

12 October 2023

Ofwat
Centre City Tower
7 Hill Street
Birmingham
B5 4UA

By email: PR24@ofwat.gov.uk


Dear colleagues,

Consultation under sections 12A and 13 of the Water Industry Act 1991 on proposed modifications to Condition B

We welcome the opportunity to respond to Ofwat's consultation on the modifications to Licence Condition B necessary to reflect the PR24 methodology on developer services. We support the approach that Ofwat are taking to developer services at PR24. We agree that the proposed modification is necessary to allow the approach to come into effect.

We have one comment to make. The consultation specifies that the excluded charges (both water and wastewater) for developer services will apply from 1 April 2025 to 31 March 2030. Given the nature of the market it would appear unlikely that the market would revert to being within the scope of revenue controls after 31 March 2030. If this was the case, this would be part of a PR29 consultation. Therefore, we do not think there is a need to specify an end date, as otherwise even if there was no changes in methodology proposed in the future, there would still need to be a further consultation.

Yours sincerely



Director of Strategy and Regulation