

OFWAT
Centre City Tower
7 Hill Street
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24th August 2020

By email: [REDACTED]

Dear Sirs,

Response to the Consultation on changing the Water UK metrics in D-MeX

Many thanks for the opportunity to provide feedback to this consultation. This is not an area that either ourselves, or the Self-Supply Community, currently operate within so have no knowledge of the impact the introduction of these new metrics will have upon Trading Parties. However, the principles of D-MeX are well understood and given the appointment of Jacobs to assess the finalised metrics, alongside the expectation of further change already embedded in the Final Determinations, this seems appropriate.

We are hugely supportive of any reporting metrics that provide greater transparency of performance in the market and better outcomes for customers. The qualitative and quantitative components of D-Mex clearly deliver against that criteria.

We have answered below, based solely upon our review of the consultation paper and associated documents, however, as previously expressed, we have no first-hand experience or knowledge to add any further context to our responses and as such they are limited.

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

Yes – these appear to cover the critical stages of the NAV process, provide clarity, and do not impose a complex reporting requirement.

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

Yes, as per above, this will provide an excellent indication of satisfaction.

3. Do you agree with the sewerage adoption metrics that we propose to include in the quantitative component of D-MeX? Do you agree that the existing sewerage metric S7.1 should be removed where the new metric SAM3/1 applies? Should any other metrics also be removed?

The metrics seem appropriate in providing greater detail of key stages; however, we do not have sufficient experience to comment on the removal of existing metrics.

- 4. Do you agree with the sewerage adoption metrics that we propose to include in the qualitative component of D-MeX? Do you agree that the existing sewerage metric S7.1 should be removed where the new metric SAM3/1 applies? Should any other metrics also be removed?**

As per question 3.

- 5. Do you have any comments on which draft self-lay water metrics should be included in the quantitative and qualitative components of D-MeX? Which existing metrics should be removed?**

No comments.

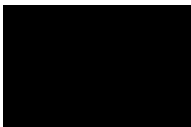
- 6. Do you agree with our proposal that the NAV metrics which we choose to include in D-MeX should apply from 1 April 2020, with survey fieldwork based on relevant transactions made from 1 October 2020, and the sewerage adoption metrics which we choose to include should apply from 1 October 2020?**

This feels appropriate given NAV metrics are already being reported against and reporting against sewerage adoption metrics was already planned for October. Also, in Jacobs assessment it was suggested that the reporting against new metrics would not be too onerous for Trading Parties. The earlier reporting is introduced the earlier the benefit will be received, or poor service identified so delaying until April 2021 feels counter intuitive.

- 7. Do you have any comments on our proposed approach to reporting?**

No, it is a logical approach.

Yours faithfully,



Claire Yeates
Strategy Director