

## **NORTHUMBRIAN WATER RESPONSE TO CORE CUSTOMER INFORMATION – OFWAT’S DRAFT GUIDANCE ON CORE INFORMATION COMPANIES SHOULD CLEARLY PROVIDE TO THEIR CUSTOMERS.**

Thank you for the opportunity to respond to your consultation on Core Customer Information. Below we respond to each of the questions.

### **Reviewing and amending the content of Condition G: Core Customer Information**

**Question 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? / Question 1: Do you agree with our proposal not to prescribe, how, where and when to communicate the Core Customer Information?**

We would support the guidance being presented as a single Code of Practice (or other form).

We are committed to providing an unrivalled customer experience to our customers, and ensuring we provide comprehensive and easy-to-access information that is easy to understand, is important to us.

It would be beneficial if Ofwat could prescribe the minimum level they expect companies to do, and then for companies to individually decide if they want to innovate and/or do anything else over and above that minimum.

**Question 2: Do you agree with our proposed changes as summarised in Table 1?**

We mostly agree with the changes proposed as summarised in Table 1.

Ofwat have stated a new expectation in relation to details about companies’ complaints handling procedures and what they expect companies to set out. We have followed the guidance that CCW outlined. Please could Ofwat clarify if they expect all information to be provided as soon as a complaint is received, or if companies should continue to follow CCW’s best practice guidance – the latter being our preferred approach.

### **Proposed Core Customer Information guidance**

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

We mostly agree with the proposed scope for the Core Customer Information.

We think that Ofwat should consider whether to ask companies to include information around financial support, given the importance customers place on price and value for money, appreciating that companies do provide this information in their vulnerability support offerings.

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

We agree in principle with the proposal that companies should, as a minimum, review their Core Customer Information as a whole and, where necessary, revise it at least once every three years. However, we believe that it may be worth considering whether a quick review should take place annual, with a formal full review taking place at least once every five years. This would tie in with material changes that companies may make to processes and/or approaches in line with the business planning and asset management periods.

We agree, wholeheartedly, with continuous improvement and learning from ourselves and others.

We request that Ofwat provide clarity on:

- What the trigger(s) for reviewing Core Customer Information “whenever requested to do so by Ofwat” could be.
- What Ofwat would determine to be a significant change to the Core Customer Information.
- The timescales that Ofwat would expect customers to be “notified directly of the changes”.

We are seeking clarity because there will be costs associated with changing Core Customer Information. We would propose taking a pragmatic approach to updating Core Customer Information generally – for example, changing websites as soon as practicably possible but only contacting customers directly through the annual billing process.

It is not only water companies, themselves, who can initiate changes to Core Customer Information, and we ask that Ofwat be mindful of that when setting and publishing final guidance. For example, if CCW were to change a process or address, companies would need to update their Core Customer Information.

**Question 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?**

In principle, we agree with the specific areas where Ofwat expect companies to actively consult CCW. We would welcome additional clarity on Ofwat’s and CCW’s expectations on the timeliness of such consultation.

In most instances, we accept that consultation can be carried out in advance of changes being made. However, in some circumstances this may not be practical or feasible. For example, there is an expectation to actively consult with CCW regarding the “Creation of and subsequent significant changes to customer facing information on what help customers should expect when incidents occur”. It is possible that this could change very quickly dependent upon the nature of any incident. In such instances, consultation may have to be retrospective.

We thank you again for providing the opportunity for us to respond to this consultation. We would be happy to discuss any aspects of our response with you.

*Claire Sharp*  
*Customer Director*

*29 January 2024*