



ESP Water Limited
Bluebird House
Mole Business Park
Leatherhead
KT22 7BA
Generalenquiries@eswater.co.uk
Tel: 0330 123 4201

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Customer-Focus Team
Ofwat
Centre City Tower
7 Hill Street
Birmingham
B5 4UA
customerfocus@ofwat.gov.uk

Dear All,

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers – ESPW response.

Thank you for the opportunity to respond to your consultation. I can confirm that this response is not confidential. ESP Water Limited (ESPW) is a new NAV having been appointed in July 2022 for our first development. We are growing quickly and have already been appointed to 32 NAV sites across England.

We have been very supportive of the introduction of customer-focused principles in a licence condition and see the development of this guidance as the next natural step. We have included your questions from the consultation in **bold** and our response inline below:

- 1. Should this guidance set an expectation for a single Code of Practice (or other form), or should companies determine how and where to display this information?**

We are very supportive of a single Code of Practice for water customers. As a NAV, we must ensure our consumers are “no worse off” and navigating all the different schemes is often difficult for us and can be confusing for our consumers. By having one format we can assure that we maintain high standards of service, which supports the full diversity of customer needs across the water sector in each region we operate in. Also, customers moving to our developments will already be familiar in how to find the information they need on their new water company.

- 2. Do you agree with our proposed changes as summarised in Table 1?**

Yes we agree with the first proposed new expectation and think adding information on bills as to how customers can access core customer information makes sense. With regards to the second expectation around identifying staff during an incident when using social media, the IT systems, which make this possible may be proportionally expensive for a NAV to adopt initially, however this could be incorporated in any new system as technology develops. We also agree with the further new expectations as listed in Table 1.



3. Do you agree with the proposed scope for the Core Customer Information? In your view, is anything missing or should be excluded?

Yes we agree with this scope, but we would suggest that “What customers should do in an emergency” information also includes advice and support available. “What services the company provides” is particularly important for a NAV, who we believe should include an area of operation as well as details on whether they supply water and wastewater. Support from incumbents with their information will also support customers in their region and more collaboration in this area would be helpful.

4. Do you agree with the proposed approach for companies reviewing their Core Customer Information?

Yes we agree with this approach to keep our core customer information accurate, up to date and review it at least every 3 years. We would propose that making it clear that a new version has been published on our website would be sufficient in meeting this requirement unless the information was substantially different and targeted communications are necessary.

5. Do you agree on the proposed areas on which companies should consult CCW? Are there any other areas on which CCW should be consulted in relation to Core Customer Information and the customer focused licence condition?

We agree with the proposal to consult CCW, although we would suggest that it may be prudent for CCW to set up a separate NAV team as more NAVs enter the market, to ensure we can meet these requirements and requests to CCW to review our information are done in a timely and effective manner.

Please do not hesitate to contact me on [contact email removed] should you wish to discuss our response or have any further questions.

Yours sincerely,