



Independent Networks
Association

Customer Licence Condition Consultation response
Ofwat
Centre City Tower
7 Hill Street Birmingham
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Email to: customerfocus@ofwat.gov.uk

7 July 2023

To the Customer Focus team,

I am writing to you on behalf of the Independent Networks Association (INA), in response to Ofwat's May 2023 consultation 'Putting water customers first – a consultation on introducing a customer-focused condition into the licences of all water companies in England and Wales'. I can confirm that this response is not confidential.

The INA represents the UK's Independent Network Operators which play a vital role in heating and energising homes and businesses, as well as providing water and wastewater services. Our members have delivered significant improvements in competition, choice and service for customers in the utility market and, together, own and operate utility infrastructure and networks that provide energy, heat, power, water and wastewater to over 4 million households and thousands of businesses right across the UK.

The INA's NAV members see customer service as fundamental to their businesses and at the heart of the competitive offering they provide. As such, they fully support the move to a principles-based customer licence condition that encourages companies to innovate and improve. The INA and the NAVs themselves have been active in the workshops and discussions in the evolution of these proposals and broadly welcome the approach that Ofwat has set out. Some specific comments on one of the questions are below:

Question 6. Which matters / company activities will benefit from having more detailed guidance, and which less?

We welcome the proposal for specific and proportionate NAV guidance, recognising their scale and varied geographical locations. We would welcome the opportunity to discuss this further with the team.

In order to enable NAVs to fully meet the proposals around customers being well informed, putting things right when they go wrong and meeting the full diversity of customers' needs, they are reliant on good communications from the upstream incumbents. This is because



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the services NAVs provide to their customers rely on the bulk supplies of water from incumbents. They are affected by faults and outages on the upstream network and any drought measures the incumbents put in place. It is imperative that incumbent networks provide timely communications to NAV licence holders. This will enable NAVs to communicate effectively with their own customers, understand restoration times and provide the help and support to their vulnerable customers envisaged by the licence condition. Guidance should have communications protocols within them. These could be developed with the industry and potentially measured.

Yours faithfully,

Nicola Pitts

Executive Director

Independent Networks Association