

## **Portsmouth Water's response to the Consultation on Gathering Data about Developer Services**

***Do you envisage having any problems completing the data request for 2021-22 by July 2022, or the historical data for 2020-21 by w/c 20 September 2021?***

Providing 2020-21 data by w/c 20 September will pose a significant challenge for us. Our systems are not currently configured to capture data in the format required. As a result, a significant amount of data will need to be manually collated, and there are some areas where we would not be able to provide the required information.

The manual collation of data would be required over a period when resources are already committed to developer customer engagement programmes, and preparation of 2022/23 new connection charges.

On the attached copy of the data set template, we have identified the availability of data, based on a RAG status:

Red: Due to changes in April 2018, in the way network reinforcement is paid for, this data is not available in the required format. This data cannot be provided by w/c 20 September 2021.

Amber: Data available, but will require significant manual input. System changes will be required going forward for this data to become more readily available. This data cannot be provided by w/c 20 September 2021.

Green: Data is available with minimum manual intervention. This data can be provided by w/c 20 September 2021.

By the time the final required data set is published, it would almost be the end of Q2 in 2021-22. Whilst we would be able to consider reconfiguring our systems to auto-collate the data more readily, there would still be significant amount of manual data collation for the Q1 and Q2 periods. That being said, with rationalisation of the proposed data set, we believe we can collate the 2021-22 data, by the end of July 2022.

***If you envisage problems with providing the full historical dataset for 2020-21, what areas would you remove from the data request, or how much additional time would you need to meet the request?***

We would be unable to provide the data items highlighted red in the attached template. Given the way network reinforcement is now charged, we do not believe companies can robustly provide this data.

Given our resource commitments, over the coming months, to developer customer engagement programmes, and preparation of 2022/23 new connection charges, we would not be in a position to submit the data, as it currently stands, until the end of December 2021.

Given the coronavirus pandemic, and how this has affected developer services activities, we do not believe cost data collection from 2020-21, would be a true reflection on the general Developer Services Market.

We believe data collection from Q3 in 2021-22 would produce data that was more reflective of the Market. Based on a reduced data set, we could produce this information by the end of March 2022.

***Are the definitions (provided in the cover worksheet) clear enough to mitigate the risk of reporting inconsistencies between companies? If not, what changes would you recommend?***

Completed Developer Services Work –

Installation of water infrastructure on some new development sites can span many years. Costs for a number of sites completed within the current regulatory year would have been provided, and paid for in previous years. In some cases, this will be in the years prior to the Charging Rules being amended in April 2018.

Developer Services Quotations Provided and Third Party Market Participants Active –

Our quotations provide both a mains requisition and self-lay cost. Clear guidance will be required on exact requirements to prevent ‘doubling-up’ on some quotes.

***Would you be able to provide information on cost drivers, in particular length of communication pipe and surface type (split into made and unmade)?***

Information on cost drivers is outlined below:

Unmade:

- Significant costs can be incurred if the works impact upon environmental or archaeological sensitive areas, when extensive mitigation or investigatory measures may be required.
- Traffic management – Road closure, traffic lights and other TMA requirements (there may be traffic management costs associated with work in unmade ground due to carriageway incursion for working space etc).
- Whether the work is carried out by the incumbent, SLP or NAV.

Made:

- As above, plus:
- Surface type – is the installation in footway, carriageway flexible or rigid construction.
- Whether the new service connection is ‘short-side’ or ‘long-side’.

***Are there any key new development characteristics you think are missing from the data request and should be included?***

Given the coronavirus pandemic, and how this has affected developer services activities, we do not believe cost data collection from 2020-21, would be a true reflection on the general Developer Services Market.

We believe data collection from Q3 in 2021-22 would produce data that was more reflective of the Market.

***Is there any additional developer services data you collect that you think would be helpful to Ofwat?***

No additional data than that already specified.

***Would an alternative data format be more appropriate (e.g., list / table of new developments connected in reporting year alongside relevant cost / revenue data and characteristics)?***

We can provide a list of total costs for all new developments, completed and quoted for in the 2020-21 reporting year, by w/c September 2021, and believe this type of format would be more appropriate for companies to meet this deadline.

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