

# Consultation on regulatory reporting for the 2022-23 reporting year

## South East Water response

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# 1. Introduction

This paper sets out South East Water's (SEW) response to Ofwat's Consultation on regulatory reporting for the 2022-23 reporting year.

Any queries in relation to this document should be sent to [tim.charlesworth@southeastwater.co.uk](mailto:tim.charlesworth@southeastwater.co.uk)

## 2. Answers to questions / response

**Q1: What are your views on the proposed changes to the APR tables listed in appendix A3 and set out in full in RAG 4?**

We have no significant issues to raise on the proposed changes to the APR tables listed in appendix A3.

**Q2: Is reporting the average time of low pressure feasible for the 2022-23 APR?**

We expect that reporting average time of low pressure will be feasible for 2022-23.

**Q3: What resource is required to report this information initially and on an ongoing basis?**

We do not anticipate that any extra resource will be required to report this information.

**Q4: Do you think that reporting both; the number of properties below the minimum standard of pressure and the average time of low pressure provides useful information.**

We are not aware that reporting average time of properties experiencing low pressure would provide us with any additional useful information.

**Q5: Do you have any comments on our approach to continue to align the GHG reporting requirements to the latest version of the Carbon Accounting Workbook?**

We agree it is important that GHG reporting requirements continue to be aligned to the latest version of the Carbon Accounting Workbook (CAW).

**Q6: Do you have any comments on our reporting guidance for GHG intensity ratios?**

We agree with the GHG intensity ratios proposed. As above, we encourage that the CAW is aligned to the methodology requirements to ensure a consistent performance comparison is secured.

**Q7: Do you have any comments on the proposal to expand the scope of mandatory reporting for operational GHG emissions?**

We agree that is appropriate to expand the scope of operational GHG emissions reporting for annual performance reporting. We are, however, mindful that the industry is committed to reaching net-zero by 2030 regarding operational emissions based on the existing scope.

**Q8: Do you have any comments on the introduction of our mandatory framework for the reporting of embedded emissions?**

We have no disagreement in principle, but if the mandatory framework is different to any current thoughts or processes, then it will need time, cost and effort to implement

Will Ofwat be running any workshops / seminars for companies on this?

**Q9: Do you have any comments on distinguishing between construction and maintenance activities for the reporting of capital project emissions?**

We acknowledge that there will be difficulties on distinguishing between construction and maintenance activities for the reporting of capital project emissions. For example, where we have an upgrade to an existing water treatment works, this would fall into both categories.

**Q10: What are the key challenges that need to be considered and addressed in introducing a rating system designed to facilitate increased standardisation and continual improvement in the reporting of embedded emissions?**

We agree in principle with a rating system designed to improve embedded emissions reporting. We believe that it is important that a rating system does not distract from the overarching principle of carbon reduction.

**Q11: Are there any particular frameworks or approaches our traffic light system should consider in determining differing levels of progress and what expected progress should look like?**

We have no particular frameworks to suggest.

**Q12: Do you have any comments on requesting a SWOT analysis that covers both operational and embedded emissions?**

We already currently prepare a SWOT analysis for our operational emissions, and therefore it makes sense to provide a parallel version for embedded emissions.

**Q13: Do you have any comments on our proposed changes to disclosures in the Statement on dividend policy and explanation of dividends paid set out in RAG 3?**

We have no comments to add on the proposed changes.

**Q14: Do you have any comments on our proposed changes to disclosures in the Statement on executive pay and performance set out in RAG 3?**

We have no comments to add on the proposed changes.

## Contact Us

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