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From: [REDACTED]
Sent: 03 March 2023 18:13
To: Ofwat Annual Reporting
Cc: [REDACTED]
Subject: SSC RAG consultation response

Follow Up Flag: Follow up
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Good afternoon,

Our feedback on the RAG consultation due today. For the consultation questions where we have not provided any response, this means we have no comments.

Questions 2, 3 and 4 on low pressure:

We are content with the number of low pressure properties (previously known as DG2) being included in the APR, as we provide it to WaterUK for Discover Water anyway. We continue to follow the original DG2 definition for this, so please include this definition in the RAG document.

However we are unclear on the definition that is being proposed for the average time of low pressure. If what is meant is the average time on the DG2 register, to align with the count of properties, then this is achievable. We would need to confirm how this is normalised though (eg average time per total customers?). However if what is meant is the average time that any customer experiences low pressure, or following a low pressure contact, then this would require a great deal of extra information including sensor data within the network and linking this through to customer contact data. This is a considerable exercise and could not be achieved robustly in the short term. The majority of low pressure contacts relate to network events such as a burst main, and so are very short term and there is crossover with supply interruptions PC reporting in this respect, which includes any interruption of 3 hours or more.

Questions 5 to 12 on carbon emissions:

We remain concerned on the ongoing development of the carbon accounting workbook and how it will be used for APR and PR24 ongoing reporting. For chemicals, there is currently no common standard being used across all of our suppliers and so this makes robust, consistent reporting for chemicals difficult. We are working on this, alongside the CAW working group for capture in the CAW, but it will not be fully in place for the 2022/23 APR. We think the objective here should be to reach a consistent approach by CAW18, in time for baselining emissions in year 2024/25 and tracking over AMP8.

For embedded emissions, we would support continuing a voluntary approach, due to the lack of availability of robust and transparent data. However we can support including embedded emissions in the mandatory SWOT analysis, which will help highlight the issues present.

On GHG intensity ratios – we believe that table 11A as it stands contains the information needed to calculate this, by drawing on DI and also APH reporting from other tables. This can therefore be an automatic calculation in table 11A. We think it is important to normalise for both volume and APH, as APH is a significant exogenous driver of power use and omitting it will create skewed intensity ratios when benchmarked across the sector.

Regards
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