


From: 
To: [Jeevan Jones](#)
Subject: RE: Monitoring and reporting approach for NAVs
Date: 21 April 2021 14:35:35
Attachments: [6F1F6C26DD7447899A2B050A798560E1\[555486451\].png](#)
[60F0CD7E2AE94B22A0D66370E1544150.png](#)

Jeevan

Just to respond to your email (below), I have few observations or issues with the content and welcome the stated intention that your regulation and interactions with NAVs will be proportionate to the risks to customers.

As you know, Albion Eco currently provides water services to large industrial customers in Wales. There will always be a tension between publishing information relating to a limited customer base and the needs for commercial confidentiality and I would therefore request that a third level is added to your proposed Tier system – based on whether the NAV serves domestic customers or, putting it another way, a separate tier for NAVs providing water services solely to large user NHH customers. You will recognise that customers in this suggested category can already wield significant commercial pressure on their supplier. This situation differs profoundly from NAVs supplying domestic customers.

Whether this third tier is implemented or not, proportionality of information provision should reflect the ‘vulnerability’ of the customer base.

I am happy to discuss this further with you.

Best wishes

David

David Knaggs
Managing Director

