

By email: customerfocus@ofwat.gov.uk

22nd November 2023

Dear Sir/Madam

A consultation on replacing Condition G in company licences with a new customer focused licence condition under sections 12A and 13 of the WIA91.

- **Delete current Condition G and replace it with a new customer focused licence condition, the wording of which is set out in Annex 1**
- **Delete Condition J**

Thank you for the opportunity to respond to the above consultation. As outlined in our response to the first consultation, we welcome the introduction of a customer focused licence condition and the protections and benefits this will provide for customers.


Customers are at the heart of our business with over 90,000 customers holding a share and having a say in the direction and management of our business through our unique Watershare+ scheme. Through this and the PR24 process we have listened to more customers and stakeholders than ever before in the creation of our recently submitted business plan to 2030 and which we are already working towards to deliver improvements and benefits to our customers.

Through our Plan we are confident that our priorities are the right priorities, they align to those of our customers, and they apply the underlying principles set out in the customer focused licence condition. Our plan supports customer affordability and puts delivering for customers at its centre, tackling the challenges of our region head on; investing to protect water quality and resilience, tackling storm overflows at our beaches, eradicating pollutions and protecting the environment from climate change, whilst supporting customers to ensure we continue to ensure no one lives in water poverty and improving customer service and experience.

Whilst we are supportive of the introduction of a customer focused licence condition, we identify one item specific to South West Water regarding the proposed wording for the licence condition G4 in relation to the Isles of Scilly. We would request that Licence Condition G4 on the Isles of Scilly is amended because, as drafted, this would apply the entirety of G3 to NHH customers on the Isles of Scilly. Licence Condition G4 needs to be amended so that only G3.1 – G3.5 apply to NHH customers on the Isles of Scilly, consistent with all other NHH customers in England and Wales who are not served by a retailer. As drafted this runs counter to Ofwat's decision that G3.6 (debt support) should not apply to NHH customers who are not served by a retailer.

Should you require any further information please do not hesitate to get in touch.

Kind regards



Chief Customer and Digital Officer
Pennon Group

on behalf of South West Water, Bristol Water and Bournemouth Water