

September 2023

Sector overview: Draft determinations of in-period outcome delivery incentives for 2022-23

Ofwat

About this document

This document provides an overview of our draft determinations on the extent to which the price controls included in our [PR19 final determinations](#)¹ need to be adjusted to reflect the sector's performance for the 2022–23 charging year. These adjustments are made under Part 3A (Performance Measure Adjustments) of Condition B of companies' licences and are referred to in this document as 'in-period' outcome delivery incentives (ODI) determinations. The specific changes, and our reasons for these, are set out in this document and the individual draft determinations documents for each company.

We have published company specific draft determinations documents and associated models related to our draft determinations on our [website](#).

Background

At the 2019 price review (PR19), companies made commitments to their customers and stakeholders about the service levels they would meet to make progress towards stated outcomes (performance commitments). Companies' performance commitments form a key part of the service package that they are expected to deliver. The performance commitments for the 2020–25 period are set out in each company's PR19 Outcomes performance commitment appendix.²

Each performance commitment (PC) has an outcome delivery incentive (ODI) that provides either financial or reputational consequences for companies of outperforming or underperforming their performance commitments. Many of the financial ODIs are paid during the 2020–25 price control-period. The reason for this is to bring payments closer in time to when customers experience a given level of performance. The remaining incentives are paid at the end of the period.

ODIs act as an incentive for companies to deliver their committed levels of performance, returning funding to customers for foregone benefits if they deliver less than is expected. Companies that go beyond and deliver greater benefits than expected to customers and the environment can receive outperformance payments to incentivise them to keep up this outperformance.

¹ or set by the Competition and Markets Authority (CMA), and as adjusted by any subsequent interim determination of K (IDoK).

² We take account of performance commitments as set out in the PR19 definitions adjusted, if relevant, by the annex 2 process. Annex 2 of each company's performance commitment appendix provides for changes and corrections to be made to its performance commitment definitions during the 2020–25 period in certain circumstances. An overview of changes and corrections made to companies' performance commitment appendices can be found at [PR19 Outcomes performance commitments: changes and corrections](#).

The companies reported performance against their PCs in their annual performance reports (APRs) in July 2023. In making our draft determinations, we have considered this information in detail and, where necessary, further information received from companies in response to our queries. In our draft determinations we set out relevant adjustments to each company's price controls, for one or more future years, in accordance with Part 3A of Condition B of each company's licence.

We will make our final determinations by 15 November 2023. These will affect customers' bills from the 2024-25 charging year.

As set out in the PR19 final determinations, if a company's outperformance is more than 3% of its wastewater or water regulatory equity for that year, it will receive only 50% of outperformance payments above this threshold, to protect customers against excessive bills. This applies to all ODI payments except to the customer measure of experience (C-MeX), developer measure of experience (D-MeX) and those allocated to retail price controls, as the sharing mechanism does not apply to the retail controls.

In our [Sector overview Final determinations of in-period outcome delivery incentives for 2020-21](#) we deferred our determination of the value of companies' ODI payments for usage of water per person (known as Per Capita Consumption) for the 2020-21 to 2023-24 charging years to the end of the 2020-25 period. We set out this decision and the reasons for it in this [decision document](#).

Executive summary

This section sets out the draft determinations of 2022-23 in-period ODI payments for the regional incumbent water and wastewater companies in England and Wales which were subject to the PR19 price review.

Table 1.1 summarises the adjustments we propose for each company in the draft determinations, having assessed companies' performance against their 2022-23 PCs. For each company, this includes the net impact of total ODI payments, the payments for the customer measure of experience (C-MeX) and developer services measure of experience (D-MeX) performance commitments, as well as any deferrals, abatements or bespoke adjustments. We set out the financial impacts of our draft determinations for all companies in section 2 of this document.

Table 1.1: Total draft determinations adjustments to price controls (£m, 2017–18 FYA CPIH prices)

Company	Total draft determination adjustments to price controls to be applied to customer bills in 2024–25 (£m, 2017–18 FYA CPIH prices)
Affinity Water	-8.088
Anglian Water	-22.357
Dŵr Cymru	-24.080
Hafren Dyfrdwy	-0.513
Northumbrian Water	-0.113
Portsmouth Water	0.302
SES Water	-1.123
Severn Trent Water	88.083
South East Water	-5.230
South Staffs Water	0.869
South West Water (South West area)	-9.244 ³
South West Water (Bristol area)	-2.577 ³
Southern Water	-42.903
Thames Water	-100.719
United Utilities	25.229
Wessex Water	7.960
Yorkshire Water	-19.825
Industry total	-114.330

Our draft determinations include a number of changes to the payments companies reported in their own annual performance reports. These changes are set out and explained in each company's draft determination on our [website](#). We refer to these changes as 'interventions'.

³ Although South West Water and Bristol Water areas operate under one licence, performance and payments related to performance commitments are reported separately for the 2020–25 control period. See [Draft determination of South West Water's in-period outcome delivery incentives for 2022–23](#).

Contents

1.	Key interventions and policy decisions	5
1.1	Leakage and per capita consumption (PCC)	5
1.2	High quality data and assurance	7
1.3	Sewer flooding	7
1.4	Pollution incidents	8
1.5	C-MeX and D-MeX	9
2.	Impact of 2022-23 in-period ODI assessment on companies' price controls	9
2.1	Our draft determinations	9
2.2	Our modelling approach	12
2.3	Deferrals and abatements	12
2.4	Inflation	12
2.5	Taxation	13
2.6	Bespoke adjustments	13
3.	Responding to this consultation	14

1. Key interventions and policy decisions

1.1 Leakage and per capita consumption (PCC)

In our [Sector overview Final determinations of in-period outcome delivery incentives for 2020-21](#) we said we expected all companies to be reporting full compliance with the common leakage and PCC methodologies in their 2021-22 APR and that we were disappointed that some companies had not yet adopted fully compliant approaches. We also said that should any company's leakage information be revised or restated, we expected companies to clearly identify any reasons for the restatement and quantify the impact of any changes to data and/or assumptions on reported leakage and on the leakage baseline if applicable.

We are disappointed that two years later some companies are still not fully compliant. Most companies that are not fully compliant were able to demonstrate that non-compliance does not have a material impact on their reported performance. For five companies, we consider the non-compliance to be material, which means we consider that it could have a significant impact on their reported leakage performance.

In their 2022-23 APRs, five companies have restated 2020-21 and 2021-22 leakage and PCC performance data and/ or their leakage and PCC baseline data. 'Baseline' is the term we use for the historical level against which performance is measured. The companies said the restatements result from improving compliance with the common methodology and/or improving the accuracy of the reported data.

We set out below our draft decision where companies are materially non-compliant with the common leakage and PCC methodologies and / or have restated their leakage and PCC data in their 2022-23 APR.

- For Affinity Water we are deferring our decision on the reported leakage outperformance payment of £0.439m for 2022-23 and intervening to remove the bespoke adjustment of £0.128m the company made to restate its 2020-21 and 2021-22 leakage data. This is because the company remains materially non-compliant with the common methodology. This will return £0.567m to customers.
- For Hafren Dyfrdwy we are intervening to increase the company's reported leakage underperformance payment for 2022-23 by £0.071m and to include a bespoke adjustment of £0.081m in respect of 2020-21 and 2021-22 performance. This ensures that the company's performance is based on its own unmeasured consumption data. This will return £0.152m to customers.
- For SES Water we are deferring our decision on the company's reported leakage outperformance payment, in line with the company's request. This is because the

company remains materially non-compliant with the common methodology. This will return £0.208m to customers.

- For South West Water (Bristol area), Southern Water and Thames Water, which are materially non-compliant with our methodology, we include the reported underperformance payments of £0.681m, £2.332m and £8.908m respectively.
- For Dwr Cymru, we are accepting the company's bespoke adjustment to restate its 2020–21 and 2021–22 leakage and PCC data, as the company states it is now compliant with the common methodology. This returns £5.456m to customers.
- For South Staffs Water (South Staffs region), we are deferring our decision on the company's leakage PC until we have a clearer understanding of the dataset and methodologies for all components of its water balance. We are accepting the company's voluntary abatement of its reported outperformance payment. This returns £0.216m to customers.
- For Severn Trent Water, we are not making a bespoke adjustment with respect to the company's restated leakage and PCC performance for 2020–21 and 2021–22. The company has not requested that we make this adjustment, which would have the effect of increasing customer bills.

Should any leakage information be revised or restated in future, our subsequent determinations will take account of the company's relevant performance and the adjustments we have made to the relevant price control in relation to the leakage performance commitment.

Details of our draft decisions for these (and other) companies' leakage PCs are set out in the company specific documents on our website.

PCC performance will be determined at the end of the 2020–25 period⁴. We will set out any appropriate adjustments to PCC ODI payments during the 2024 price review (PR24). Those adjustments may take into account in-period adjustments made earlier in the period, including those relating to leakage ODI payments, particularly where the company has revised or restated performance or new information becomes available. We also expect

⁴In our [Sector overview Final determinations of in-period outcome delivery incentives for 2020–21](#) we deferred our determination of the value of companies' Per Capita Consumption (PCC) ODI payments for the 2020–21 to 2023–24 charging years to the end of the 2020–25 period. We set out this decision and the reasons for it in [Consultation on PCC ODI timing and determination – Our decision](#) which we published after having considered stakeholder responses to our July 2021 consultation.

companies to improve their ability to explain and provide a quantification of the external impacts on PCC, in particular any changes to working patterns as a result of the Covid-19 pandemic and its ongoing impact on water consumption by both household and non-household consumers.

1.2 High quality data and assurance

In our [Sector overview Final determinations of in-period outcome delivery incentives for 2021-22](#), we said that the data, information and evidence companies provide to support their reported performance should be of good quality and subject to a rigorous, high-quality assurance process. We said this is critical to provide confidence to us, customers and other stakeholders that the information reported is accurate and reliable. We reinforced this message and our expectations for data and assurance in companies' 2022-23 APR submissions in [IN 23/03 Expectations for monopoly company annual performance reporting 2022-23](#).

We are concerned that, in 2022-23, some companies are still not following the PC reporting guidance or definitions. In particular, some companies are still only providing the following reporting and assurance requirements in response to queries from us and not within their APR submission:

- specific third-party assurance required for bespoke PCs; and
- Regulatory Accounting Guideline (RAG) checklists for common PCs (or a statement that the company is fully compliant where this was the case).

Whilst there has been an improvement in the quality of information and evidence provided by some companies to support their reported performance for 2022-23, some companies are still not providing a level of detail and supporting information, proportionate to the size of their ODI payment, in their APR commentaries to explain the drivers of performance and associated ODI payments.

We require all companies to be transparent with their stakeholders in providing all the specified data and assurance when they are supposed to. Where we have concerns with the quality of the data, evidence or assurance underpinning reported performance or payments, we may choose to intervene to protect customers.

1.3 Sewer flooding

Our review of companies' APR submissions identified that some companies had reported performance that appeared to be inconsistent across interrelated wastewater PCs.

Through our query process, these companies provided us with further information to support their performance on these PCs. However, companies were not able to provide convincing explanations and quantify how their interventions in the sewerage network impacted their performance on these PCs.

We reiterate what we said in [IN 23/03 Expectations for monopoly company annual performance reporting 2022-23](#), that in order to ensure transparency for customers and other stakeholders, companies should provide a proportionate level of detail and supporting information in their commentaries to explain drivers of performance and associated ODI payments. This is particularly important where there are material outperformance payments or underperformance payments and where there is performance that is inconsistent across interrelated PCs.

We require all companies to be open and transparent with stakeholders in explaining how their interventions in the sewerage network have impacted the performance of relevant PCs. Where we have concerns about this, we may choose to intervene to protect customers.

1.4 Pollution incidents

This PC is reported as the total number of pollution incidents (categories 1 to 3) per 10,000km of sewer length for which the company is responsible in a calendar year. The metric is based on the data that the companies confirm with the Environment Agency and Natural Resources Wales, the environmental regulators. That data is reviewed by the environmental regulators in accordance with their respective annual Environmental Performance Assessment (EPA) methodologies.

We will work closely with the environmental regulators as they continue to keep under review how to best use emerging and existing environmental data more effectively to drive measurable improvements in water quality in England and Wales. Work is also underway to better align the efforts of the regulatory bodies and optimise the way information is shared and used to hold water companies to account.

In Wales, work to install Event Duration Monitors (EDMs) was completed in March 2020. In England, all storm overflows will be monitored by EDMs by the end of 2023. While EDMs are being rolled out in England, companies have been retrospectively estimating the number of incidents. Once EDM rollout is completed, the Environment Agency expects to carry out a review to check the accuracy of historical company reporting based upon those retrospective estimates. In the meantime, the Environment Agency has not included in the total number of incidents reported any identified this way unless the Environment Agency has seen other evidence that it would have been possible for the company to report a pollution incident so-estimated at the time it occurred. The Environment Agency has taken this approach to ensure that the reporting methodology does not change during the current price review period and that all companies report using the same methodology.

If in the future additional pollution incidents are identified that should have been reported, we may adjust performance payments accordingly.

1.5 C-MeX and D-MeX

C-MeX (the customer measure of experience) is designed to incentivise water companies to provide an excellent customer experience for residential customers, across both retail and wholesale activities that can impact on the service they receive. D-MeX (the developer services measure of experience) is designed to incentivise water companies to provide an excellent customer experience to developer services customers, including small and large property developers, self-lay providers and those with new appointments and variations (NAVs).

The ODI payments for both C-MeX and D-MeX for each company are set out in table 2.1 and in each company-specific in-period ODI draft determination document. We have taken the data from the APR submissions and compared this against the recorded data from our survey agent, Accent. The C-MeX and D-MeX scores for 2022–23 can be found on the [Customer and Developer Services experience](#) pages of the Ofwat website and in the published C-MeX and D-MeX models.

2. Impact of 2022–23 in-period ODI assessment on companies' price controls

2.1 Our draft determinations

In this section we outline the financial impacts of our draft determinations.

Unless otherwise stated all values are £m in 2017–18 financial year average (FYA) Consumer Prices Index including owner occupiers' housing costs (CPIH) prices.

Table 2.1: Draft determinations on adjustment to 2024–25 price controls as a result of performance against ODIs

This table sets out our draft determinations on the ODI payments to be applied to price controls in the 2024–25 charging year after accounting for:

- the in-period ODI payments for each company based on their performance in 2022–23;
- our draft determinations on these payments after any interventions;
- brought forward deferrals;
- our draft determinations on 2022–23 deferrals and abatements;

- bespoke adjustments, including prior year restatements, where relevant; and
- our draft determination on C-MeX and D-MeX payments.

For further details on the interventions, deferrals, abatements and bespoke adjustments, see the company specific draft determinations.

These draft determinations on the ODI payments to be applied for each company are also set out in the in-period adjustments model published on our website for each company.

Sector overview - draft determinations of in-period outcome delivery incentives for 2022-23

Company	Company's reported ODI payments (£m)	Ofwat DD ODI payments (£m)	ODI payments deferred from 2021-22 (£m)	Ofwat DD deferrals (£m)	Ofwat DD abatements (£m)	Bespoke adjustments (£m)	C-MeX payments (£m)	D-MeX payments (£m)	Total ODI payments to be applied to customer bills in 2024-25 (£m)
Affinity Water	-6.387	-6.826	0.000	0.000	0.000	0.000	-1.060	-0.202	-8.088
Anglian Water	-22.090	-22.100	0.000	0.000	0.000	0.005	-0.262	0.000	-22.357
Dŵr Cymru	-19.378	-19.378	0.000	0.000	0.000	-5.766	2.191	-1.127	-24.080
Hafren Dyfrdwy	-0.356	-0.506	0.000	0.000	0.000	-0.085	0.032	0.046	-0.513
Northumbrian Water	-3.920	-3.934	0.000	0.000	0.000	0.000	3.368	0.452	-0.113
Portsmouth Water	-0.370	-0.370	0.343	0.000	0.000	0.000	0.243	0.085	0.302
SES Water	-0.672	-0.880	0.000	0.000	0.000	0.000	-0.138	-0.105	-1.123
Severn Trent Water	24.315	23.700	31.594	0.000	0.000	30.120	0.000	2.669	88.083
South East Water	-3.544	-3.544	0.000	0.000	0.000	0.000	-0.937	-0.748	-5.230
South Staffs Water	0.157	0.157	0.000	0.000	-0.216	0.756	0.127	0.044	0.869
South West Water (South West area)	-8.170	-8.239	0.000	0.000	0.000	0.000	-0.697	-0.308	-9.244
South West Water (Bristol area)	-2.929	-2.929	0.000	0.000	0.000	0.000	0.214	0.139	-2.577
Southern Water	-37.429	-37.429	0.000	0.000	0.000	0.000	-3.657	-1.817	-42.903
Thames Water	-82.278	-82.278	0.000	0.000	0.000	0.000	-13.121	-5.320	-100.719
United Utilities	22.214	22.214	0.000	0.000	0.000	-0.055	3.024	0.046	25.229
Wessex Water	-1.128	-1.128	7.242	0.000	0.000	0.000	1.610	0.237	7.960
Yorkshire Water	-16.463	-16.463	0.000	0.000	0.000	0.005	-0.510	-2.857	-19.825
Industry total	-158.429	-159.934	39.179	0.000	-0.216	24.982	-9.573	-8.768	-114.330

2.2 Our modelling approach

We set out how we would apply in-period ODI payments in our PR19 final determinations and the [PR19 reconciliation rulebook](#). In the rulebook we set out where we would make decisions on specific inputs to our published models during the in-period determinations process.

In this section we set out our proposed approach. In each of the 17 ODI performance models we have included a worksheet called 'Ofwat_IPD23_actions' to record changes we have made to the models. These range from data cleansing type modelling changes with no financial impact to interventions or corrections which can affect ODI payments. For details on these changes, please refer to the company specific models published on our website.

2.3 Deferrals and abatements

As set out in the PR19 reconciliation rulebook, companies can ask us to defer outperformance or underperformance payments, or to abate outperformance payments on individual performance commitments. A deferral results in us delaying when the adjustment will be made to a company's revenue. When deferring payments to the following year, we apply a time value of money adjustment, as set out in the PR19 reconciliation rulebook.

In our in-period ODIs final determinations for 2021-22, we agreed to requests from Severn Trent Water, Wessex Water and Portsmouth Water to defer outperformance payments of £30.698m, £7.035m and £0.333m respectively. After adjusting for the time value of money, the value of these deferrals increased to £31.593m, £7.242m and £0.343m respectively. All three companies have applied the deferred outperformance payments to customers' bills for 2024-25. This means there is no deferral to carry forward to future years.

2.4 Inflation

In the PR19 final determinations all ODI rates were specified in 2017-18 financial year average (FYA) prices. This means that ODI payments for in-period ODIs need to be translated into the relevant price base for this year's in-period determinations.

For this year's in-period determinations, the relevant price base is the consumer prices index including owner occupiers' housing costs (CPIH) in November 2023. As set out in the reconciliation rulebook, we use published inflation data, companies' submissions and the latest HMT publicly available short-term inflation forecasts to estimate this index.

We estimate this to be 4.3% and have applied this in the published in-period adjustments models for each company. This is based on the approach we used for the PR19 final determinations in December 2019. We will revise this estimate in our final in-period determinations informed by latest forecasts and stakeholders' responses.

2.5 Taxation

We adjust the size of companies' net ODI payments to reflect the marginal rate of tax to ensure companies receive the level of ODI payments as envisaged in the PR19 final determinations and to maintain an appropriate strength of incentives.

We said companies should set out their expected marginal tax rate for the following charging year in their requests for an in-period determination with appropriate evidence. We said we would take this into account, as well as upcoming changes to tax policies and any other relevant factors, when making our determinations.

For our draft determinations we maintain a uniform marginal tax rate of 19% for most companies in 2022–23. From 2023–24 onwards we apply a marginal tax rate of 25% for most companies in line with the UK government's decision to increase corporation tax from April 2023. There are two exceptions to this. For Dŵr Cymru and Southern Water, we have included 0% marginal tax rate, consistent with the allowances made at PR19. Both companies set out a case to demonstrate that they do not expect to incur tax during the 2020–25 period.⁵ We provide more details on these decisions in the company specific draft determinations documents.

2.6 Bespoke adjustments

In some instances, we may need to make bespoke adjustments to account for matters that have arisen after our PR19 determinations and after publication of the reconciliation rulebook in December 2020. For example, in July 2021 our [green recovery funding](#) decisions included additional in-period funding for two companies (Severn Trent Water and South Staffs Water).

Table 2.2: Breakdown of bespoke adjustments

Company	Prior year restatements (£m) ¹	Time value of money adjustment on prior year total (£m) ¹	Green recovery (£m)	Total bespoke adjustments to be applied to customer bills in 2024–25 (£m)
Affinity Water	0.000	0.000	0.000	0.000
Anglian Water	0.005	0.000	0.000	0.005
Dŵr Cymru	-5.540	-0.226	0.000	-5.766
Hafren Dyfrdwy	-0.082	-0.003	0.000	-0.085

⁵ In the [PR19 reconciliation rulebook](#) (p58), we said "companies should set out their expected marginal tax rate for the following charging year in their requests for an in-period determination, including whether they expect to pay corporation tax and any capital allowances, with appropriate evidence. We will take this information into account when making our determination."

Company	Prior year restatements (£m) ¹	Time value of money adjustment on prior year total (£m) ¹	Green recovery (£m)	Total bespoke adjustments to be applied to customer bills in 2024-25 (£m)
Northumbrian Water	0.000	0.000	0.000	0.000
Portsmouth Water	0.000	0.000	0.000	0.000
SES Water	0.000	0.000	0.000	0.000
Severn Trent Water	-0.008	0.000	30.129	30.120
South East Water	0.000	0.000	0.000	0.000
South Staffs Water	0.000	0.000	0.756	0.756
South West Water (South West area)	0.000	0.000	0.000	0.000
South West Water (Bristol area)	0.000	0.000	0.000	0.000
Southern Water	0.000	0.000	0.000	0.000
Thames Water	0.000	0.000	0.000	0.000
United Utilities	-0.053	-0.002	0.000	-0.055
Wessex Water	0.000	0.000	0.000	0.000
Yorkshire Water	0.005	0.000	0.000	0.005
Industry total	-5.673	-0.230	30.885	24.982

¹In addition to adjustments for the Green recovery programme, the table also shows appropriate bespoke adjustments relating to instances this year where companies have restated their previous performance to be in line with the reporting requirements of the PC. Where such adjustments are required, a time value of money adjustment is also applied to ensure the revenue adjustments are Net Present Value (NPV) neutral.

3. Responding to this consultation

We would welcome any comments on this document. Please email them to in-periodODIs@ofwat.gov.uk or post them to:

IPD2023 Consultation response
Ofwat
Centre City Tower
7 Hill Street
Birmingham B5 4UA

Or IPD2023 Consultation response Ofwat, 11 Westferry Circus, Canary Wharf, London, E14 4HD.

The closing date for this consultation is **18 October 2023**. If you wish to discuss any aspect of this consultation, please contact the In-period ODI team by post or by email at in-periodODIs@ofwat.gov.uk.

We intend to publish responses to this consultation on our website at www.ofwat.gov.uk. Subject to the following, by providing a response to this draft determination you are deemed to consent to its publication.

If you think that any of the information in your response should not be disclosed (for example, because you consider it to be commercially sensitive), an automatic or generalised confidentiality disclaimer will not, of itself, be regarded as sufficient. You should identify specific information and explain in each case why it should not be disclosed and provide a redacted version of your response, which we will consider when deciding what information to publish. At a minimum, we would expect to publish the name of all organisations that provide a written response, even where there are legitimate reasons why the contents of those written responses remain confidential.

In relation to personal data, you have the right to object to our publication of the personal information that you disclose to us in submitting your response (for example, your name or contact details). If you do not want us to publish specific personal information that would enable you to be identified, our [privacy policy](#) explains the basis on which you can object to its processing and provides further information on how we process personal data.

In addition to our ability to disclose information pursuant to the Water Industry Act 1991, information provided in response to this overview document, including personal data, may be published or disclosed in accordance with legislation on access to information – primarily the Freedom of Information Act 2000 (FoIA), the Environmental Information Regulations 2004 (EIR) and applicable data protection laws.

Please be aware that, under the FoIA and the EIR, there are statutory Codes of Practice which deal, among other things, with obligations of confidence. If we receive a request for disclosure of information which you have asked us not to disclose, we will take full account of your explanation, but we cannot give an assurance that we can maintain confidentiality in all circumstances.

We will publish our final determinations by **15 November 2023**, after considering representations from all stakeholders.

**Ofwat (The Water Services Regulation Authority)
is a non-ministerial government department.
We regulate the water sector in England and Wales.**

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