

**From:** [Thomas Sarah](#)  
**To:** [Ofwat P and O](#)  
**Cc:** [Hobbs Steven](#)  
**Subject:** Response to D-Mex consultation  
**Date:** 19 August 2020 17:08:33  
**Attachments:** [image001.jpg](#)

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Dear Ofwat,

Thank you for the opportunity to respond to the consultation on changing the Water UK metrics in D-Mex. The Consumer Council for Water (CCW) is the statutory consumer organisation representing water and sewerage customers in England and Wales.

We have no comments on the main questions. In general, we support a process that drives effective and meaningful improvements in developer services and we are broadly content with the direction of D-Mex and the use of WaterUK metrics in the process.

However, we are struggling to see how the new metrics, relating to both NAVs and adopting sewers, will have a substantial effect on companies' performance. The consultation seems to support this view as it states that the potential over- or under-representation of NAV activity will be mitigated by 'the quantity of NAV we propose to include relative to other metrics'. We understand this to mean that the number of NAV metrics will be insufficient to have an impact on the results. If this is the case, then it seems to us that the number of NAV metrics will be insufficient to have a meaningful impact on a company's D-Mex score. In which case, it is not clear to us how these metrics will drive behaviour. The consultation also makes a similar comment in relation to the sewer adoption metrics.

With this in mind, it would be helpful if Ofwat could clarify what, if any, additional measures it plans to put in place to encourage water companies to address their performance in the areas highlighted in this response. We are currently considering how CCW can work with companies to encourage good practice in these areas of work and we will keep you updated on this.

Finally, on a minor point, the consultation proposes to publish D-MEX scores in companies' APRs. We could suggest that Ofwat add a link to this in the developers section of their website, so it is easier for developers to find this information.

With regards

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