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Customer Focus Team  
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Dear All,

**Ofwat Consultation – Draft Vulnerability guidance for water companies supporting customers who need extra help – ESPW response.**

Thank you for the opportunity to respond to your consultation. I can confirm that this response is not confidential. As you know, ESP Water Limited (ESPW) is a new NAV having been appointed in July 2022 for our first development. We are growing quickly and have been appointed to 28 NAV sites across England and our portfolio of future projects is similarly growing rapidly.

ESPW are very supportive of the introduction of this guidance in conjunction with the new customer licence condition.

**1. Do you agree that we should retain the vulnerability definition we set out in our 2016 Vulnerability Focus report?**

Yes we think this definition is a good one as it captures all those that may need “extra help.” Also, by keeping it, there is consistent messaging.

**2. Do you agree with our approach to nomenclature, particularly our use of the term 'extra help'?**

This is extremely broad but is in line with movement by the energy sector and we are supportive.

**3. Do you agree with our proposed approach to applying the guidance to new appointees and the Welsh non-household sector?**

Yes we agree.

**4. What impact do you think our draft guidance will have on the experiences of customers who need extra help?**

ESP strive to ensure that all our customers receive an excellent level of customer service and are treated fairly and consistently. However, we do understand that some people will need extra help that we may not necessarily understand until we ask them.

**5. Are there further lessons from other regulated sectors that could be incorporated into our draft guidance?**

The energy sector is already using the phrase “extra help” and they are committed to maintaining a PSR like the water industry, so Ofwat’s proposals align.

However, one area that is missing from water guidance is a standard around communication protocols between incumbent water companies and NAVs where a fault or issue on the upstream network causes issues for the NAV network and its customers. Good communications and restoration information are essential for the NAV to support its own customers and particularly vulnerable customers. Ofwat guidance in this regard would be helpful.

**6. Do you agree with our proposed approach to enforcing our customer-focused licence condition by reference to our draft guidance?**

Yes. It makes sense to refer to guidance in the customer focused licence condition.

**7. Do you agree that our draft objectives cover the broad areas of vulnerability support activities that companies should be considering?**

Yes we think this is a good summary.

**8. Do you agree with the proposed list of minimum expectations we have set out?**

We agree. The minimum expectations are reasonable and align to current best practice however, they should consider that each companies’ approach may be different depending on their size and geography, i.e., one approach by an incumbent may not be appropriate for a NAV.

**9. Do our draft minimum expectations offer a good balance between making clear the minimum standards we expect from companies, and challenging companies to innovate and find new ways to meet the needs of their customers?**

Yes. We would however ask that any assessment of company performance in this area should consider the differences between NAVs and other water companies.

**10. Do you agree with the proposed approach and timeline around companies' vulnerability strategies?**

Yes, but as suggested in question 8, these will be proportionate to the size of the company.

**11. Do you agree with our proposed approach and timelines for setting out our detailed expectations around the design of priority services registers in a separate standard document?**

No. For completeness and ease of reference, we feel the vulnerability guidelines and PSR expectations should ideally be in the same guidance.

Please do not hesitate to contact me on [catherine.fearon@espug.com](mailto:catherine.fearon@espug.com) should you wish to discuss our response or have any further questions.

Yours sincerely,

Catherine Fearon  
Head of Regulatory Compliance (Water)