

June 2018

Trust in water

Company monitoring framework 2018

Final position paper

About this document

This document sets out our company monitoring framework for the 2015-20 period, which describes how we will oversee the information that the 17 largest water and sewerage and water only companies ('the water companies') in England and Wales provide to customers and other stakeholders. It explains the actions that we want companies to take.

This document was revised in June 2018. We updated this document to:

- set out clearly the requirement for self assurance companies to demonstrate leading edge behaviour, which the past two years' company monitoring framework assessments have identified as an important factor for achieving self assurance;
- clarify that our overall assessment of a company's company monitoring framework categorisation will include consideration of whether or not a company has met or exceeded the expectations for one or more assessment areas by a clear margin;
- refresh the examples which might lead to a downward move in assurance category;
- set out the process and timeline for this year's company monitoring framework assessment, with company categorisation published in January 2019 to align with our initial assessment of companies 2020-25 business plans; and
- make some minor changes to wording where we think that this improves the clarity or readability of the document.

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1. Key messages

Our [shared vision for the water sector in England and Wales](#) is one where customers, the environment and wider society have trust and confidence in water and wastewater services. We want the companies that provide those vital services to be accountable to their customers for delivering the services they need and want at a price they can afford.

Having information that is easy to understand provides transparency and helps everyone build trust and confidence in water. Information forms the basis for conversations enabling water companies to listen to their customers and deliver the outcomes they and wider society want. Information also reveals excellence within the sector, to provoke all companies to lift their game and deliver the best for their customers.

Water companies' boards are accountable for the quality and transparency of the information they provide on their performance. It is important that they continue to review what information their customers and other stakeholders want and need. Companies need to adopt a proportionate and transparent approach to data assurance to provide confidence to customers and stakeholders in the information they publish.

The company monitoring framework, alongside the financial monitoring framework which monitors companies' financial structures and financial stability, are important tools in building trust and confidence.

We help promote transparency by making sure companies, where appropriate, provide comparative information across the sector. This enables customers, retailers, investors and other stakeholders to analyse the companies' relative and absolute performance. Companies report information in an [annual performance report](#), including both information specific to its customers and stakeholders and information that is comparative across the sector.

The company monitoring framework helps us to ensure that stakeholders can have confidence in this information. Where companies have met the high standards customers and other stakeholders expect, they have discretion to put in place assurance to give confidence about their performance. Through the company monitoring framework, we step in where companies do not provide the standard of information that customers and other stakeholders expect. Where necessary, we make sure that assurance is provided in a proportionate way that can help rebuild trust and confidence.

Within the framework we make a distinction between data assurance activities of water companies to provide accurate data and the wider assurance that they provide to demonstrate that they are listening to customers and delivering services they want and can afford. Both are essential to build trust and confidence.

In 2018, we will take into account how companies have performed against our initial assessment of business plan tests on data quality and assurance in our company monitoring framework assurance categorisation. The initial assessment of business plan tests on data quality and assurance will also be taken into account in the company monitoring framework. We will align the timescales for the publication of our company monitoring framework results with the initial assessment of business plan results, both of which will be published in January 2019.

This document sets out:

- **The interactions between the company monitoring framework and price review (specific to 2018) in section 2;**
- **The overall framework in section 3;**
- **The specific assurance requirements for companies in each category in section 4;**
- **How companies move between categories over time in section 5; and**
- **The annual cycle of assurance activity in the framework in section 6.**

2. Interactions between company monitoring framework and price review

In September 2018, companies will provide us with their business plans for the 2020-25 period. These business plans are important for companies to demonstrate that they will maintain and improve customers trust and confidence. Our initial assessment of business plans will test how companies have met our expectations and requirements for meeting the needs of customers.

As set out in our [Final Methodology](#), when considering how much confidence we can place in assurance statements in company business plans, we will take account of the 2018 company monitoring framework assessment as part of our initial assessment of business plans.

Our initial assessment of business plans will also impact on our assessment of companies in the 2018 company monitoring framework. We will take into account how the companies' business plans have performed against our initial assessment tests on data quality and assurance, as part of in the 2018 company monitoring framework assurance categorisation.

To ensure a consistent and proportionate approach, we will ensure that we only assess the same company data once, and so will only assess data under either the company monitoring framework and or the initial assessment of business plans.

We will align the publication of the 2018 company monitoring framework assessment with the publication of the initial assessment of business plans in January 2019.

3. The overall framework

This chapter explains why assurance is important and how the company monitoring framework works.

3.1 Why it is important for water companies to provide assurance to customers and stakeholders

Information is central to our vision of trust and confidence in the sector. We expect water companies to have open and honest conversations with customers and other stakeholders with a high level of transparency. It is important that they provide accessible information that will provide assurance that they are listening to customers and delivering services they want and can afford. This will build trust and confidence through the sector. If issues arise that could reduce this trust and confidence, companies need to respond proactively to engage with customers and stakeholders, providing appropriate information to address the issue.

We will continue to challenge the sector, to ensure it improves and provides the quality of information stakeholders want. We are ready to step in if companies fall short, using the right tools from our available toolkit to achieve the best results. We have set out the approach we will take in this company monitoring framework so that the sector understands it and so that our actions are predictable.

3.2 Why is data assurance important?

Accurate information forms the basis for conversations on performance between water companies and their customers and other stakeholders. Water companies must take full responsibility for the integrity of the data they collect, analyse and publish. Data assurance that is appropriately focused, which builds on appropriate processes and procedures for gathering and reporting, reduces the risk of any inaccurate or incomplete reporting.

We expect companies that perform well in this area will continue to keep their processes and procedures for reporting accurate information under review. We expect them to target the level of assurance to an appropriate level based on the risks associated with the reporting of that information. In line with our strategy of fostering trust and confidence in the sector, we expect companies to report on the data assurance carried out, and the outcome of that data assurance in reporting that information to us and stakeholders.

3.3 What is the company monitoring framework?

The company monitoring framework is a tool to challenge all companies to provide information for customers and stakeholders that is reliable, timely, appropriate to the audience, and for companies to be transparent with customers and stakeholders about the data assurance they put in place.

By information, we mean more than merely data. It is important that what companies present is relevant to and provides an appropriate context for the audience with which they are communicating. Having information that is easy to understand and navigate provides transparency and helps everyone build trust and confidence in water.

This framework sets out the basis on which we will step in to protect customers and intervene in how companies provide assurance in a proportionate way that can help rebuild trust and confidence.

3.4 What information does it apply to?

The company monitoring framework applies to companies that have an annual turnover which exceeds the ‘small company definition’ as defined in our Regulatory Accounting Guidelines¹.

In assessing the appropriate category for a company under the framework, we may consider any information that a company has provided to customers and stakeholders, or indeed the absence of appropriate information. The information may include that which is published for customers or for market participants, and that which is provided to stakeholders other than Ofwat. Chapter 4 explains how we will do this.

For each category, the company monitoring framework specifies requirements for companies to follow where they are required to publish (or otherwise report to Ofwat or other stakeholders). This applies where we have given adequate notice ahead of when the information is required to be published (reported). Chapter 4 sets out what these requirements are.

¹ See paragraph 5.1.2 of [RAG 3.10 - Guideline for the format and disclosures for the annual performance report](#)

Chapter 6 explains the process that we and companies follow each year.

4. Requirements for each category

4.1 The three assurance categories

Following our annual company monitoring framework assessment, each company will be placed in one of the three assurance categories below.

Category	What this means
Self assurance	A company has demonstrated consistently that customers and other stakeholders can place trust and confidence in the information that it provides. We expect companies in the self-assurance category to meet expectations in most, if not all, assessments, by a clear margin with evidence of exceeding expectations to demonstrate leading-edge behaviour.
Targeted	A company did not consistently meet the high standards that customers and other stakeholders expect
Prescribed	A company did not instil sufficient confidence about their ability to deliver, monitor and report performance

As a result of our 2016-17 CMF assessment companies are currently in the following assurance categories:

Category	Company	Move from prior year
Self assurance	United Utilities	n/a
	South East Water	n/a
	Northumbrian Water	Up from targeted
Targeted	Affinity Water	n/a
	Anglian Water	n/a
	Dŵr Cymru Water	n/a
	Portsmouth Water	n/a
	Seven Trent Water	Down from self-assurance
	Sutton and East Surrey Water	n/a
	South Staffordshire Water	n/a
	South West Water	n/a
	Yorkshire Water	Up from prescribed

Category	Company	Move from prior year
Prescribed	Bristol Water	n/a
	Dee Valley Water	n/a
	Southern Water	n/a
	Thames Water	Down from targeted

The different assurance requirements that apply to companies in each of the three categories are outlined in 4.2 to 4.4 below.

4.2 Self assurance

Water companies in this category have demonstrated that customers and other stakeholders can place trust and confidence in the information that they provide. So they have few requirements in providing assurance. We expect companies in the self-assurance category to meet expectations in most, if not all, assessments, by a clear margin with evidence of exceeding expectations to demonstrate leading-edge behaviour.

Self assurance companies are only required to meet a set of base requirements all companies must meet, which are as follows.

- Over the reporting year each Board must confirm that it has complied with **all** its relevant statutory, licence and regulatory obligations and is taking appropriate steps to manage and/or mitigate the risks it faces.
- The company will provide transparency on the audit procedures it has put in place in relation to data assurance.
- The company will provide a summary of the outcome of the data assurance that has been carried out.

It is for companies to work with assurers to provide transparency in an appropriate way that will inform customers and other stakeholders of the assurance that is carried out in order to build trust and confidence, but which does not reduce probing

questions and speculative feedback that is appropriate between assurers and Boards². This applies to any information a company is required to provide/publish.

We will assess the way companies have assured themselves and others, even in those cases where they are not required to do so in a particular form, such as an assurance plan.

These requirements also apply to companies in the targeted and prescribed categories.

4.3 Targeted

Companies in this category did not consistently meet the high standards that customers and other stakeholders expect. The companies, in conversation with stakeholders, are best placed to identify where the risks, strengths and weaknesses arise in providing information that stakeholders want and will trust. Targeted companies are required to carry out an exercise each year to consider these aspects in order to target areas to improve. This should consider both data assurance and how companies provide assurance to customers more generally. The areas to be targeted may not be those of greatest underlying risk as the company may be able to demonstrate that it already has strengths in these areas. The exercise must aim to take account of stakeholders' views.

For areas that the exercise identifies that a company should target, it is required to publish draft assurance plans on its website. The company will engage with stakeholders before it publishes final assurance plans. In other areas, the company has the same level of discretion as companies in the self assurance category.

We set out further guidance on how companies should engage in section 4.5.

4.4 Prescribed

Companies in the prescribed category have not demonstrated that they can deliver accurate and reliable information that gives stakeholders trust and confidence. Water

² For avoidance of doubt, any contractual arrangements entered into with external assurers should explicitly allow the company to share full reports with Ofwat if they have not been published in full. We accept that there is no duty of care to Ofwat from the assurer and Ofwat would not publish or share material provided under these terms that the company had not published without agreement.

companies should be accountable for assessing and managing their own risks. We consider that companies are best placed to understand the risks to providing accurate and reliable information and producing assurance plans to minimise those risks. And customers are more likely to be protected if a company is actively challenging itself, rather than just attempting to follow guidance that may or may not target the greatest risks.

We need to intervene to make sure that companies in this category produce appropriate assurance, while keeping clear accountability to their customers and stakeholders. We consider that if stakeholders are to gain trust and confidence in a company that has not delivered in the past, it is important that they are able to be involved in the process of how that company intends to improve.

A company in the prescribed category will carry out a risks, strengths and weaknesses exercise with stakeholders to highlight the areas of assurance that have the most significance or are of greatest risk to customers. It is for the exercise to define these. For the areas identified, the company will need to incorporate independent external assurance as part of its assurance plans. By exception, a company may explain why this is not appropriate. In this case, the company should engage with Ofwat on this issue, before publishing draft assurance plans.

A company in the prescribed category must publish all of its assurance plans for all information on its website ahead of reporting. It will engage with stakeholders before it publishes final assurance plans, so that stakeholders (including Ofwat) can gain confidence and, if necessary, provide comments that the company would need to respond to, before confirming the final plans.

The approach we have set out provides a way for companies to build trust and demonstrate that information they provide is appropriately assured.

4.5 Guidance for targeted and prescribed companies

We expect each company to tailor the type and extent of engagement to each particular stakeholder. Where a company is required to carry out engagement, it should be able to demonstrate efforts to engage proactively with stakeholders. A company will most likely want to explore different issues with different stakeholders as part of the conversations that occur. The decisions a company takes in proactively engaging with stakeholders and of how it does this should be made on the basis of what is in customers' best interests.

The risks, strengths and weaknesses exercise should consider both data assurance and how companies provide assurance to customers more generally. A company may want to engage with stakeholders to understand various aspects of how information is provided, including:

- stakeholders' current concerns about information that is reported;
- the relative importance a stakeholder places on the various information the company reports;
- how a stakeholder uses information and their needs for the precision that information is reported to; and
- if stakeholders would value information presented in a different way or desire further information.

The company will publish a statement on the exercise in the autumn of each year. The statement must allow stakeholders to understand how the exercise has been carried out and why the areas highlighted are the most appropriate. The engagement for the exercise should result in a statement that is acceptable to all stakeholders. Ofwat is one of those stakeholders, but we would not expect extensive involvement with all companies. We have not set a precise date for when these will be published, but it must be before 30 November each year. Companies must consider how they can effectively engage with stakeholders when deciding on the timing of their exercises, engagement and publication of both the statement and assurance plans. This should take into account both the ability of stakeholders to be involved in the process and the ability of the company to understand and respond to stakeholders' views.

Following the exercise, companies must publish assurance plans on their websites, although the areas that these plans are required to cover will depend on whether a company is in the targeted or prescribed category and on the areas with most significant risk, strength and weaknesses in assurance. The draft plans may be published at the same time as the statement or at a later date.

We expect that assurance plans will take into account the conversations that companies have had with their stakeholders. We therefore expect variations in both the approach and focus of these plans. It is important that plans are developed in the context of the wider assurance that companies provide to customers and stakeholders to demonstrate that they are listening to customers and delivering services. It is essential that the plans are clear on the data assurance activities that water companies will put in place to provide accurate data that underpins the information that companies provide. Any data assurance plan should follow a risk-based approach.

The company should aim to publish draft plans in a way that stakeholders will best understand and be able to find and navigate. In confirming final plans, we expect companies to be clear on the comments they have received and provide a response to the comments whether or not this has changed the final plan.

By exception, we may provide specific formal guidance to a company, which we would expect it to follow. This is distinct from the comments we provide when companies engage with us. A company will need to consider these comments in the round with other stakeholders' comments. We will make clear when we are providing formal guidance. If we provide a company with guidance, it may want to discuss how it intends to apply that guidance.

Guidance may focus either on the data assurance that companies carry out or on the wider aspect of companies providing assurance to stakeholders and customers on delivery. At this point we have not identified any specific guidance we consider we need to provide to protect customers. We consider the framework we have set out will protect customers and will help trust and confidence to develop in the sector. We will oversee how companies provide assurance and only step in if necessary.

The likely timing of these steps, and how a change in categorisation might affect the timing are outlined in section 6.

5. Moving between categories

Under the company monitoring framework we undertake a new assessment on each company each year. A company is able to move up from targeted to self assurance, or prescribed to targeted assurance on a yearly basis.



A company will move from the targeted to self assurance category, or prescribed to targeted category, annually providing:

- following Ofwat's overall assessment, there is no evidence of behaviour that leads to a reduction in the trust and confidence stakeholders can place in it, or continuation of a low level of trust and confidence;
- there is an absence of significant problems with its assurance plans in the previous year;
- companies in the prescribed category must have remained in that category for a minimum of 12 months and can only move to the targeted category, or
- companies in the targeted category demonstrate that targeted areas have been adequately addressed.
- In the case of moving from targeted to self assurance there is evidence of exceeding expectations to demonstrate leading-edge behaviour

A company will move from self to targeted assurance, or targeted to prescribed assurance, if its behaviour leads to a reduction in the trust and confidence customers can place in it. A self assurance company can be moved to targeted or prescribed assurance depending on the significance of the issues involved.

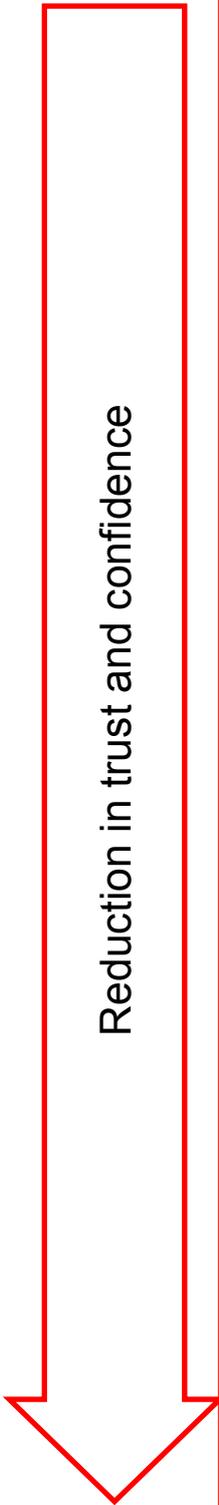
We conduct assessments of the quality of companies' assurance across several different areas. The individual assessment areas feed into an overall assessment in which Ofwat considers in the round what the exercise has shown about the overall trust and confidence that can be placed in the information that each company

produces. Companies are then allocated categories, in line with the tests set out above.

Most changes will occur in the in the annual assessment, but we may, especially with significant issues, move companies immediately.

In considering whether a company's behaviour has led to a reduction of the trust and confidence that customers and other stakeholders can place in it, we take into account the individual circumstances of the issue involved. A self assurance company could either be moved to the targeted or prescribed category depending on the significance, scope and number of the issues involved. The kinds of issues which might result in downward movement are as follows.

- A company does not report accurate and reliable information to Ofwat, wider stakeholders, or in the operation of markets **and**:
 - fails to address the issue in a timely manner once identified; and/or
 - fails to engage appropriately with stakeholders taking into account the materiality of the error and its significance to customers; and / or
 - the issue relates to information that is significant to customers and is long standing, but its assurance processes have not identified the error.
- A company which is not meeting or has not met its performance commitments, or otherwise is at risk of not meeting statutory obligations, fails to engage appropriately with stakeholders by:
 - failing to be transparent that there is an issue; and/or
 - not providing a clear explanation of the performance issue; and/or
 - not providing an explanation of how it will address the issues in the best interests of customers.
- Ofwat opens a strategic case that involves potential compliance issues with existing obligations or otherwise there are a material number of open cases or cases closed within the last two years involving the company. This does not include cases that have been delayed but where the company has provided timely and co-operative responses. This in itself would only move a company to the targeted category.
- Where a company's response to a case is poor and/or the company is not co-operative.
- A company has to restate previously submitted data due to improved information available, but:
 - The revised data shows that a performance commitment previously assessed as met is now known to have not been met,
 - The size and impact of the restatement is significant enough to affect trust and confidence in the overall view of performance, or
 - The errors appear to be systemic or affect our previous view of company assurance.
- A company has not demonstrated it is meeting our principles for Board leadership, transparency and governance.
- Where rules about charges have been introduced, if we give direction to a company we consider is not acting as required by the rules.



Reduction in trust and confidence

To provide further clarity, we set out the following case studies to explain particular examples of where we would and would not take action.

In the following examples we have referred to relevant stakeholders. The stakeholders that are relevant will depend on both the issues and a company's circumstances. It is for companies to engage with its stakeholders and be able to explain the choices it has made in engaging with stakeholders. These choices should be made on the basis of what is in the best interests of customers.

The following are examples that would lead to a company being moved from self assurance to prescribed, or from targeted to prescribed.

1. A company is aware it has published inaccurate information **and** attempts to address this in a way that conceals it from relevant stakeholders **or** does nothing to address the issue.
2. A company is aware of clear evidence that it is likely not to meet a performance commitment or statutory duty **and** does not proactively engage with relevant stakeholders.
3. A company which has a significant performance failure against its performance commitments (for example performance is below the penalty collar and it is returning the maximum amount of money to customers under the defined outcome delivery incentives (ODIs)) or against its statutory obligations, has not set out what additional actions it is putting in place or otherwise explained how it is acting in the interests of its customers.
4. If a company that reaches the self assurance category reports inaccurate information and has not provided a transparent explanation of the assurance processes it has carried out, including revealing the results of the assurance process to stakeholders, it would be moved to the targeted category. If it attempted to conceal the error, it could be moved to the prescribed category.

The following are examples that would not be an impediment to a company moving from prescribed to targeted, or from targeted to self assurance.

1. A company does not think that meeting a performance commitment is in the best interests of customers and is planning not to meet the commitment, but:

- is proactive and seeks to engage with customers and stakeholders at an early opportunity;
- explains how its plans are in the best interests of customers – for instance, if the extra costs that it thinks customers would bear would be greater than the benefits that customers would receive;
- it is clear on how customers are not worse off – for example, how money will be returned under financial ODIs; and
- receives broad acceptance from stakeholders for its approach.

While we may not agree with the company's position, appropriate engagement should limit any impact on trust and confidence. We have already put in place measures to protect customers by setting outcome ODIs that will recompense customers for benefits that are not received.

2. There are errors in data that are not significant to customers. The company:

- is proactive and seeks to engage with relevant stakeholders at an early opportunity;
- is able to demonstrate that the issues are not the result of failings in its assurance procedures; and
- sets out in a timely fashion how it will address the errors.

If the information is not of significance to wider stakeholders, it may just be regulators that are proactively engaged. A risk-based approach to assurance may lead to minor errors occurring; as long as these are dealt with appropriately, trust and confidence can be maintained.

6. Process

In the table below we have included the processes that the companies will carry out during the reporting year. We appreciate that to provide an effective assurance plan that builds trust and confidence, it is important to allow flexibility for companies to manage their own timescales.

Activity	Categories (minimum)	Description
Engagement on risks strengths and weaknesses exercise	Targeted and prescribed	Companies proactively engage to give stakeholders the opportunity to provide input to the exercise.
Publish risks, strengths and weaknesses statement	Targeted and prescribed	Companies complete and publish statements on their risks, strengths and weaknesses exercise. They need to complete the risk, strengths and weaknesses exercise before they can publish draft assurance plans. Companies must consider how they can effectively engage with stakeholders on assurance plans when deciding on the timing of publication. All statements must be published well in advance of 30 November in the same year.
Publish draft assurance plans	Targeted and prescribed	Companies publish draft assurance plans. They must consider how they will be able engage stakeholders before publishing final plans when deciding on the timing.
Engagement on assurance plans	Targeted and prescribed	Companies proactively engage with stakeholders, giving them the opportunity to provide comments on assurance plans.
Ofwat revises categorisation on website	All	Ofwat will revise the categorisation. As the 2018 company monitoring framework will feed into the initial assessment of business plans, we intend to publish the company monitoring framework categorisation at the same time as the initial assessment in January 2019.
Publish final assurance plans	Targeted and prescribed	Companies publish final assurance plans, providing responses to any comments they have received.

Activity	Categories (minimum)	Description
Companies publish information	All	<p>Throughout the year, companies consider what information they need to provide to their customers and stakeholders.</p> <p>Companies produce an annual performance report (APR). This will include:</p> <ol style="list-style-type: none"> 1. regulatory financial reporting; 2. price control and additional segmental reporting; 3. performance summary; 4. additional regulatory information; and 5. The APR reflects a base level of reporting and assurance, which is set out in the Regulatory Accounting Guidelines³. The additional minimum steps we expect all companies to take in relation to assurance are set out in section 4 of this document. <p>As a minimum for companies in all three categories, sections 1 and 2 of the annual performance report should be covered by a financial audit opinion.</p> <p>For the APR, we expect all companies to include a summary, or links to, their assurance plan, assurance findings and company response. This should be accessible for all customers and stakeholders.</p> <p>Companies must publish their charges schemes each year and provide us with (and publish) an assurance statement from its Board of Directors on its charges schemes.</p>

We also recognise that if a company moves down categories in the company monitoring framework the company will need to revisit its approach which may affect these timings. For companies moving down from self assurance this would mean undertaking a risks, strengths and weaknesses exercise and publishing a draft assurance plan.

³ See <https://www.ofwat.gov.uk/wp-content/uploads/2018/04/Audit-Opinion-for-the-Annual-Performance-Report-2017.pdf> and RAG3.10 <https://www.ofwat.gov.uk/publication/rag-3-10-guideline-format-disclosures-annual-performance-report-2/>

For a company moving to prescribed, we would expect it to revisit (or undertake) its risks, strengths and weaknesses exercise as a first step towards developing wider and more detailed assurance plans. We would generally expect the statement resulting from the exercise to be published within eight weeks of the publication of the company monitoring framework assessment report.

We would generally expect any subsequent assurance plans to be published on companies' websites ahead of publishing their annual performance reports.

Ofwat (The Water Services Regulation Authority) is a non-ministerial government department. We regulate the water sector in England and Wales. Our vision is to be a trusted and respected regulator, working at the leading edge, challenging ourselves and others to build trust and confidence in water.

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