

## Everflow Water response to CPCoP consultation CP0007

1. **Do you think the Change Proposal will achieve the following policy aims:**
  - a. **Covid-19 Affected Customers should continue to be protected.**
  - b. **Customers who are operating normally and can pay should be subject to normal debt recovery processes.**
  - c. **Retailers should take the necessary steps to differentiate between those customers who genuinely need support and those who should be expected to pay.**

We agree with the policy objectives and that the change proposal will meet those objectives.

2. **What is your view of the proposal that the protections relating to disconnection, suspension of enforcement, late payment and interest charges will only automatically apply to Covid-19 Affected Customers?**

We agree that the protections should only apply to Covid-19 Affected Customers (those with premises which are closed and the business is not operating).

3. **What do you think should be included in a Covid-19 Repayment Scheme? Do you have any examples of similar schemes that you have offered and/or have considered as a result of Covid-19? Please provide details.**

We offer payment plans to our customers on a regular basis, although these are most commonly arrangements covering ongoing usage as well as historic debts. There are no other schemes which we would particularly consider relevant to this response.

[REDACTED]

Evidence which we would look to obtain for customers to access longer payment plans would include detail on some or all of the following:

- Nature of business
- Impact of Covid-19 on their business
- Confirmation they are open for business
- Actions they have already taken to draw on government support
- Credit score
- Latest management accounts/forecasts/financial information (where available)
- Latest bank statement (as this may be all that smaller customers have available)

We would only make a Covid-19 Repayment Scheme available to customers signing up to Direct Debit, as this reduces the risk for the business by ensuring greater control and gives a clear indication where customers are choosing not to adhere to the arrangements under the scheme.

**4. What are your views on our proposals to require Retailers to clearly provide a method of contact on websites, as set out in section 4.3?**

We agree that it should be easy for customers to find out what help is available to them at this time, and it should be easy to get in contact with us and access help. CCW has told us that we are already providing a good service to our customers in these respects.

Several customer notices about Covid-19 are prominently displayed on our website, including a link to a temporary closure form and a statement about the temporary protection against enforcement, disconnection and late payment charges. We have lately added a new form for customers to notify us when they reopen. We have also written to our customers on multiple occasions providing them with information about support that is available.

Contact details for Customer Services (a phone number and email address) are displayed on our website as usual and we include this information in our customer communications. It is unclear whether the suggestion in section 4.3 is that a separate dedicated email address and phone number for Covid-19 related customer support is required. We do not think this is necessary. All of our Customer Service team is fully trained to handle contact relating to Covid-19 and we are not in a situation where we need to prioritise and separate Covid-19 related contact. On the contrary, our contact rate has dropped to the extent that we have furloughed some of the team.

**5. What is your view of the legal drafting for the Change Proposal?**

The legal drafting of the change proposal is appropriate.

**6. Do you consider that the Change Proposal promotes and facilitates the General Principles of the CPCoP (section 4 of the CPCoP)?**

These proposals are not closely aligned to the objectives in section 4 of the CPCoP but the provisions are being made in extreme circumstances while the 'general principles' are intended to guide protections in normal operating conditions.

**7. What is your view on our assessment that the impact of implementing the changes on Retailer's systems will be low? What is your view of the proposed implementation date of the Change Proposal being 1 June 2020?**

We can confirm that the impact of these changes on our systems will be low and we agree that the implementation of the change proposal should be 1st June 2020.

**8. Do you consider that the amendment to Part II3 of Operational Terms is still required to protect Self-Supply Retailers from disconnection?**

We do not have a view on this.