table 2 of the consultation document.

**Q2: Do you support our proposed approach to approving new codes, as set out in section 2.3?**

Yes, we support the changes proposed for the approval of new codes. We agree it is right to maintain a period of public consultation to ensure equal treatment of those who have already published codes and maintain transparency.

The reduced timescales that you have set out for public consultation and the ability for automatic code approval in the event that no consultation responses are received will bring greater efficiency to the process.

**Q3: Do you support our proposed approach to updating approved codes, as set out in section 2.4?**

Yes, we support the proposed approach set out in section 2.4.

**Q4: Do you have any other comments on the draft guidance document published alongside this consultation?**

We have no further comments to make on the draft guidance. We intend to publish our own Trading and Procurement Code in June 2018, following confirmation of the final guidance.

If you have any questions regarding our response, please do not hesitate to contact me.

Yours sincerely,



Christopher Offer  
**Director of Regulation & Corporate Affairs**