

Responses to CCWater Draft Forward Work Programme 2014-15 to 2016-17

We received 17 responses from the Welsh Government, Ofwat, Consumer Futures and 14 water and sewerage companies (Anglian, Bristol, Cholderton [verbal], Dee Valley, Northumbrian, Sembcorp Bournemouth, Severn Trent, South East, Southern, South Staffordshire, South West, Thames, United Utilities and Wessex)

Key themes

- Overall support for the draft Forward Work Programme (FWP);
- Specific support for the review of the PR14 process;
- The FWP should make reference to our work relating to the alternative dispute resolution system;
- The position on social tariffs could be made clearer;
- CCWater should play a more prominent role in influencing the Government to share information with water companies to assist with targeting households for Social Tariffs;
- There should be more collaborative research with companies and visibility of CCWater's research programme;
- CCWater's target of 80% satisfaction with service should be made more challenging;
- CCWater should play a greater role in ensuring SIM data is reported consistently across all companies;
- Future reporting on business plan outcomes should also be consistent with CCWater's information requirements project;
- The FWP should place a greater emphasis on CCWaters' role in collecting and disseminating best practice;
- Detail should be included in the FWP about how CCWater's role will change as the Water Bill is enacted; and
- Excess profits is not considered an appropriate term to use in the document.

Key changes made

General

- The text has been amended to outline that where appropriate we will work collaboratively on research;
- Although not due to a consultation response, we have also added in reference to our work to press companies to be clearer and more transparent on their website about their tax arrangements and company structures.
- At the request of the Welsh Government, reference to their position relating to competition has been removed.

Key strands of our work for water consumers

- The FWP Key Issues section has been amended to include the sentence: "In line with responsibilities given to us in the Water Bill, we will speak up for customers in our role as statutory consultees on a range of issues to help make the market work in customers' best interests."

Value for Money

- The wording has been amended to clarify CCWater's position on social tariffs and to align with Welsh Government's guidance;
- Under the 'Review of the 2014 Price Review', we have added that as part of this work we will assess the quality and usefulness of customer research used to develop 2015-20 business plans, and seek to promote good practice to ensure customer research is carried out effectively and plays a key role in future reviews;
- Text has been amended to make it clearer that business customers in Wales who use less than 50 megalitres of water will be ineligible to switch supplier; and
- The reference to 'excess profits' has been replaced with 'where companies have beat assumptions'.

Right First Time

- Our work in relation to the alternative dispute resolution system has been included.

Water on Tap

- The text has been amended to give clarity that we hope to deliver high-quality standards which are maintained and any consumer issues that emerge are properly addressed.

A Sewerage System that Works

- Specific reference has been made to Sustainable Drainage Systems.

Speaking up for and informing Consumers

- The text has been amended to outline our work of informing consumers about the performance of their water company; and
- Although not due to a consultation response, we have also added in reference to our work to press companies to be clearer and more transparent on their website about their tax arrangements and company structures.

	Response from	Points made	CCWater response
1	Bristol Water	<p>In general we are supportive of the focus and priorities outlined in CCWater's draft Forward Work Programme 2014/15 to 2016/17 and will be happy to support CCWater as appropriate and when required.</p> <p>There are two comments / suggestions, however, that I would like to make.</p> <p>Firstly, I note and support your reference to government's role in relation to affordability/ water poverty. Our social tariffs research was very clear - customers do not support the principle of cross subsidy. Tackling social deprivation is (or should be) the government's responsibility, and it needs to play a leading role and take a much more proactive, authoritative stance in this regard. Companies, regulators and consumer organisations are all willing to work with government but that's not the same as taking over government's own responsibilities.</p> <p>One area where CCWater could play a more influential lobbying role in this respect is to put pressure on government to take steps to share the data it holds with water companies. For years the DWP used the Data Protection Act as a reason not to share data about households in receipt of benefits, which effectively tied companies' hands when trying to target the help available, including the government's own WaterSure scheme, to households experiencing financial difficulties. The ICO has made it clear, however, that the DWP only has to gain consent from claimants to be able to do this lawfully. There is still little sign of progress being made though.</p> <p>Secondly, there appears to be no reference to an ADR process (or the European directive) in the draft FWP. As you will be aware, Tony, Carl and Colin are working with the industry and Ofwat to develop an ADR scheme which will enhance the existing complaints procedure arrangements for consumers. Current proposals, if accepted and implemented, not only incorporate CCWater's current role but also provide for an enhanced role for CCWater, as well as a binding resolution for consumers whose complaints are considered to be deadlocked, something which currently doesn't exist.</p> <p>It would therefore seem both highly relevant and appropriate for CCWater to make reference to an ADR scheme (i.e. state its position and possibly make reference to the ongoing work in respect of this) in the final version of the FWP.</p>	<p>Sharing benefit data is not a priority strand of work for CCWater at present. We have no evidence of customers' views on this specific issue. However, we will continue to support the water industry's benefit data sharing initiative as appropriate on the basis of it potentially helping companies to deliver financial assistance to those in need.</p> <p>The FWP has been amended to highlight this work, giving reference to CCWater helping to implement the new ADR process and delivering a binding resolution for customers for the handful of complaints that reach deadlock and therefore reducing the need for some consumers to take their complaint to court.</p>

	Response from	Points made	CCWater response
2	Wessex Water	<p>Thank you for the opportunity to comment on your draft forward work programme. Overall we think this is a sensible programme focussing on areas that matter to customers.</p> <p>The core key themes identified are consistent with previous years and generally in line with those we see in our own customer research. We also agree with the areas within those key themes that you intend to concentrate on.</p> <p>We are particularly pleased to see a focus on affordability of water charges. We offer a wide range of support for customers in financial difficulty under <i>tap</i> and are working with a number of debt advice agencies and vulnerable customer organisations to increase both awareness and take-up of our low rate tariffs and debt repayment schemes. CCWater have been very helpful in the ongoing development of <i>tap</i> and we would welcome their support, as a well-regarded and independent customer representative, to promote the schemes particularly to those groups that may be more reluctant to seek help, such as the elderly.</p> <p>We are also pleased to see a commitment to working more in partnership with water companies on media exposure and this should extend to education of customers. We would encourage CCWater to progress this as soon as possible. One example could be a joint campaign on ‘bag it and bin it’ to reduce sewer blockages and potential flooding.</p> <p>The work programme identifies a number of actions needed by others. We are very happy to work with you on those relevant to water and sewerage companies.</p> <p>It also identifies a number of actions for CCWater with regards to working with the UK Government. We would encourage CCWater to add more detail to the forward work programme and in particular make reference to lobbying for Government to allow companies access to benefits data and giving landlords financial incentives to provide details of their tenants.</p> <p>We have found the customer and stakeholder engagement model for</p>	<p>We welcome these comments and can confirm we will continue to work with companies to help promote their assistance schemes.</p> <p>Our Christmas ‘Fats Oils and Grease’ press release featured links to company campaigns and we retweeted company press releases on the same subject. We would be happy to work in partnership on a ‘bag it and bin it’ campaign. Text changed to ‘what not to flush’ campaign.</p> <p>These are not priority strands of work for CCWater at present as we have no specific evidence of customers’ views on sharing benefit data or landlords providing tenants details. However we will continue to support the water industry’s benefit data sharing and landlords’ tenant information sharing initiatives, as appropriate, on the basis of potentially achieving a reduction in the impact of debt on all customers bills and targeting financial assistance to those most in need.</p>

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		<p>PR14 to be very successful, particularly the contribution of our Customer Scrutiny Group and the role of CCWater on that group. The challenge process has made a real difference to our customer and stakeholder engagement. It has added to the quality of our business plan both from the challenges and observations that have been made by the CSG and also because of the additional guidance and advice this process has provided. Our stakeholders have been more directly involved in formulating our PR14 proposals than at previous price reviews and this has generated a more comprehensive and considered plan.</p> <p>We have some more specific points on the programme as follows:</p> <ol style="list-style-type: none"> 1. We would welcome more commitment from CCWater to work collaboratively with companies on CCWater research projects. Working together ensures maximum value can be made of the findings by all parties. This could take the form of: <ol style="list-style-type: none"> a. notifying companies in advance of the customer research programme for the coming year b. notifying companies in advance that a specific customer research project is taking place c. allowing companies to comment on research documentation, or d. partnering on specific research projects of mutual interest to both CCWater and water companies. 2. The work programme rightly refers to improving customer satisfaction above the current 90% seen in CCWater's tracking surveys. Given this, we feel that CCWater's own target of 80% satisfaction with the quality of their service should be more challenging. <p>I hope you find these comments constructive and helpful. If you have any queries please let me know.</p>	<p>Text has been amended to reflect this.</p> <ol style="list-style-type: none"> a. This year our Policy Managers have discussed our research programme with companies and we will do this in future years. b. We will continue to notify companies when research is being undertaken in their area. c. We will continue to allow companies to comment on research documentation where appropriate. d. Although the research programme for 2014-15 has now been approved, we will continue to partner on research with companies (where appropriate) and would welcome companies to come forward with potential projects. We already participate in UKWIR-led research projects/studies, and will do so again in 2014-15. <p>CCWater's target to improve consumer satisfaction with quality of service is purposely designed to be SMART. Our 80% target is aspirational and already represents a significant step-change for CCWater to improve from its current satisfaction rating of 69%. Reaching 80% would put us within reach of the best organisations which we annually benchmark ourselves against.</p> <p>Companies have the opportunity to get things right first time, due in part to policy and process improvements brought about by feedback from CCWater, so it is right to expect strong tracking survey results from those companies. But even as companies get more complaints right first time, this conversely leaves CCWater to deal with a larger share of disaffected consumers with more protracted complaint</p>

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			<p>issues which on average would not realistically lead to achievement of a 90% satisfaction rating.</p> <p>Moreover, it is not appropriate to equate the 80% satisfaction target with our complaint handling service to a 90% satisfaction score with overall service.</p> <p>We feel to set any other percentage target for satisfaction would be unrealistic, potentially damaging to staff morale and therefore counter-productive to our aspirational ambition.</p>
3	Dee Valley	<p>1. INTRODUCTION</p> <p>Thank you for the opportunity to respond to this consultation.</p> <p>The draft Forward Work Programme generally covers the right areas but it may be useful to expand on the points below to provide additional clarity.</p> <p>2. SOCIAL TARIFFS</p> <p>It would be helpful if CCWater could clarify its stance on social tariffs. On page 10 the statement “we will continue to push companies to develop social tariffs” would appear to be a different message to that on page 18; “we will continue to help companies consider whether social tariffs would be a useful addition”. Also, can the comment on page 10, “we will also be pressing for both companies and Government to help to fund social tariffs” be expanded?</p> <p>3. PROTECTION FOR CUSTOMERS FROM ROGUE TRADERS</p> <p>Some third party companies offer customers the opportunity to save money on their water bills. Usually they do this by applying for surface water drainage rebates on a customer’s behalf or by providing water efficiency services. The customer pays the third party and then the third party pays the water company. There have been some recent incidences whereby a customer has paid a third party for this service but the third party has not paid the water company and the customer has been held to account. We would hope that there could be a role for CCWater to be more involved in protecting customers from rogue companies.</p> <p>4. SERVICE INCENTIVE MECHANISM (SIM)</p>	<p>Wording has been amended to improve clarity on these points.</p> <p>This was a problem incident, but there are also some legitimate businesses which identify savings for customers. Our approach is to ensure consumers are protected by working with water companies to inform consumers about opportunities to minimise bills themselves (P20) whilst using our website and appropriate media to inform of the risks of paying via agents.</p>

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		<p>CCWater uses companies' SIM data to compare performance and identify underperforming water companies. As CCWater undertakes analysis of the SIM data could it take on a greater role to ensure that the data is reported consistently across all companies?</p> <p>5. PRICE SETTING PROCESS</p> <p>We welcome CCWater's intention to review the overall approach to price setting, including the role of the local Customer Challenge Groups (CCG). One possible outcome that CCWater might have to adapt to is how they adjust if CCG's have a greater role working with water companies in the future.</p>	<p>Where we identify issues we will raise them with companies or Ofwat. However, it is not CCWater's role or responsibility to formally police the SIM as we do not have the resources nor full access to the data.</p> <p>In March 2014, we commissioned an interim review of the Customer Challenge Group (CCG) process to date, to talk to participants on the groups about what has worked well, and not so well in the process. This review will feed into the post project review that Ofwat plan to undertake. Both reviews will include a look at the role CCWater has played and will enable us to determine how we should position ourselves in future.</p>
4	Southern Water	<p>Thank you for giving me the opportunity to comment on the forward work programme for the Consumer Council for Water. It is a hugely exciting time for our industry and it must be rewarding for you to see customers being put at the very heart of company business plans.</p> <p>Overall the forward work programme you have proposed looks very sensible. It is good to see more explicit commitments associated with non-household customers, given the introduction of competition in that area, and it will be important that both household and non-household customers are appropriately protected during the introduction of the market. I am also heartened to see the focus on Social Tariffs, in particular, your commitment to lobbying the appropriate route for funding these tariffs through taxation and benefits and not just via the water and sewerage bill.</p> <p>There are four areas which I would like to see more emphasis placed on within the forward work programme.</p> <ul style="list-style-type: none"> • Customer research. The programme does make note of the research conducted by the CCW, which proved useful. I believe that there is an opportunity for the CCW to work more closely with companies to make some of the research more actionable, potentially share the costs of research and add legitimacy to particular emotive areas of research. • It would be good to see a greater emphasis placed on the role of the CCW in promoting and sharing best practice, particularly for household customers. The CCW has the benefit of reviewing 	<p>We will continue to give advice and information to Government and other stakeholders when appropriate.</p> <p>Text has been amended to reflect how we work with other organisations when undertaking research.</p> <p>Text has been added to the 'informing consumers' work stream to reflect our work in this area.</p>

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		<p>performance in all of the companies in the UK and I believe that it would be in the interest of customers if the CCW was more proactive in disseminating best practice.</p> <ul style="list-style-type: none"> • It would be helpful if the forward work programme describes more about the role of each of the area interest groups in addressing regional issues. For instance in the South East region ourselves, Veolia, South East Water and Thames have significant metering programmes and this raises particular issues, such as the introduction of different transitional tariffs on the same group of customers. • Finally, and most importantly, it would be helpful for the CCW to take a more active role in the way in which customer willingness to pay is evaluated. It is clear from the current business planning round that 'stated preference' is an imperfect tool for assessing willingness to pay. However, given the almost universal use of this approach, the risk of any one company moving away from it are high and there must be a role for CCW to take a lead on the evaluation of a more effective and supported approach, we ahead of future business planning activity. <p>I hope that you find my observations constructive and I look forward to working with you and your team to continue to deliver improvements to the way in which customers are serviced by our industry.</p>	<p>Our local teams work closely with our policy specialists to ensure that we provide appropriate input/engagement with companies at local level and that, as a national organisation, we are informed of all developments that impact water consumers. This puts us in a strong position to share experience and good practice. CCWater uses its knowledge base drawn from the regional teams to inform national debates and policy development.</p> <p>Under the 'Review of the 2014 Price Review' (page 17), we have added that as part of this work we will assess the quality and usefulness of customer research used to develop 2015-20 business plans, and seek to promote good practice to ensure customer research is carried out effectively and plays a key role in future reviews</p>
5	Northumbrian Water	<p>We welcome the opportunity to comment on CCWater's draft forward work programme for 2014-17.</p> <p>In our view, the draft forward work programme covers all of the relevant priorities for customers.</p> <p>We fully support CCWater's focus on value for money and its wish to help deliver assistance for customers struggling with bills. The Rt Hon Owen Paterson MP, Secretary of State for the Environment, recently wrote to the Chief Executives of all English water and sewerage companies to highlight the very real cost-of-living pressures currently being experienced by households across the country and his wish to bring down the cost of living for hardworking families. Keeping utility bills affordable, including water, is a crucial part of this. The cost of unpaid bills increases charges to paying customers as it adds significantly to the operating costs of the companies. We note your reference to helping the Welsh Government deliver guidance on bad debt. We acknowledge</p>	No response required

	Response from	Points made	CCWater response
		<p>the support you have given the industry in pressing for changes in England and we would request your continued support.</p> <p>We believe that many more customers can benefit from switching to a water meter and are planning to target many of our communications to ensure that customers are aware of the potential savings.</p> <p>We note CCWater's role in supporting business customers. We agree that the introduction of a retail market for business customers should not be detrimental to household customers, who do not have the choice to switch.</p> <p>We congratulate CCWater on continuing success in controlling its costs. However, there is a balance to be struck between doing this and having appropriate resources available to meet the current challenges, including regulatory reform, and market reform.</p> <p>Northumbrian Water looks forward to working closely with CCWater throughout the coming year.</p>	
6	Severn Trent Water	<p>Thank you for the opportunity to comment on CCWater's forward work programme.</p> <p>We note that that proposed areas of focus are consistent with those in CCWater's current work programme and are evidenced by customer research. We remain broadly supportive of the programme and the areas it covers.</p> <p>We would like to make more specific comments in the following areas.</p> <p>Review of the 2014 Price Review</p> <p>We believe the introduction of customer challenge groups was a positive development for customers at PR14 and constructive challenge from our customer challenge group, the Water Forum, helped us develop a better plan as a consequence. We are grateful for the considerable time commitment CCWater made to our Water Forum.</p> <p>We will continue discussions with CCWater and other stakeholders as we consider what role our Water Forum or similar challenge body could have in the future, particularly has we begin delivery of our plan against agreed measures of success.</p>	No response required

	Response from	Points made	CCWater response
		<p>Help social tariff implementation</p> <p>We welcome the constructive challenge that CCWater, working with our Water Forum, has made to the development of our proposals for further options to help customers who are struggling to pay. We will continue to work with CCWater as we develop further detail in the coming year.</p> <p>Delivering benefits for business and non-household customers</p> <p>We welcome your intention to ensure customers are informed about the introduction of the retail market. If non-household customers are to take full advantage of the retail market, an independent and objective voice will be important to give them confidence to explore the choices available.</p> <p>We also welcome CCWater's intention to challenge that the design and regulation of the market delivers the benefits business customers are expecting. We believe that a market that will deliver the best outcomes for customers - by encouraging the full potential for innovation and choice to be exploited - is one where there is freedom of entry and exit for all participants in the market, including incumbent companies.</p> <p>The example of the Scottish non-household retail market has demonstrated that, with appropriate safeguards in place, this can be achieved without being to the detriment of either non-household or household customers.</p>	
7	South East Water	<p>Thank you for the opportunity to respond to the consultation on the Consumer Council for Water's Draft Forward Work Programme. South East Water is broadly supportive, with many of the programme's aspirations reflective of South East Water's own strategic priorities.</p> <p>Our recently published Business Plans for 2015-2020 have customers' views at their heart, and seek to address and manage long term strategic issues such as water supply in a way that maintains an affordable service for our customers, and embraces the new market for Business customers.</p> <p>We will be introducing a further Social Tariff in 2015, and will continue to look for ways to support our vulnerable customers in paying for their water service, and to work with Consumer Council for Water to that</p>	No response required

	Response from	Points made	CCWater response
		<p>end.</p> <p>Our own customer service performance has been subject to Consumer Council for Water scrutiny and challenge and continues to improve. Our business plans commit us to improving right-first-time performance, and to achieving above-average industry performance through the next price-review period, and we will continue to share our plans and progress with the Consumer Council for Water.</p> <p>Operating in an area of water stress means that our priorities support the Water on Tap requirement to provide safe, reliable, good quality drinking water that our customers value and use wisely.</p> <p>CCW's Water on Tap priority is a key priority for South East Water's customers too, with four of our Business Plan Outcomes directly related to the supply demand balance. We will continue to work with the Consumer Council for Water and other stakeholders in partnership to deliver our water efficiency programme to help inform customers about their water use and how they can take action to use water more efficiently.</p> <p>South East Water will be implementing its own Customer Panel in 2015 to continue the challenge provided through the business plan process by the independent Customer Challenge Group in the development of our Business Plans. Direct customer input to the development of our plans is a healthy and welcome development and one that will be helpful CCW in pursuit of its objective of Speaking up for and informing customers.</p>	
8	Consumer Futures	<p>Overview</p> <p>We are pleased to comment on the Consumer Council for Water (CCWater)'s Draft Forward Work Programme for England and Wales 2014 - 15 to 2016 - 17.</p> <p>Consumer Futures (and its predecessor Consumer Focus) has formed a good working relationship with CCWater to explore issues affecting water consumers, such as water and sewerage debt or strengthening consumer interest representation in the regulation of the water industry. Strong links have also been built between Consumer Futures and CCWater on a range of issues across different sectors such as benchmarking complaints and debt data, assessing bills' affordability and customers' ability to pay, and the use of credit reference information by utility companies.</p>	

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		<p>We welcome the opportunity to respond to CCWater's three year work programme. We positively support the plan laid out for the coming years and welcome the fact that it is based on evidence provided through sound consumer research. The overview section helpfully sets out and identifies the long-terms strategic pressures affecting consumers and we would agree that the five key themes should form the strategic framework for CCWater's Forward Work Programme.</p> <p>Within the Draft Forward Work Programme Overview, there are clear areas of synergy between what CCWater is proposing to deliver and work that Consumer Futures has planned for the next year across water, energy and post and within a range of areas that are outlined below. We are looking forward to the opportunity of continuing to work closely with CCWater to share information and experience of best practice in these and other areas.</p> <p>Affordability / helping vulnerable customers</p> <p>We fully support CCWater's plans under 'Helping vulnerable customers' to work with the UK Government to deliver a comprehensive affordability solution that water customers find acceptable. We support the provision of fair, affordable charges for water that are value for money, and although the provision of social tariffs is not directly relevant to the situation in Scotland, we support more targeted support to those who cannot afford their bills. This is an area we are keen to incorporate into future work.</p> <p>We support the view that the development and accessibility of social tariffs is essential to adequately support those who, without this additional help, would struggle to pay. But because paying customers fund social tariffs through their charges, we agree that reassurance must be sought that they find levels of subsidy fair and acceptable and we support CCWater in its commitment to press companies and government to 'help to fund social tariffs, so that the costs are not borne only by water customers'.</p> <p>Social tariffs that have existed in the energy sector for around 10 years are currently being phased out. The Warm Home Discount Scheme currently provides a rebate for those with low incomes and other initiatives, such as cold weather payments and winter fuel payments,</p>	<p>We agree that there are areas of synergy between our proposed work and that of Consumer Futures.</p> <p>Current social tariff regulations provide for companies to design and operate their own tariffs to meet the specific needs of the customers in their specific regions. However we will continue to highlight our research findings that customers would favour a single industry wide social tariff.</p> <p>There is no current legal provision for data sharing to support the delivery of assistance with water charges. However we will continue to support, as appropriate, the water industry's exploration of the potential for provision to be put in place to help them deliver</p>

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		<p>are also in place. From our experience of energy consumers when it comes to tariff design and eligibility criteria, simplicity is critical and data-matching schemes can be useful in order to target the help and reduce the costs. Further, having one common scheme across companies reduces confusion and collaboration between companies is crucial.</p> <p>To help ensure the fair treatment of all customers, identify and understand consumer vulnerability, we would also suggest that CCWater urges water companies to adopt the British Standard 18477 - Inclusive service provision. We know that Wessex Water is keen to explore this as a tool to improve services to its customers.</p> <p>Carry out assessments of water company debt recovery</p> <p>We are broadly supportive of the need to carry out debt assessments on water companies to ensure that maximising income is balanced with the need to adequately protect consumers through following best practice debt management, in line with Ofwat's guidelines.</p> <p>We are aware of CCWater's pivotal role in conducting such assessments and we would be interested in learning more about the principles and practicalities of the scheme, since we would support a similar model being introduced in Scotland.</p> <p>Consumer Futures will publish shortly a report on water and sewerage debt in Scotland and we would welcome an opportunity to discuss our research findings with CCWater, in light of the above.</p> <p>Consumer Futures (and its predecessor bodies) has a long history of involvement in the issues relating to the debt and disconnection policies of the major energy suppliers. We have worked closely with Ofgem on this, commencing with the joint guidelines on good practice introduced in 2002, to carrying out our periodical in depth debt and disconnection review of the big six and quarterly analysis of the social obligations monitoring information collected from all suppliers by Ofgem. Consumer Futures has worked with CCWater and Ofwat in recent years to share information and learn from the experience in the water sector: we are keen to continue to do so.</p> <p>Fair charges</p>	<p>financial assistance to those in need.</p> <p>The British Standard 18477 is a voluntary standard. We will monitor companies' exploration of its use to improve inclusivity of services over and above that currently on offer through compliance with existing regulatory requirements.</p> <p>The principle of the debt assessment is based on Ofwat's domestic debt collection guidelines. The aim of the debt assessments is to ensure that companies are collecting debt in line with their own debt collection processes which should follow the essence of the guidelines.</p> <p>We would be happy to share our experiences and processes with Consumer Futures to help them develop something similar.</p> <p>We look forward to seeing the research. We will explore opportunities to discuss the findings with Consumer Futures and, in due course, any implications from the report for our work.</p>

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		<p>There is commonality between CCWater's Fair Charges workstream and the work to be undertaken by a 'long term charging' working group set up by the Scottish Government, at Consumer Futures' request, to review tariff structures and policies to ensure that they are fair, transparent and in the best interest of customers.</p> <p>To support this working group, we have recently undertaken research into customers' views on charging for water and sewerage services and would be keen to share the findings of this research with you when it is published in February 2014.</p> <p>Targeting extra help for consumers in vulnerable situations</p> <p>We fully support the need to identify where services to customers can either impact on or create vulnerability.</p> <p>Consumer Futures has a cross sector workstream focusing on consumer vulnerability. In addition to the provision of fair and inclusive services, we are currently working with regulators to see how individual and collective policy developments can empower regulators to tackle consumer vulnerability.</p> <p>It is our hope that by working together with CCWater and other industry stakeholders on providing inclusive services that we can mutually support one another in achieving our longer term goals.</p> <p>Price review</p> <p>We welcome a sustained focus on the development of an innovative, consumer-led regulation of the water industry. This should work to ensure that the outcomes that customers value are reflected in price reviews and that companies deliver at a price that is acceptable and affordable to all customers. We fully support CCWater's plans to assess how effective the process of the Customer Challenge Group has been in delivering a good deal for customers through PR14 and believe that this is an essential activity to ensure the existence of a credible and legitimate price review process.</p> <p>In Scotland, Consumer Futures has been working closely with the Customer Forum to support the development of Scottish Water's Business Plan that is reflective of customer priorities. We also plan to</p>	<p>We would very much welcome this and other opportunities to share information, and have recently made arrangements to meet with Consumer Futures Scotland to discuss debt and affordability issues.</p> <p>We look forward to working with others to reduce consumer vulnerability.</p>

	Response from	Points made	CCWater response
		<p>assess the work of the Forum during 2014-15 and its impact on improving the regulatory contract for customers, and in particular the balance between price and services.</p> <p>In 2014/15 we plan to learn from customer challenge across sectors and we will consider evidence from others sectors on the benefits and challenges of customers' involvement in price review processes, We will want to work closely with CCWater on this important issue.</p> <p>Market reform</p> <p>We very much welcome CCWater's proposal to represent the needs of businesses when the English water market opens up in 2017. We fully support work to protect those who may not realise the full benefits the market has to offer to ensure they are not disadvantaged. We would welcome engaging further with you on your research work into small and medium enterprise (SME) customers in terms of, for example, debt and affordability issues, examining engagement with SMEs, etc.</p> <p>Part of Consumer Futures' remit is to represent the interests of SMEs. This forms part of a cross-sectoral workstream. We will publish the findings in early 2014 from research into SMEs' experience after five years of the water retail market in Scotland which is open to all non-domestic organisations. We would welcome the opportunity to share our findings with CCWater.</p> <p>Consumer Future's work plan for 2014/15 intends to look more closely at how SMEs interact with the market across a number of areas (energy, post, water in Scotland) and we would be keen to work more closely with CCWater to achieve positive outcomes for SMEs. Again, we would welcome further discussions with you on this.</p> <p>Marketing arrangements between water companies and other organisations</p> <p>We support CCWater's call for greater transparency into the relationship between water providers and insurance suppliers and believe that it is essential that consumers are clear on who they are taking out insurance with.</p> <p>In 2011 Consumer Focus Scotland published a report based on consumer</p>	<p>Once the results of the Customer Challenge Group (CCG) Review are known we will be in a position to consider how best to use and share this information and will be happy to work with Consumer Futures on its project.</p> <p>We would welcome engaging with Consumer Futures on our work around representing non-household customers, particularly SMEs, and discussing our, and their, current and future research into the views of SME customers.</p> <p>We look forward to seeing the research findings and discussing them with Consumer Futures in due course. We will consider any implications from the report for our work.</p> <p>We would welcome engaging with Consumer Futures as it carries out this work.</p> <p>CCWater published research on customers' views of third party marketing arrangements which water companies have with organisations (such as HomeServe). This included customer views on the principle of water companies having these arrangements, perceptions of product relevance, and understanding of the</p>

	Response from	Points made	CCWater response
		<p>research into Homeserve / Scottish Water marketing material. As a result of findings and recommendations in that report, the relationship between Scottish Water and Homeserve is more explicit and demarcated within marketing material to minimise ambiguity and confusion on behalf of consumers.</p> <p>http://www.consumerfocus.org.uk/scotland/publications/trust-and-transparency-2</p> <p>Right first time</p> <p>We fully endorse CCWater's plans to continue to pressure water providers to get their services right first time to customers in order to reduce complaints. We see scope for providers to improve how they deliver services and how they respond to customers when there are issues. We also advocate that suppliers should aim to put an issue right first time to avoid customers having to embark on a lengthy and distressing engagement with the supplier to resolve an issue.</p> <p>Consumer Futures is part of a Sounding Board for the Scottish Public Services Ombudsman (SPSO). SPSO is responsible for handling complaints about water providers in Scotland and uses complaints to evidence and tackle service failures by providers. The Sounding Board will review how complaints are handled and where they can be improved as 'right first time' also applies to second tier complaints.</p> <p>As the complaints handling framework may undergo some changes in England and Wales to improve the redress complainants can obtain, we are keen to share the experience of complaints handling in Scotland, especially following the establishment of the SPSO Sounding Board, should they be applicable to the arrangements in England and Wales.</p> <p>Informing consumers</p> <p>We agree with plans to increase awareness for consumers on appropriate disposal of waste. From attending the recent Water Industry Customer Conference, we are aware of various campaigns by water companies to reach the public with improved messaging. Indeed Scottish Water has now launched a national campaign on the correct disposal of kitchen and bathroom waste.</p>	<p>marketing information they received and the processes involved in taking up the product or cancelling it. - See more at:</p> <p>http://www.ccwater.org.uk/blog/category/reports/page/2/</p> <p>We are now working with water companies and HomeServe to ensure that the findings of the research are reflected in the marketing literature.</p> <p>CCWater is keen to work with all appropriate stakeholders as the complaint handling framework changes to benefit consumers.</p> <p>We welcome any opportunity to identify good practice with other consumer bodies.</p>

	Response from	Points made	CCWater response
		In addition, Consumer Futures continues to work closely with Scottish Water to improve customer messaging and increase awareness of guaranteed service standards and payments, and the need to carry out adequate messaging and customer consultation during capital investment programmes.	
9.	Informal response from Cholderton and District Water	<p>Broadly supportive of our draft Forward Work Programme, but made the following comments:</p> <p>Drinking water quality - it should be clear in the Forward Work Programme that drinking water quality is a matter which is dealt with by the DWI and any work that CCWater does in this area should be led by the DWI. This approach will prevent regulatory creep and reduce the risk of customers not knowing which organisations deal with particular issues.</p> <p>Leakage - CCW should consider that leakage can only be addressed to the extent in which Ofwat will allow for within the price review process.</p>	<p>We mention in the ‘water on tap’ section of our Forward Work Programme that our work in this area is with liaison with DWI. The FWP only references customer communications and information and doesn’t suggest any extension of our role. The Memorandum of Understanding and agreed working practices with the DWI are designed to ensure customers get the right information from the right organisation.</p> <p>We acknowledge this in the ‘water on tap’ section Communication with customers is also important.</p>
10.	Ofwat	<p>Following our recent discussions I was very interested to see CCWater’s draft forward programme and understand your priorities for the coming year and beyond.</p> <p>I very much welcome the strong themes of value for money, affordability and focus on vulnerable customers which chime with our own plans for the year ahead. As I would expect, engagement with the price review features strongly in the draft document, but it is good to see such a broad range of issues where CCWater looks to make a difference for customers.</p> <p>I particularly welcome the focus on outcomes, and the challenge that CCWater will make to companies to deliver for their customers. At the same time, I look forward to the support and constructive challenge that CCWater can bring to help Ofwat fulfil its role most effectively.</p> <p>I note the proposal to assess how effective the new price review process has been. As you know we are developing our plans to review PR14, and it would be good to keep in touch to make sure that our appraisals complement each other. Timing will also be important so that we can observe outcomes correctly and capture stakeholders’ experience accurately.</p>	<p>Our intention is to appoint an external consultant to independently review the Customer Challenge Group process in the preparation of PR14 Business Plans, while this is ‘fresh in the memory’ in early 2014, with a view to this review forming part of an eventual wide review of PR14. We will communicate regularly and invite comment/input from Ofwat in this process.</p>

	Response from	Points made	CCWater response
		<p>Outside of the price review, I appreciate the support that you and your team have been giving to the work on Alternative Dispute Resolution and customer redress. You might want to highlight this in your forward programme, deservedly sharing credit for the progress so far and noting CCWater's continuing role as the project moves towards implementation. As well as continuing to act as mediator, CCWater can play an important part in making sure that the scheme operates efficiently and that companies make best use of it to identify and address systemic problems, helping to pre-empt future complaints.</p> <p>Companies can also deliver better service and pre-empt complaints by providing the information that customers need in a timely and accessible way. CCWater, Ofwat and others can help by providing additional information appropriate to their roles, and the forward programme helpfully commits to boosting CCWater's contribution in this area. We see a clear link here with our work on the information that companies provide. We will be conducting a risk-based review to identify cases where poor company information risks causing customer detriment. CCWater would be well placed to support us with this work, so we would value any help that you can offer.</p> <p>We will also look to CCWater for support as we develop our policy thinking on vulnerable customers over the coming year. We plan to draw on experience from the wider consumer community, which has been focusing on this issue against the backdrop of a challenging economic climate. Social tariffs are very much part of the picture, and I welcome the forward programme commitment to make sure that companies engage effectively with customers on their social tariff proposals.</p> <p>Turning to competition, I value CCWater's involvement in delivering retail choice for business customers, and welcome the commitment to strengthen this input in the future. I appreciate that you will want to focus in the forward programme on CCWater's high-level role and objectives, but it might be worth adding something on the specifics - perhaps including your involvement in Open Water.</p> <p>Finally, while the forward programme mentions the work CCWater has done on the Water Bill, it might also be worth setting out for stakeholders some of the changes to CCWater's work that will arise when the Bill is enacted. For example, you might want to comment on your new role as statutory consultee on a range of issues.</p>	<p>The FWP has been amended to highlight this work, giving reference to CCWater helping to implement the new Alternative Dispute Resolution (ADR) process and delivering a binding resolution for customers for the handful of complaints that reach deadlock and therefore reducing the need for some consumers to take their complaint to court.</p> <p>We already work closely with companies to help ensure that their information and literature meets customer needs. Where we identify problems we work with companies at a local level to resolve these. We will be happy to assist Ofwat in its consideration of this issue.</p> <p>We note and welcome the plan to involve CCWater in developing policy thinking on vulnerable customers. We look forward to hearing more on this.</p> <p>We will work constructively with industry stakeholders and the Open Water Programme to shape competitive arrangements that satisfy customers' expectations and deliver the best outcomes for customers. We will also assess market frameworks to ensure there are no unintended consequences for customers that cannot choose retailer.</p> <p>The FWP Key Issues section has been amended and now includes the sentence: "In line with responsibilities given to us in the Water Bill, we will speak up for customers in our role as statutory consultees on a range of issues to help make the market work in customers' best</p>

	Response from	Points made	CCWater response
		<p>Please let me know if you want to discuss any of this when we have our next catch up meeting, or in the meantime you could pick up any points with Barbara Hughes.</p> <p>I look forward to working with you as we take these issues forward over the coming months and years.</p>	interests.”
11.	Sembcorp Bournemouth Water	<p>This is Sembcorp Bournemouth Water’s response to CCWater’s consultation on its draft forward programme. We welcome the opportunity to comment.</p> <p>We appreciate the work that CCWater is doing on behalf of the water consumer in England and Wales and note that this consultation is very much a development of previous CCW Forward Work Programmes.</p> <p>We have no specific areas of concern regarding your Forward Work Program and concur with your thoughts that consumers benefit from your activities and that going forward CCWater in its current format will continue to add value for the consumer.</p> <p>We continue to support the concept of local consumer advocates whose local knowledge is invaluable when dealing with customers concerns about their water company.</p> <p>We note and support the frequent use of the expression “working with water companies” as this reflects the spirit of our mutual aim to offer consumers the best water supply service possible.</p> <p>We particularly support your observation under long term strategic pressures that independent work is still required to increase customers’ perception of value for money, a message which needs to be delivered in a carefully structured fashion to ensure that it is correctly understood by the consumer.</p> <p>We note that CCWater will continue to improve its web site and other media communications but, as in the 2012-13 to 2014-15 Forward Programme the consultation makes no clear reference to the methods to be used. Our own research as part of PR14 showed clearly that there is very little awareness of CCWater by the general public and we would have liked to seen in the Forward Programme some specific plans to improved media communications.</p>	<p>We had already recognised that CCWater’s previous website could have been improved and since the date of publication of the Draft Forward Work Programme we have had the CCWater website completely redesigned. We will continue to build on this to make improvements in the future with a focus on easily accessible and relevant information for consumers.</p>

	Response from	Points made	CCWater response
		Given that CCWater and water companies are very much working together we feel it would be appropriate during 2014 for CCWater to hold a working party, either nationally or regionally, to exchange views on this subject and hopefully extract some innovative and cost effective options for raising awareness of CCWater.	<p>We are planning to undertake some benchmarking research which will help us understand the level of awareness of CCWater by the general public. We will be using the new Informing Consumers work to raise the profile of CCWater through the ways explained in more detail throughout the Forward Work Programme however specific plans are outlined in our PR Strategy.</p> <p>We held a stakeholder workshop in April 2013 during which we exchanged views on the role CCWater could take without duplication of the work of other organisations including Water UK. The findings of these have been incorporated into the Forward Work Programme. We will explore the option of another event during 2014.</p>
12.	South Staffordshire Water	<p>Thank you for providing the opportunity to comment on the document. I would like to make the following comments, on behalf of SSW:</p> <p>1. The document references affordability and vulnerable customers a number of times and we support your views and concerns. However, more emphasis of the impact that chronic non-payers have on other customers and water companies would be welcomed; and CCW should seek to assist companies in researching/finding innovative ways to deal with this issue.</p> <p>2. With the onset of market reform in England which enables non-household customers to switch water provider, further consideration should be given to the provision of impartial advice based on customer service delivery alone, if approached by non-household customers. Other, equally important elements of the decision making process which includes; sustainability of supply, value for money and cost should be incorporated in any advice offered by CCW to non-household customers.</p> <p>3. We support any activity that improves customer satisfaction and strengthens the “right first time” principle and that provides customers with excellent levels of service and value for money.</p> <p>4. We appreciate that customers’ perceptions around leakage have been acknowledged ie that they believe it should be reduced but are generally not willing to pay for it. This is reflective of our own findings in customer research.</p>	<p>We do intend to continue our work with companies to help them identify and overcome the problems faced by customers which can lead them to fall into debt. In particular we expect to undertake research and hold a seminar on this issue during 2014.</p> <p>The FWP has been amended to make this point clearer.</p> <p>We will be considering the most effective approach to raising non-household customers’ awareness of market changes. We will look at how and when to engage with different types of non-household customers and the types of information to be provided.</p>
13.	South West	We are pleased to be able to provide comments on CCWater’s	

	Response from	Points made	CCWater response
	Water	<p>consultation paper 'Draft Forward Work Programme'.</p> <p>We are also pleased to see that the priorities listed continue to reflect the priorities of customers, which have been developed through research and more recently tested to ensure they are still relevant. Along with the tactical activities it is good to see that CCWater recognise the role that they can play at a more strategic level to influence Government on matters that will affect water consumers, for example, market opening, price review and the potential for water supply pipe adoption.</p> <p>However we would like to see included areas that support our ability to reduce bad debt, for example supporting the industry with regard to the Landlord portal; and understanding how the welfare reforms will impact customers' ability to pay and how the changes may affect direct payment schemes. We hope CCWater see the benefit in supporting the industry in such matters so that we can act in the best interests of all customers and reduce the burden of bad debt.</p> <p>We were surprised not to see the 'Alternative Dispute Resolution' process mentioned in terms of how this will work alongside current complaint escalation processes of which CCWater feature greatly and to ensure customer awareness of such a scheme where appropriate.</p> <p>We are pleased to see that as part of considering opportunities that Market Reform may bring, CCWater recognises the role they can play in ensuring household customers are not disadvantaged in anyway. Over the past two years we have worked closely with CCWater as part of the Customer Challenge Group (CCG) to ensure our submitted business plan for 2015-2020 demonstrates robust customer research and engagement to produce high levels of customer acceptability.</p> <p>We note that CCWater plan to review the overall approach to price setting introduced for the 2014 price review including the role of the local CCG's. Learning lessons to improve the process for the next price review will be helpful. We hope that the review is done in such a way as to not to undermine the work of the CCG's and Ofwat's confidence and doesn't jeopardise the work of which CCWater were a big part. We request that you consider the potential overlap between Ofwat and CCWater in conducting this review.</p>	<p>For information - our Briefs to MPs and Lords on the Water Bill can be found on our website here.</p> <p>As detailed in the responses above, we have now improved the wording of the FWP to clarify our intention to continue our work in support of these areas.</p> <p>The FWP has been amended to highlight this work, giving reference to CCWater helping to implement the new ADR process and delivering a binding resolution for customers for the handful of complaints that reach deadlock and therefore reducing the need for some consumers to take their complaint to court.</p> <p>The review will be independent, speak to a wide cross section of CCG participants, and is intended to identify what went well in the CCG process, what didn't go so well (and why). The work is intended to be an information gathering exercise to help with the review of the PR14 process when it occurs. Undertaking it now will enable respondents to provide a view on their experiences to date while it is fresh in their minds, rather than having to recall experiences from twelve months or longer ago. We will also work with Ofwat through this independent review of CCG's PR14 work to ensure there is clarity and</p>

	Response from	Points made	CCWater response
		I hope our comments have been useful, at South West Water, there is a strong determination to deliver value for money and excellent services to our customers and we look forward to continue to work closely with CCWater at both a local and a national level in order to achieve this.	consistency.
14.	United Utilities	<p>1. Introduction</p> <p>UUW welcomes the opportunity to respond to the Consumer Council for Water's (CCWater) draft consultation on its forward work programme. We support the areas that you have highlighted in your document.</p> <p>2. General Observations from your consultation paper</p> <p>We recognise the role that UUW plays in supporting CCWater in achieving its objectives.</p> <p>We believe there are further opportunities where we can work more closely with CCWater to help deliver a better outcome for our customers.</p> <p>As a company we conduct regular research and insight into the views of our customers through a number of research programmes. This research helps to inform where we need to improve our services to customers but also helps identify the things that we do well and to validate new services that we are implementing for our customers.</p> <p>We also recognise the extensive research that CCWater conducts on a wide range of consumer topics. There are perhaps opportunities for both the company and CCWater to engage in a regular dialogue to share the findings of this research to better inform customer insight and improve the overall customer experience. We will explore with our CCWater Chair how we can achieve this.</p> <p>Your consultation paper recognises the evolving changes that are facing the industry specifically around market reform and a new approach to outcome focused price reviews.</p> <p>We have engaged with CCWater both independently and through our Customer Challenge Group. We recognise the extensive contribution that CCWater have made to our recent submission and we look forward to continued engagement as we finalise our plans.</p>	The findings of our research are published on our website here .

	Response from	Points made	CCWater response
		<p>We note that CCWater intend to monitor and challenge companies each year on the delivery of their Price Review outcomes. We would be interested in understanding how this may compliment the reporting regime that Ofwat may adopt post 2015. As we transition to the new regulatory contract it would be helpful to understand CCWater's data requirements. We suggest that this could form part of the scope of work of CCWater's information requirements project.</p> <p>With regard to market reform we have already made steps to prepare our business for these changes, specifically those in the competitive market. Our organisation has now been split into separate business functions (Wholesale Water and Wastewater, Household and Non-Household) in readiness for competition.</p> <p>As the market reform moves into a more defined and mature position we recognise that there may be a requirement for CCWater to represent particular business segments such as small commercial and business organisations.</p> <p>3. Customer priorities for the Consumer Council's Forward Work Programme</p> <p>Value for Money</p> <p>We note that 'Value for Money' remains a key theme from your updated research. We also see this area as key and we have included it as a future metric in our AMP6 plans. We currently survey over 1000 customers quarterly to see how we are doing against this measure and to understand what are the drivers that influence this.</p> <p>We are acutely aware that many customers are facing extreme hardship and are struggling in the current economic climate. Value for money and affordability is a challenge that the company faces now and we anticipate will continue for some time. Government austerity measures and the likely impact of the proposed Welfare reforms are and will affect many people in the North West of England.</p> <p>Your consultation makes reference to asking companies to develop pricing schemes to help vulnerable customers. We believe that pricing schemes need to address those customers that may be deemed as vulnerable and also those customers that may be on the brink of falling</p>	<p>We expect companies to inform CCWater periodically on the progress of the delivery of Business Plan outcomes for customers, based on the measures of success and targets companies proposed and developed with their CCGs. While each companies' outcomes differ, we are aware that there may be a 'cross over' between the information companies gather in tracking outcome delivery, and the information CCWater will periodically ask for. Discussions with companies will need to take place to uncover cross overs and ensure information is provided at the right time and the right level of detail, without causing duplication of reporting or an unnecessary burden.</p> <p>Through our research and interaction with non-household customers in our business customer meetings, we understand the needs of different customer groups in order to represent these customers in the changing market.</p> <p>We welcome the inclusion of the value for money metric in your business plan.</p> <p>We agree that pricing schemes need to address those customers that are vulnerable and those on the brink of falling into affordability or hardship issues. We would consider customers in this situation to be in a potentially vulnerable position.</p>

	Response from	Points made	CCWater response
		<p>into affordability or hardship issues.</p> <p>We are working closely with the CCWater Policy Manager to develop a social tariff that has appropriate support from all customers and is focused on helping the most vulnerable customers.</p> <p>We have also developed a Payment Assistance Package that has a range of targeted schemes to help customers who may have outstanding arrears and those customer facing affordability issues. Depending on the customer's circumstances we tailor these offerings to individual circumstances. This approach allows a more holistic solution which is more likely to be sustainable for the customer over the longer term.</p> <p>We welcome CCWater's approach to identifying opportunities for customers to have more customer focused approaches to charging. We are constantly looking at innovative approaches to tariff development and would be keen to work with CCWater in this area.</p> <p>Right First Time</p> <p>We welcome your plans to drive improvements in handling of complaints.</p> <p>We have worked hard to reduce the number of complaints received from our customers and were pleased that CCWater recognised our performance in this area for the year 2012/13. We made a reduction of over 10,000 complaints during that period following the implementation of a series of initiatives delivered following listening and engaging with our customers. We do recognise, however, that we still need to make further improvements.</p> <p>We believe that further work is still required to ensure that there is a consistent approach to reporting and classification of complaints and we would welcome your input into this area.</p> <p>Your forward programme references best practice. Specifically you refer to assessing water companies' approaches to dealing with customers who are in debt and sharing best practice where possible. We have carried out our own independent research of industry best practice and wider utility practice which has helped inform our future plans to help</p>	<p>We note the Payment Assistance Package offered by United Utilities and welcome the opportunity to continue to work with the company on this issue.</p> <p>We will continue to monitor complaints and where there is evidence of inconsistency, look to address these either through clarification of the guidance or directly with the company. This ties in with previous work we have done with individual companies both in the reporting of complaints and their categorisation.</p> <p>In line with the charges work set out in the FWP we will continue to identify good practice and, through our engagement with companies on the development of Charges Schemes, press for companies to adopt this where appropriate. In terms of CCWater's wider work on complaints, much of this information is reported on our website,</p>

	Response from	Points made	CCWater response
		<p>customers who may be struggling with affordability issues.</p> <p>We believe there is value in extending your best practice to cover a broader spectrum of service related areas to help companies improve service to their customers. We recognise that data may need to be anonymised but feel that there is value in this area. We would be keen to understand where other companies have had successes in complaint reduction through the different approaches to policies and charging principles.</p> <p>A Sewerage System that works</p> <p>Customers affected by sewer flooding remains a key priority for UUW. We continue to work closely with the local CCWater committee with regards to our plans to reduce the impact on customers affected by sewer flooding.</p> <p>We have shared our approach and plans for the next price review period in detail and demonstrated that our proposed plans will be delivered in the most cost effective way. We have made significant progress in managing our sewerage network through investment and changes to our Wastewater operating model, as demonstrated by the improvement in customer satisfaction.</p> <p>We are pleased that CCWater support our approach.</p> <p>We note that CCWater intend to monitor the impact and cost of the adoption of private sewers and drains and private pumping stations into water company ownership. We do not believe that CCWater has a role in monitoring the transfer of private assets from an economic perspective, this is the responsibility of Ofwat. Data collected to date on private sewers has related to the August Reporting Return and PR14 submission. Again it is not clear whether Ofwat will continue to collect this information in the future. However, we recognise the role that CCWater play in advising customers of changes in the ownership of the private sewer network and supporting them through the transition.</p>	<p>shared with companies at regular meetings, and available through our local complaints teams.</p> <p>We will work with Ofwat and the companies when assessing the impact of the transfer on customers' bills. We will not be duplicating Ofwat's data collection process.</p>
15.	Welsh Government	<p>Message from the Chair:</p> <p>"Welsh Government not yet convinced that competition would be beneficial." - <i>We do not think you need to state our policy position for us in the factual context of this introduction, but in any case we would</i></p>	<p>Wording has been amended to reflect comments.</p>

	Response from	Points made	CCWater response
		<p><i>not use the wording employed here.</i></p> <p>Executive Summary:</p> <p>Value for money: We will press water companies to deliver water and sewerage services at a price that customers find acceptable. This will include the development of a fair competition market for business customers in England <i>Addition:(without disadvantaging ineligible customers who are not eligible to switch supplier, e.g. business customers in Wales)</i>, work to influence social tariffs, paced metering with transitional arrangements, companies sharing their profits with customers and fair charges schemes.</p> <p>A sewerage system that works: We will help consumers who suffer sewer flooding in their houses or other areas of their property. We will also work with sewerage companies to keep them focused and to choose cost-effective and sustainable solutions to surface water overloading the sewerage system <i>Addition: (such as Sustainable Drainage systems or “SuDS”)</i>. We will monitor the impact and cost of the adoption of private sewers and drains and private pumping stations into water company ownership.</p> <p><i>For information: We wish to encourage the use of the SuDS approach. The Welsh Government will develop proposals for consultation in 2014 to commence Schedule 3 of the Flood and Water Management Act 2010. New developments will be required to include sustainable drainage systems (SuDS) to manage excess surface water in new developments and for them to that comply with national standards that will be set by the Welsh Government. It will also establish SuDs approving bodies (SABs) which will approve proposed drainage systems, to ensure that proposed new developments comply with the national standards are met before planning permission is given</i></p> <p>Long term strategic pressures:</p> <p>The Water Act will introduce a new water market in England and will allow business customers, charities and public sector bodies to choose their water supplier - <i>Addition as a footnote: except where these are in those areas which are presently served by an incumbent based wholly or mainly in Wales</i></p>	<p>Wording has been amended to reflect comments.</p> <p>Wording has been amended to reflect comments.</p> <p>Wording has been amended to reflect comments.</p>

	Response from	Points made	CCWater response
		<p>Value for money:</p> <p>Help and protection for those who are less advantaged, vulnerable or cannot afford to pay their water bill - where companies have sought and are able to demonstrate broad acceptability for specific proposals from their wider customer base including social tariffs, where customers are willing to support their introduction.</p> <p><i>Ref: to social tariffs “where customers are willing” - it would align better with our social tariff guidance and our policy if this said “where companies have sought and are able to demonstrate broad acceptability for specific proposals from their wider customer base”. FYI, We do not propose specific thresholds of acceptability or other criteria for customer acceptance of a social tariff proposal. We expect consultation and engagement on social tariffs to be proportionate, fair and targeted. We also expect Ofwat to consider customer support for social tariffs on a case by case basis. (See page 4</i> :http://wales.gov.uk/topics/environmentcountryside/epq/waterflooding/publications/social-tariff-guidance/?lang=en)</p> <p>Water on tap:</p> <p>Inform with consumers perspectives, the ongoing debate about whether water customers’ supply pipes should be adopted.</p> <p><i>Understood but could be better worded</i></p> <p>A sewerage system that works</p> <p>Encourage sewerage companies to use innovative, sustainable solutions to deal with excess rainfall and reduce the amount of water that flows into the sewers.</p> <p><i>As per reference to SuDs on page 6; it seems odd not to mention SuDs by name at this point or earlier and to leave it until near the end (pg 27).</i></p>	<p>The text has been amended to improve clarity on this point.</p> <p>Wording has been amended to reflect comments.</p> <p>Wording has been amended to reflect comments.</p>
16.	Anglian Water	<p>Thank you for sharing your rolling work programme with us and giving us the opportunity to comment on it.</p> <p>Our customers have also told us that with many budgets under pressure, affordability of bills is a top priority. We have responded to Ofwat’s</p>	

	Response from	Points made	CCWater response
		<p>challenge and are committing to holding Retail costs at the 2013 level for the next 5 years, given that CCW costs are predominately people related, much like that of Retail, we would be disappointed to see costs rise beyond 2013 level.</p> <p>We fully support your continued focus on value for money, increasing the emphasis on helping and supporting those who are less advantaged or vulnerable. Providing value for money is extremely important to us and we will be developing methods for monitoring our customers perception of this. We would also be keen to learn from you in more detail what best practice has been adopted to enhance the customers perception of value for money.</p> <p>We also support your challenge to companies to find ways to help customers who struggle to pay. Focus should not however be limited to social tariffs and we would encourage CCWater to research and take a broader look into this area.</p> <p>We agree there should be monitoring of deliverables against business plans however your proposed information requirement template does not seem aligned with this. We would be interested to hear how you plan on doing this, without increasing the reporting costs or requirements for the companies.</p> <p>We will have a range of measures in place to monitor our performance and outcomes against our business plan. We will provide details of these on an annual basis and following this would be happy to discuss further with you in more detail if required. We will also be exploring a successor to the customer engagement forum in order to provide a format and platform to challenge and hold us to account on those measures.</p> <p>Your plan to ensure customers' views are taken into account is a very welcome one with regards any proposal to adopt customers' private supply pipes. We would be interested in any research you may have carried out on this topic.</p> <p>Increasing the information to customers in a relevant and timely way will remain key in improving customers' perception of our industry and we are open to new ideas and suggestions for better targeting our messaging.</p>	<p>We are continuing to explore opportunities to determine the various drivers of satisfaction with value for money. Ultimately this work may provide indicators of best practice, but in the meantime we look forward to learning more about your plans .</p> <p>The FWP states our intention to continue to help deliver 'Help and protection for those who are less advantaged, vulnerable or cannot afford to pay their water bill - including social tariffs'.</p> <p>We have a strong existing evidence base on this issue but also expect to undertake further research into the views and experiences of those struggling to afford bills during 2014.</p> <p>While each companies' outcomes differ, we are aware that there may be a 'cross over' between the information companies gather in tracking outcome delivery, and the information CCWater will periodically ask for. Discussions with companies will need to take place to uncover cross overs and ensure information is provided at the right time and the right level of detail, without causing duplication of reporting or an unnecessary burden.</p> <p>We are currently discussing how we can work collaboratively with other organisations to research consumers' views on this matter.</p> <p>We are happy to support company initiatives designed to inform consumers and raise awareness of good practice in relation to their water supply.</p>

	Response from	Points made	CCWater response
		<p>Working closely to bring long term sustainable behavioural change relating to water efficiency is very welcomed. We believe this will become increasingly important to the customer as meter penetration increases. You may perhaps consider a role in helping companies raise awareness with customers of the impact they may themselves make on the quality of supply within their own home.</p> <p>We note your role in supporting business customers and welcome this to ensure there is no detriment to the household customers.</p> <p>In the main, our view is that the draft programme covers the relevant priorities for customers.</p>	
17.	Thames Water	<p>Thames Water response to CCWater draft Forward Work Programme for England and Wales 2014-15 to 2016-17</p> <p>We welcome the opportunity to comment on CCWater's draft Forward Work Programme for the three-year period from April 2014. We continue to have a positive and open working relationship with CCWater's regional team in London and the South East, and have worked closely with the Chair, our local consumer advocate, and members of the policy team over the past 12-months on a broad range of issues, both directly and through our Customer Challenge Group.</p> <p>Water company financial performance</p> <p>The water industry's financial performance is a central theme throughout the draft Forward Work Programme. As you will know, water companies are tightly regulated and must meet their statutory obligations within price limits set by Ofwat. The water industry has invested over £108bn since privatisation to improve the services it provides to customers, and at Thames Water we are planning to invest nearly £8bn between 2014 and 2020 to improve Britain's oldest treatment works, pipes and sewers. Investors reasonably expect a fair return on the money they have invested - much like the mortgage on a house - and through striking a balance between company performance and returns to investors, water companies are able to finance this essential investment at the lowest possible rates. Our credit rating is among the best in the industry, and this has directly led to lower bills for customers and an improved level of service.</p>	

	Response from	Points made	CCWater response
		<p>The statement that companies are making “excess profit” appears throughout the consultation document. It is unsubstantiated, misleading and unhelpful for the industry and customers at a time when the public are particularly sensitive to cost of living issues following the economic downturn. Our annual profit in 2012/13 was at its lowest level since privatisation, while we continued to make record levels of investment in the service we provide, with bills among the lowest in the country. We suggest that the use of the term “excess profits” is reconsidered, unless firm evidence can be provided to justify this assertion</p> <p>Efficiencies in the delivery of our capital programme allowed us last year to announce the reinvestment of £150m in the service we provide to customers. The suggestion that this occurred as a result of CCWater having “persuaded water companies to reinvest for the benefit of customers” is understandable but questionable. We announced £90m of reinvestment in our 2012/13 financial results, which was overlooked by CCWater when discussing the industry’s financial performance with the media in July. In fact, the Financial Times stated that we had been “publicly rebuked by CCWater”. It was then left for us to persuade CCWater to publicly acknowledge the reinvestment to which we had already committed. We have subsequently announced a further £60m of reinvestment without any direct persuasion from CCWater. Furthermore, a £10m tax rebate from HMRC received in 2013 - which could have been paid directly to shareholders - has instead been set aside for our Customer Assistance Fund, which makes donations toward the arrears of those of our customers in particular financial hardship.</p> <p>Forward Work Programme</p> <p>We have structured this consultation response in such a way as to mirror - as far as possible - the format of the draft Forward Work Programme, which we hope will be helpful when you are reviewing our comments. The draft Forward Work Programme is split into five key themes; value for money, ‘right first time’, water, sewerage and ‘speaking up for and informing consumers’. Our comments on these sections are set out below:</p> <p>1. Value for money</p> <p>The consultation document states that CCWater “will continue to monitor and challenge companies on the delivery of the Price Review</p>	<p>Our analysis of water company financial performance since 2010-11 shows that the industry has outperformed Ofwat’s assumptions in final determinations 2009, particularly in terms of the cost of new debt and gains made from higher than anticipated RPI inflation.</p> <p>For the first two years of this current price control period, we calculate that £720m profit was generated across the sector from cheaper new debt and higher RPI.</p> <p>Outperformance against Ofwat’s cost of capital assumptions including the cost of debt coupled with gains from unanticipated higher RPI, lead us to conclude that excess profits have been generated.</p> <p>Though profit has been achieved from the factors described above, we acknowledge that Thames (along with other companies) have shared this success with customers through reinvestment.</p> <p>We intend to highlight to customers where companies have either responded to our challenge, or by their own initiative, delivered early improvements or benefits for customers as a consequence of the financing gains achieved since the last price review.</p> <p>Once the 2014 price review reaches its conclusion, we will look at how companies will report progress against their outcome</p>

	Response from	Points made	CCWater response
		<p>outcomes they have said they will deliver” (p4). It would be useful to understand how this monitoring might align with that which will be done by Ofwat, and that which Ofwat may expect Customer Challenge Groups to undertake following the conclusion of the price review. It would also be helpful for the document to explain how this proposed monitoring work will affect the existing performance reports produced quarterly by water companies to the regional CCWater offices, and avoid any potentially burdensome duplication.</p> <p>The document also states that CCWater will “assess the effectiveness of the PR14 process in delivering a good deal for customers and how CCGs have worked and added value to the process” (p10). It is important that this activity should complement similar work that is likely to be carried out by Ofwat, companies and CCGs. There is an opportunity for all parties to work collaboratively to assess the effectiveness of the PR14 process, and of CCGs in particular. We suggest that in the ‘speaking up for and informing water consumers’ section of the work programme (p27) greater mention is made of how CCWater plans to be involved in companies’ Customer Challenge Groups over the coming years. CCWater has played an important and critical role in these groups through the business planning process to date, which we believe should be recognised and described in more detail.</p> <p>We are pleased to see that CCWater now supports social tariffs (p10), and we will introduce our own social tariff in 2014 as part of an enhanced package of measures to support those of our customers most struggling to pay their bills. We believe that although the Government’s intention to allow companies to introduce social tariffs tailored to their own local circumstances is laudable, the resulting introduction of many diverse social tariffs presents its own challenges, which we suggest CCWater might sensibly explore in collaboration with companies and through its own work in the coming years.</p> <p>We support CCWater’s aspiration to help the UK Government deliver a comprehensive industry wide affordability solution (p12). We believe that a nationally mandated social tariff - designed around standardised eligibility criteria - would be simpler for customers to understand, more cost effective to implement and easier to administer. Moreover, it could make it simpler for data sharing arrangements to be brought forward</p>	<p>commitments to customers, and work with Ofwat to see how this may cross over in the reporting of KPIs and any other regulatory performance.</p> <p>Our intention is to ensure that companies provide information on how they are performing against these measures, without duplication. It is important that information is provided at the right time and consistently, and it is our intention that companies, regulators and CCWater work together to ensure this is an effective process.</p> <p>While each company’s’ outcomes differ, we are aware that there may be a ‘cross over’ between the information companies gather in tracking outcome delivery, and the information CCWater will periodically ask for. Discussions with companies will need to take place to uncover cross overs and ensure information is provided at the right time and the right level of detail, without causing duplication of reporting or an unnecessary burden.</p> <p>The review will be independent and is intended to identify what went well in the CCG process, what didn’t go so well (and why) - all with a view to identifying good practice and improving the CCG PR14 Business plan challenge for future price reviews. It is intended to help and improve CCGs, with no intention to undermine them. We will also work with Ofwat through this independent review of CCG’s PR14 work to ensure there is clarity and consistency.</p> <p>Our work with companies on the development of social tariffs will continue to include encouraging collaboration between companies where this would be helpful. We will also continue to highlight customers’ preference for a single industry wide social tariff.</p> <p>As explained above, we will continue to support the water industry’s work to explore the potential for benefit data sharing, as appropriate.</p>

	Response from	Points made	CCWater response
		<p>which would allow companies to identify those most in need of support and ensure that they are in receipt of any assistance available.</p> <p>We do not believe that it will always be sustainable in the longer term for companies to be expected to help fund social tariffs. Voluntary company support for social tariffs places such schemes at risk of not being sufficiently funded in the event that a material change occurs in the company's financial circumstances. Government funding for social tariffs, though unlikely, would arguably be a more progressive approach to financing assistance for vulnerable customers than charging through a 'levy' on water bills that is not linked to a household's ability to pay or affordability. However, the statement in the consultation document that this approach would be preferred as "the costs are not borne by water customers" (p10) is a little misguided. Any Government scheme would be funded by HM Treasury, which ultimately would be paid for by the majority of water customers through taxation. We suggest that the work programme could be expanded to include an assessment of companies' implementation of social tariffs, and publicise examples of good practice in the support provided to those in financial hardship.</p> <p>2. Right first time</p> <p>We support CCWater's aspiration for "companies to get their customer service right first time and reduce complaints" (p10) and we continue to deliver our own customer service improvement plan. This work led to a reduction in complaints of over 50% in the 12-months preceding Q3 2013/14 that has been praised by our regional CCWater team.</p> <p>The majority of water customers are satisfied with the service they receive from their water company. While we are always striving to improve customer satisfaction, we believe that it should be recognised that the 90% and 85% satisfaction for water and wastewater services respectively are already significant positive results (p21) which should be recognised in the work programme. Although not directly comparable with the water sector, a useful comparison can be drawn from a Which? survey of energy customers in 2013, which showed that satisfaction levels ranged from a maximum of 85%, to as low as 39%.</p> <p>Given the high level of customer satisfaction with their water and wastewater service, the aspiration for CCWater to achieve 80% customer satisfaction with its own service (21%) seems a little unambitious,</p>	<p>The FWP actually states that the approach would be preferred as "the costs are not borne only by water customers."</p> <p>Funding through taxation would enable costs to be shared across all consumers rather than just bill payers and in a way which would take account of ability to pay. Our research also indicates customers believe water companies should also contribute to the cost of funding social tariffs.</p> <p>CCWater's target to improve consumer satisfaction with quality of service is purposely designed to be SMART. Our 80% target is aspirational and already represents a significant step-change for CCWater to improve from its current satisfaction rating of 69%. Reaching 80% would put us within reach of the best organisations which we annually benchmark ourselves against.</p> <p>Companies have the opportunity to get things right first time, due in part to policy and process improvements brought about by feedback from CCWater, so it is right to expect strong tracking survey results from those companies. But even as companies get more complaints right first time, this conversely leaves CCWater to deal with a larger share of disaffected consumers with more protracted complaint issues which on average would not realistically lead to achievement of a 90% satisfaction rating.</p> <p>Moreover, it is not appropriate to equate the 80% satisfaction target with our complaint handling service to a 90% satisfaction score with overall service.</p>

	Response from	Points made	CCWater response
		<p>although we accept that this measure relates specifically to those customers whose water companies have not resolved their complaint, rather than the generality of service.</p> <p>3. Water on tap</p> <p>We support CCWater’s aspiration to see as many water customers as possible satisfied with the safety of their drinking water, and for the level of satisfaction on this measure to increase from the current level of 91% (p23). It should be noted however, that the Drinking Water Inspectorate reported compliance with drinking water standards at 99.96% in 2012. This wide disparity between actual performance and public perception could perhaps be improved through enhanced communications, engagement and advertising. However, this activity would come at a cost to all customers and would not result in any physical improvement to drinking water quality. It should be recognised in the work programme that it is important for companies to strike this balance.</p> <p>It is not clear what is meant by CCWater’s wish to help the industry deliver “high-quality standards which are maintained, and where necessary, improved” (p23). We suggest that this point could be helpfully expanded in the final Forward Work Programme.</p> <p>4. A sewerage system that works</p> <p>The consultation document states that CCWater will monitor the impact of the adoption of private sewers, and challenge companies where “costs seem unnecessarily high” (p26). It is in both companies’ and customers’ best interests for the adoption of private sewers, drains and pumping stations to be done in the most efficient manner possible. It would be useful for the work programme to explain how CCWater plans to objectively assess whether costs are unnecessarily high.</p> <p>We strongly support the aspiration to help deliver a reduction in the incidence of sewer flooding in consumer’s properties (p25), but do not believe that this will necessarily result in the hoped for “rising trend in the level of satisfaction with company action to minimise sewer flooding”. The number of customers affected by sewer flooding is very low and the majority of water consumers will have little understanding of the action being taken by their sewerage company to minimise it. As</p>	<p>We feel to set any other percentage target for satisfaction would be unrealistic, potentially damaging to staff morale and therefore counter-productive to our aspirational ambition.</p> <p>This relates to awareness raising and promoting the industry’s good performance. We want more customers to recognise that their water supply is of a high quality and that it is safe.</p> <p>The text has been amended to improve clarity on this point.</p> <p>We will work with Ofwat to establish whether the costs of the transfer are “unnecessarily high”.</p> <p>We agree that monitor satisfaction levels with company action to resolve sewer flooding is not straight forward. Ideally we would like to see companies carry out and perhaps publish their own research in this area to inform their own levels of service to this particular group of customers. We appreciate however, that this could be seen as adding to the burden of data reporting. In the absence of this we will monitor satisfaction levels with waste water services in our annual</p>

	Response from	Points made	CCWater response
		<p>such, we suggest that an alternative measure of success should be considered in relation to company performance in this area; for example, levels of written complaints relating to sewer flooding.</p> <p>5. Speaking up for and informing water consumers</p> <p>We support the aim to improve the current CCWater website (p28) with enhanced content, and suggest that the ‘look and feel’ of the website could also be improved to ensure that water consumers are able to more easily access relevant information. The current website is not yet quite at the standard that we believe companies would be challenged to achieve by their regional CCWater teams. As digital media is an increasingly important channel for consumers, we suggest that this should be made an area of high priority. We would be happy to provide more detailed feedback to help with any work to improve the current CCWater website, and also provide advice on how this might be achieved.</p> <p>We agree with the statement in the consultation document that it is in customers’ best interest for duplication of work to be avoided through collaborative work with water companies (p28). We are happy to work collaboratively with CCWater on research, and other work, and would like to do more of this with CCWater’s national office, building on the positive working relationship we have established with our regional team in recent years.</p> <p>Working with others to help water consumers</p> <p>The consultation document refers to CCWater’s aim to work with the Welsh Government to help deliver guidance on bad debt following the Flood and Water Management Act 2010 (p12). This legislation includes provision for residential landlords to become liable for their tenants’ unpaid water charges should they not provide their tenants details to the relevant water company. This measure would have a material impact on the level of bad debt in the water industry, which currently adds around £16 to the average household water bill across England and Wales. We believe that this provision should be enacted to help address the issue of rising bad debt, and is in the best interest of water consumers across the country. As such, we believe that CCWater should press the UK Government to implement this measure as soon as reasonably possible.</p>	<p>tracking survey and within SIM. Written complaints are also a useful indicator together with the company KPI.</p> <p>We recognise that digital media is an increasingly important channel for consumers and that CCWater’s previous website could have been improved. Since the date of publication of the Draft Forward Work Programme we have had the CCWater website completely redesigned. We will continue to build on this to make improvements in the future with a focus on easily accessible and relevant information for consumers. We are working on a social media, website and a Search Engine Optimisation strategy and have created a new post with responsibility for this area of work.</p> <p>We are happy to work with companies on research where it is appropriate to do so. This year our Policy Managers have discussed our proposed research with companies.</p> <p>UK Government decided that the case for imposing new regulation on landlords was not made following the consultation ‘Tackling Bad Debt in the Water Industry’. The consultation failed to provide evidence that the cost to landlords arising from the implementation of these regulations would be outweighed by benefits to water companies or savings to customers. In our response to the Welsh Government consultation on the implementation of regulations we have suggested a review of the effectiveness of the policy in Wales once the Regulations have been in place for some time. If taken forward this may add to the evidence available to UK Government in the future.</p>

	Response from	Points made	CCWater response
		<p>Water consumers' views</p> <p>The research work carried out by CCWater provides a useful and informative insight into the views of water consumers in England and Wales (p14) and we have been pleased to work collaboratively with the national research team on the annual tracking survey, and through both inviting and providing comments on further research activities conducted by both ourselves and CCWater. We believe that the broad variety of work research work completed by CCWater could be better publicised throughout the industry and beyond. This would expand the potential audience for the results of the research and raise the profile of the findings. This could be done through - for example - an email bulletin, newsletter, or enhancements to the CCWater website.</p> <p>The consultation document states that research into drought published by CCWater during the past year found that consumers consider the word 'drought' too extreme to use in the UK (p14) and that consumers are not widely engaged on the issue. We do not believe that the answer here is to change the language to match customers' inaccurate perception of the seriousness of the situation. On the contrary, we need to improve understanding through better and more consistent engagement with customers. One of the reasons for the success of the overall communications strategy during the 2012 drought was the consistent language, tone and messaging employed by most of the parties, in which CCWater played an important part. During that drought period our own message testing research found that the use of the phrase "we are in drought" in our water shortage awareness advertising campaign was viewed as honest, direct and credible by our customers, and was preferred over more subtle messages. What is clear is that communications with customers on sensitive and complex issues such as drought should be thoroughly tested before being made public, if they are to have the desired effect on awareness and behaviour, and the context in which particular words are used is extremely important.</p> <p>We are supportive of and very pleased to be involved with CCWater's annual tracking survey (p14). For the last two years we have commissioned a bespoke report analysing the Thames Water customer responses provided through this research, and we are pleased that companies were given the opportunity to increase the sample size in this year's survey fieldwork, addressing a weakness in the fieldwork</p>	<p>This year, we have shared the proposed research programme with companies and other key stakeholders. We are also discussing with other organisations where we can work more collaboratively. Research summaries are shared with stakeholders and all of our research is published on the CCWater website, this has recently been reviewed to help making research reports easier to find. We are also considering holding seminars with the industry to discuss relevant topics, where our research will form part of the agenda.</p> <p>We agree with this statement.</p> <p>We welcome feedback on the annual household tracking survey, and are pleased that Thames Water is making good use of the data. We recognised that some companies would like to have a bigger sample size to conduct more robust sub-group analysis by giving each company the option to pay to boost their sample. This gives the survey flexibility to accommodate company specific needs, whilst</p>

	Response from	Points made	CCWater response
		<p>methodology that prevented as much detailed analysis as might be liked by individual companies. Although the tracker survey provides an excellent overview of water consumers' views across England and Wales, the relatively small sample sizes for individual companies, and commensurately larger margins of error, make it difficult for companies to track their performance from year to year, or to draw meaningful comparisons with other companies. We suggest that an expanded sample may further improve this research activity.</p> <p>Research into water saving conducted by CCWater and published in the last year provides useful insight into customers' attitudes toward water efficiency (p14) and we support CCWater's aim to inform customers how they could save money. We believe that this message should be expanded beyond solely metered customers however, as all customers - whether they have a water meter or not - can save money through lower energy bills by reducing their hot water consumption.</p> <p>Care should be taken when using the results of the price review threshold of acceptability research (p14) as this study was undertaken using a qualitative methodology and with a resultantly small sample. For example, only 52 household customers were involved in the research, none of which were supplied by Thames Water. When compared to larger quantitative research work carried out by companies in the course of their business planning - including our own, which involved over 1,000 participants - different results may have been found that will be more representative of the views of their customers on the acceptability of their own business plans.</p> <p>Suggested additions to the Forward Work Programme</p> <p>We are pleased to see the consultation document recognise a number of up and coming issues - such as supply pipe adoption, abstraction reform and fracking - which are important additions to the previous work programme. In addition to the points we have already made above, there are several further areas where we believe that the Forward Work Programme could be expanded. More detail would be welcomed on the work that CCWater will do on the non-household retail market, and the 'enhanced role' in representing business customers that is mentioned (p7). Furthermore, the section on long-term strategic pressures (p9) makes no mention of upstream competition and how CCWater will interface with this agenda, including how they will assess the potential</p>	<p>recognising the budgetary limitations which CCWater operates in.</p> <p>We agree with this statement and we currently make this link in our communications.</p> <p>We agree and recognise that, due to the qualitative nature of the research and get small sample, the results of the research is indicative only and provided CCWater with a signal as to customers' views on what would be an acceptable threshold.</p> <p>We will work constructively with industry stakeholders and the Open Water Programme to shape competitive arrangements that satisfy customers' expectations and deliver the best outcomes for customers. We will also assess market frameworks to ensure there are no unintended consequences for customers that cannot choose retailer.</p>

	Response from	Points made	CCWater response
		<p>impacts on customers.</p> <p>We believe that the work programme could commit to more partnership working with companies on customer research to avoid duplication and the risk of contradictory findings, to get the most cost effective results, and to improve ownership of results and improve service to customers on areas of mutually agreed importance. As mentioned early, the regular sharing of good practice and research findings with the industry would be welcomed, as would improvements to the user-friendliness of the storage of research reports on the CCWater website.</p> <p>Finally, we suggest that future consultations would benefit from the use of structured questions, which assist the interpretation of responses.</p>	<p>As per comments above relating to research.</p>