



Customer Licence Condition Consultation response  
Ofwat  
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To the Customer Focus team,

### **Customer Licence Condition Consultation**

I am writing to you 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'.

Having considered the questions detailed in the consultation, we have shared our views below. I can confirm that this response is not confidential.

- 1. Do you have any comments on the outcomes or examples?**  
No, we agree that the outcomes detailed seem appropriate aligned to a customer centric culture.
- 2. Do you have any suggested changes to the proposed wording of the principles to meet our specified outcomes for households?**  
No, we are comfortable with the wording drafted.
- 3. Do you agree with our proposed approach to exclude non-households from the condition relating to customers struggling to pay or in debt, consistent with corresponding non households served by a retailer?**  
Yes, this seems like a sensible approach.
- 4. Do you agree with our proposed approach that the remainder of the licence condition apply to non-household customers without a retailer?**  
Yes, this seems like a sensible approach.
- 5. Should any areas of customer service be prioritised in our development of the guidance? If so, which areas?**  
Currently published guidance appears to be sufficient and aligns to the proposed licence condition. We welcome the drafting of the NAV guidance detailing proportionality and would welcome the inclusion of NAVs in the drafting.
- 6. Which matters / company activities will benefit from having more detailed guidance, and which less?**  
Current guidance appears to be sufficient at this time.
- 7. Do you agree with our proposal to include reference to CCW as a consultee within guidance?**  
Yes, we support this proposal.
- 8. How can we gather further insight on company performance in this area?**



Aside from the industry insight already sought by Ofwat and through CCW, alternative options to gain insight may be best placed through occasional and topic specific / appropriate RFI's which is a method that is commonly used in other regulated industries.

**9. What are your views on annual reporting requirements to monitor compliance against the licence condition?**

We support the need to self-monitor compliance and to provide information during the APR in support of this; we would expect any reporting requirements to be measurable and therefore tangible in regard to the service delivered for customers.

**10. What are your views on our proposed timescales for implementation?**

The proposed implementation of the licence condition during Qtr 3 2023-24 is achievable and seems reasonable, therefore we would expect that any changes to the annual reporting requirements would then take effect from the APR submission due in July 2025 once the licence condition has been in effect for a full year.

**11. What are your views on consequent changes to other conditions in licences and are there any other changes we should make?**

We have no concerns with the proposal to remove SLC J.

I hope that this response is helpful. If you have any questions or would like to discuss these in more detail, please feel free to get in touch.

Yours sincerely

Vicky Bell  
**Head of Regulation and Compliance**