



Tim Griffiths
Ofwat
Centre City Tower
7 Hill Street
Birmingham
B5 4UA



Richard Dunmore



22nd July 2021

Consultation on gathering data about developer services

Dear Tim

Thank you for the opportunity to respond to the consultation on gathering data about developer services published in June 2021. We support Ofwat's aim of reviewing the regulation of developer services for PR24 and understand the requirement to obtain data to support this review.

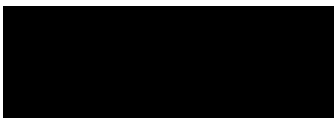
A detailed response to each of the questions asked is included in the attached document. There are a few specific points that we felt it was worth emphasising in this letter. We believe that the waste and network reinforcement areas could be dropped from the required dataset, as they will not benefit Ofwat in this analysis as Network Reinforcement is 100% non-contestable and only a small volume of waste connections are carried out by the incumbent companies.

We also strongly believe that the dataset should be reconciled to the APR submissions rather than to completed jobs. This will make confidence in company comparisons much higher and would avoid the issues caused by the mix of completed jobs which could cover multiple charging years, include legacy network reinforcement, and potentially reflect activity from several years ago rather than the current state of competitiveness in the market.

There are also concerns that the level of manual intervention required is considerable. This can be addressed by reducing scope and/or increasing the timeframes for submission. If this is to be embedded into the APR for 2021-22, then this concern over the timeline must be addressed. We do not believe we can automate capture and reporting of this data for 2021-22, part way through the year.

We look forward to working with you on PR24 arrangements for developer services.

Yours sincerely



Richard Dunmore
Head of Market Development