



'Happy Tree - Full Moon Party' Created by Mary Price

Ofwat Charging Team  
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Friday 13<sup>th</sup> August 2021

Dear Ofwat

**Re: Statutory consultation on changes to our charging rules**

Thank you for the opportunity to comment on the statutory consultation on changes to charging rules.

We welcome the approach you have adopted to this consultation, and appreciate the recognition and in some places acceptance of the proposals we made in our response to the earlier consultation. We hope that these will support a more simplified and efficient process to the benefit of all interested parties.

We note the comment made by IWNL regarding the time available for new appointees to set their tariffs being too short. If this is the case we would note that the deadline for companies to publish charges by 1<sup>st</sup> February is necessitated by unmetered billing, which in our case is carried out in advance of the charging year and commences in mid-February. As NAV customers are all metered and therefore not billed until the charging year has commenced, this may support a short extension to the timetable for NAVs to set their charges, whilst still allowing households sufficient notice of any significant changes.

On the changes proposed to new connections and infrastructure charges we have no further comments to make in addition to our response to the earlier consultation. We did notice that paragraph one of the Charging Rules refers to the "Charging Rules for New Connection Services" – we think for consistency that this should be updated to "English New Connection Rules" as elsewhere in the document.

We would suggest further clarity could be provided on the date from which these changes will apply. The consultation states these changes will take effect from 1st April 2022. Does that mean for the charge setting processes that will begin after that date, i.e. for setting charges for 2023/24, or for the charges to be applied from that date i.e. for 2022/23?

Yours Sincerely,  
James Holman  
Head of Economic Regulation

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