

This is Welsh Water's response to the document: *Consultation on updating Ofwat's charging rules* published 8 June 2021.

If you require further information, please contact me.

Kind regards

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Q1: Do you agree with our proposed rule changes? Please offer alternatives if you think they would better achieve our intentions.

The changes come under three categories, which I answer in turn:

Changes to all rules

Change the publication deadlines to require publication of WCR "by 13 January", and for CSR and NCR "by 1 February"

We support these changes, as they will aid transparency with stakeholders, and go further suggesting that the dates for the publication of the "Scope of charges" (13th July) and Indicative Wholesale Tariff Document (October 13th) in the Wholesale Charging Rules are also made explicit. These are currently defined as six months and three months before publication of the tariffs;

Amend glossary to reflect outputs from industry working group on terminology

Agree

Changes to Charges Scheme Rules

Amend to allow simultaneous publication of statement of significant changes and charges scheme

Agree

Changes arising from "English" rules

There are also several suggestions for changing the "English" Developer Services charging rules for English companies, as such we offer no comment.

Appendix 3 deals with the incorporation into the charges rules of information requirements for worked examples that have been published as part of the annual IN for expectations on charges publications. We note this and will continue to produce this document as part of our developer services charges publications.

Q2: Do you agree with our proposed changes in Appendices 1, 2 and 3?

We agree with the changes suggested in Table 2. In line with our comment above and to be aligned to the changes elsewhere, the requirement for the statement to be published "at least three weeks before..." should be changed to "no later than 11 January" in the rule below.

2	With the exception of new appointees, each undertaker should provide to the Water Services Regulation Authority a statement setting out any significant changes anticipated by the undertaker, and publish the statement, at least three weeks before the deadline for publication of the charges schemes	CSR Information requirement A2
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Q3: We seek your views on our clarification of the five-year rule. In particular, we would like to know of any potential implications for charges and customers' bills from companies following our interpretation.

This is referring to the rules for English companies; we offer no comment.