

From: [REDACTED]
To: [CPCoPcodechange](#)
Cc: [REDACTED]
Subject: CPCoP consultation – CP0009
Date: 09 December 2020 18:17:14
Attachments: [image001.jpg](#)

Good evening

RE: Covid-19 and the business retail market: Proposal to amend a Customer Protection Code Change Proposal – CP0009 – a consultation

Thank you for providing Affinity Water with the opportunity to respond to this consultation.

Whilst a lot has been achieved since March 20, the impact of Covid-19 on the economy is far from over. The effort expended by many market stakeholders to date, along with the concern and care for affected customers is nothing short of commendable. Throughout Ofwat has demonstrated true leadership by creating a positive and supportive environment for CCW, MOSL, wholesalers, retailers and customers to design and deliver real world solutions which support the longevity of the market. We have reviewed the proposal and rather than provide responses to each of the questions listed in section 10 (page 27) of the consultation document we would like to offer the following feedback for your consideration.

In general, we are supportive of, and satisfied that the change proposal achieves its intended policy aims, being:

1. That those customers adversely affected by Covid-19 are provided with appropriate levels of support and protection.
2. Customers who are able to pay should be incentivised to pay in a timely manner.
3. Retailers should take the necessary steps to differentiate between those customers who genuinely need support and those who should be expected to pay.

In addition, we are supportive of the principle of mutual responsibility of customers and retailers to contact one another to discuss the impact of Covid-19 on the customer (“Covid-19 Affected Customers”) and for the customer to provide evidence to support any protections afforded by this status.

Our understanding is that the Customer Protection Code of Practice applies to activities carried out directly by retailers and any 3rd party agency acting on behalf of a retailer under contract. However, we are unsure whether the protections under the CPCoP would extend to activity relating to debts that have been sold off to non-retailer entities. That is, the involvement of the retailer has ceased and the customer is being pursued by the new owner of the debt. We feel that it might be beneficial to clarify these points in the final drafting or alternatively comment as to how parties in these circumstances might be expected to interact.

In terms of implementation timescales we are supportive, however, we would anticipate and accept that it is the views from retailers and customers which will guide your decision on this.

I hope you find our comments helpful, please do not hesitate to contact me if you would like to discuss further.

Kind regards

Matt

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