Non-household water customer complaints

1 April 2019 – 31 March 2020

ccwater.org.uk

Foreword

This report has been produced in line with our strategic ambition that water companies provide 'outstanding services that are always delivered right first time'.

The competitive water retail market in England has now been fully open for three years and our report is designed to give a balanced view of non-household (NHH) complaint performance for 2019-20. Where we have identified issues, we will use our findings to hold to account those underperforming retailers to make changes that drive further improvement in 2020-21.

Our findings show that complaint levels have started to fall for the first year since the market opened in 2017. However, we should not lose sight of the fact that the rate of complaints over the first two years of the open market rose dramatically and there is still some way to go before we return to 2016-17 pre-market levels. There are also worrying signs that the quality of complaint handling is getting worse, with CCW having to investigate almost twice the number of complaints compared to 2018-19.

We do not believe that most eligible NHH customers will be able to enjoy the benefits that open market competition is intended to deliver until poor performing retailers get to grips with the causes of complaints. Switching retailer has benefited a minority of customers, but a sustained improvement in performance needs to take place to ensure this is something that can be enjoyed by NHH customers more widely.

Retailers reported that they were responsible for the vast majority of complaints, rather than the wholesalers who continue to manage the treatment and delivery of tap and wastewater. That means it is largely within retailers' gift to improve services. However, we recognise that wholesalers also have a key part to play in the delivery of customer service. If we are to return to the pre-market levels of complaints, it is vital that wholesalers and retailers work well together to provide the high quality service that customers should expect.

In the final quarter of 2019-20, the COVID-19 pandemic began to have an impact in both England and Wales. Monthly data on complaints suggests that this had little effect for the purposes of this report. The impact of lockdown from mid-March 2020 arrived too late to dramatically affect complaint numbers in 2019-20. However, we have worked with retailers to help them to deliver the important messages on the support available for NHH customers during this difficult time.

Detailed information on complaint numbers is given in the appendices accompanying this report.

If you have questions or would like to comment on our report, you can send your feedback to feedback@ccwater.org.uk

1. Executive Summary

1.1 Total complaints decrease

For our 2019-20 report, we have focused primarily on written customer complaints reported by retailers and complaints CCW receives directly. These are the two most reliable sets of complaint data to identify emerging issues and allow us to compare changes in a consistent way.

This is the first year that complaint numbers to both companies and CCW have fallen since the market fully opened. We are encouraged that fewer NHH customers in England and Wales found it necessary to complain than in 2018-19.

While the improvement is welcome, there is much more work to be done to reduce complaints to pre-market levels. Complaints to companies were still 22% higher and complaints to CCW 317% above the pre-market levels in 2016-17.

1.2 The majority of retailers/companies have improved although further work required

Most retailers improved their complaint rates per 10,000 SPIDS, with just five companies receiving more complaints in 2019-20 than in the previous year. Two of these five are very small retailers whose impact on the overall market is negligible. Similarly, CCW saw a reduction in the number of complaints it received for most providers - only three companies having worse rates than in 2018-19.

Table 1 highlights the complaint performance of each retailer and company in Wales.

Clear Business Water, Hafren Dyfrdwy, SES Business Water, Veolia and Yu Water all received more complaints than in 2018-19. Of these, Veolia and Yu Water are very small retailers and their complaint rates are based on receipt of just four and one complaint respectively.

14,363

Non-household written complaints received by companies; a 19.8% decrease on the previous year

13.6%

Decrease in non-household complaints received against companies by CCW on the previous year

105

The number of CCW investigations against retailers; almost twice the number of the previous year

22%

Increase in written complaints compared to 2016-17 (pre retail market opening)

317%

Increase in NHH complaints against retailers to CCW compared to 2016-17 (pre retail market opening)

Table 1 Retailers/companies - NHH complaint performance

Change since last year (Company)	Per 10K SPIDs (Company)	Company	Per 10K SPIDs (CCW)	Change since last year (CCW)
0%	0.0	ADSM	0.0	0%
-13% ▼	17.1	Affinity for Business	6.5	▲ 27%
-26% ▼	18.5	Business Stream	3.7	▼ -62%
-2% ▼	54.3	Castle Water	15.7	▼ -12%
10% ▲	83.9	Clear Business Water	18.9	▼ -17%
-31% ▼	18.9	Dwr Cymru Welsh Water	1.5	▼ -10%
-75% ▼	16.4	Everflow	13.1	▼ -22%
N/A ▼	0.0	First Business Water	2.2	N/A
40% ▲	35.0	Hafren Dyfrdwy	0.0	▼ N/A
-40% ▼	29.3	Pennon	7.6	▼ -20%
0%	0.0	Regent Water	0.0	0%
199% ▲	51.4	SES Business Water	15.6	▼ -9%
0%	0.0	Smarta Water	0.0	0%
N/A ▼	0.0	The Water Retail Co	0.0	▼ 0%
N/A	254.8	Veolia	0.0	▼ 0%
-15% ▼	83.0	Water Plus	17.3	▼ -11%
-37% ▼	14.7	Water2Business	1.5	▼ -50%
-23% ▼	41.1[1]	Wave	11.1	▼ -13%
-71% ▼	22.6	Yorkshire Water Business	1.1	▼ -54%
N/A ▲	35.7	Yu Water	35.7	▲ N/A
-19% ▼	50.3	Average	12.0	▼ -8%

▼ Decrease in complaints per 10K SPIDs ▲ Increase in complaints per 10K SPIDs

■ Above the industry average for complaints per 10,000 connections/SPIDs.

Notably, larger retailers - Water Plus, Castle Water, Wave and Everflow - who have been identified as poor performers in previous CCW annual and quarterly reports all saw a decrease in complaints.

Complaints to CCW per 10,000 SPIDs also fell for the majority of the retailers compared to 2018-19. Only Yu Water, First Business Water and Affinity for Business saw an increase. The rise for Yu Water was the result of a single complaint to CCW.

Despite improving in one or both measures, Clear Business Water, Water Plus, Castle Water and SES Business Water are above the market average in complaints made to companies and those received by CCW. They were also the worst four companies across the reporting year with SPID numbers in excess of 5,000.

[1] Complaints to Wave include small numbers of complaints from customers in Scotland. System changes will address this issue for 2020-21.

1.3 Causes of complaints

Data provided to us by retailers contains only the number of written complaints received rather than identifying their root causes. Complaints received against retailers by CCW are recorded by main category to provide further detail as to why customers are complaining.

Complaints have fallen across all categories that CCW use for this purpose. Despite a small reduction in volume, billing and charges remained the most common complaint category in 2019-20. It accounted for 74.9% of all those brought to CCW. Poor administration was the second most common cause of complaints to CCW, with 11.1% of the total.

There is still much more retailers can do to improve in the area of billing and charges. Companies that are able to bill customers in an accurate and timely way will help reduce complaints and bring improved customer satisfaction and likely improve customer retention rates.

Falling numbers of complaints relating to administration and retail competition[2] is welcome evidence that the issues related to retailers' customer service and account handling identified in our previous NHH annual reports are improving.

1.4 Investigations

Where an issue exhausts a retailer's complaints procedure, CCW may undertake a formal investigation.

The number of investigations undertaken by CCW increased significantly in 2019-20, up from 57 in 2018-19 to 105. For the third year running, Water Plus had more investigations than any other retailer or water company in Wales. It accounted for over half of all investigations. Five other companies saw an increase in the number of investigations compared to 2018-19.

The rise in investigations is disappointing and suggests that some companies are not learning from previous complaint handling failures and translating this into improved ways of working. We want to see a marked improvement from poor performing companies in 2020-21 and will be scrutinising their efforts closely to ensure customers have less reason to complain.

1.5 Complaints with involvement of wholesalers

While the two main causes of complaints received by CCW were related to retail services, some NHH complaints are caused by operational problems - such as leakage allowances or other long-standing issues. Resolution of these complaints requires the involvement of wholesalers, and we therefore ask retailers to provide the number of complaints they receive which are wholly, or partly, attributable to wholesalers.

In 2019-20, 22% of written complaints received by retailers were partly or wholly attributable to a wholesaler. This is a slight reduction on 2018-19, suggesting some improvement in the collaborative working between wholesalers and retailers which we have encouraged. However, with 78% of all complaints being attributable to retailers, the majority of underlying issues that generate complaints can - and should - be addressed by retailers' own actions.

1.6 Future work

CCW is encouraged by the signs of improvement in the market and if this is sustained it could indicate that a turning point may have been reached. It is now important that retailers maintain their focus on improving services to their customers in order that complaints continue to decline across the industry. The full impact of COVID-19 on the market has yet to be realised and CCW will monitor developments and modify its approach accordingly.

To help drive improvement, CCW will continue to work with retailers across the market, pushing poor performers to improve. We will also continue to explore how we can work more effectively with the NHH retail market operator, MOSL, and the water regulator, Ofwat, particularly around maximising the use of data. Where we see evidence of companies failing to meet their licence conditions, we will press Ofwat to take firm regulatory action.

[2] Retail competition covers areas such as incorrect categorisation of NHH customers as HH customers, problems associated with switching retailer and administration between retailers and wholesalers.

2. Introduction

In April 2017, competition in the provision of water and sewerage retail services was extended to all business, charity and public sector organisations operating out of NHH premises in England. Retail companies (referred to in this report as 'retailers') handle NHH customer complaints and enquires, bill customers and read their water meters. The provision and maintenance of water services remains the responsibility of regional water companies (referred to in this report as 'wholesalers'). The retail market was not opened up to further competition in Wales[3], and retail services for the majority of NHH customers are still provided by water companies operating in Wales[4].

This report looks at customer complaints received directly by retailers and companies, as well as NHH complaints received by CCW. It compares performance based on the number of complaints normalised by the number of supply points (SPIDs[5]) served by each retailer at the end of the financial year. We have used this same measure from our first 2017-18 annual report for consistency, allowing direct comparisons regardless of changes in company size. While we believe normalisation is the fairest way to compare performance, we recognise that small changes in complaint numbers can have a significant impact on the normalised rate of smaller retailers. Where appropriate, we account for this in the report's commentary. Retailers are also categorised by size – as small, medium or large - at various points in the report[6].

Retailers have once again provided CCW with details of the telephone complaints they received and ideally we would have used this to provide a more complete picture of complaints across the market. However, having analysed the data, we are not confident that the quality is robust enough to use for comparative purposes. We will continue to work with retailers to improve their reporting of telephone complaints in 2020-21, with a view to incorporating this data more fully in our next annual report.

Retailers have provided written assurance statements that the complaint data they have submitted to CCW is both complete and correct.

We saw further consolidation in the market during 2019-20 with Business Stream's acquisition of Yorkshire Water Business Services and Three-Sixty on 1 October 2019 being the most significant moves to date. Where retailers left the market during the year, we have not featured their performance as part of this report other than to include their complaints as part of the overall totals. In the case of Business Stream, we have derived its overall performance by aggregating the pre and post-acquisition data. This provides a fairer reflection of performance over the 12-month period than would otherwise have been presented were we simply to use the year-end SPID count for normalising the data. An explanation for how this was calculated for each measure is included in Appendix 5.

[3] Only those NHH customers using more than 50 megalitres of water a year can currently choose their water retailer in Wales.

[4] Water companies in Wales are referred to as 'companies' throughout the report.

[5] A Supply Point ID (SPID) is a reference number for each supply point to a premises and applies only to retail companies. For companies we use connections instead of SPIDs for normalising complaints.

[6] Retailer size determined by SPID count: Small <5,000 SPIDs; Medium 5,000 – 100,000 SPIDs; Large >100,000 SPIDs

3. NHH complaints in England and Wales

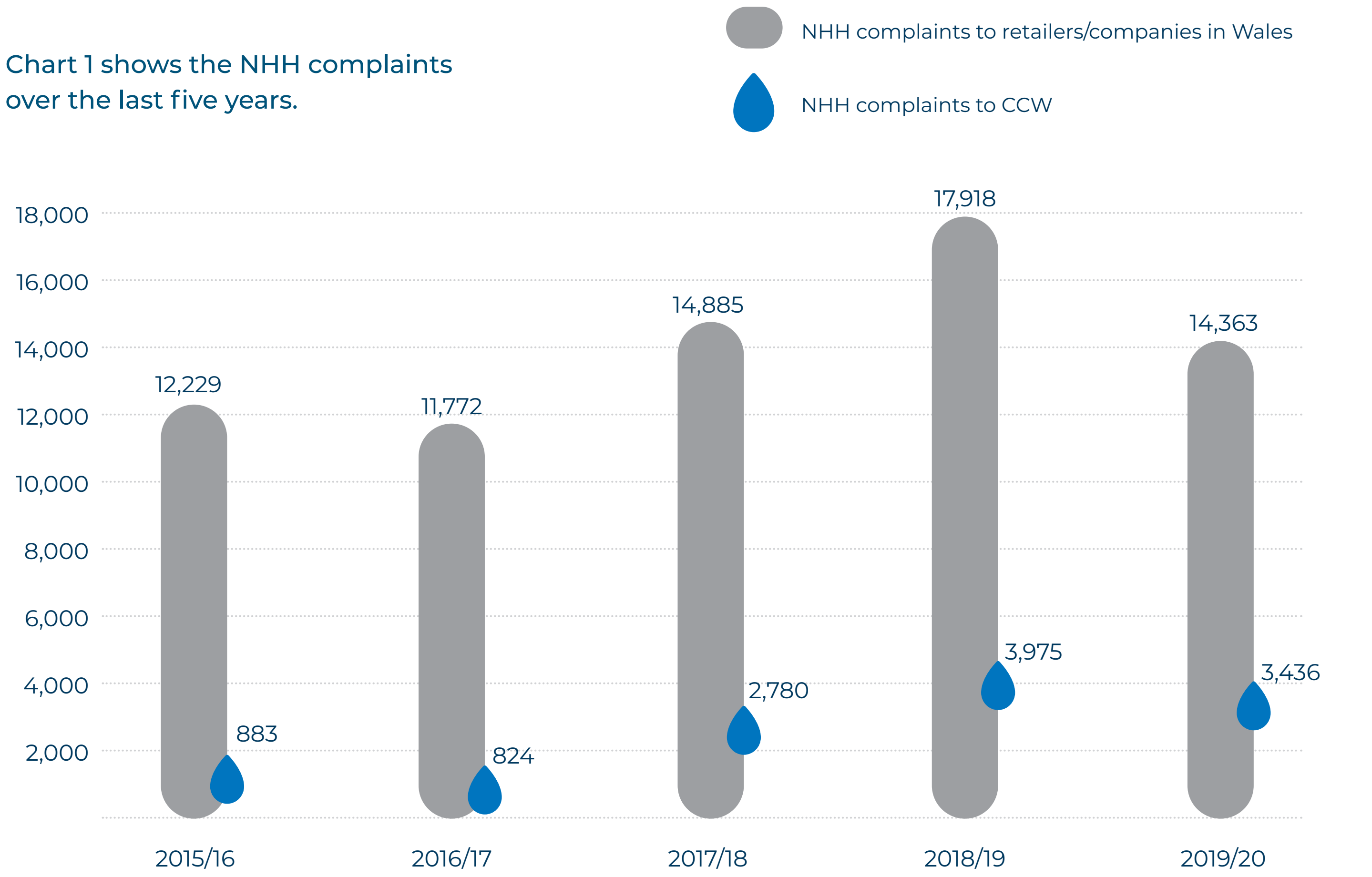
3.1 Total complaints decrease

In 2019-20 we saw a decrease in the number of written NHH complaints to retailers (19.8 %) and a smaller, but not insignificant, fall in those received by CCW (13.6%). This is the first time these measures have fallen since the retail water market was fully opened in England in April 2017.

The reduction is encouraging, however, complaints to retailers remain 22% higher than 2016-17 levels and those received by CCW are around four times the pre-market rate. There is therefore still more work for retailers to do. The trend over time shows complaints to CCW fell for three successive quarters and we will continue to monitor this to ensure the improvement continues.

CCW monitors retailer performance and the issues behind the complaints we receive on a continual basis. We published quarterly information on the complaints we received and met regularly with retailers to press them on service issues. We also hosted a retailer workshop to help develop a market approach to improving customer service and to address specific issues. We have also met with retailers and wholesalers to help identify difficulties and improve the way they work together to deliver a better, seamless resolution for customer complaints.

Chart 1 shows the NHH complaints over the last five years.



3.2 Customer Insight Research

For the third year running, CCW collaborated with Ofwat on its annual 'Customer Insight research' to measure business customers' views of the NHH retail market and the service they receive. This included a survey of just over 1,000 customers across England. The surveys were complemented by 56 in-depth interviews with SME business customers and 56 Third Party Intermediaries (TPIs). TPIs advise business customers on getting the best deal in the market for their clients. They offered some valuable evidence of how the market is serving customers.

91%

of switchers had reported receiving a benefit in the last 12 months

The surveys highlighted that:

- Satisfaction levels are stable but billing and customer service issues remain - 78% of business customers reported satisfaction with their current water and wastewater retailer, which is in line with the 80% who did so in 2018-19. Around 6% of customers reported being dissatisfied, with the main reasons for this concerning billing issues (69% of those dissatisfied) and customer service issues (54%).
- Awareness levels have increased - 58% of business customers are aware that they are able to switch the company providing their water and wastewater retail services or potentially re-negotiate a better deal with their existing retailer. That is higher than the second year of the market (2018-19 at 53%) and the first year (2017-18 at 48%).
- Market engagement is steady, with larger businesses continuing to be more active than smaller businesses. Around 4% of eligible business customers had switched or renegotiated in the last 12 months. That is similar to the overall annual switching and re-negotiation rates seen in 2018-19. As in the second year of the market, larger businesses were more active than smaller businesses (26% had switched or renegotiated).
- Motivations for switching/re-negotiating are foremost but not exclusively price based – of those who considered switching or renegotiating in the last 12 months, 38% did so with a view to achieving a lower price or bill. Nevertheless around a quarter also reported that they were interested in consolidating bills.
- Switchers and re-negotiators reported benefits from having done so – most (91%) of those who had switched in the last 12 months reported having received some form of benefit. The leading benefits cited were lower prices (66%), with improvements in customer service (10%) and quality of service (10%) also prevalent.

58% of business customers are aware they are able to switch

38% of switchers did so with a view to achieve a lower bill

The in-depth interviews with SME customers revealed:

- General levels of knowledge about the market or alternative offers were fairly low across the board, even among those who had actively switched or re-negotiated.
- Those who had switched or re-negotiated generally expressed satisfaction that they had got a better deal in terms of price and/or improved billing and/or customer service, and that the process of switching or re-negotiation had been relatively smooth and fast.
- Participants had been prompted or encouraged to switch or re-negotiate, usually after being contacted by a retailer or a TPI.
- For those that have not switched or re-negotiated, four main barriers impeding SMEs from engaging with the business retail market can be identified: a belief that the savings available would be marginal; low levels of knowledge and interest in the water market; lack of time; and being "trapped" by outstanding billing issues.
- The vast majority of participants who had switched or re-negotiated said the process of switching was easy, uneventful, and went ahead without issues. For those who used TPIs, the vast majority said they enjoyed the "hands off" experience.
- The vast majority of those interviewed said that they had found cold calling from TPIs to be a frequent occurrence. However, most participants said they received a much greater number of cold calls with respect to electricity and gas than they did other utilities such as water.

The in-depth interviews with TPIs revealed:

- TPIs have moved towards consultancy services for NHH customers such as account management, efficiency and billing support, rather than a narrower focus on switching suppliers based mainly on price. This is in part because TPIs report that:
  - Many NHH customers are simply not motivated by the relatively low level of savings available
  - Some NHH customers actively seek services or value beyond price; and
  - In part because some customers are seeking TPIs' help in getting the basics right such as accurate and timely billing.
- TPIs typically draw on existing and established client relationships in other markets – such as gas, electricity and/or telecoms – to broaden their offers to water customers.
- TPIs cited difficulties with accurate billing as a major issue for their clients. Reflecting both their customers' experiences and their own in dealing with retailers on behalf of customers, TPIs noted billing issues included: inaccurate bills, an over-reliance on estimated meter readings, bills being too complex, irregular billing intervals, missing bills, and prolonged periods for retailers to address billing issues.

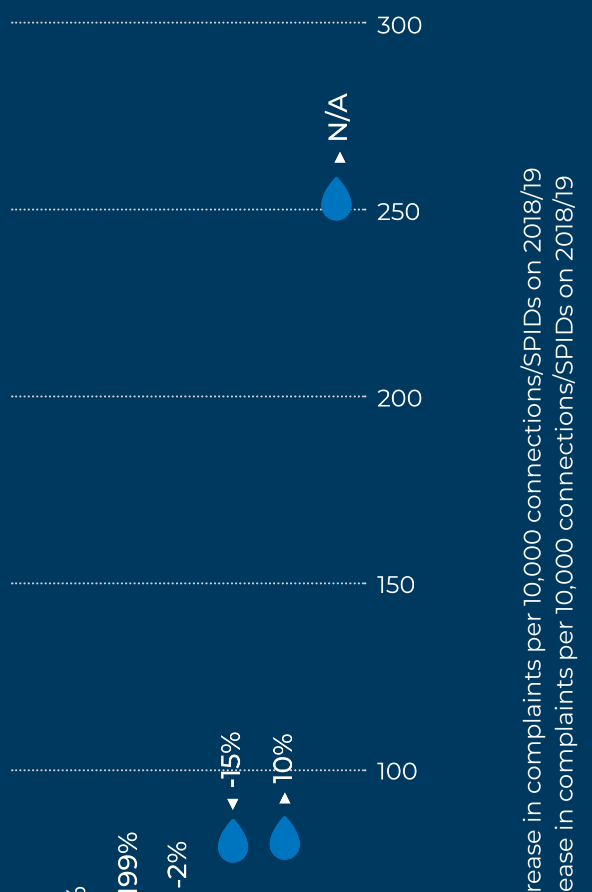
4. Individual complaint performance of retailers and companies

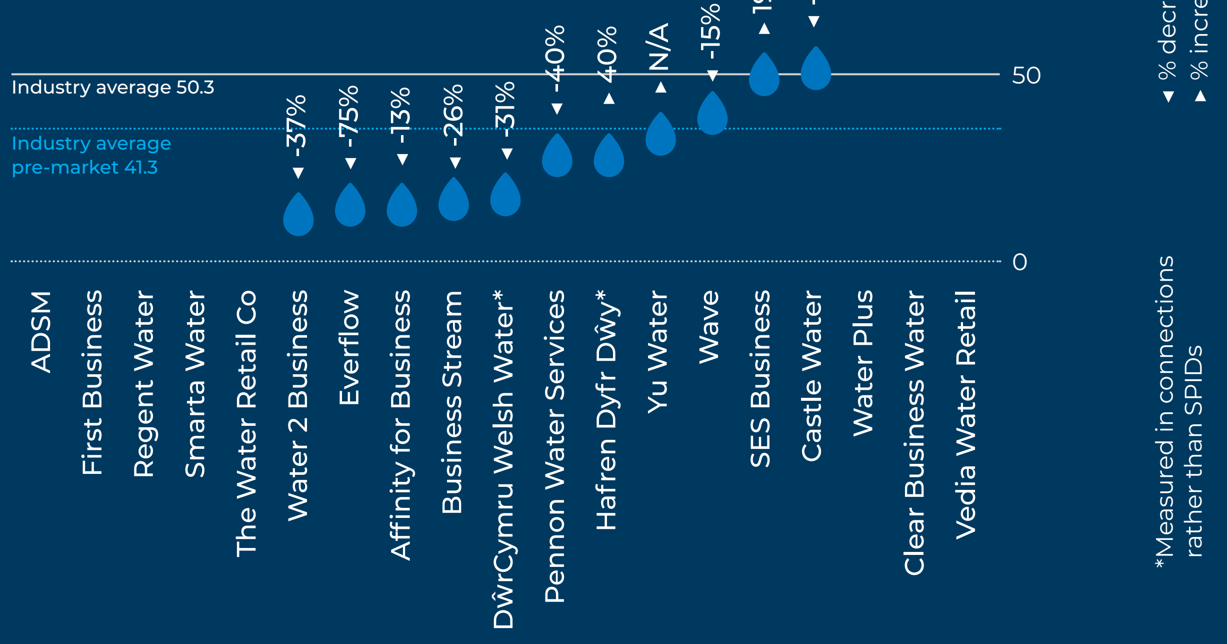
4.1 Big differences remain in written complaint performance

When comparing complaints per 10,000 SPIDs there remain significant differences between the best and the worst performing companies. Many of the retailers with a very small number of SPIDs reported no complaints or - in some instances - a very low number. While we normalise complaint numbers to account for the different size of retailers, we recognise that for companies with very low SPID numbers, each complaint has a significant effect on the per 10,000 SPIDs rate. Where this is the case, we include their performance in the appropriate chart with further explanation provided where appropriate.

Chart 2 shows the complaints per 10,000 SPIDs or connections for 2019-20. The percentages for each increase and decrease are calculated on changes in complaints per 10,000 SPIDs/connections, rather than total complaint numbers to factor in changes in retailer market share.

Chart 2: NHH written complaints to retailers and companies in Wales per 10,000 supply points (SPIDs) 2019-20





It is encouraging that the majority of retailers reported falling complaint numbers. Only five retailers showed a deterioration in the number of written complaints per 10,000 SPIDs/connections compared to 2018-19. Of these, Veolia and Yu Water are very small retailers with only 157 and 280 SPIDs respectively and while this makes their associated complaint rates appear high, these are based on just four complaints to Veolia and a single complaint to Yu Water. Despite the low numbers, CCW is disappointed that customers find it necessary to complain when the retailers serve a very small customer base. Neither retailer recorded any complaints in 2018-19.

In our 2018-19 report, we advised caution that the written complaints reported by SES Business Water may not be accurate. It had reported very low numbers which did not correlate with the amount CCW had received against it. CCW subsequently met with SES Business Water and ascertained this was the case and the retailer has now addressed this in their complaints reporting processes. The large increase in their complaint rate from 17.2 to 51.4 per 10,000 SPIDs, therefore reflects an improved reporting culture and is not simply an increase in disaffected customers. This is supported by the fact that the correlation between complaints to the company and those made to CCW is now more in line with expectations than in 2018-19.

4.2 Telephone complaint performance

While Chart 2 provides a good insight into retailer performance, it does not paint a complete picture as complaints made in writing[7] only tell part of the story. Retailers have continued to report the number of telephone complaints they received. However the vast disparity in reporting rates[8] suggests that processes are still not consistent enough to make any accurate and meaningful comparisons between retailers.

In previous years, companies have provided the number of unwanted contacts. These are telephone calls deemed 'unwanted' from a customer point of view, and are linked to the reason for the contact rather than whether it was a complaint. This was no longer a reporting requirement in 2019-20 and therefore these numbers are unavailable.

That means it is not possible to directly compare telephone complaint performance from the past two years. From April 2020, retailers and companies were required to report telephone complaints and we will continue to work with them to drive consistency and allow for better information to enable direct comparison to be made.

[7] Written complaints include complaints raised through email
[8] Telephone complaints rate per 10,000 SPIDs varies from 0 to 324.9

4.3 NHH complaints received against retailers and companies in Wales to CCW decrease

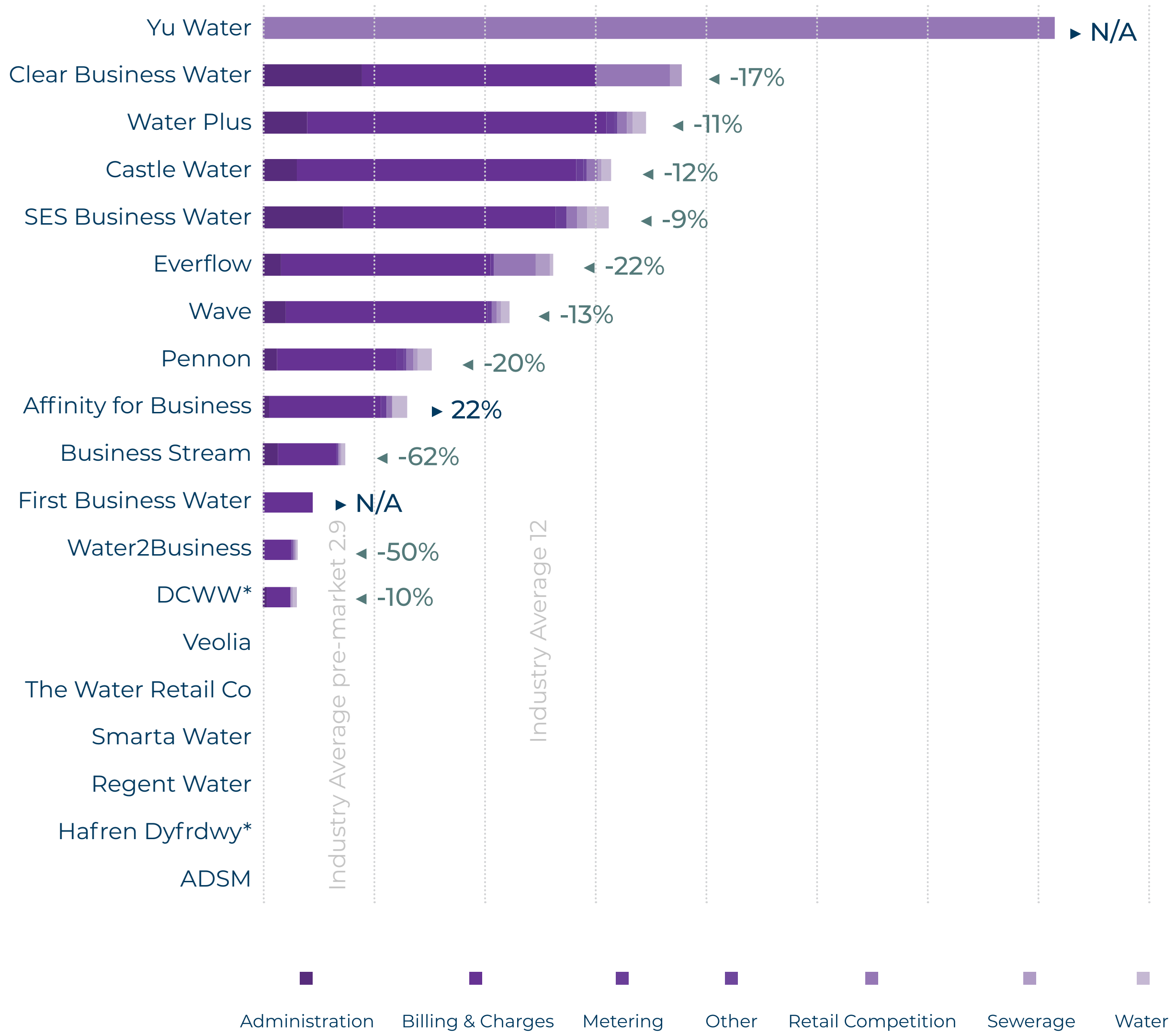
Our recording methods allow us to capture more detail on the causes of complaints that are made to us about retailers and water companies in Wales. We break complaints down into seven main categories: administration, billing and charges, retail competition, water, sewerage, metering or 'other' for complaints which do not fit into any of the main categories, for example, environmental concerns or a dispute where a third party is involved.

Although the numbers are not as high as the written complaints received by retailers and companies in Wales, they provide a good comparator. By cross-referencing both sets of information we can make a more informed view on retailer performance.

Chart 3 shows the complaints received by CCW and the change on the previous year. It also breaks down the main root cause of complaint.

The majority of retailers showed an improvement based on the complaints CCW received from customers. While Yu Water was the worst performing retailer based on complaints per 10,000 SPIDs, it should again be noted that the low number of SPIDs plays a significant part in this and only one complaint was received. Aside from Yu Water, only First Business Water and Affinity for Business have worse complaint rates since 2018-19 and both are below the market average.

Chart 3: NHH complaints received by CCW against retailers/companies in Wales per 10,000 Connections/SPIDs 2019/20



*Measured in connections rather than SPIDs

4.4 Investigations increase significantly

Investigations are our most serious involvement in complaints and provide a good indication of the quality of retailers' complaint handling.

CCW investigates a complaint under the following criteria:

- When the company procedure has been exhausted and issues remain that the customer has raised and should be addressed by the company;
- Where there are long-standing service failures that the company were aware of but failed to action. This includes a company not responding to repeated points the customer is raising unless it falls under an exemption; or
- Where the company has not correctly escalated a complaint in line with its complaints procedure and CCW would have investigated the complaint if the company had done so.

CCW raised 105 investigations against the retailers in England and companies in Wales during 2019-20 – marking an 81% increase on the previous year. Of these, 57 investigations (54%) were made against Water Plus - almost as many as the entire market in 2018-19.

Some other retailers also performed poorly in this area with Wave, Castle Water and SES Business Water all seeing substantial increases on 2018-19. There were 25 investigations against Wave (+11 on 2018/19), 14 against Castle Water (+5) and 4 against SES Business Water (+4).

In contrast, Everflow had no investigations in 2019-20 - a significant improvement on the five it received the previous year. Other retailers with falling numbers of investigations were Pennon (-3) and Business Stream (-2).

Billing and charges were the root cause of 81.9% of all investigated cases with administration responsible for 10.5%. This percentage split highlights that the handling of billing and charges complaints raises the most issues for customers and CCW.

The rise in investigations is of concern. Retailers must work harder to resolve complaints quickly and effectively, fully addressing all of the concerns the customer has raised.

Table 2 shows the investigations CCW carried out against the retailers in the year.

Company	Investigations 2017-18	Investigations 2018-19	Investigations 2019-20	Change on 2018-19
ADSM	0	0	0	0
Affinity for Business	1	0	1	+1
Business Stream	0	3	1	-2
Castle Water	1	9	14	+5
Clear Business Water	0	0	0	0
Hafren Dyfrdwy	0	0	0	0
Dŵr Cymru	0	0	0	0
Everflow	1	5	0	-5
First Business Water	0	0	0	0
Pennon	3	5	2	-3
Regent Water	0	0	0	0
SES Business Water	0	0	4	+4
Three Sixty Water	0	0	0	0
Water Plus	17	21	57	+36
The Water Retail Company	0	0	0	0
Water2business	0	1	1	0
Wave	5	14	25	+11
Yorkshire Water Business Services	0	0	0	0
Yu Water	0	0	0	0
Total	28	58	105	+47

4.5 Number of complaints to retailer compared to complaints to CCW

Where retailers have effective systems in place to resolve the complaints raised directly with them, fewer customers should end up approaching CCW. By comparing the number of written complaints that have been raised with the company to the amount that have been received by CCW, we also get an indication of how well complaints are being handled by companies.

Table 3 shows the ratio of complaints to companies compared to complaints to CCW in the year.

Table 3: The ratio of complaints to retailers/ NHH customers in Wales compared to complaints to CCW in 2019-20

Company	Company written complaints	Complaints to CCW	Company written complaints to CCW complaints ratio
First Business Water	0	1	0.0
Yu Water	1	1	1.0
Everflow	104	83	1.3
Affinity for Business	129	49	2.6
SES Business Water	214	65	3.3
Castle Water	2731	789	3.5
Wave	1746	472	3.7
Pennon	471	122	3.9
Clear Business Water	151	34	4.4
Water Plus	6524	1357	4.8
Business Stream	1126	186	6.1
Water2Business	210	22	9.5
Dwr Cymru Welsh Water	382	31	12.3
ADSM	0	0	N/A
Hafren Dyfrdwy	35	0	N/A
Regent Water	0	0	N/A
Smarta Water	0	0	N/A
The Water Retail Co	0	0	N/A
Veolia	4	0	N/A

Higher ratios suggest that complaints are being handled more effectively than lower numbers. The ratio across all complaints in 2019-20 is 4.2 (14363/3436) and Table 4 shows significant variance across the market. CCW will work with retailers in 2020-21 to explore these variances further.

4.6 Poor and better performers

To help us assess the performance of individual retailers we have looked at a number of key areas. As in previous reports, we have assessed performance in both complaints to the company and to CCW to determine whether numbers are increasing and whether or not they are above or below the current and pre-market average levels. We have also looked at the number of investigations that CCW undertook as a way of determining performance in complaint handling.

Table 4 provides a breakdown of the measures we have used when assessing the performance of the retailers or companies in Wales who reported complaints in 2019-20.

Table 4 Retailer and companies in Wales NHH complaints 2019-20 and triggers for poor performance[9]

Company	Written complaints % increase	CCW complaints % increase	Above industry average written complaints	Above industry average CCW complaints	Above pre market average company complaints	Above pre market average CCW complaints	Increase in investigations
SES Business Water	✓		✓	✓	✓	✓	✓
Clear Business Water	✓		✓	✓	✓	✓	
Castle Water			✓	✓	✓	✓	✓
Water Plus			✓	✓	✓	✓	✓
Yu Water	✓	✓		✓		✓	
Veolia	✓		✓		✓		
Affinity for Business		✓				✓	✓
Everflow				✓		✓	
Wave						✓	✓
Business Stream						✓	
First Business Water		✓					
Hafren Dyfrdwy	✓						
Pennon						✓	
ADSM							
Dwr Cymru							
Smarta Water							
The Water Retail company							
Water2business							
Regent Water							

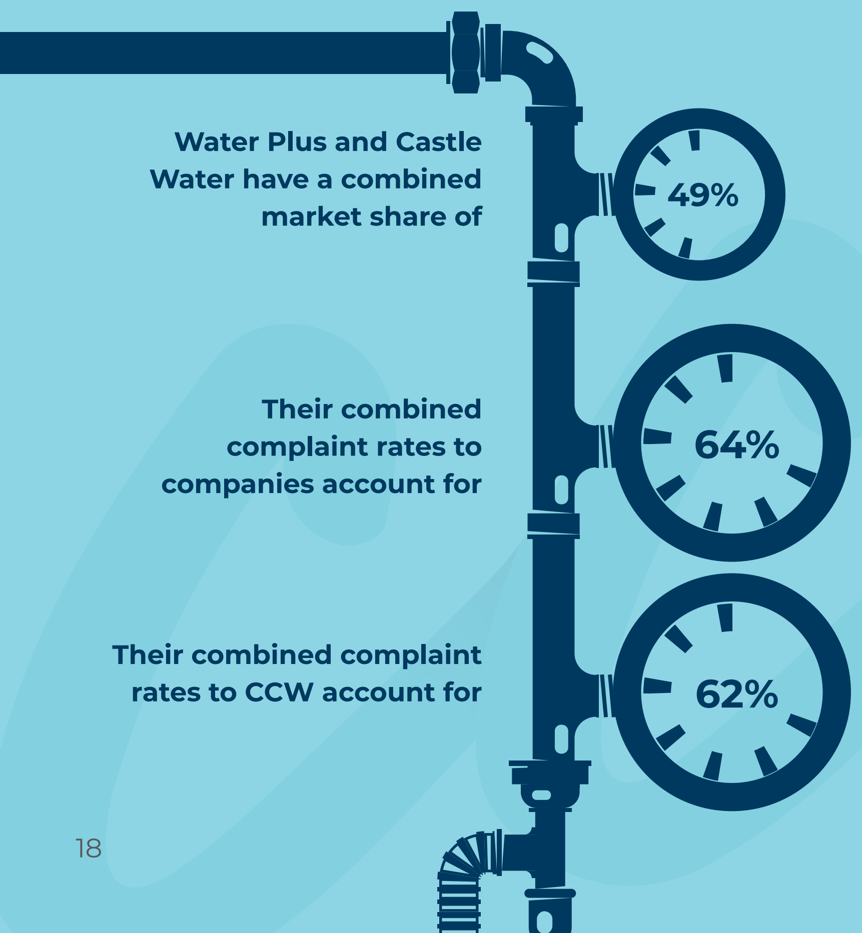
[9] All complaint values normalised per 10,000 SPIDs

4.7 Poor performers

SES Business Water met six of the seven poor performance triggers, although it is difficult to ascertain the validity of the increase in written complaints due to under-reporting in 2018-19. It is a medium-sized retailer that continued to grow in 2019-20, ending the year with over 41,000 SPIDs - an increase of 8%. It is a concern that complaints to the retailer are almost three times the rate for 2018-19, although in that particular year's report we advised that the data provided by it should be treated with caution.

The current rate of complaints to the retailer now places them above the market average. Complaints to CCW show that the majority of complaints centre on billing and charges, in line with the rest of the market. However, complaints associated with poor administration were double the rate for the overall market. Furthermore, SES Business Water was subject to four investigations in 2019-20 having had none in the previous year. Three of these investigations related to billing issues with the fourth centred on administration.

Water Plus, Castle Water and Clear Business Water met five of the seven poor performance triggers. Water Plus and Castle Water have a combined market share of 49%, however their combined complaint rates account for 64% of all complaints to companies and 62% of all those made to CCW.

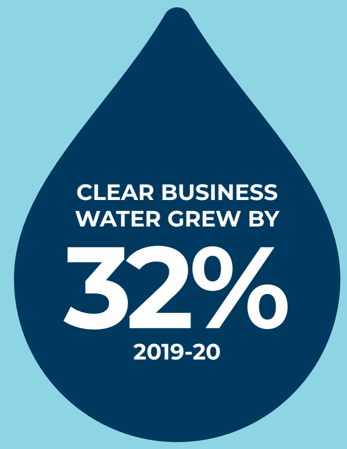


Water Plus is the largest retailer with 30% market share, but saw a steady decline in SPID numbers throughout 2019-20. As in 2018-19, it is one of the worst three performing retailers for written complaints both to the company and to CCW when normalised by 10,000 SPIDs. While 2019-20 has seen a reduction in overall complaint levels, much of this improvement came from a relatively strong performance early in the year. This was overshadowed by an underlying rise in complaints during the latter part of 2019-20.

CCW regularly engaged with Water Plus in relation to its complaint numbers through 2019-20. The retailer explained that the key driver for increased complaints since October had been its activity to apply fees for late payments, as well as its debt collection agency referrals. Water Plus feel these complaints have now peaked and should continue to reduce as its customers adapt to the new arrangements.

A particular concern is the increase in the number of investigations CCW has undertaken, rising from 21 in 2018-19 to 57 in 2019-20. It accounted for 54% of all investigations CCW undertook against retailers. The largest proportion of investigations, 28 in total, were centred on issues around customers who disputed either their responsibility for, or the accuracy of, their bills.

In March 2020, our CEO and our Board Chair met with Water Plus to discuss our continuing concerns and made it clear that we expected the retailer to demonstrate a significant and rapid improvement in the coming months. Water Plus acknowledged the issues and committed to work with us on finding and implementing potential solutions. CCW will continue to scrutinise the retailer's progress closely.



Clear Business Water met five of the seven poor performance triggers. It is a medium-sized retailer that grew by 32% in 2019-20, ending the year with over 17,000 SPIDs. Chart 3 shows that almost a quarter of all complaints to CCW about Clear Business Water centred on poor administration, more than twice the market average. Furthermore, a significantly higher proportion of complaints were about retail competition (18%) than the market average (3%), which includes complaints where customers encountered difficulties when switching retail provider.

The final quarter of 2019-20 saw an improvement in the number of complaints both to the company and to CCW but this was not significant enough to bring it back into line with the rest of the industry. CCW met with Clear Business Water in February 2020 to raise our concerns and the retailer has now put an action plan in place to reduce complaints below market average. We will continue to monitor for evidence of improvement throughout 2020-21.

Castle Water is another large retailer, with a 19% share of the market. While total complaints to the company reduced by 2% in 2019-20, much of the reduction was achieved in the first half of the year. Complaints rose in five of the last six months of 2019-20. The fall in complaints to CCW is welcome but it remains 31% above the average for the market. Furthermore, it is disappointing to see a 56% increase in the number of investigations undertaken.

CCW frequently criticised Castle Water throughout 2019-20 for its inconsistent performance and failure to establish a long-term positive improvement trend. We actively engaged with the retailer about the various issues picked up from the complaints made to CCW and challenged them to improve. Castle Water has acknowledged our concerns and has undertaken to put measures in place to address them.

Castle Water formally merged with Affinity for Business on 1 April 2020. As complaints rates for Affinity for Business have historically been significantly lower than Castle Water, there is an opportunity for the new company to share learning and significantly improve its service to customers. CCW will continue to engage with the new organisation and monitor its performance carefully throughout 2020-21.

4.8 Companies with mixed performance

Veolia is a very small retailer with only 157 SPIDs which means any complaint received will have a bigger impact on the normalised per 10,000 SPIDs rate. However, we are disappointed that the retailer received four complaints given its small base. CCW did not receive any complaints against Veolia.

Yu Water also has a small base of just 280 SPIDs and is therefore subject to similar distortions in the normalised rate. It received only one complaint in 2019-20 but failed to resolve it and the customer ended up approaching CCW for help.

Everflow is a medium-sized retailer that grew by 58% in 2019-20, ending the year with 63,349 SPIDs. It was named as a poor performer in our Quarter 1 and Quarter 4 updates during 2019-20. This was based purely on complaints to CCW and performance in this area continues to be worse than the market average. However it does not meet any of the other poor performance triggers and was not subject to any investigations in 2019-20.

4.9 Companies on CCW's watch list

Hafren Dyfrdwy saw a 40% rise in NHH complaints in 2019-20. Although its complaint rate of 35 complaints per 10,000 SPIDs remains comfortably below the market average of 50.3, CCW will continue to monitor its performance through its regular engagement with the company.

In an ideal world, customers would have no reason to complain and therefore we welcome the fact that several retailers have reported that they received no complaints in 2019-20. Some of these retailers have received no complaints since market opening and as the majority have very low numbers of SPIDs, there is no evidence to suggest that this data is incorrect. However, while we ask companies to provide assurance that their data is accurate, we cannot ignore the possibility that some complaints may go unreported. We are planning to work more collaboratively with the industry in 2020-21, comparing our data with that held by MOSL to provide further reassurance that complaints are being recorded and reported accurately.

Hafren Dyfrdwy saw a
40%
rise in NHH complaints 2019-20

They are still comfortably below the market average at
35
per 10,000 SPIDs

4.10 Better performers

Other than the smaller retailers who reported no written complaints and did not have any complaints raised with CCW, there were four retailers who were below the industry average and showed improved performance.

Water2Business is a large retailer and improved in both complaints to the company and CCW per 10,000 SPIDs compared to 2018-19. Furthermore, its complaint levels are below those of the pre-market average on both measures.

Business Stream, **Pennon** and **Wave** still have higher levels of complaints to CCW than the pre-market levels. However, they were all below the industry average and had improved performance in both complaints to the company and to CCW. We are concerned however to see an increase in investigations for Wave compared to the previous year.

In Wales, **Dŵr Cymru** performed well in all measures.

5. Root causes of complaints received against retailers/ companies by CCW

For the complaints received against retailers by CCW, we separate them into seven main categories: billing and charges, administration, retail competition, water, sewerage, metering or 'other' for the complaints which do not fit in the main categories.

Chart 4 shows the NHH complaints received by CCW by main category.

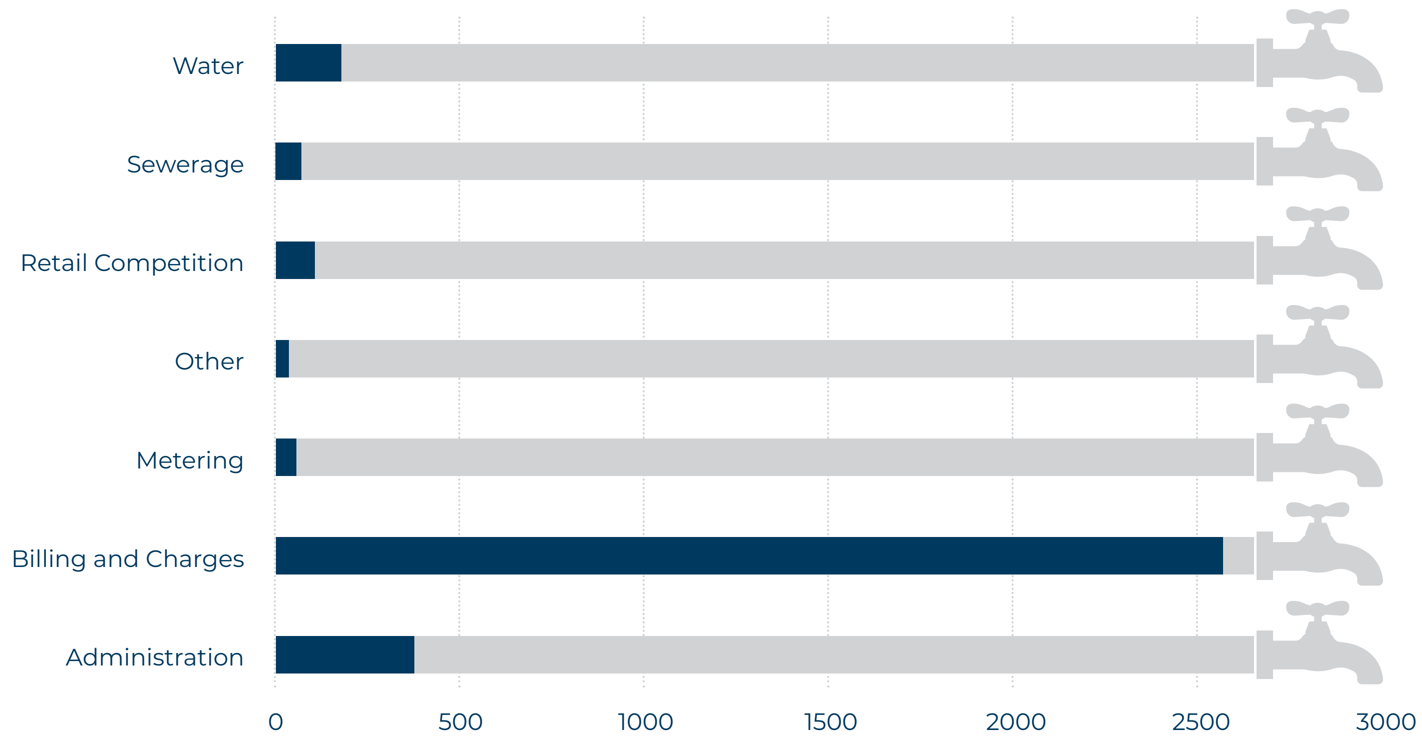
Billing and charges remained the highest category of complaint in 2019-20, accounting for 74.9%.

The number of billing and charges complaints decreased by 7.4% from 2,779 to 2,573 in 2019-20. However, proportionally they increased by 5% (from 69.9%) as complaints in other categories fell by greater numbers. This is significantly higher than among households where billing and charges complaints make up 46% of the total. The number of long unread meters in the retail market continues to be a concern due to the effect this has on the accuracy of customer charges. While there appears to have been an overall decrease in this number, the increase we have seen in billing and charges complaints suggests there is still a lot of work to be done by companies in this area.

Proportionally, administration complaints dropped by 3.1% (from 14.2%), retail competition by 1.1% (from 4.5%) and all 'other' complaints fell by 0.6% (11.3%).

The fall in administration and retail competition complaints provides some evidence that issues related to the retailers' customer service and account handling may be improving. At the same time, the increase in billing complaints suggests that the retailers still have a lot of work to do to tackle billing related issues, especially concerning leakage and disputed liability.

Chart 4 NHH complaints received by CCW by main category 2019-20



6. Complaints with involvement of wholesalers

We continue to ask retailers to provide the number of complaints it considers the wholesaler to be partially or fully responsible for to help identify whether there are any issues between the two areas of the business.

Retailers reported that 22% of complaints were partly or fully caused by the wholesaler, a 3% reduction on 2018-19. Table 5 shows the proportion of complaints where the retailer reported partial or full responsibility of the wholesaler.

The percentage of wholesaler involvement is broadly in line with what we would expect through our analysis of complaints to CCW. While the decrease is welcome, we feel that further improvement is achievable in wholesaler and retailer interactions.

We remain focused in our plans to improve data collection by CCW and other agencies to help identify root causes and drive further improvement in this area. CCW will continue to work with both parties to help make sure the communication is seamless, invisible and benefits customers. We are particularly interested to analyse relationships between individual retailers and wholesalers that may be affecting performance issues.

Complaints partly or fully caused by the wholesaler

22%

Table 5 NHH written complaints that retailers deemed was a wholesaler issue[10]

Retailer	Total Written Complaints	Deemed to be a retail issue	Deemed to be a wholesale issue	Deemed to be a mixed issue	% of complaints with wholesaler involvement
Affinity for Business	129	95	27	7	26%
Business Stream	1126	939	91	96	17%
Castle Water	2731	2147	201	383	21%
Clear Business Water	151	126	11	14	17%
Everflow	104	76	13	15	27%
Pennon	471	262	68	141	44%
SES Business	214	138	51	25	36%
Veolia Water Retail	4	0	4	0	100%
Water 2 Business	210	159	39	12	24%
Water Plus	6524	5182	198	1144	21%
Wave	1746	1373	239	134	21%
Yu Water	1	1	0	0	0%
Total	13411	10498	942	1971	22%

[10] Table excludes retailers where zero complaints have been reported

7. Conclusion

We have seen a welcome reduction in complaint numbers to both retailers and CCW for the first time since the market fully opened to all NHH customers in England in April 2017. The number of complaints to retailers fell by 20% and those received by CCW reduced by 13.6% compared to 2018-19. The majority of retailers saw reductions in complaint numbers in line with the overall trend.

The improvement is encouraging but there are still areas of significant concern. Complaints made to retailers in England remain significantly higher than in Wales where retail competition was not extended. Both Welsh water companies – Hafren Dyfrdwy and Dŵr Cymru Welsh Water – had complaint levels below the pre-market average.

Clear Business Water and Water Plus were two of the worst performing retailers for the second successive year - joining SES Business Water and Castle Water in the bottom four.

There was also evidence of a deterioration in the handling of complaints by some retailers. CCW had to carry out a record 105 investigations against retailers in 2019-20 - almost double the number raised in 2018-19. It was also 14 times higher than the amount of investigations raised against NHH complaints in 2016-17.

Billing and charges remains the category most complained about despite a small reduction in complaints of this nature. Three-quarters of total complaints were associated with issues of this type, while an even greater proportion of CCW investigations (82%) involved problems with billing and charges. The customer insight research we carried out with Ofwat reinforces the view that this is a major cause of dissatisfaction for business customers, with outstanding billing issues also providing a barrier to switching retailer.

Fully opening the retail market in England has provided NHH customers with the option to shop around for a better deal and, as the market develops and customers become better acquainted with the options available to them, poor performing retailers may lose customers if they do not improve their offer. Falling SPID numbers for some of the poorer performing companies suggest that customers may have already started voting with their feet.

We expect to see further improvements in 2020-21, although the potential impact of the COVID-19 pandemic on the market is difficult to forecast. Early indications are that complaints have started to decline in 2020-21 as businesses entered lockdown. The rate of complaints as businesses return to work may see spikes of activity that are completely out of sync with previous years and this will make comparison more difficult for both CCW and retailers. The way this affects retailers, testing their ability to thrive in changing economic conditions is likely to be a considerable challenge.

It is important that customers are given clear and accurate information to help them navigate the retail market, and be aware of the services available to them. CCW regularly reviews the content of retailers' websites to see how well they are communicating with their customers. During COVID-19 there has been even greater scrutiny to ensure the help available to customers during this difficult time is made clear and accessible. We have worked closely with Ofwat to ensure messages have reflected the raft of regulatory changes made to address the impact of the pandemic. We will continue to review retailers' websites and other forms of communication, including social media, and flag up any concerns we have with the companies involved.

CCW will continue to use all means possible to press retailers and wholesalers to raise their game and improve their service to customers. The past year has seen us increase our influence in the NHH market by becoming voting members of the Market Codes Panel as the customer representative . This strengthens the consumer voice on the panel and complements our existing work with MOSL. We will continue to campaign that consumers are the primary focus of the NHH market, not only in the eyes of retailers, but also wholesalers, Ofwat and MOSL.

The number of complaints to retailers in 2019-20 fell by

19.8%

Complaints received by CCW in 2019-20 fell by

13.6%

We have recently reviewed our quarterly NHH complaints reporting infographic and will enhance this to ensure it is beneficial to customers and the market. We have plans to improve data sharing across the industry to provide the insight that retailers and companies in Wales can use to improve their service to NHH customers. Alongside this, we will continue to:

- Publicly highlight the better and poorer performers each quarter to give customers an insight into which retailers are delivering good service
- Challenge retailers who receive complaint numbers above the industry average or see complaints rise per 10,000 supply points
- Push wholesalers and retailers to strengthen their working relationships in delivering timely complaint resolution
- Seek improvements to market codes where they will benefit consumers
- Work closely with Ofwat where we see retailers or wholesalers failing to meet their obligations and there is potential for active regulatory intervention.

Appendix 1 - NHH complaints to CCW against retailers/companies in Wales by month in 2019-20

Company		Supply points/ connections	April	May	June	July	August	September	October	November	December	January	February	March	2019/20	Per 10k
ADSM		1381	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Affinity for Business		75460	5	3	4	5	3	3	5	5	2	6	3	5	49	6.5
Business Stream	1	406489	18	17	13	14	11	11	21	18	16	21	16	10	186	3.7
Castle Water		502507	60	66	63	84	59	74	67	55	63	68	69	61	789	15.7
Clear Business Water		17989	2	6	3	2	4	3	5	3	3	1	2	0	34	18.9
DCWW		201593	4	4	3	3	2	2	6	2	0	2	2	1	31	1.5
Everflow		63349	5	12	12	9	7	4	4	5	7	8	4	6	83	13.1
First Business Water		4495	1	0	0	0	0	0	0	0	0	0	0	0	1	2.2
Hafren Dyfrdwy		9996	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Leep Utilities		47	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Pennon Water Services		160645	15	16	6	16	10	13	8	11	4	5	14	4	122	7.6
Regent Water		253	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
SES Business		41651	4	8	8	11	5	10	5	4	3	2	3	2	65	15.6
Smarta Water		1092	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
The Water Retail Co		320	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Three Sixty	2	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
TOR Water	3	149	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Veolia Water Retail		157	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Water Plus		786116	111	123	100	118	107	113	148	133	88	123	108	85	1357	17.3
Water2Business		142523	3	5	1	2	1	1	2	1	1	3	2	0	22	1.5
Wave		424649	65	57	31	47	28	34	38	41	35	31	42	23	472	11.1
Yu Water		280	0	0	0	0	0	0	0	0	1	0	0	0	1	35.7
YWBS	4	236302	4	2	4	11	4	2	0	0	0	0	0	0	27	1.1
Other regional retailers		17014	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Others*	5		20	20	19	22	16	6	18	9	10	21	24	12	197	
TOTAL		2858006	317	339	267	344	257	276	327	287	233	291	289	209	3436	12.0

1 - Business Stream's complaint rate per 10K is an average of two rates: 4.9 - prior to acquisition of Yorkshire Water Business and 2.5 - after the acquisition.
2 - Three Sixty exited the market on 1st October 2019
3 - TOR Water exited the market on 1st January 2020
4 - Yorkshire Business Water has been aquired by Business Stream on 1st October 2019
5 - Wholesalers and any other non-retailers, as well as retailers who exited prior to 2019/20 (Aquaflow)

Appendix 2 - NHH written customer complaints to retailers/companies in Wales by month in 2019-20

Company		Supply points/ connections	April	May	June	July	August	September	October	November	December	January	February	March	2019/20	Per 10k
ADSM		1381	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Affinity for Business		75460	9	5	5	21	9	9	13	18	5	12	16	7	129	17.1
Business Stream	1	406489	53	47	42	42	46	41	159	152	117	157	128	142	1126	18.5
Castle Water		502507	197	205	202	271	173	193	218	176	236	254	293	313	2731	54.3
Clear Business Water		17989	11	15	4	2	10	17	13	21	15	20	11	12	151	83.9
DCWW		201593		89			105			97			911		382	18.9
Everflow		63349	8	12	7	10	9	5	8	14	5	8	8	10	104	16.4
First Business Water		4495	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Hafren Dyfrdwy		9996		8			16			3			8		35	35.0
Leep Utilities		47	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Pennon Water Services		160645	44	68	56	51	24	19	38	29	26	40	29	47	471	29.3
Regent Water		253	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
SES Business		41651	17	11	4	29	17	17	25	28	17	25	9	15	214	51.4
Smarta Water		1092	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
The Water Retail Co		320	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Three Sixty	2	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
TOR Water	3	149	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
Veolia Water Retail		157	0	0	0	0	0	0	1	0	2	0	1	0	4	254.8
Water Plus		786116	441	563	406	537	554	440	727	683	468	621	534	550	6524	83.0
Water2Business		142523	18	13	14	21	22	9	14	14	15	23	21	26	210	14.7
Wave		424649	216	215	210	235	136	137	111	103	101	107	110	65	1746	41.1
Yu Water		280	0	0	0	0	0	0	0	0	1	0	0	0	1	35.7
YWBS	4	236302	77	78	56	91	138	95	0	0	0	0	0	0	535	22.6
Other regional retailers	5	17014	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
TOTAL		2858006	1091	1232	1095	1310	1138	1098	1327	1238	1106	1267	1160	1285	14363	50.3

1 - Business Stream's complaint rate per 10K is an average of two rates: 15.9 - prior to acquisition of Yorkshire Water Business and 21.0 - after the acquisition.

2 - Three Sixty exited the market on 1st October 2019

3 - TOR Water exited the market on 1st January 2020

4 - Yorkshire Business Water has been aquired by Business Stream on 1st October 2019

Appendix 3 - NHH complaints received by CCWater in 2019-20

Company		Supply points/ connections	Administration	Billing & Charges	Metering	Other	Retail Competition	Sewerage	Water	Total	Per 10k
ADSM		1381	0	0	0	0	0	0	0	0	0.0
Affinity for Business		75460	2	38	2	0	2	0	5	49	6.5
Business Stream	1	406489	29	125	0	3	4	3	6	186	3.7
Castle Water		502507	76	633	17	7	26	9	21	789	15.7
Clear Business Water		17989	8	19	0	0	6	1	0	34	18.9
DCWW		201593	3	22	0	0	0	2	4	31	1.5
Everflow		63349	5	60	1	0	12	4	1	83	13.1
First Business Water		4495	0	1	0	0	0	0	0	1	2.2
Hafren Dyfrdwy		9996	0	0	0	0	0	0	0	0	0.0
Leep Utilities		47	0	0	0	0	0	0	0	0	0.0
Pennon Water Services		160645	10	87	5	2	5	3	10	122	7.6
Regent Water		253	0	0	0	0	0	0	0	0	0.0
SES Business		41651	15	40	2	0	2	2	4	65	15.6
Smarta Water		1092	0	0	0	0	0	0	0	0	0.0
The Water Retail Co		320	0	0	0	0	0	0	0	0	0.0
Three Sixty	2	5	0	0	0	0	0	0	0	0	0.0
TOR Water	3	149	0	0	0	0	0	0	0	0	0.0
Veolia Water Retail		157	0	0	0	0	0	0	0	0	0.0
Water Plus		786116	156	1062	28	10	35	19	47	1357	17.3
Water2Business		142523	1	17	0	1	1	1	1	22	1.5
Wave		424649	44	385	8	2	9	7	17	472	11.1
Yu Water		280	0	0	0	0	1	0	0	1	35.7
YWBS	4	236302	4	24	0	0	3	4	8	27	1.1
Other regional retailers		17014	0	0	0	0	0	0	0	0	0.0
Others*	5		27	60	2	15	10	25	58	197	
TOTAL		2858006	380	2573	65	40	116	80	182	3436	12.0

1 - Business Stream's complaint rate per 10K is an average of two rates: 4.9 - prior to acquisition of Yorkshire Water Business and 2.5 - after the acquisition.
2 - Three Sixty exited the market on 1st October 2019
3 - TOR Water exited the market on 1st January 2020
4 - Yorkshire Business Water has been aquired by Business Stream on 1st October 2019
5 - Wholesalers and any other non-retailers, as well as retailers who exited prior to 2019/20 (Aquaflow)

Appendix 4 - NHH complaints investigations carried out by CCW in 2019-20

Company		Investigations	
		2018/19	2019/20
ADSM		0	0
Affinity for Business		0	1
Business Stream		3	1
Castle Water		9	14
Clear Business Water		0	0
DCWW		0	0
Everflow		5	0
First Business Water		0	0
Hafren Dyfrdwy		0	0
Leep Utilities		0	0
Pennon Water Services		5	2
Regent Water		0	0
SES Business		0	4
Smarta Water		0	0
The Water Retail Co		0	0
Three Sixty	1	0	0
TOR Water	2	0	0
Veolia Water Retail		0	0
Water Plus		21	57
Water2Business		1	1
Wave		14	25
Yu Water		0	0
YWBS	3	0	0
TOTAL		58	105

1 - Three Sixty exited the market on 1st October 2019

2 - TOR Water exited the market on 1st January 2020

3 - Yorkshire Business Water has been aquired by Business Stream on 1st October 2019

Appendix 5 - Business Steam NHH complaints per 10,000 SPIDs calculations in 2019-20

NHH complaints to CCW against retailers/companies in Wales by month in 2019/20

Company	Supply points/ connections	April	May	June	July	August	September	October	November	December	January	February	March	2019/20	Per 10k
Business Stream 1 APR 2019 - 31 SEPT 2019	170753	18	17	13	14	11	11							84	4.9
Business Stream 1 OCT 2019 - 31 MAR 2020	406489							21	18	16	21	16	10	102	2.5
								Average per 10K							3.7

NHH written customer complaints to retailers/companies in Wales by month in 2019/20

Company	Supply points/ connections	April	May	June	July	August	September	October	November	December	January	February	March	2019/20	Per 10k
Business Stream 1 APR 2019 - 31 SEPT 2019	170753	53	47	42	42	46	41							271	15.9
Business Stream 1 OCT 2019 - 31 MAR 2020	406489							159	152	117	157	128	142	855	21.0
								Average per 10K							18.5

The voice for water consumers
Y corff sy'n rhoi llais i ddefnyddwyr dŵr

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