

## **Storm overflows consultation response- Detelectronic (22/05/23)**

**Q1: Do you agree with our proposals to set a performance commitment based on average spills, with financial consequences for companies that do not meet their targets?**

No the performance commitment should be based on total number of spills, not based on an average. Using an average of total CSOs weakens the spirit of the performance criteria.

**Q2: Do you agree with our proposed approach to unmonitored storm overflows?**

No all-storm overflows should be monitored. The TOTEX cost of these monitors is very low.

**Q3: Do you agree with our proposed approach to mid-period changes?**

Agree.

**Q4: Do you agree with our proposed approach to emergency overflows?**

Agree all emergency overflows should be monitored.

**Q5: Do you have any further comments on this performance commitment?**

### **Introduction of Quarterly performance recording**

Reporting should be done quarterly as per a company's financial reporting structure. i.e. a set of quarterly management accounts provides a company with data to see how it is performing, therefore allowing for it to improve over the year. Reporting annually is too late, and often too far after the event. Treat this same as the mid-period changes.