

UUW response to Ofwat's Consultation on revising Ofwat's guidance on bulk charges for New Appointments and Variations (NAVs)

Introduction

United Utilities Water (UUW) welcomes the opportunity to comment on Ofwat's November 2020 consultation on revising bulk charges guidance for New Appointments and Variations (NAVs)¹.

We have set out our response to each of the points in the consultation in three sections below:

- Proposed amendments to areas in the guidance which we agree with, assuming we have interpreted it correctly;
- Proposed amendments to areas in the guidance which we disagree with, including an explanation why; and,
- Areas covered by UUW in our response, or noted in the CEPA report², that have not been covered by Ofwat's decision document. These include:
 - Update of bulk supply charging guidance to reflect the WACC set for incumbent companies at PR19.
 - How vacant properties are treated with regards to NAV bulk charges
 - How to treat full service NAVs

As stated in our response to the July 2020 consultation on bulk charges for New Appointments and Variations (NAVs)³, we continue to constructively engage with the NAV community. NAVs have used these engagement sessions to highlight areas where we could make our charges more accessible and to ask for clarification on our approach. Following our publication of the 2020/21 Bulk Charges for NAVs we met with a number of NAVs to discuss points of clarification and seek feedback on our approach. We will continue to engage with NAVs, as part of our annual review of charges, and consider how best to incorporate their ideas into our bulk charges. In response to feedback from NAVs we continue to develop our approach, this includes wastewater pumping station adoptions, vacant properties in relation to NAV bulk charges and the provision of emergency services. We hope that our commitment to active engagement will help us to provide an environment which allows competition to drive real benefits for all stakeholders.

Areas of the draft guidance we agree with:

Ofwat draft guidance: An expectation that incumbents use menu-based approaches so that charges reflect the actual mix of properties in the relevant starting point, making bulk charges for new appointees more cost reflective and accessible to new appointees.

We consider our approach to be in line with Ofwat's expectation that menu-based approaches should accurately reflect the characteristics of an individual site. We have taken this to mean the mix of customer types in a NAV site, rather than site specific characteristics for individual customer types (for example mains length avoided per household customer).

¹ <https://www.ofwat.gov.uk/wp-content/uploads/2020/11/Bulk-charges-for-new-appointees-a-consultation-on-revising-our-guidance.pdf>

² <https://www.ofwat.gov.uk/wp-content/uploads/2020/07/200610-Ofwat-CEPA-NAVs-FinalReport-redacted-1.pdf>

³ <https://www.ofwat.gov.uk/wp-content/uploads/2020/07/United-Utilities-Response-to-NAV-Bulk-Charges-consultation.pdf>

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Our understanding is that there would be a single standard discount for each type of customer and that the "menu-based approach" relates to the mix of the type of customers in that development.

We offer both a blended average volumetric rate for simplicity as well as a menu approach for more complex sites including large users or trade effluent customers, or where there is surface water drainage.

We publish a tariff calculator⁴ on our website that allows NAVs to assess ongoing charges for prospective sites. It very clear from our tariff calculator that we are not only providing a blended average tariff but also providing a menu based approach. For the purpose of entering into a contract we then convert this into an average. We have included the tariff calculator as an appendix to our response.

When we refer to "average" or "blended" discounts we are referring to the range of characteristics of individual customer groups across different sites. That is, we don't offer a site specific household customer discount, we offer a single household customer discount for all sites.

When Ofwat publishes the consultation response on the guidance it would be helpful for Ofwat to confirm what is meant by menu-based approach, i.e. that it refers to the mix of customer types in a NAV site, and not the specific site characteristics for individual customer types?

We use individual starting points, not blended, and we are assessing independent discounts, albeit they are averaged discounts for each customer group. However non household and household are so similar that, for simplicity, we provide a single average tariff. We could consider separating these out again however we would still expect the charges to be very similar.

UW comment: We agree with the draft guidance and it is consistent with our approach (assuming we have interpreted the guidance correctly).

Ofwat draft guidance: A preference for bottom-up cost estimation approaches when incumbents calculate their avoided costs to promote the development of more cost-reflective charges.

We agree with the proposal for the preference to use a bottom-up approach to estimating avoided costs. This is consistent with the approach applied by UW and best reflects the actual avoided costs of operating infrastructure on a NAV site.

We are supportive of being involved in a working group to develop this guidance further.

UW comment: We agree with the draft guidance and it is consistent with our approach.

Ofwat draft guidance: A clarification that indirect costs that are avoided by incumbents, due to the entry of a new appointee, should be included in the estimation of avoided costs.

We agree with the proposal that indirect costs that are avoided by incumbents, due to the entry of a new appointee, should be included in the estimation of avoided costs. This is consistent with the approach applied by UW.

UW comment: We agree with the draft guidance and it is consistent with our approach.

⁴ <https://www.unitedutilities.com/globalassets/documents/builders--developers-docs/bulk-charges-for-navs---tariff-calculator.xlsx>

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Ofwat draft guidance: That incumbents should carefully consider which avoided costs are appropriate for a site, using industry best practice where appropriate – we consider CEPA's list of avoided costs that are common to most sites served by new appointees to be a useful starting point, and this may evolve over time.

We agree that the CEPA list of common avoided costs is a useful starting point and note that we include all of these in our bulk charges for NAVs methodology.

Areas of further consideration should include costs associated with managing interactions with the Non-household Retail Market. These costs are recovered from wholesale non-household tariffs (the starting point) but should not be recovered through NAV charges.

UW comment: We agree with the draft guidance and it is consistent with our approach.

Ofwat draft guidance: A revised approach to the rate of return element, reducing the level of prescription on providing an appropriate allowance for new appointees, which may include the use of an adjusted rate of return when estimating average annuities.

We agree with the revisions Ofwat has made in the guidance reducing the level of prescription on providing an appropriate allowance for new appointees.

We agree that any additional allowance should reflect the operational risk experienced by NAVs to operate on-site assets which the incumbent has avoided. This aligns to our current approach where we include a profit allowance within in the NAV tariff discount. In addition to the working capital deduction, we include an allocation of normal profit to reflect the business risk faced by the NAV.

Annuity values might differ between companies depending on whether or not infrastructure repair is treated as operating expenditure or capital expenditure. This might affect how the discount is expressed. For example a company might have a small annuity value as the maintenance aspect is all treated as operating expenditure.

We consider our approach to be consistent with the draft guidance because:

- a) where an annuity is required we assume that the NAV will recover the cost of the original implementation from the developer;
- b) the cost of maintenance is captured via operating costs because we treat infrastructure repairs as operating expenditure (which is not the same for all companies); and,
- c) we include an annuity for asset replacement in the future, where appropriate.

UW comment: We agree with the draft guidance and it is consistent with our approach.

Ofwat draft guidance: A new principle which sets out that we expect incumbents to consider the impact of how they structure their bulk charges on environmental outcomes.

We are content with the additional guidance provided on environmental incentives and the principle that incumbents should consider potential impacts on environmental outcomes. In particular we are content with the proposed approach to not financially penalise new appointees for promoting greater water

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efficiency and that the calculation of avoided costs should seek to take account of the characteristics of the site on the incumbent's costs.

In relation to water efficiency, we consider our standardised approach to NAV charging already achieves this, as discounts are based on an assumed (regional average) level of consumption per property. Therefore our NAV volumetric rate discounts do not reduce if the NAV delivers greater levels of water efficiency – it remains the same. This approach is consistent with the guidance proposed by Ofwat on ways in which incumbents might address environmental outcomes.

UW comment: We agree with the draft guidance and consider our approach takes into account the impact on environmental outcomes.

Ofwat draft guidance: Additional detail on the approach to avoided surface water drainage and highway charges.

We welcome the additional guidance on the approach to avoided surface water drainage and highway charges.

In relation to incentivising sustainable development and reduced surface water we consider our approach is in line with the draft guidance because:

- a) sustainable drainage is incentivised through the discount for the sustainable development we provide to developers. The NAV site would therefore be incentivised in its development phase. We do not provide any ongoing discount year on year for that because this is covered by the developer incentive;
- b) we have an additional incentive for non-household customers. This is an incentive for non-household customers to implement a sustainable drainage system (SuDS) on their own existing site (it is not a developer incentive). This discount would apply if there was a non-household premise on a NAV site (as an adjustment to the starting point tariff). This approach would support incentives for SuDS on, for example, a large user NAV.

We would be happy to discuss this further as part of the working group.

UW comment: We agree with the draft guidance and consider our approach to be consistent with the guidance.

Ofwat draft guidance: Additional detail on the approach for adjusting for leakage

We note that Ofwat has also added in a new section on the leakage adjustment (section 2.3, page 15).

We agree with the approach that the adjustment for leakage should be based on an estimate of the incumbent's level of leakage for the site, not the new appointee's actual level of leakage or leakage on the incumbent's wider network.

This is consistent with the approach applied by UW.

UW comment: We agree with the draft guidance and it is consistent with our approach.

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Ofwat draft guidance: Amended guidance on publishing bulk charges

We agree with the updated guidance provided on publishing bulk charges so that they are transparent, accessible and up to date (section 3.2, page 18).

We agree that the information published should allow prospective new appointees to confidently estimate their bulk charges when seeking to serve a new site.

We include worked examples in our published bulk charges statement and also publish a tariff calculator to enable prospective NAVs to estimate their own charges.

We continue to constructively engage with the NAV community and seek feedback on improving the transparency and accessibility of the bulk charges for NAVs.

UW comment: We agree with the draft guidance and it is consistent with our approach.

Areas of the draft guidance we disagree with:

Ofwat draft guidance: A clarified approach to large user tariffs, ensuring all incumbents adopt the wholesale minus approach for at least all new sites while recognising transitional arrangements may be needed for existing sites.

We acknowledge the clarification in the guidance in relation to large user tariff and that in adopting the wholesale minus approach the large user tariff should only be relevant where there is one or more single large user of water as end customer(s) on the site.

However, there may be certain NAV sites, for example very large developments that only include household properties, where the wholesale minus approach may result in a lower discount than a company's wholesale charges for large user customers.

We have developed an approach which will work for the generality of developments, however at some point the way in which we would supply a large housing development becomes in essence indistinguishable from a large user/bulk supply to an incumbent for a large supply of water, for which it may be more appropriate to transition from an "end user minus" to standard wholesale bulk supply pricing.

We would be concerned that NAVs may consider that a larger development should not be charged more than a bulk supply trade (or even a large non-household customer) that uses an equivalent amount of water.

We acknowledge that an alternative might be to introduce a two-tier approach to include a large development NAV tariff which aims to more closely mirror our Select 50 large user tariff. However such an approach seems sub-optimal for a number of reasons:

- it would seem to add unnecessary complexity/duplication in the tariff structure;
- it could lead to smaller discounts being applicable to smaller developments;
- it would still not be fully consistent with large user tariffs, so that whilst it would reduce the risk of challenge from NAV customers, it won't fully eliminate it.

An independent third party review of our NAV tariff arrangements supported that our current methodology represented an appropriate approach to managing regulatory and legal compliance.

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We consider our current approach is the right approach that recognises that, at a point of scale, the circumstances in supplying a NAV becomes similar enough to supplying a Large User or Bulk Supply and that the prices should align. Therefore for 2021/22 we will retain our existing methodology of offering the "lesser of" the NAV charge and the company's wholesale charges. We will review our current approach for 2022/23 charges, once Ofwat finalises its view on Large User Tariffs currently in the draft guidance, but consider the alternative approach to introducing a two-tier tariff would be sub-optimal.

UW comment: We do not agree with the proposed amended guidance and propose to retain our existing approach for 2021/22 charges, which we consider to be the right approach, but will revisit this for 2022/23 charges.

Areas covered by UW in our response that have not been covered by Ofwat's decision document

We raised two areas in our response to the July 2020 consultation that have not been covered by Ofwat's decision document and one area of note from the CEPA Study:

- How vacant properties are treated with regards to NAV bulk charges;
- How to treat full service NAVs; and
- Update of bulk supply charging guidance to reflect the WACC set for incumbent companies at PR19

How vacant properties are treated with regards to NAV bulk charges

Consideration should also be given to how vacant properties are treated with regards to NAV bulk charges. This is not an issue for volumetric charges, but is an issue for fixed Surface Water Drainage charges which are due for each property connected to the incumbent's sewer network. If the incumbent were to charge the NAV for each connected property regardless of whether a property was occupied or vacant, then the NAV may not be able to fully recover these costs from their customers if the site is not fully occupied. This does not affect any of UW's existing contracts, as there are no NAV sites currently connected for Surface Water drainage, but could hypothetically affect future contracts.

We have identified four potential options for consideration:

1. Levy a fixed charge for each connected property. This ensures that the incumbent fully recovers the costs of providing the service but creates a risk the NAV is unable to fully recover this cost from their customer base.
2. Levy a fixed charge for each occupied property. This would require a high level of administration on behalf of both incumbent and NAV to determine the level of occupation for a NAV site and to refresh the bulk NAV charge on a periodic basis to adjust for the level of occupancy.
3. Levy a fixed charge for each connected property, but also include an additional fixed discount within this charge to allow for the average percentage of vacant premises for a typical NAV site. This would provide a fixed % discount for all NAV sites, as opposed to a bespoke discount based on the actual number of occupied and vacant properties.
4. Charge NAVs for Surface Water Drainage based on volumes (e.g. from the water meter) instead of a fixed charge per property. This would help ensure that NAV charges are proportionate to the level of occupancy / usage, but is a significant deviation from the wholesale charging structure.

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We consider option 3 above to be the most appropriate approach, as this would address the issue, whilst best satisfying feedback from NAVs that they prefer to avoid unnecessary contact with the incumbent. We would welcome confirmation on this matter in Ofwat's final NAV charges guidance.

Absent any further guidance from Ofwat we will implement option 3. We will only implement this if it is something that NAVs request.

How to treat full service NAVs

We also are keen to work with industry stakeholders to consider how best to ensure "full service" NAVs can be satisfied that they are competing on a level playing field.

Ofwat has stated⁵ that incumbents should not include existing strategic assets (i.e. treatment works) within infrastructure charges, as reinforcement of such assets is expected to be recovered from the generality of customers. We note that full service NAVs, which provide their own treatment facilities, have indicated to us that they consider that their circumstances are inconsistent with the current approach to infrastructure charges.

We consider this to be an area worthy of further consideration in reviewing the charging guidance in order to ensure that these issues are fully assessed. We would be pleased to participate in such a review in the interests of establishing what a satisfactory approach could be given the specific circumstances faced by full service NAVs.

Update of bulk supply charging guidance to reflect the WACC set for incumbent companies at PR19

In the CEPA Study "Bulk Charges for New Appointments and Variations (NAVs) Regime in the Water Industry in England and Wales"⁶ published alongside the July 2020 consultation on the Ofwat website, CEPA noted that a number of companies raised the fact that the WACC in Ofwat's bulk supply charging guidance should be updated to reflect the WACC set for incumbent companies at PR19.

It would be helpful if the final bulk supply charging guidance is updated to explicitly reflect the WACC set for incumbent companies at PR19.

Absent any further guidance from Ofwat we will update our approach to reflect the PR19 WACC.

⁵ Charging Rules for New Connections – decision document December 2016, Section 3.2, page 32.

⁶ <https://www.ofwat.gov.uk/wp-content/uploads/2020/07/200610-Ofwat-CEPA-NAVs-FinalReport-redacted-1.pdf> page 37

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APPENDIX: TARIFF CALCULATOR

Guidance note on using this charge calculator

This workbook illustrates how we will calculate the bulk charge for a NAV site with a large user and/or the surface water drainage charge, where applicable. We hope that this will be a useful tool to help NAVs understand the ongoing charges they will be liable to pay at such sites.

It isn't necessary to use this tool to calculate the ongoing volumetric charge for a site without a large user. This is because we charge such sites using the blended charge published in our 'bulk charges for NAVs' charges statement.

Water

Use the table 'End-user fixed charges' to input the number of plots of each type you expect there to be on the site. If you do not know the meter size of your non-household customers, then a best guess will suffice - meter size does not determine the level of the ongoing charge, as these charges are discounted 100% against the end-user charge.

Note that Select customers will require at least two entries in this table: one to reflect the appropriate customer banding (Select 50, Select 180 etc) and at least one more to represent the meter size. Note that while some Select customers require more than one meter, this tool assumes one meter per Select customer for simplicity.

We will also require NAVs to pay a meter standing charge for the bulk supply meter(s). Note that we don't charge for the installation of these meters. We recommend NAVs assume a bulk meter size of at least 100mm.

Wastewater - foul charges

Use the table 'Volumetric charges - foul' to input the number of plots of each type you expect there to be on the site. A Select sewerage customer discharges at least 50,000m³ of wastewater. Use the on-site trade effluent consent option to tell us how many trade effluent consents there are on-site, if any.

Wastewater - surface water drainage charges

We will charge where surface water from a NAV's site drains to our network.

Use the table 'Fixed charges - surface water and highways drainage' to calculate the surface water drainage charges due. As discussed in our NAV bulk charges statement, if roads on the NAV site are public roads, we will charge for highways drainage.

NAVs should refer to our wholesale charges scheme to determine the correct surface water and highways drainage banding for their non-household customers.

If you have any comments or questions about the use of this tool, please let us know at: NAVenquiries@uuplc.co.uk

OutpCalculatorW

Purpose - NAV bulk supply charge calculator for NAV sites.

FIXED CHARGES

End user fixed charges	Charge multiplier	Memo - wholesale charge	Memo - Wholesale fixed charge payable	NAV fixed charge	NAV fixed charge payable
<i>Units</i>	<i>nr</i>	<i>£/customer</i>	<i>£</i>	<i>£/customer</i>	<i>£</i>
Household standing charge (measured)		16.52	-	-	-
NHH standing charge for meter size 12/15 mm (0.5")		16.41	-	-	-
NHH standing charge for meter size 20/22 mm (0.75")		16.59	-	-	-
NHH standing charge for meter size 25/28 mm (1")		19.25	-	-	-
NHH standing charge for meter size 30/32/35 mm (1.25")		19.25	-	-	-
NHH standing charge for meter size 40/42 mm (1.5")		24.97	-	-	-
NHH standing charge for meter size 50/54 mm (2")		37.17	-	-	-
NHH standing charge for meter size 75/80 mm (3")		40.12	-	-	-
NHH standing charge for meter size 100 mm (4")		42.71	-	-	-
NHH standing charge for meter size 150 mm (6")		42.71	-	-	-
Select 50 user fixed charge		18,550	-	18,086.26	-
Select 180 user fixed charge		60,310	-	58,802.28	-
Select 750 user fixed charge		122,560	-	119,496.06	-
Select plus user fixed charge		122,560	-	119,496	-
Total		-	-	-	-

Bulk meter charges	Charge multiplier	Bulk meter charge	NAV fixed charge
<i>Units</i>	<i>nr</i>	<i>£/meter</i>	<i>£</i>
NHH standing charge for meter size 12/15 mm (0.5")		16.41	-
NHH standing charge for meter size 20/22 mm (0.75")		16.59	-
NHH standing charge for meter size 25/28 mm (1")		19.25	-
NHH standing charge for meter size 30/32/35 mm (1.25")		19.25	-
NHH standing charge for meter size 40/42 mm (1.5")		24.97	-
NHH standing charge for meter size 50/54 mm (2")		37.17	-
NHH standing charge for meter size 75/80 mm (3")		40.12	-
NHH standing charge for meter size 100 mm (4")		42.71	-
NHH standing charge for meter size 150 mm (6")		42.71	-
Total		0	0

VOLUMETRIC CHARGE

On-site water losses	Adjustment
<i>Units</i>	<i>%</i>
On-site water losses - regular users	4.00%
On-site water losses - Select customers	3.00%

Volumetric charges	Assumed consumption	Bulk meter consumption	End user consumption	Memo - wholesale charge	Memo - end user wholesale	NAV volumetric charge	Total NAV charge
<i>Units</i>	<i>m3/cust</i>	<i>m3</i>	<i>m3</i>	<i>£/m3</i>	<i>£</i>	<i>£/m3</i>	<i>£</i>
Household	87	-	-	1.68	-	1.353	-
Non-household	250	-	-	1.701	-	1.353	-
<i>The cells below are only used if there is a large user on the NAV's site</i>							
Household	87	-	-	1.68	-	1.356	-
Non-household	250	-	-	1.701	-	1.329	-
Select 50	50,000	-	-	1.33	-	1.253	-
Select 180	180,000	-	-	1.098	-	1.037	-
Select 750	750,000	-	-	1.015	-	0.960	-
Select Plus	3,000,000	-	-	0.396	-	0.352	-
Total		-	-	-	-	-	-

NAV SITE BULK CHARGE SUMMARY

Total site NAV bulk charge	Volumetric starting point	Fixed charge starting point	NAV volumetric charge	Annual fixed charge	Volumetric discount	Starting point discount
<i>Units</i>	<i>£/m3</i>	<i>£</i>	<i>£/m3</i>	<i>£</i>	<i>%</i>	<i>%</i>
Bulk charge for NAVs	-	-	-	-	0.00%	0.00%

END OF SHEET

OutpCalculatorWw

Purpose - NAV bulk discharge charge calculator for NAV sites.

Pumping station flag (1 if site has wastewater pump)

FIXED CHARGES

Fixed charges - surface water and highways drainage	Charge multiplier	Memo - wholesale charge	Memo - Wholesale fixed charge payable	NAV fixed charge	NAV fixed charge - on site pumping station	NAV fixed charge payable
Units	nr	£/customer	£	£/customer	£/customer	£
Household - surface water and highways drainage		93.29	-	86.26	76.34	-
Household - highways drainage only		28.00	-	25.89	22.91	-
Household - surface water only		65.29	-	60.37	53.43	-
Surface water drainage: Band 1		90.52	-	81.46	72.09	-
Surface water drainage: Band 2		224.85	-	202.35	179.08	-
Surface water drainage: Band 3		501.09	-	450.94	399.08	-
Surface water drainage: Band 4		1,133.77	-	1,020.30	902.96	-
Surface water drainage: Band 5		2,371.43	-	2,134.09	1,888.65	-
Surface water drainage: Band 6		5,272.47	-	4,744.77	4,199.10	-
Surface water drainage: Band 7		10,017.09	-	9,014.53	7,977.81	-
Surface water drainage: Band 8		16,549.54	-	14,893.18	13,180.39	-
Surface water drainage: Band 9		23,721.25	-	21,347.11	18,892.08	-
Surface water drainage: Band 10		41,374.67	-	37,233.69	32,951.62	-
Surface water drainage: Band 11		68,958.16	-	62,056.48	54,919.66	-
Surface water drainage: Band 12		96,541.63	-	86,879.26	76,887.69	-
Surface water drainage: Band 13		124,125.11	-	111,702.05	98,855.73	-
Surface water drainage: Band 14		151,708.61	-	136,524.85	120,823.78	-
Surface water drainage: Band 15		179,292.61	-	161,348.11	142,792.23	-
Highways drainage: Band 1		38.80	-	34.92	30.90	-
Highways drainage: Band 2		96.36	-	86.72	76.74	-
Highways drainage: Band 3		214.75	-	193.26	171.03	-
Highways drainage: Band 4		485.90	-	437.27	386.98	-
Highways drainage: Band 5		1,016.33	-	914.61	809.43	-
Highways drainage: Band 6		2,259.63	-	2,033.47	1,799.61	-
Highways drainage: Band 7		4,293.04	-	3,863.37	3,419.06	-
Highways drainage: Band 8		7,092.66	-	6,382.79	5,648.74	-
Highways drainage: Band 9		10,166.25	-	9,148.76	8,096.61	-
Highways drainage: Band 10		17,732.00	-	15,957.29	14,122.12	-
Highways drainage: Band 11		29,553.50	-	26,595.64	23,537.00	-
Highways drainage: Band 12		41,374.99	-	37,233.97	32,951.87	-
Highways drainage: Band 13		53,196.48	-	47,872.21	42,366.74	-
Highways drainage: Band 14		65,017.97	-	58,510.65	51,781.62	-
Highways drainage: Band 15		76,839.69	-	69,149.19	61,196.67	-
Total		-	-	-	-	-

VOLUMETRIC CHARGE

On-site water losses	Adjustment
Units	%
On-site water losses - regular users	4.00%
On-site water losses - Select customers	3.00%

Volumetric charges - foul	Charge multiplier	Assumed consumption	Bulk meter consumption	End user consumption	Memo - wholesale charge	Memo - end user wholesale charge	NAV volumetric charge	NAV volumetric charge - on site pumping station	Total NAV charge
Units	nr	m3/cust	m3	m3	£/m3	£	£/m3	£/m3	£
Household		87	-	-	1.15	-	0.977	0.914	-
Non-household		250	-	-	1.184	-	0.977	0.914	-
On-site trade effluent consents					193.83				-
<i>The cells below are only used if there is a large user on the NAV's site</i>									
Household		-	87	-	1.15	-	0.979	0.954	-
Non-household		-	250	-	1.184	-	0.966	0.940	-
Select		50,000	-	-	1.12	-	1.055	1.088	-
Total									

NAV SITE BULK CHARGE SUMMARY

Total site NAV bulk charge	Volumetric starting point	Fixed charge starting point	NAV volumetric charge	Fixed charge payable	Volumetric discount	Discount from starting point
Units	£/m3	£	£/m3	£	%	%
Bulk charge for NAVs	-	-	-	-	0.00%	0.00%

END OF SHEET