

29 June 2023



Ofwat
City Centre tower
7 Hill Street
Birmingham
B5 4UA

Registered Office:
Portsmouth Water Ltd
PO Box 8
Havant
Hampshire PO9 1LG

Tel: 023 9249 9888

Web: www.portsmouthwater.co.uk

Please ask for Paul Treagust
Our Ref PT/230629
Your Ref

Dear Ofwat,

Response to consultation on changes to New Appointments and Variations policy and assessment guidance

Thank you for the opportunity to respond to your consultation. Please find below our response to the three questions outlined in the consultation document.

1. What are your views on the proposed update to our Policy Statement and Application Guidance that would apply to applications for sites in Wales?

We would welcome the update on your Policy Statement and Application Guidance on NAV applications for sites in Wales. We provide further reasoning in Q3.

2. What are your views on how, with respect to this policy proposal, we can best achieve our aim that regulatory burdens are kept to a minimum while ensuring companies deliver the best outcomes for customers?

We support the principle of keeping regulatory burden to a minimum but believe there is a certain level of regulatory activity that needs to be maintained to ensure the best outcomes for customers are achieved. These activities should include:

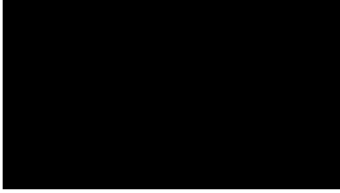
- publishing full reasoning behind decisions on applications so it is transparent what outcomes customers are benefiting from.
- following up with the NAV / incumbent to ensure that benefits identified in the application are being fulfilled.

3. What are your views on introducing a similar requirement for sites in England at some point in the future?

We would support the introduction of a similar requirement in England. To ensure a level-playing field, achieving the best outcomes for customers and to have a mechanism to measure benefits to customers, we would like to see NAV's included in C-MeX, D-MeX and the new BR-MeX. We

would also like to see NAV's included in the smart metering proposals for non-household customers being brought in for incumbents in AMP8.

Yours faithfully,



PAUL TREAGUST
Network Engineer