

25 August 2020

## Consultation on changing the Water UK metrics in D-MeX

### Leep Networks (Water) Ltd - response

Ms Rachel Fletcher  
CEO, Ofwat

Dear Ms Fletcher

Leep Networks (Water) Ltd (LNWL) is fully supportive of the inclusion in D-MeX of specific elements of the NAV – Incumbent relationship. We agree that doing so will encourage companies to align their service to NAVs with service to developers and self-lay operators. We have restricted our response to those elements specific to the NAV market.

**Q1: Do you agree with the NAV metrics that we propose to include in the quantitative component of D-MeX?**

We agree with this proposal.

**Q2: Do you agree with the NAV metrics that we propose to include in the qualitative component of D-MeX?**

We agree with this proposal.

**Q6: Do you agree with our proposal that the NAV metrics which we choose to include in D-Mex should apply from 1 April 2020, with survey fieldwork based on relevant transactions made from 1 October 2020, and the sewerage adoption metrics which we choose to include should apply from 1 October 2020?**

**Q7: Do you have any comments on our proposed approach to reporting?**

We are aware of the reservations expressed by some companies via Water UK, primarily focussed on the potential disruption caused by the implementation of NAV metrics into D-Mex as currently designed and the possible difficulty faced by companies in meeting their obligations. LNWL understands these concerns and supports an approach which ensures the accuracy and timeliness of reporting. We would not have an objection to the implementation being set back to April 2021, though we believe that it may be useful for companies to maintain 'in house' records of interactions with NAVs, mirroring the proposed metrics in this consultation. These metrics could then be retrospectively recorded in the D-MeX system.