

**From:** [REDACTED]  
**To:** [CPCOPcodechange](#)  
**Cc:** [Ofwat Correspondence](#)  
**Subject:** Thames Water response to Customer Protection Code of Practice - A Call for Inputs  
**Date:** 27 June 2023 08:42:25  
**Attachments:** [Outlook-cid\\_image0.png](#)

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Good morning

Please find below Thames Water's comments in relation to questions 4,5 and 6 of this CFI. This response is being sent on behalf of Thames Water's Head of Market Development, [REDACTED]. Should you have any further queries relating to this response, please feel free to contact [REDACTED] directly at [REDACTED].

*Thames Water welcomes the opportunity to respond to Ofwat's Customer Protection Code of Practice – A Call for Inputs. No part of our response is confidential, and we are happy for it to be published in full.*

*We have limited our response to questions 4, 5 and 6 which we have addressed together.*

*The formation of the Non-household (NHH) retail market established that retailers are the primary contact point for business, public sector and charitable customers. This has led to unintended consequences with wholesalers no longer sighted on the operational/emergency needs nor the operational/emergency contact details for NHH customers. This may pose a significant risk for NHH customers, including sensitive customers (such as prisons and hospitals) and those with critical national infrastructure. With this in mind we do think there is merit in requiring retailers to strengthen their responsibilities for these scenarios, which could be outlined in the Customer Protection Code of Practice.*

*As a wholesaler that supplies several category 1 sensitive customers and customers with critical infrastructure, we understand the importance of clear communication with these customers during planned, unplanned events or emergency incidents. To ensure that we can support retailers and the NHH customer effectively during these events, we need to understand the requirements of these customers, which the retailer is well placed to provide. This would include providing wholesalers with contact details which can be used in planned, unplanned and emergency events. Therefore, by including a requirement in the CPoP for retailers to ensure their customer needs and requirements are documented and proactively shared with the wholesaler, this should provide customers with a better response and service during these events.*

*To provide these services effectively during planned, unplanned and emergency events, and to ensure there is minimal impact to the customer, wholesalers need access to up to date contact details for the customer. Importantly, these need to be operational/site-based contacts rather than the contact details for central billing functions. Considering the Code Change Committee recently recommending CPW137- Interim Supply Customer Data Provisions for approval by Ofwat, this provision of data in the format proposed in the code change could also be used as an initial step for retailers to provide customer information to wholesalers for unplanned events. An RWG good practice guide has been published on this topic which also includes standardised customer contact data requirements and is a useful reference. To ensure common standards and enable adequate data control in an efficient way these contact details would best be held within market systems (rather than bilaterally). This would provide the framework to build on any change made to the CPCoP.*

*I hope the comments made above are useful. Should you wish to discuss any aspect of our response in more detail, please do not hesitate to get in touch with me.*

Kind regards



   
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