



Customer Focus Team
Ofwat
Centre City Tower
7 Hill Street
Birmingham, B5 4UA

Email: customerfocus@ofwat.gov.uk

18 October 2023

To the Customer Focus team,

Ofwat consultation on draft vulnerability guidance for water companies

I am writing to you in response to Ofwat's recent consultation 'Ofwat's draft vulnerability guidance for water companies supporting customers who need extra help'.

Having considered content of the consultation and the questions provided, we have shared our views below. I can confirm that this response is not confidential.

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

Yes, the definition is clear and support the identification of customers who may need extra help.

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

Yes, this is aligned to the energy industry and we support this approach.

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

Yes.

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 What impact do you think our draft guidance will have on the experiences of customers who need extra help?

Assuming there is already compliance with current vulnerability guidance, we would not expect this will deliver any significant changes for customers.

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 Are there further lessons from other regulated sectors that could be incorporated into our draft guidance?

No, although support is sought to ensure communications between incumbents and NAVs during upstream network incidents is improved to ensure we can communicate key information such as estimated restoration times to our customers and specifically vulnerable customers in a timely manner.

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 Do you agree with our proposed approach to enforcing our customer-focused licence condition by reference to our draft guidance?

Yes, we agree this is a sensible approach. We look forward to further information relating to any required reporting and are keen to understand when this will be made available.

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

Yes.

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

The minimum expectations seem reasonable and aligns to current best practise.



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 standards document?

No, for completeness and ease of reference the vulnerability guidelines and PSR expectations should be located within the same form of guidance.

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