

# Customer Protection Code of Practice – A call for inputs

## United Utilities response – June 2023

Thank you for providing an opportunity to comment on potential changes to the Customer Protection Code of Practice (CPCoP). We recognise the importance of the CPCoP, particularly for smaller customers who are less likely to switch, providing an important additional tool to ensure the NHH market meets the needs of customers.

Whilst the CPCoP relates to the interactions between customer and NHH retailer there are relevant points that can be made considering the wholesale perspective. We have responded to questions that include a focus on the steps taken between retailer and customer that can help wholesalers provide a better service to both. These experiences focus on both the day to day operation and dealing with incidents. Learning from events such as the 'Beast from the East' and the 2022 Freeze-thaw highlights the importance on effective communications, and this is the focus of our response.

### **Response to specific questions**

#### ***4. What views do you have on extending additional protections to particular vulnerable customers, and what extra protections do you think it would be appropriate to consider adding to the CPCoP for these customers?***

We support the proposal to reinforce the importance that retailers meet their obligation to inform wholesalers if they are aware of significant potential vulnerabilities of customers to supply interruptions. In addition we would support changes to the CPCoP to encourage retailers to further engage with their customers in relation to the level of consequence and vulnerability to a supply interruption. In order to best support customers in the run up to, during or after an incident it is as important for wholesalers to be provided with accurate up to date emergency contact details as it is to ensure that wholesalers know of particular customers vulnerabilities. We would welcome it if the CPCoP set an obligation on retailers to collect and pass on emergency contact information.

#### ***5. What views do you have on whether the CPCoP should include protections for customers with critical infrastructure?***

Due to the nature of information security around critical national infrastructure, it is currently challenging for a wholesaler to be fully aware of the impact that a water supply interruption would have on other, dependent, infrastructure. Wholesalers are not provided with a list of critical national infrastructure, which is dependent on water to ensure delivery of the critical function. We have practical experience of such issues and anecdotal information which demonstrates that other sectors as broad as emergency services to telecommunications have a dependency on water supply that is not fully understood e.g. Emergency Service Control rooms and their fall-back locations, or water cooled data centres or telephone exchanges.

It would be beneficial for the CPCoP to reiterate and strengthen obligations for retailers to establish with their customers details of critical functions and the level of built-in resilience for the site in question (e.g. do they have their own onsite storage or alternative supply arrangements?) It is important for such information to be shared with the relevant wholesaler to enable risk awareness in their area of operations, and also allow for proportionate responses to ensure minimal disruption to the critical function. Proportionate responses could be to simply be aware of the location of the site/asset of concern so we can factor that into our incident response strategy, or a bespoke arrangement (similar to the Tier 1 response plans) if we deemed this to be appropriate. This information should include current emergency

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contact information so that wholesalers can contact customers and arrange, for example, bottled water deliveries during water supply interruptions.

### ***6. What views do you have on how the CPCoP could be strengthened to deal with emergency events?***

Following the 2018 Beast from the East freeze thaw event we undertook a data quality review to help better identify customers who would be particularly sensitive to a supply interruption. This included collection of emergency contact details for all sensitive non-household customers so they could be contacted directly with relevant information and advice during an event.

We have continued to build on this work but there remain gaps in the information.

Support ahead of events to better collate information, not only contact details, but also detail of how vulnerable a customer is can provide significant benefit to customers during an event. This collection of data needs to be a day to day activity so that when events occur the necessary information is already in place.

The CPCoP should reiterate the obligation, where retailers are required to identify vulnerable customers, so that they collect information to inform wholesalers. Information relating to the detail of vulnerability would help wholesalers build a more complete picture that would support improved response to events. In addition, where possible, retailers should provide up to date emergency contact information for all customers.