



Waterwise
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Dear Ofwat

Ofwat PR24 Draft Methodology - Waterwise Response

Many thanks for the opportunity to comment on draft methodology for PR24. We have focused our response on those aspects most closely related to Waterwise's vision that *Water is used wisely, every day, everywhere, by everyone* but have also taken the opportunity to respond on some of the broader elements in the draft methodology, where these drive or could drive water efficiency.

Ch2 – Regulating through the price review

Q2.1: Do you agree with the challenges facing the sector and the ambitions for PR24 we have identified?

- **Yes**, we do agree with the key challenges and the four ambitions set out for PR24. We are particularly pleased to see the increased focus on the longer term and on delivering environmental and social value. In the section on Statutory Duties and Strategic Policy Statements (2.2.1) we would add a reference to supporting the achievement of the Environment Act 2021 targets and the UK's carbon targets.
- **We welcome the inclusion of business water efficiency for the first time; the inclusion of net zero plans for the first time; and that demand management will be one of the proposed common performance commitments. However, we feel the draft methodology is lacking in many areas which will hinder the sector's ability to deliver against this. The primary absence here is one of mainstreaming water efficiency into the wider price review approach.**
- In the last four years we have experienced two **droughts and several extreme heat events** with records being set on an almost annual basis. Climate change is with us and it is evident that we are **woefully unprepared** for the future in terms of how we manage our water resource needs. PR24 comes at a **critical juncture for Ofwat** in terms of water resources.....the choice is between acting to ensure sufficient investment takes place to meet society's water needs or starting to bake into our future a range of almost unthinkable outcomes for people, businesses and the environment.
- **As part of meeting the challenge we urgently need Ofwat to address the inadequate funding and resourcing for water demand management.** Currently there is a huge mismatch in the funding and resourcing between water resource supply-side activities and demand management/water efficiency. Demand management has been identified in the regional water resource plans as making up about 60% of the water we need to find to ensure future resilience of supplies and the environment. Water efficiency alone is around 30%. Yet the scale of resourcing

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and investment to achieve that level of saving is minute compared to what is currently being spent on supply-side options. This is despite the fact that as well as being crucial to meet the water supply deficit water also delivers reduced customer bills (both water and energy); leads to lower carbon emissions; and leaves more water in the environment. This imbalance is neither sustainable nor defensible and will hold the sector back from delivering against the challenges and ambitions Ofwat sets out for PR24. We need:

- Ofwat to ensure that regional groups and water companies commit a **more appropriate proportion and amount of investment into water efficiency** given the above and that they really do step up water efficiency in PR24 on water efficiency and demand management. We want to see at least 20% of total water company spend in their water resources management plans spent on water efficiency given it is earmarked to deliver around 30% of the supply deficit. Currently we are spending less than £3 per customer a year on actual water efficiency delivery while we are spending more than three times as much just on investigations into a handful of potential supply side options that will deliver far less water;
- **The regulators to be properly resourced on water efficiency** and demand management rather than currently where Ofwat have less than 1 FTE and the Environment Agency have 2 FTE; and
- **RAPID's remit expanded to include demand management**, with RAPID actively pursuing national scale opportunities for very large water savings including through infrastructure solutions such as smart meter roll-out, more efficient new development and large-scale retrofit programmes.
- **Ofwat should take heed of the recommendations of the [Senior Water Demand Reduction Group](#) - commissioned by the Secretary of State - for PR24.** These include requiring companies to set a target date for a smart meter for every home and for every business that uses water in the same way as homes do (the vast majority of business customers) - smart metering receives no mention in the draft methodology; mainstreaming behavioural science and behaviour change, and the water-saving impact of campaigns and water efficiency programmes - not just social media reach.
- **No company's business plan should be awarded 'Outstanding' or 'Standard' status without sufficient and ambitious water efficiency investment and scope.** It would not be credible for a business plan to be judged as 'Outstanding' or even 'Standard' if it doesn't include for example a smart meter for every home and business; a water efficiency offer for all homes and businesses; campaigns informed by behavioural science and measured by the water savings and not just social media reach. Waterwise would be happy to help Ofwat define the water efficiency criteria for these two categories.
- **We note that the methodology appears to be drafted as if in a vacuum from wider policy and legislative commitments and challenges.** For example, water efficiency is essential to economic growth, public health, housebuilding, the cost of living crisis (including energy bills) and social and climate justice, as well as clearly needing to deliver statutory national carbon and demand targets, but none of these are mentioned.
- **We welcome the net zero measures but they do not go far enough.** The Senior Water Demand Reduction Group suggested that Ofwat require water companies to



carbon cost their entire business plans. This would drive the most carbon-friendly outcomes which include water efficiency, and would reflect the sector's key role in the climate emergency as well as climate justice and adaptation. We are disappointed to note that the draft methodology only refers to the water companies' own carbon emissions, and not those from how their 'product' is used by their customers in homes and businesses - the vast proportion of the carbon emissions from the water sector. Waterwise has long and publicly urged for both the sector and Ofwat to include these emissions in zero carbon plans and measurement.

- There is still **no commitment to an independent review of the price review** methodology's impact. The Senior Water Demand Reduction Group recommended an independent audit after each price review and at the end of each price review period, on the impact on water efficiency against statutory and wider regulatory and policy ambition. We continue to assert that Ofwat should not be marking its own homework on the impact of its price reviews, and call for an independent review against the issues it cites as important, which include demand management, customer bills, climate change and the environment.

Q2.2: Do you agree that continuing to use our three building blocks helps push companies to meet our ambitions for PR24?

- **We support the ongoing focus on Outcomes** that are important to customers, the environment and wider society.
- We support the need to ensure expenditure is efficient as this in theory provides best values to both customers and the environment - however, it is vital that this does not take a form that is at the expense of the crucial investment we need to see in demand management and infrastructure. In light of that challenge we are pleased to see recognition in the methodology that companies will need to deliver resilient services in the long term.
- We are pleased that greater certainty of funding will be provided for nature-based solutions which can offer multiple benefits.

Q2.3: Do you agree that we have struck the right balance between what's in and what's outside of the price control?

Q2.4: Do you have any comments on our approach to evaluating progress? What specific evaluation questions (based within the four key ambitions) do you think an evaluation should look to answer?

- We want to see Ofwat **publishing an annual assessment of performance** across the sector against the common performance commitments and against statutory water demand and carbon targets. This is important to help hold the sector to account.
- We agree with other stakeholders including the Senior Water Demand Reduction Group that the evaluation of any price review should be **independent** of Ofwat.

Ch3 - Design and implementation of price controls

- We are very disappointed with the focus in Section 3.3 on water resources supply side infrastructure, markets and trading, in comparison with the focus on the document on water efficiency, which is treated as niche and specific whilst the supply

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side gains far greater prominence(see comments in response to Q2.1). Around 60% of the 4 billion litres a day water resources deficit needs to come from reducing water demand. It is critical that:

- **The regulators are properly resourced on water efficiency** and demand management rather than currently where Ofwat have less than 1 FTE and the Environment Agency have 2 FTE;
 - **RAPID's remit is expanded to include demand management** and it is actively pursuing national scale opportunities for huge water savings including through infrastructure solutions such as smart meter roll-out, more efficient new development and large-scale retrofit programmes.
 - Ofwat ensures that regional groups and water companies commit **a more appropriate proportion and amount of investment into water efficiency** given the above and that they really do step up in PR24 on water efficiency and demand management. We want to see at least 20% of total water company spend in their water resources management plans spent on water efficiency given it is earmarked to deliver around 30% of the supply deficit. Currently we are spending less than £3 per customer a year on actual water efficiency delivery while we are spending more than three times as much just on investigations into a handful of potential supply side options that will deliver far less water.
- We support the removal of **developer charge income offsets** on the proviso that companies must offer water efficiency and sustainable drainage incentives to encourage more sustainable developments together with surcharges for developments that do not promote water efficiency and sustainable drainage. The United Utilities and [Thames Water water neutral development schemes](#) are excellent examples of what can be offered and we would like to see other companies adopting a similar framework. We do not necessarily agree with the requirement to avoid cross-subsidy where the incentive delivers a greater benefit for wider society than would otherwise be delivered through statutory requirements on the development. For example by going beyond water consumption levels set in building standards by including water reuse.
 - We have been following the developments with nutrient neutrality closely, along with the requirements for new development to be water demand neutral [in the Sussex North area](#). Along with other stakeholders we believe that **water demand neutrality** should be considered as a minimum where new development is proposed in areas where there are current or future water availability challenges - and would prefer **water net gain (as per the example of the biodiversity net gain requirement)**. Water neutrality is a Strategic Objective in the [new UK Water Efficiency Strategy](#). In particular, it must be progressed for development in areas where existing over-abstraction is known to be impacting protected wildlife sites or WFD status and is only being allowed to persist based on overriding public interest (IROPI).
 - There are opportunities for new **demand-side tools** to emerge in these places. For example, a water-saving credit scheme funded by developers for new development in water-stressed areas similar to that being launched by Natural England for nutrient neutrality and set out in Appendix 9 of the draft methodology.

- We are pleased to see that Ofwat plans to apply **elevated scrutiny** of the forthcoming set of WRMPs, including utilisation risk.

Ch4 - Reflecting an understanding of customers and communities

Q4.1. Do you agree with our approach to making sure that companies' price review submissions and our determinations reflect an understanding of customers', communities' and environmental concerns?

- We are pleased to see Ofwat emphasising the importance of meeting the needs of current **and** future customers. It is important that decisions with long term ramifications are not just based on short term issues and priorities.
- However, we were shocked to see no mention of behaviour change in the draft methodology. The Senior Water Demand Reduction Group recommended that the sector establish social science-led protocols and an independent framework for effective evaluation of behavioural change in terms of actual water saved - sharing this widely and replicating it across the sector; and reflect in PR24 the need for campaigns to measure actual behaviour change on water-saving impact, and for this information to be shared for sector-wide learning. Ofwat has an essential role in showing leadership and setting the right framework for this. Where is it?!
- We are pleased to see recognition in the methodology that the companies can do more to support **financially vulnerable customers** including through the **single social tariff** which we want to see implemented as soon as possible and definitely before April 2025 as suggested. It is needed now! However, there is very little in the methodology about customers with other vulnerabilities - Ofwat has an essential role in driving climate justice and social justice. For example, water scarcity will hit customers without privilege (not only financial), the most, as climate change tightens even further. Ofwat and the sector must ensure that their work is not only part of the solution here but also doesn't redesign barriers to climate justice into its planning and work.
- We support the commissioning of **collaborative research into common areas of business plans**. In previous price reviews it has been very difficult to compare research findings between water companies with wide variations in the nature and type of engagement; the questions being asked and how they have been taken into account.
- We note that Ofwat is strongly discouraging companies from undertaking customer research on **ODI rates**. As a corollary to this we would expect companies to be closely involved in scoping the collaborative research in this area and for them to be transparent about any areas where they disagree with the proposed approach or how the data has been interpreted.
- We strongly support the development of a common approach to testing customer views on **acceptability and affordability** of business plans. As highlighted above this was an area which was fairly opaque in previous price reviews.
- We note the new BrMEX - the **business customer measure of satisfaction**. We are not convinced that business customers will have the time or energy to engage with this adequately. However, if BrMEX is introduced, it must contain questions on the offer businesses receive from wholesalers and their retailers on water efficiency which was one of the key outcomes identified when the market was established. We also agree with MOSL that there are significant structural issues with the market which impact on water efficiency and need to be tackled and that these should be

prioritised.

Q4.2. Do you agree with our proposal to conduct open challenge sessions?

- The proposals are interesting but we do have concerns. Having a heavy reliance in the process on one or two **open challenge meetings** is risky. Such meetings can be notoriously difficult to run and can be dominated by special interest groups, for example on storm overflows, at the expense of discussion of other issues including water efficiency.
- It would be particularly useful if part of the standard content for the open challenge sessions of each company could be a transparent **benchmarking comparison** of the company's proposals and level of ambition with those of the other water companies on the **common ODIs**. This benchmarking of ambition is an area where Customer Challenge Groups and other stakeholders have struggled in the past. Without it it is very difficult to put a company's plans in context with the wider sector.

Q4.3. Do you have views on open challenge sessions that can align with the collaborative approach in Wales?

- We agree that open challenge sessions could helpfully **be held in Wales** as well as England. We will engage with the Wales PR24 Group on water efficiency in PR24, including through our Wales Water Efficiency Group.

Q4.4. Do you have views on how the outcome of collaborative customer research can contribute in the context of the collaborative approach in Wales?

- Ideally the **collaborative research** would be fit for purpose/use for both England and Wales and it would be able to tease out the findings for Wales from the wider research.

Ch5 – Delivering outcomes for customers

Q5.1. Do you agree with our proposed package of common performance commitments? Is water demand best incentivised through separate performance commitments on household and domestic consumption and leakage or through a performance commitment measuring total demand?

- **We support the use of common performance commitments** and generally **we support the overall package proposed**. We are pleased to see more environmental commitments included relative to PR19. In terms of regaining/maintaining public trust we believe that it is more important than ever that the performance expectations are ambitious.
- **We strongly support the proposal to include a common performance commitment on reducing water demand** for the reasons set out in [our letter to Ofwat](#) in January 2022. These reasons include ensuring that we have resilient water supplies; that we are protecting and enhancing the natural environment; that we are supporting delivery of our net zero requirements; and that we are reducing customer bills.
- In our January 2022 letter we also listed a set of **design principles** to inform the selection of the water demand PC metric. These principles included that it should cover non-household (NHH) water use and we are pleased to see this has been

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taken into account in the draft proposals. However, many of our design principles, such as public health, are not referenced in the methodology

- We recognise that there will be differing views across the sector on how the PCs for demand management are configured.
- For our own part, on balance, our preferred option, as set out in the January 2022 letter, was to have two PCs; one for consumption (HH + NHH) and one for leakage. Both would be based on MId demand reduction figures taken from the WRMPs and regional plans with rewards for outperformance and penalties for failure to meet the target. Inter-company comparison could be assessed during the AMP by comparing % of target reached.
- The reason we preferred two targets (i.e. consumption and leakage) rather than a single Distribution Input (DI) target was in large part to ensure that investment in HH and NHH water efficiency isn't crowded out by investment in leakage reduction but that both are kept in focus. For a similar reason, of the two options presented in the latest consultation **our preference would be to have three PCs (HH consumption, NHH consumption and leakage) rather than a single composite total demand (Distribution Input) commitment.**
- There is a significant risk that by combining the three elements into a single DI measure one or two key elements (for example NHH) will be sidelined with the focus of investment being on the third area - we have traditionally seen for example the rewards and penalties attached to leakage as much higher than those for water efficiency, which has skewed action towards that one element. As highlighted in the National Water Resources Framework; the Government's Strategic Direction Statement and in the development of the proposed national target **we need significant progress across all three areas to secure future water supplies and the performance commitment should reflect this.**
- The requirement to report on either the composite or the component elements is welcomed. We should also continue to track PCC type figures which can be useful for public engagement - recognising that PCC is not only in the gift of water companies but also relies on the policy and regulatory environment and wider issues such as weather and global pandemics.
- We understand the reasoning behind excluding **large NHH customers** from the PC but on balance would like to see all NHH users included as they are in the proposed Environment Act water demand target. We do not believe that all of these large NHH water users are already at optimum water use efficiency. If excluded then an alternative mechanism is needed to help achieve the proposed Environment Act demand reduction target. For example, a requirement for large NHH water users to develop and progress a publicly available water use plan as seen in other countries.
- We agree with Ofwat's suggestion in its [November consultation](#) for funding to be ring-fenced in PR24 for a **collaborative, sustained multi-channel water efficiency campaign** linked to a thorough evaluation programme and believe this should cover both HH and NHH users. It is essential that this a) includes independent experts such as Waterwise, and not only the industry's voice, and b) includes measurement of actual water savings from such a campaign, and not just social media reach. This was also a key recommendation of the Senior Water Demand Reduction Group. So why isn't it included in the draft methodology? We need to see water companies step up efforts to engage with water users to raise awareness of the need to value water;

to save water and to use it wisely. **In the final methodology and in subsequent work as well as a ring fenced budget for collaborative campaigns we would like to see the C-MeX and BR-MeX PCs refined to include a measure of HH and NHH customer awareness of the value of water.**

- On BR-MeX, as highlighted in our response to Q4, we would add that there are **fundamental structural issues** in the water retail market that need to be addressed by regulators and that until these are addressed the metric may not be as helpful as envisaged.
- **We support the proposal to include a new common operational GHG emissions PC at PR24** in line with the regulatory accounting guidelines. However, we do want again to highlight that the vast majority of water-related GHG emissions (over 80%) arise from how the product that the water companies sell is used in homes and businesses (Scope 3 emissions).
- Therefore, we agree with Ofwat that **we need to see companies move beyond the focus on operational emissions** to consider embedded emissions but we also want to see that scope extension to include the much more significant level of emissions from how their product is used. We believe this is important given the water sector's wider role and responsibility in helping its customers and society reduce emissions, especially those from use of their public water supplies. In the first instance the requirement could be for companies to estimate household usage emissions and to identify ways that they, and others, can support societal emissions reductions arising from water use. This work could be undertaken as a follow-on from the Water UK 2030 Net Zero Roadmap.
- We also support the prioritised recommendation of the Senior Water Demand Reduction Group that **companies should be required to set out the carbon impact of their entire business plan.** We want to see a PC on **smart meter roll-out** given it is a key enabler for both household and business customer engagement and for demand reduction (leakage and consumption). Recent research by Artesia and Frontier Economics (see [here](#)) has shown the positive benefit cost case for the water companies in England and Wales of a smart meter roll-out at pace. The Senior Water Demand Reduction Group recommended that government and regulators set a date by which all homes (and businesses using water for domestic purposes) would have a smart water meter fitted. Ofwat's [own guidance](#) on long term planning published in April sets out a technology reference scenario the companies should include in their planning of a full smart meter roll-out by 2035.
- We are pleased that the data tables will allow Ofwat (and stakeholders) to ascertain both the scale of proposed roll-out in PR24 and the type of meter.

Q5.2. Do you agree with our proposed guidance for bespoke performance commitments?

- **We agree with the proposal for fewer bespoke commitments and with the proposed guidance** (i.e. that they should be proposed where there are local circumstances that do not apply to most other companies or on issues where a company's performance is poor relative to others but there is no common performance commitment).

Ch6 – Setting expenditure allowances

- We found this section of the draft methodology very confusing. It is unclear to us

where crucial water saving investments such as **smart meter roll-out** would sit. Are they base expenditure or enhancement expenditure? There is a risk that they are misallocated by companies with investment rejected by Ofwat as, we believe, was the case in part in PR19 when various decisions were appealed to the CMA. It would be useful for Ofwat to set out their position on this more clearly in the final methodology including on this specific issue given the recent research on the [huge benefits of smart meters](#) to leakage reduction, water consumption savings and wider customer engagement.

Funding for water companies to maintain good asset health and resilience

Q6.4. Do you agree that resilience enhancement should be used to fund companies to manage increasing risks to specific hazards that are beyond their control and not covered by base expenditure and other enhancement areas?

- This sounds sensible however it would be **useful to see some examples** set out in the final methodology noting our point above on where investment in smart meters sits.

Delivering best value

Q6.9. Do you agree with our proposed approach to encouraging companies to deliver best value through our cost assessment?

- **We support the move to a “best value” approach** that takes into account the value of investment for customers, society and the environment. In theory it encourages companies to consider the wider benefits and costs of their proposals and so can better reflect things like health benefits, carbon emissions reductions, biodiversity enhancements, wellbeing and recreation. For example, investment in water efficiency can deliver vital water savings but it can also save customers energy, improve the environment, reduce carbon emissions and in some cases reduce flood risk.
- We have seen in recent price reviews that the process has squeezed out some of the very solutions that are necessary to deliver efficiency and best value, such as mainstreamed water efficiency, and we made this point in [our representations](#) to the CMA in PR19. What we saw in PR19 in response to the determination was companies:
 - Scaling back metering programmes which are shown to reduce water use by between 12-22% compared to customers that pay by rateable value;
 - Cutting household customer engagement programmes and the provision of water-saving devices to homes;
 - ‘Accepting’ penalty payments on per capita consumption under-performance to focus available investment funds on avoiding larger magnitude penalties linked to other commitments such as leakage;
 - Significantly reducing water efficiency efforts targeted at non household business customers who use over 20% of supplied water but for whom there is no AMP7 performance commitment on wholesalers
- We are also worried by the tone of the statement that “*we are concerned about the impact that additional benefit schemes could have on customer bills*”. Schemes that deliver additional benefits will often, but not always, be more costly than a scheme that delivers fewer benefits and so will result in higher bills. Whilst we agree that seeking customer views and testing affordability is valid in these cases the views of other stakeholders and crucially the wider beneficiaries should also be taken into

account.

Q6.10. Do you agree with our proposed approach to removing the potential disadvantage that nature-based operating expenditure solutions may face in relation to the treatment of enhancement operating expenditure?

- We are pleased to see Ofwat recognising the challenge in previous price reviews of **securing investment for nature-based solutions** despite their wider benefits for the environment and society when compared to many end-of-pipe solutions. Both the water company and the Ofwat options to address this seem reasonable and we have no strong view on which should be adopted.

Ch10 – Companies' PR24 submissions

Q10.1. Are the PR24 submission requirements clear and sufficiently specified?

- Yes. We are pleased to see Ofwat requiring **all the supporting documents** to be published on their websites. In past price reviews it has often been difficult and time consuming to find or obtain supporting documents.
- The **excel data tables and commentaries** supporting the plan should also be published as these hold useful information on the pace and scale of future investments and anticipated outcomes such as consumption and leakage levels, metering roll-outs.
- We would urge Ofwat (and Environment Agency) to **publish timely comparative information** once the draft plans have been submitted. Comparative information is very useful to national stakeholders but also to those reviewing an individual company's proposals and wanting to put them in context with ambition in the wider sector. As highlighted earlier (Q4.2) this comparative information should be a standard content element of the Open Challenge presentations.

Q10.2. Is any data missing, or included but not required or areas we need to look at again?

Q10.3. Are the limits on the number and size of documents workable? Should we be more prescriptive in terms of file and folder structures etc?

- The proposals seem workable.

Ch11 – Encouraging quality and ambitious business plans

Q11.1. Do you agree with the framework we propose to encourage the best business plans?

Q11.2. Do you agree with the proposed scope of our 'quality' assessment? Specifically, do you agree:

- we should have minimum expectations in the six areas described above?
- with the minimum expectations we specify in each of the six areas?
 - **No company's business plan should be awarded 'Outstanding' or 'Standard' status without sufficient and ambitious water efficiency investment and scope.** It would not be credible for a business plan to be classified as 'Outstanding' or 'Standard' that doesn't include for example a smart meter for every home and



business; a water efficiency offer for all homes and businesses; campaigns informed by behavioural science and measured by the water savings and not just social media reach. Waterwise would be happy to help Ofwat define the water efficiency criteria for these two categories

Q11.3. Do you agree with the proposed scope of our ambition assessment?

- **No, we also want to see long term delivery strategies assessed for ambition.** We believe this is important as we need to see how companies plan to deliver against things like the Environment Act long term targets and the various 2050 commitments on leakage and household consumption.

Q11.4. Do you agree with our proposed reputational, financial and procedural rewards and penalties, including the overall package of reward and penalty?

- We believe the reputational area could be strengthened if **more detailed comparative information** was also made available (see response to Q10.1 and Q4.2). The comparative data would set out how the company sits in relation to the wider sector, for example on leakage ambition. It should be provided at draft plan, final plan and annually during the AMP

Q11.5. Do you have any other comments regarding our proposed approach to business plan incentives at PR24?

Appendix 6 – Performance Commitments

Environmental

QA6.5. Do you agree with our proposed definition for the biodiversity performance Commitment?

- We agree with the proposed definition for the biodiversity performance commitment.

QA6.6. Do you agree with our proposal to have separate operational greenhouse gas emissions performance commitments for water and wastewater, which are based on a normalised measure?

- We agree with the proposal to have a separate operational GHG measure for water and for wastewater. However, as highlighted in our response to Q5.1 we do want the sector to start to estimate and publish the carbon emissions from how the water it supplies is used (Scope 3 emissions). These product use emissions are an order of magnitude higher than the sector's operational emissions. We believe the sector has a role to play in helping wide society reduce emissions from the use of the product it supplies.
- We also want to see water companies calculating the carbon footprint of their proposed business plan.



If you have any questions on our response please do get in touch.

Regards



Nicci Russell
Managing Director Waterwise



Who is Waterwise

[Waterwise](#) was founded in 2005 and is the leading authority on water efficiency in the UK. We are an independent, not-for-profit organisation, receiving funding from supporters across and beyond the water sector and wider sponsorship and research projects. We like to be at the front, leading and supporting innovative efforts to realise our mission; that water will be used wisely, every day, everywhere, by everyone.