



Independent Networks
Association

Customer Focus Team
Ofwat

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Ofwat consultation on draft vulnerability guidance for water companies

I am writing to you on behalf of the Independent Networks Association (INA), in response to your consultation. 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. While the competitive market for last-mile networks in water and wastewater, is relatively less mature than in energy, experience to date has demonstrated the significant potential for further development of the NAV sector to deliver more substantial and wide-ranging benefits to both developer and end customers.

The INA and its NAV members generally support the approach set out by Ofwat for vulnerable customers and this also aligns with the approach used by Ofgem for energy customers. Specific responses are below.

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

We agree with the definition as it captures all those that may need “extra help”. By keeping it, there is also a consistent message.

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

This is very broad but is in line with the energy sector and we are generally supportive.



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

We agree.

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 What impact do you think our draft guidance will have on the experiences of customers who need extra help?

Assuming existing compliance, this should not change the consumer experience.

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 Are there further lessons from other regulated sectors that could be incorporated into our draft guidance?

The energy sector is aligned to the approach proposed for the water industry.

The INA is keen to ensure that NAVs, independent energy networks and energy suppliers will also be supported by Ofwat and Ofgem in seeking agreement from the Information Commissioner to share data on their PSR databases. We understand from Ofwat (and Ofgem) officials that this is stage 2 of the work that allowed electricity distribution and water incumbents to share data. It would be helpful to progress this work as a priority.

One area that is missing from water 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 can help the NAV 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, it 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.



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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

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

Yes

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 believe it would be preferable to have the vulnerability guidelines and PSR expectations in the same guidance document

Nicola Pitts
Executive Director of the INA