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25 January 2024

Dear Ofwat,

Re: Consultation on Core Customer Information – Ofwat’s draft guidance on core information companies should clearly provide to their customers

I am writing to you on behalf of Independent Water Networks Limited (“IWNL”), part of the BUUK Infrastructure Group of companies, in response to your consultation, ‘Core Customer Information – Ofwat’s draft guidance on core information companies should clearly provide to their customers’, published on 21 November 2023.

We are grateful for the opportunity to add our opinions on this matter; our responses to your questions can be found in the Appendix below. We agree with you that Ofwat should not prescribe how, where, and when to communicate the Core Customer Information; in our opinion, this would not allow companies the freedom to produce what their customers tell us they want to see. By allowing us the room to innovate, we can produce solutions which can only be to the benefit of the wider water industry. This will help customers and companies alike.

In addition, we are confident that companies themselves would know best how and where to display the Core Customer Information. We would, of course, work with our customers and relevant stakeholders, such as the CCW, to understand what would work best for them. This would include questions on the language used and where on our websites the information should be stored. By interacting with our customers, we can focus our efforts in the right areas, rather than simply fulfilling a prescriptive process.

I hope that this letter is helpful. If you have any questions on any of the issues I have raised or would like to discuss these in more detail, please feel free to contact me.

Kind regards,

Keith Hutton
Group Regulation Director

Appendix

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 of the opinion that companies themselves would know best i.e. determine how and where to display information. Nevertheless, we expect that in reality we would end up doing both. This would entail retaining a single 'Code of Practice', in the form of either a document or webpage, in an easily identifiable format/place for our customers and others to find. While we may not call it a 'Code of Practice' anymore, we will ensure that it contains the relevant information. In addition to this, we would work with our customers and charities to understand the best way to communicate the information in a way that suits customer needs. This would ensure that the information is communicated in whatever medium, or language, the customer requires. This would give us the ability and freedom to meet our customer demographics more easily.

We appreciate that without a framework in place, this does leave companies open to comparison, right across the industry. We would stress that companies should therefore prioritise innovation within their workstreams, so as to keep each other providing the best service possible for all customers.

2) Do you agree with our proposal not to prescribe how, where and when to communicate the Core Customer Information?

Yes, we agree with your proposal to not determine how Core Customer Information will be communicated. Companies such as ourselves would work with all stakeholders to work out best way to achieve this, sharing innovation and best practice with peers.

3) Do you agree with our proposed changes as summarised in Table 1 (see below Table 1: key changes we propose to make to Condition G: Core Customer Information when we move it into guidance)?

Yes

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

Yes

5) Do you agree with the proposed approach for companies reviewing their Core Customer Information?

Yes

6) Do you agree on the proposed areas on which companies should consult CCW?

Yes, we consult with CCW on a number of topics already.

7) Are there any other areas on which CCW should be consulted in relation to Core Customer Information and the customer focused licence condition?

At this moment in time, we are satisfied that the obvious areas have already been covered in your consultation.