

From: [REDACTED]
To: [Charging](#)
Cc: [REDACTED]
Subject: Consultation on charging innovation to support affordability
Date: 03 November 2022 18:30:49

Good Evening,

Please see below SEW's responses to the consultation on charging innovation to support affordability, as well as proposed changes to the charging rules.

Q1. Do you agree that companies should be looking at how they can introduce charging innovation to support affordability, as well as supporting environmental goals?

Yes, we believe companies should have the flexibility to introduce or offer tariffs that are designed to either 1) accommodate affordable tariffs for essential use, but 2) also have the ability to influence customer behaviour with the objective of reducing demand.

We therefore welcome Ofwat's approach and intent in this area.

Q2. Do you have any comments on our regulatory framework for protecting customers, in the context of charging innovations?

We consider the existing regulatory framework is adequate in its protection for customers and suggest no further amendment.

Q3. Do you have any comments on our proposed principles for good practice charging trials?

We agree with the proposed principles in the consultations. We would also recommend that tariff trials are considered to enable disabled consumers to participate in savings. Such customers may be on Social Tariffs with capped rates, and their circumstances should be considered, in order to promote good behaviours and incentivisation for those customer segments. This is particularly of importance to disabled consumers and their ability to access inclusive services

Q4. Do you have any comments on Ofwat's role in supporting good practice charging trials?

We agree that Ofwat could provide a useful role in facilitating how different companies are approaching and managing tariff pilots, with a view to identifying good practice. We note the Ofwat observation that pilot trials could be perceived as new ways to maximise revenue, and feel that both Ofwat and CCW are well placed to reassure customers and support the tariff objectives.

Q5. Do you have any comments on the discussion regarding our charging rules and related regulatory compliance?

We agree and support the suggested changes, with no further comment

Many thanks,

[REDACTED]
[REDACTED]

Regulation and Strategy

DDI [REDACTED]

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