

July 2022

Creating tomorrow, together:
consulting on our methodology for PR24

**Delivering UK Government
priorities for the English water
sector through our
2024 price review
draft methodology**

Ofwat

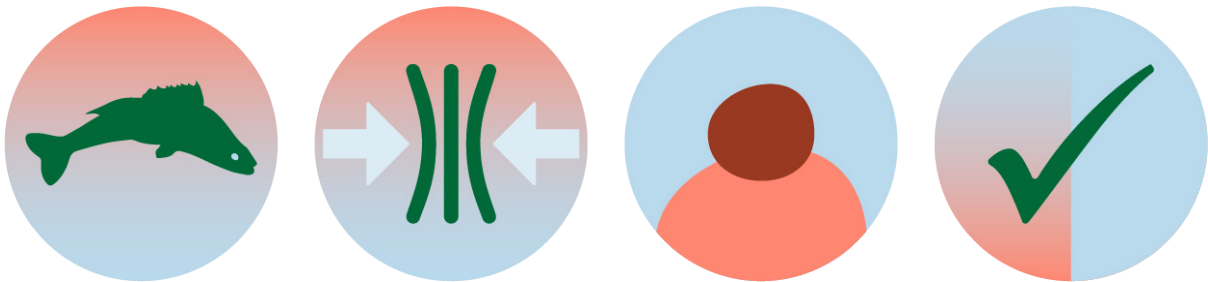
About this document

UK government has set strategic priorities for Ofwat in its [strategic policy statement](#) (SPS), published on 28 March 2022.¹ We are required to act in accordance with the SPS in carrying out our relevant functions relating wholly or mainly to England.²

The UK government's SPS covers a wide range of issues, many of which relate to the natural environment and water quality, and to the resilience of water company operations to long-term trends, including those flowing from climate change and population growth.

These are set out under four strategic priorities which are to:

- **protect and enhance the environment;**
- **deliver a resilient water sector;**
- **serve and protect customers; and**
- **use markets to deliver for customers.**



While we have a range of regulatory tools, and the price review is not the only means of delivering the strategic priorities the UK government has set out, these themes are central to our draft methodology. The importance of addressing the need to reduce the impact of water company operations on river water quality, including to drive a reduction in the use of storm overflows, are reflected in our proposed approach to setting common performance commitments and incentivising companies to make rapid progress on addressing storm overflows. Moreover, we are seeking to encourage an increase in the use of nature-based solutions and partnership-based delivery

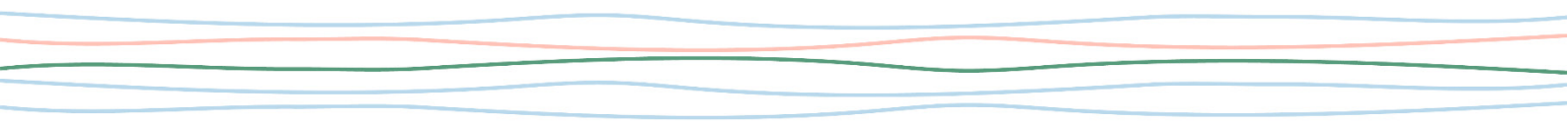
¹ Under section 2A of the Water Industry Act 1991

² For these purposes, "relevant functions relating wholly or mainly to England" means the functions mentioned in Section 2(1) of the Water Industry Act 1991 so far as they relate to appointment areas wholly or mainly in England. An "appointment area" is the area for which a company holds an appointment as a water and/or sewerage undertaker.

models by setting clear expectations on companies, providing more certainty on the future funding of these activities, and reflecting these expectations in our proposed approach to cost assessment. Our approach to reducing greenhouse gas emissions and improving biodiversity should further encourage nature-based solutions.

Our draft methodology for PR24 reflects the need for companies to take a long-term approach to planning how they will meet future needs in a way which accommodates uncertainty and changing requirements. The UK government expects that the regulated water industry will reflect these priorities and objectives in its strategic direction. Our emphasis on the importance of adaptive planning, the need for company plans to take account of all relevant national targets and the clear expectations we have set for companies' approaches to developing their water resources and drainage and wastewater management plans, all reflect the priorities set out in the SPS.

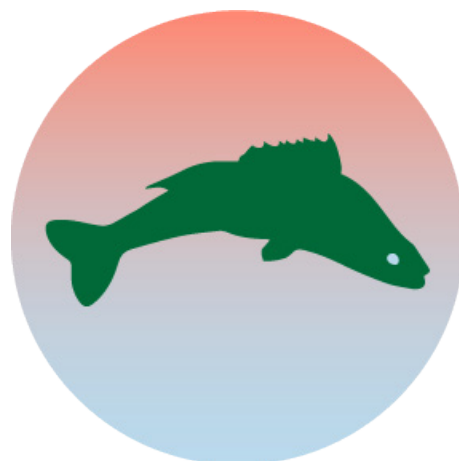
In the following sections we set out how our draft methodology proposals address each of the priorities UK government has set for us in the SPS.



Protecting and enhancing the environment

UK government's SPS sets a strategic priority for us to protect and enhancement environment. We must do this through priorities to:

- get the basics right; and
- encourage environmental ambition.



We summarise below how we propose at PR24 to contribute to the delivery of each.

Getting the basics right

UK government's priority is for us to work with other regulators and government to challenge water companies to improve their day-to-day environmental performance to enhance the quality of the water environment.

To meet this priority, at PR24 we propose to require companies to adopt a package of common environmental performance commitments for 2025–30, including:

- biodiversity;
- greenhouse gas reductions;
- water use;
- storm overflows;
- river water quality;
- pollution incidents (serious and total);
- discharge permit compliance; and
- a range of water quality measures.

We will expect companies to propose service levels which meet the UK government's targets and Environment Agency requirements, as well as their expectations on storm overflow reductions. We will encourage companies to be ambitious and go beyond these expectations by setting stretching service level requirements across all companies, backed by outperformance and underperformance payments.

Specifically, we will:

- challenge all companies to reduce serious pollution incidents to zero by 2030.
- expect companies to deliver an average of no more than 20 spills per storm overflow for 2025 and go further where their legal duties require.

We also expect companies to draw on and co-ordinate with the work undertaken as part of the Drainage and Wastewater Management Planning (DWMP) process to undertake additional work on storm overflows during 2020-25. This should go further than the outcome of investigations planned for the 2020-25 period of work otherwise included in their PR24 Water Industry National Environment Programme (WINEP) proposals.

Environmental ambition

UK government's priority is for us to drive water companies to be more ambitious in their actions to protect and enhance the environment, in particular by taking appropriate action to improve water quality.

Our proposed approach at PR24 is consistent with the Water Industry Strategic Environmental Requirements (WISER), WINEP and river basin management planning. In particular, we:

- expect water companies to deliver the requirements set out in the WISER where they have a legal duty to do so, and to deliver the wider expectations where these have customer support and remain affordable.
- will support a move towards a more outcomes-focused WINEP and work with the Environment Agency to achieve this, ensuring consistency with the approach that we prefer to take for other enhancement expenditure.³
- expect companies to take account of river basin management plans when developing their WINEP programmes and enhancement proposals.

³ Under this approach we set the outcomes we expect companies to deliver and then the efficient totex allowances needed to support the delivery of these outcomes. This will help companies choose the best approach to deliver the outcomes required in the WINEP, facilitating the use of nature-based solutions.

Encouraging ambition

We will encourage companies to deliver ambitious improvements in the quality of the natural environment.

The sector must improve its performance by making a bigger step towards net zero to play its role in dealing with climate change. We expect companies to continue to reduce greenhouse gas emissions and move towards net zero through their on-going activities funded from base expenditure allowances. We propose to allow specific enhancement expenditure to reduce greenhouse gas emissions further and are introducing 'net zero challenge' funding. This will make cost allowances for efficient companies to go further than their peers through a bidding process. We are also proposing a new operational greenhouse gas emissions performance commitment to encourage companies to deliver further reductions in emissions during the 2025–30 price control period.

We will expect companies' PR24 business plans to include proposals to reduce phosphorus pollution and make progress towards the UK government targets in their WINEP programmes. We propose to introduce a river water quality performance commitment to encourage companies to go further than these targets where it is cost effective for them to do so. We intend for this to encourage reductions in the amount of phosphorus discharged at wastewater treatment works and phosphorus entering rivers due to wider partnership working, including by using nature-based solutions and catchment management.

We also propose to encourage companies to enhance the water environment by:

- incentivising reductions in water demand, which will reduce unsustainable abstraction.
- considering whether local circumstances – for example the need to reduce abstraction from priority habitats such as chalk streams – require a performance commitment to provide appropriate incentives.
- expecting WINEP programmes to take account of river basin management plans, so that an integrated approach for the protection and sustainable use of water is taken across both.

Delivering value for money

Our approach to assessing costs for environmental improvements at PR24:

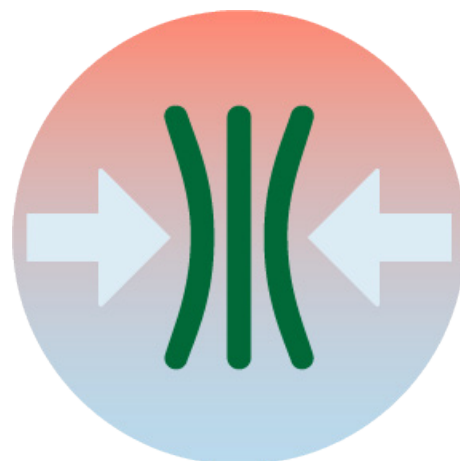
- expects companies to seek proportional contributions from third parties who materially benefit from environmental schemes by taking into account third-party funding in our benchmarking of enhancement expenditure.
- proposes that companies focus additional proposals for funding to reduce spills from storm overflows on addressing environmental harm from high priority sites.
- proposes an approach for funding upgrades to wastewater treatment works to support nutrient neutrality.

We will allow enhancement expenditure for companies to deliver wider environmental and social benefits which go further than their formal targets and statutory requirements where this is necessary to carry out their functions. Companies should engage with their customers to inform their proposals and get customer support for them if they have a higher cost. We propose to consider the wider benefits more robustly and extensively in our assessment of enhancement proposals by encouraging companies to deliver best value.⁴ This should encourage companies to take forward nature-based solutions where they are the best solution. Furthermore, in response to companies suggesting that there are barriers to taking forward opex-based solutions, we propose to give more funding certainty to opex-based solutions, such as allowing them to capitalise operating expenditure or by providing a ten-year allowance for operating expenditure.

⁴ Best value is where investment generates the greatest economic benefit for customers, the environment and society, compared to costs, over the long-term.

Delivering a resilient water sector

UK government sets us a strategic priority to deliver a resilient water sector. We must also meet this priority through the following expectations:



- Meeting long-term water resources needs;
- Managing water demand;
- Delivering resilient drainage and wastewater services;
- Greater resilience to flooding;
- Asset health; and
- Security, corporate and financial resilience.

We summarise below how we propose at PR24 to contribute to the delivery of each.

Delivering a resilient sector

UK government's priority is for us to challenge the industry to plan, invest in, and operate its water and wastewater services to secure the needs of current and future customers, in a way which delivers value to customers, communities and the environment over the long-term. To meet this priority, at PR24 we propose:

- companies' proposed service levels and associated investments should be set in the context of a long-term strategy.
- companies should take account of all relevant statutory targets, acknowledging uncertainty and what their customers can afford.
- an approach to encouraging nature-based solutions, partnerships and best-value assessment, which will promote cross-sector working.
- to more strongly incentivise innovation and very high performance through enhanced incentives on key performance commitments, such as sewer flooding and pollution incidents.

We will also work closely with partner regulators, such as the Environment Agency, to make sure expenditure allowances are appropriate to cover the efficient costs of environmental requirements.

Meeting long-term water resources needs

UK government expects us to support and challenge water companies to meet long-term water resources needs in a sustainable way, including increasing water supply and reducing demand.

Our draft and final determinations will recognise the justified need set out in the final water resources management plans (WRMPs). We are challenging water companies to meet the need in a way that provides wider benefits – such as flood resilience as well as social and environmental improvements – whilst representing the best value for money over the long-term. We are also proposing to continue development funding and incentives to support progress on the delivery of strategic water resource solutions during 2025–30. At PR24, we expect:

- companies to meet the long-term ambitions identified in the National Framework, including those for leakage, per capita consumption and drought resilience.
- companies to pay regard to the key areas we expect to be incorporated through regional water resource planning and WRMPs.⁵
- company business plans to reflect their final WRMPs and address our feedback during the water resource management planning process.
- challenges identified through regional plans and WRMPs to be addressed collaboratively where this is applicable and appropriate to do so to identify efficient best value solutions.

We propose to consider whether companies have met our expectations when we assess expenditure proposals and business plans as appropriate.

We will also address water resources challenges by:

- expecting Direct Procurement for Customers (DPC) to be the default approach for large scale (£200m+) separable infrastructure.
- committing to putting in place a revised trading incentive at PR29 which will support trading from strategic water resource solutions.
- proposing to incentivise reducing water demand, through one or more performance commitments, which will reduce unsustainable abstraction.

⁵ Ofwat, '[Ofwat's expectations for strategic planning frameworks at PR24](#)': letter to Regulatory Directors, November 2021.

- considering whether local circumstances – for example the need to reduce abstraction from priority habitats such as chalk streams – requires a bespoke performance commitment to provide appropriate incentives.

Managing water demand

UK government expects us to support and challenge companies to reduce demand for water and increase our resilience to drought in a way that represents long-term value for money.

At PR24 we will set appropriately incentivised water consumption performance commitments with service level targets that are consistent with relevant industry commitments, UK government and relevant statutory targets. We expect all companies to plan to reduce leakage by 50% reduction by 2050 as a minimum.⁶ Companies' PR24 submissions should propose how they will deliver this in their long-term delivery strategies. We also propose to incentivise reductions in business consumption via the introduction of a new performance commitment and we are exploring how we can design these incentives in a way that promotes and does not distort the business retail market.⁷

We will require companies to report progress in reducing overall water demand and the components of this demand, leakage, per capita consumption (PCC) and business demand in their annual regulatory reporting. We are consulting on whether we should incentivise delivery at an individual component level or at the overall water demand level. We expect to incentivise performance improvements, and to set target service levels taking account of relevant industry commitments, UK government targets, and any relevant statutory targets.

We are collecting further information from companies to understand the level of consistency of approaches adopted to address leakage on customers' own pipes. We are also collecting information regarding company estimates of the level of leakage from customer supply pipes. We will review companies' proposed approaches to addressing leakage on customers' own pipes when we assess their draft WRMPs. We will review the extent to which a consistent approach can deliver customer benefits in our response to draft WRMP proposals.

⁶ Ofwat, '[Leakage](#)', 2022 and '[Appendix 9](#)'.

⁷ Consistent with the recommendations of an independent report that was commissioned by water companies and retailers as part of the Industry Action Plan to improve the water efficiency of businesses.

Delivering resilient drainage and wastewater service

UK government expects us to take into account the aims of the drainage and wastewater planning process, encourage the sector to collaborate during their development and implementation and deliver resilience in a way which represents best value.

At PR24, we will meet this expectation by requiring water companies to develop DWMPs, taking into account relevant legislation and regulatory guidance and feedback, including the DWMP technical framework and the DWMP guiding principles.^{8, 9} We will also expect DWMPs to:

- deliver long-term best value, consider wider costs and benefits, and short- and long-term risks.
- fully consider partnership working opportunities in the development of their DWMPs, including co-funding and co-delivery.
- consider a wide range of options that mitigate the risks identified in their DWMPs, including nature-based solutions, catchment-scale schemes and traditional grey infrastructure interventions.

We will continue to engage proactively with companies during the development stages of DWMPs by providing our consultation responses to the draft plans, and meeting with them to discuss our views on progress and delivering against the aims of their plans.

We will assess how companies have reflected our expectations and guiding principles in their final DWMPs, and how they have responded to our feedback provided throughout the planning process. We propose to take this into account, together with any differences between final plans and business plans, when we assess expenditure proposals and business plans.

⁸ Ofwat, '[Ofwat's expectations for strategic planning frameworks at PR24](#)': letter to Regulatory Directors, November 2021.

⁹ Defra, '[Guiding principles for drainage and wastewater management plans](#)', February 2022.

Greater resilience to flooding

UK government sets a priority that we challenge water companies to deliver greater flood resilience for their own infrastructure and services.

Through DWMPs, we expect water companies to assess the short, medium and long-term risks of internal and external sewer flooding and surface water flooding. For example, by understanding the vulnerability of their catchments to sewer flooding due to an extreme wet weather event. The DWMP process also provides the basis for collaborative and integrated planning with organisations that also have responsibilities relating to drainage and flooding.

We and the Environment Agency have developed a joint approach for how water companies should consider flood (and coastal) resilience in the context of their statutory roles and duties.¹⁰ To support the effective management of flood (and coastal erosion) risk, we expect water companies to collaborate and work in partnership with others within and beyond the sector, reflecting the needs of the areas in which they operate. When developing business plans, we expect companies to fully consider partnership working opportunities, including co-funding and co-delivery. Where there are material benefits to third parties, we expect companies to actively seek contributions from these parties. The size of these contributions should be in proportion to the benefits that these parties can expect to receive through the investment.

Our proposals for outcomes at PR24 also support greater flood resilience, by:

- proposing common performance commitments on internal and external sewer flooding.
- expecting companies to deliver reductions over time.
- proposing strong financial incentives to provide encouragement.

We will also monitor the risk of properties flooding in a storm as part of our wider operational resilience monitoring.

Finally, we propose to amend the definition of resilience enhancement to cover the management of increasing risks from hazards that are beyond their control, which are

¹⁰ Environment Agency and Ofwat, '[A joint approach for how water companies should consider flood and coastal resilience in the context of their statutory roles and duties](#)': letter to Regulatory Directors, June 2022.

not covered by other enhancement areas, eg fluvial flooding of company assets. We want companies to deliver wider environmental and social benefits while carrying out their statutory functions, where this is best value for customers, communities and the environment. To support this, we are proposing to consider wider environmental and social benefits more robustly and extensively in our assessment of enhancement proposals through encouraging companies to deliver best value.

Asset health

UK government expects us to promote good asset management and challenge companies to better understand the health of their assets, adopting a strategic and long-term approach.

We promote good asset management both within and outside the price review process. Outside the price review process, we have undertaken an asset management maturity assessment. This provided us and companies with a shared understanding of the range of asset management maturity in the sector, including monitoring and managing asset health and operational resilience. It also helped to identify and share examples of best practice and innovation as well as to explore ways to address any gaps and risks.

Our proposed PR24 outcomes regime includes key asset health performance commitments, such as mains repairs, unplanned outages and sewer collapses. These performance commitments capture the impact of a company's failure to mitigate risks when they have an impact on service. Financial incentives on performance commitments will encourage companies to improve service levels and asset health.

Outside of PR24 we are also developing an integrated monitoring framework to provide a more complete view of asset health and operational resilience.

Companies address most of their resilience risks through base expenditure allowances. We therefore expect companies to continue to undertake these activities. Companies have made improvements to asset health within base cost allowances in the past and we expect them to continue to do so in the future. At PR24 we are proposing to include more of a forward look in our base expenditure modelling. We already include forecast cost drivers in our base cost models so that allowances reflect future changes in scale, density and complexity of water and wastewater treatment. We are collecting additional data where treatment complexity might increase in the future so we can take this into account when setting efficient expenditure allowances. We are open to considering company evidence on additional exogenous factors or cost drivers that require a step change in efficient maintenance expenditure through the cost adjustment claim process.

We will provide resilience enhancement expenditure for companies to address increasing risks from hazards not covered elsewhere. Planning for, and delivery of, WRMPs and DWMPs and associated expenditure will also make a significant contribution to enabling companies to be resilient to climate change and population growth.

Finally, we expect company's long term delivery strategies to inform their PR24 business plans. We expect a single plan of company enhancement expenditure over the 2025–30 period and an adaptive plan in the long-term that allows companies to follow different investment pathways depending on which uncertainties come to fruition. Adaptive plans will take account of the impact of plausible alternative scenarios, including climate change and population growth.

Security, corporate and financial resilience

Security

UK government expects us to support companies in the delivery of the Security and Emergency Measures Direction (SEMD) outcomes.

We must continue to ensure our regulatory approach, including PR24, promotes the efficient delivery of companies' obligations as defined by the SEMD.

Expenditure on the delivery of the SEMD outcomes will contribute to resilience to security threats and operational incidents. We are working closely with Defra and the Drinking Water Inspectorate to ensure efficient delivery of companies' legal obligations to protect against the wide range of new security threats and meet preparedness requirements. We expect maintenance and replacement of existing security assets and systems to modern equivalent standards to be delivered from base allowances. We propose to provide additional enhancement allowances to cover new designations and step changes to a new improved level of service.

Corporate and financial resilience

UK government expects us to encourage companies to meet transparency and governance objectives.

Water companies provide an essential public service. We are expected to encourage and incentivise them to meet the objectives set out in our Board Leadership Transparency and Governance principles, to be accountable for their actions and performance delivered to customers and the environment. We will deliver on this expectation at PR24 by:

- expecting water companies to be financially resilient in the long term and to meet our expectations in respect of dividends and performance related executive pay.
- only allowing companies to take revenue from customers that is reasonable for the control period, reflecting efficient cost allowances, a reasonable allowed return and which balances recovery of costs between different generations of customers.
- encouraging companies to ensure dividend policies, dividends paid and performance related executive pay reflect performance, including performance in meeting obligations and commitments to customers and the environment.
- considering whether to lower notional gearing so that companies have an equity buffer that is sufficient to deal with uncertainties, ensure the effective operation of the incentive-based regime and to manage the effects of longer-term as well as shorter-term challenges.

We will ensure companies remain accountable for their performance in delivering against our final determination, for their financing choices and their financial resilience.

We are also proposing the following roles for companies and their Boards to:

- own and be accountable for their business plans and the business planning processes that underpins all aspects of the plan.
- provide assurance and satisfy themselves that the systems, risk management and processes used to inform this assurance are appropriate and effective.

We will also utilise our tools outside of PR24 to incentivise corporate and financial resilience. We are carrying forward work on the options to strengthen customer protections from risky financial structures. We consider proposals to strengthen the regulatory ring-fence and enhanced monitoring and reporting will better protect the interests of customers from risky financial structures. We will set out our proposals in a consultation that is separate to the PR24 draft methodology.

Serving and protecting customers

UK government sets us a **strategic priority to serve and protect customers by pushing water companies for better and fairer services for all as well as meeting the needs of vulnerable customers**. This includes expectations to:

- provide effective and timely services for all customers; and
- protect small business customers.

We set out below how we propose at PR24 to meet this priority and expectations.

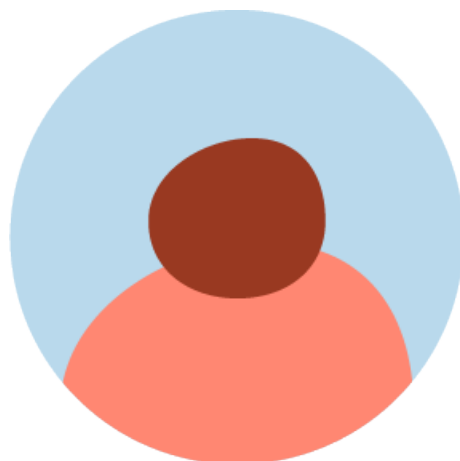
Serve and protect customers

UK government sets a priority that our price determinations should secure a fair deal for all customers now and in the future and we should challenge companies to meet the needs of vulnerable customers.

At PR24 our long-term delivery strategies require companies to consider, and engage with their customers, about how to strike a fair balance between current and future generations. We are developing a common approach to researching customers' views of the affordability and acceptability of plans. This will ensure that customers' views are comparable across companies.

We hope that higher quality, more transparent engagement will help further foster the relationships needed to make greater progress on the big challenges like responding to the nature and climate emergencies, expediting environmental improvements and responding to the pressures on people's finances. This is particularly the case where delivery of outcomes will benefit from companies working in partnership with their customers and communities to deliver ambition at pace.

We are also doing collaborative customer research, across all companies, to gain an understanding of what is important to customers and separately seeking customers' views at company and country level to directly influence outcome delivery incentives for each company.



We will also ensure that customers and other stakeholders can comment directly on companies' plans. We are proposing that each company should hold open challenge sessions at which customers, community and environmental representatives will be able to question the company about its draft and final plans. Companies will need to demonstrate that their plans are affordable, including for those struggling to pay.

We primarily use our wider toolkit beyond PR24, to challenge companies to meet the needs of vulnerable customers. We have set out standards for customer engagement that include the need to develop an understanding of the needs and views of vulnerable customers, including the transiently vulnerable.¹¹

UK government also expects us to consider the affordability of bills overall, as well as requiring companies to support residential customers who might struggle to pay their bills. We expect companies to support affordability in PR24 through:

- Delivering a step-change in efficiency.
- Innovating and working in partnerships to deliver more for customers.
- Taking a long-term focus to reduce lifetime costs and phase investments over time.
- Clearly understanding customers' views, including their expectations about increasing bills today compared to the future.
- Clearly understanding and supporting customers' diverse needs on a day-to-day basis, not just simply for a price review.
- Demonstrating their plans are affordable, including for those struggling to pay.
- Taking steps, for example bill smoothing, to manage the impact on affordability and fairness between current and future customers.

We also expect companies to submit plans that address two scenarios:

1. implementation of the Single Social Tariff; and
2. continuation and development of companies' existing offers of support to customers that struggle to pay their bills.

We will also support affordability outside of the price review, for example through consulting on charging rules, Priority Services Register data sharing, licence changes

¹¹ Ofwat, ['PR24 and beyond: Customer engagement policy – a position paper'](#), February 2022.

to support high quality customer service, and our Paying Fair Guidelines which set minimum expectations for supporting customers in debt.^{12, 13}

Effective and timely services for all

UK government expects us to push companies to provide a better and fairer water service for all, by improving customer services and complaints handling.

At PR24, we propose to:

- continue to incentivise companies to improve customer service and complaints handling using our customer measure of experience (C-MeX);
- continue to incentivise companies to improve service to developers through our developer services (D-MeX) performance commitment;
- introduce a new common performance commitment for the English water companies (BR-MeX) to improve company performance in relation to the wholesale services they provide to retailers and business customers; and
- we will back performance commitments with strong financial incentives.

Outside of the price review process we will continue to conduct work with CCW on complaints handling.

Protecting small business customers

UK government expects us to protect the interests of micro- and small business customers and to improve the value available to all customers from the business retail market.

We primarily address these priorities outside of price reviews, through our use of markets. At PR24, we are promoting greater collaboration between water companies and retailers to improve value in several ways, including through the introduction of new performance commitments on business water efficiency and BR-MeX.

¹² Ofwat, [Paying fair guidelines](#), 2022.

¹³ Ofwat, [Customer focussed licence condition](#), 2022.

Using markets to deliver for customers

UK government sets a priority that, wherever it is appropriate, we should consider promoting competition in markets.



We should focus our efforts on the:

- business retail market;
- major infrastructure provision;
- the New Appointments and Variations (NAV) market;
- ecosystem services; and
- bioresources.

We primarily address this priority outside of price reviews through our use of markets. To meet this priority at PR24, we propose to:

- incentivise wholesalers to provide a good service to business retailers and customers, through the BR-MeX performance commitment;
- incentivise companies to provide a good service to developers, through the D-MeX performance commitment;
- use Direct Procurement for Customers (DPC) by default for all large scale new (£200m+) separable infrastructure;¹⁴ and
- support the bioresources market, by setting average revenue allowances based on the amount of sludge companies produce and assessing more bioresources costs within our cost benchmarking models, which is intended to mimic price setting by markets.

¹⁴ DPC is the process we have established whereby major infrastructure is designed, built, financed, operated and / or maintained by a competitively appointed provider.

We are also proposing to streamline how we regulate developer services, by:

- removing some elements from price review regulation where evidence of a competitive market exists, eg wastewater developer services and water developer services for new developments over 25 properties;
- improving our approach where regulation remains necessary, ie where competition remains limited, such as in network reinforcement; and
- consulting on whether water services for new developments of 25 properties and fewer should be inside or outside price review regulation.

**Ofwat (The Water Services Regulation Authority)
is a non-ministerial government department.
We regulate the water sector in England and Wales.**

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