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To: [Jonathan Eddleston](#)
Cc: Regcorrespondence@southernwater.co.uk; [Hopkins, James](#)
Subject: Ofwat consultation on New Appointments assessment process
Date: 20 June 2023 14:51:58
Attachments: [image001.gif](#)

Dear Jon,

Thanks for inviting us to respond to the consultation on New Appointments assessment process for sites in Wales.

In recent years we have invested heavily in enhanced processes, up to date, easy to use systems and changing the way we organise our people to better support NAV customers. We've seen the NAV market flourish in our region, with over 44% of connections now made by NAVs.

Whilst we will always be supportive of the NAV market, we do have concerns on some of the disbenefits customers, and the environment, encounter as part of this rapidly expanding market. Therefore we would welcome a review of the English assessment process too.

We are supportive of the Policy Statement and Application Guidance, and believe that something similar in England would be beneficial. From experience, we see the appointment of a NAV to benefit the developer at the expense of the end customer, this is because the developer benefits from cost incentives on initial install of assets and onward adoption, however the customer is still left with no choice on supplier (not real competition from a customer perspective), furthermore only 9% of agreements we have in place are for both supply and discharge services, therefore customers are left to engage and pay multiple companies. We know through our own research this causes confusion and poor experience as customers have two companies to interact with, where previously they only had one. Additionally, if there is an issue with the customers water or waste services, the customer may contact the wrong company which leads to a poor customer experience and frustration.

From an environmental perspective we see little to no action being taken to educate customers on the benefits of using water efficiently. Our engagement with NAVs has confirmed that whilst their websites have some information on water saving, they have no water efficiency programmes, nor are they in the process of rolling any out. We are considering working with NAVs on our Target 100 programme, to ensure that all customers are benefitting from the initiatives we are rolling out as part of our programme.

I hope the above helps give some insight, however please reach out if you'd like to discuss further.

Thanks, Ashley

Ashley Marshman
Head of Operational Customer Service

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