
south east water

Statutory consultation in
changes to our charging rules

South East Water response

September 2021

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Pure knowh₂ow

Thank you for the opportunity to comment on this consultation and for the feedback information you provided from your initial consultation in June, it was very useful. We broadly agree, and are supportive, of the proposals laid out in your paper. We have made some minor comments below.

We will continue to engage with our stakeholders and Ofwat on the wide work on developer services moving forward and look forward to further workshops and engagement in this area.

Charging publication dates

We are happy with the proposed publication dates and that all publication dates should be fixed. We agree it is important for the wholesale charging documents to be published earlier to enable retailer's time to review documents and publish their retail charges.

Publishing statements of significant change

We agree with the proposal of setting fixed dates for the publication of statements of significant change, we also agree with proposed dates you have set out. We are specifically supportive of the removal of the requirement for a July publication of any statement of significant change for the wholesale charges and agree that engagement with our retailers is essential to ensure that understand the potential impact on their charges.

Cost reflectivity

We understand that this is a challenging area. Although the principle of a "one size fits all" approach would seem to be the most appealing proposal, it is clear that all companies have different cost drivers, activity levels and contract types etc. that mean a more rigid approach may cause issues. We are pleased that you have taken into account the feedback from your consultation in June and that you have amended the working in the "Summary of proposed changes to charging rules" to reflect this.

Consistent terminology

South East Water were part of the working group reviewing terminology across the industry and we will continue to engage in any further work in this area. With so many views across companies, and other stakeholders, this has been a challenging project. However, your comment "we do not think it is necessary or desirable to require companies to seek approval if they wish to use additional or include additional terms in their charging document" means that although we will have to use standard terminology (some of which may not be common for us) we will also be able to add explanations in a more company specific way too. We have no doubt that over a period of years the more standard terms will be adopted.

Worked examples

South East Water were part of the working group looking at proposed worked examples. As you have noted in your consultation the idea behind the examples is to provide understanding of how companies charging arrangements operate and provided a minimum number of scenarios that should be included in the document. We assume that where companies have area/regionally specific scenarios, they would add these in additions to the standard scenarios set out in your document.

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