



The voice for water consumers  
Llais defnyddwyr dŵr

# **CCW response to the Ofwat Consultation on Customer Protection Code of Practice Tranche 1 Changes**

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## 1. Introduction

CCW (the Consumer Council for Water) is the independent voice for water consumers in England and Wales. Since 2005, we have helped thousands of business and household consumers resolve complaints against their retailers or water companies, while providing free advice and support. All of our work is informed by extensive research, which we use to champion the interests of consumers and influence retailers, water companies, governments and regulators.

We welcome the opportunity to submit our views on this consultation regarding proposals to update the Customer Protection Code of Practice (CPCoP) Tranche 1 changes.

## 2. Key points

We are supportive of Ofwat's decision to undertake a holistic review of the protections afforded to business customers by the CPCoP. We referenced the need for change in our report on 'Business Customers' Experience of the Water Retail Market – Five Year Review'<sup>1</sup>.

We agree with the majority of the proposals in the Tranche 1 consultation, as we believe they will bring greater clarity for trading parties and customers.

However, we are concerned that Ofwat has rejected our proposal to improve the change process for the CPCoP by adding a defined period for the process from a request for change and Ofwat evaluating and making a decision on the change.

Therefore, we reiterate that we want greater transparency introduced into the change process for the CPCoP. This needs to include clear timelines for the end-to-end process. We accept there may be circumstances in which a change proposal is complex and requires additional information to be gathered in order to progress. However, we believe this should be by exception and not a reason to refrain from setting a defined period by which Ofwat will evaluate, consult and make a decision on a change proposal.

The lack of any timetable setting out how Ofwat is required to evaluate the proposal effectively allows a change request to be delayed indefinitely. This could delay an important change that could substantially improve services for business customers. We expect a change request to take no longer than six months to be considered, consulted on and a decision made.

We urge Ofwat to reconsider this ahead of the tranche 2 consultation.

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<sup>1</sup> [CCW Business Customers Experiences of the Water Retail Market – Five Year Review 2023](#)

