

CPCoP CFI Response
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By email: CPCOPcodechange@ofwat.gov

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Dear Ofwat,

RE: Customer Protection Code of Practice – A Call for Inputs

Thank you for the opportunity to review and respond to your call for inputs on how the Customer Protection Code of Practice (CPCoP) could be improved or strengthened.

The CPCoP sets out the minimum standards that Ofwat expects all non-household Retailers to comply with in their dealings with their non-household (NHH) customers. As an incumbent wholesaler working with Retailers in the business retail market, we feel we are not best placed to provide detailed comments across the range of questions and topics related to the CPCoP in Ofwat's call for inputs.

We only provide our views in relation to the levels of protection targeted in the CPCoP in the planning for unplanned emergency events.

Q6. What views do you have on how the CPCoP could be strengthened to deal with emergency events?

We agree that dealing with customers in a fair, transparent, and honest way is critical in ensuring customers have a positive experience of, and effectively engage with, the Business Retail Market. That overarching outlook is also valid for the preparations and planning that can be put in place to help mitigate the impacts

on customers from events one did not intend to happen, be that due to wholesaler asset failures or extreme weather events impacting normal services and stretching otherwise resilient wholesaler systems. We accept that the primary responsibilities in such unplanned events lies with Wholesalers, who are not subject to the requirements of the CPCoP. However, we believe the CPCoP can be strengthened to reinforce the expectations that Retailers will maintain customer contact information, and make such information available to Wholesalers, for use when contacting these customers in emergency and unplanned events, which may be outside typical business working hours (where necessary).

We would have liked to see this customer emergency contact information being shared via the central market systems, as proposed in the Wholesale Retail Code and Market Arrangements Code Change Proposals, Ref CPW110/CPM041. However, the expectation Ofwat subsequently set when it rejected the change proposal was that Retailers should follow the RWG Emergency Contact Details Good Practice Guide.

We would like to see the CPCoP be used to reinforce this requirement by referring specifically for the need for Retailers to secure and maintain their compliance with the good practice guide. Retailers could be encouraged to collect contact details for their customers organically, through usual customer management activity or as a specific activity. They should also ensure that details are stored and maintained in line with data protection regularly and normal data management practices within their organisations. To avoid data becoming outdated, Retailers should maintain regular communication with their customers and advise Wholesalers when contact information requires updating.

Should you have any further questions or require more information please let me know.

Yours faithfully,



Regulatory Strategy Manager, Yorkshire Water