



ccw

The voice for water consumers  
Llais defnyddwyr dŵr

Business Customer Complaints  
1 April 2020 - 31 March 2021

[ccwater.org.uk](http://ccwater.org.uk)

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# Executive Summary

**Our annual report gives an overview of complaint performance in the business retail water market in England for 2020-21. We also examine how well water providers are performing in Wales where only the very largest water users are able to choose their water retailer.**



**It is disappointing that business customers continued to feel the need to complain to their retail services provider<sup>1</sup> in 2020-21 with complaint numbers largely unchanged on the previous year. More positively it is good that complaints raised to CCW fell for the second year running.**

However, the impact of the Covid-19 pandemic is likely to have contributed to the reduction in contact at various points during the year. It is therefore too early to say whether the fall in complaints is driven by improvements in customer service and complaint handling. If improvements have been made, we would expect the reduction to be sustained over the coming year.

The Covid-19 pandemic was clearly a factor in both the quantity and nature of complaints, and presented the water sector and business customers with

unprecedented challenges throughout 2020-21. The scale of these were reflected in our **Testing the Waters** business customer research which found that 79% of businesses were moderately or severely impacted by the pandemic.

As the sector responded to the challenges, CCW expected - and customers deserved - swift and clear communication of the support and help available from their retail services provider. Despite the support offered by providers being fairly strong, especially in the early months of the pandemic, communication of this often fell short with many customers unaware of what was on offer.

This resulted in low satisfaction levels for those most in need, as shown in our research. Poor customer service, billing issues, inaccurate meter readings, lack

of ownership in handling business customer complaints and delays in being able to contact providers were all cited as causes of dissatisfaction. Ten per cent of respondents who contacted their provider told us that making a complaint was the reason for their contact.

Overall throughout the year, complaints performance across the industry was mixed. Total written complaints to providers rose again following a fall in 2019-20.

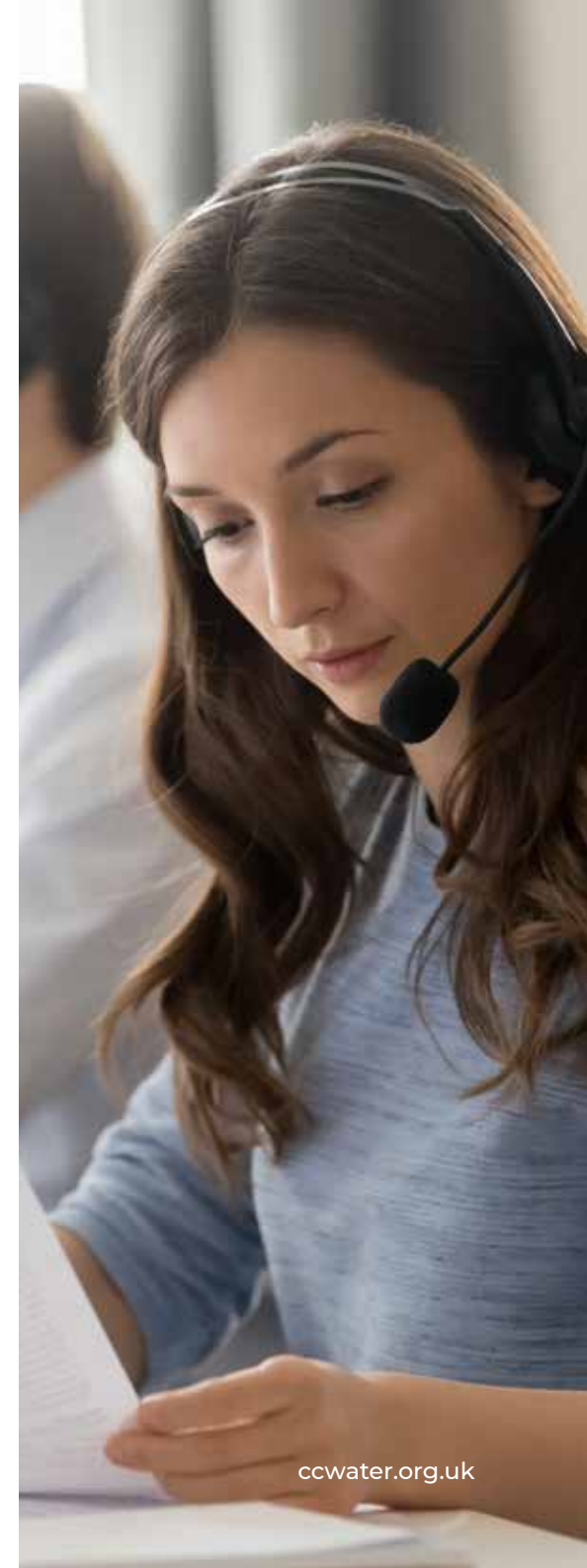
However this rise was largely caused by an increase in complaints to Castle Water<sup>2</sup> and Business Stream<sup>3</sup>.

Setting aside complaints to those two providers, the number of complaints was broadly similar to those seen in the previous year.

<sup>1</sup> In April 2017, the water retail market in England was opened to businesses, charities and public sector organisations. This allowed them to choose who provides their retail services which cover customer service, billing and meter readings. In Wales, only business customers who use 50 megalitres of water a year are eligible to access the retail market and choose their water retailer. Therefore, for the majority of business customers in Wales, their retail services are still provided by the water providers Dŵr Cymru Welsh Water and Hafren Dyfrdwy. For the purpose of this report, the use of the word 'providers' relates to both retailers and water providers.

<sup>2</sup> Castle Water and Affinity for Business merged on April 1 2020, effectively increasing the size of the company by 15%. Written complaints in 2020-21 increased by 36% (1033 additional complaints) on the total numbers reported by Affinity for Business and Castle Water in 2019-20.

<sup>3</sup> In October 2019, Business Stream took over Yorkshire Water Services. This means that the 2019-20 figures included six months of data from the merged providers. In 2020-21, there were 12 months of data from the merged providers, which may explain the increase in complaints seen for Business Stream.



# Executive Summary

**Complaints from business customers to CCW fell for the second successive year. At first glance this might suggest that providers improved their complaint handling and resolution and this is supported by a reduction in the number of CCW investigations.**

However complaints began to rise again as businesses emerged from the initial pandemic lockdown. The level of complaints from business customers to CCW remained more than three times greater than pre-market at 2,848 complaints in 2020-21 compared to 824 in 2016-17.

Furthermore as the number of investigations by CCW is still significantly higher than those seen in the household sector there is still more work to do.

Covid-19 influenced a shift in the nature of complaints. Billing and charging concerns still made up more than three-quarters of complaints to CCW.

However within these we saw large increases in issues relating to estimated bills and some smaller rises associated with debt recovery activity.

While the market conditions were very different, many of the key themes to emerge were similar to those in previous years.

The large majority of complaints made to retailers were identified as being caused by retailer action, the proportion rising from 78% to 85%. While not dismissing the role of wholesalers in the market, this clearly illustrates that there is a huge potential for retailers to significantly improve complaints performance by addressing the key issues driving complaints.

**Water Plus** and **Castle Water** continued to negatively skew complaints performance in the business retail water market.

They were the worst performers in both of our key measures - complaints made directly to providers and those made about providers to CCW.

**Water2Business** and **First Business Water** showed strong performance. In particular Water2Business built on its strong position in 2019-20 and provided evidence that provider size does not necessarily correlate with poor complaint performance.

There are lessons that can be learnt by the industry from these better performing retailers.



**2,848**

Complaints  
in 2020-21

Billing and  
charging concerns  
still made up more  
than **three-quarters**  
of complaints

**85%**

of complaints  
were identified as  
being caused by  
retailer action

# Introduction

**CCW uses two complaint sources to gain insight into the performance of providers; written complaints received directly by providers and complaints raised directly to CCW about providers. All complaint measures are normalised by the number of supply points (SPIDs<sup>4</sup>) served by each retailer.**

CCW recognises that for smaller providers, each complaint can make performance appear disproportionately poor. We categorise providers based upon their size in the following way.

## Small

Less than  
5,000 SPIDs

## Medium

Between 5,000  
and 100,000  
SPIDs

## Large

Greater than  
100,000 SPIDs

Around 99% of the sector is dominated by medium to large providers and complaints to smaller providers are negligible by comparison, totaling only six written complaints and two complaints to CCW in 2020-21. We therefore consider medium and large providers separately from the smaller providers, using the median and quartiles as our preferred measures across this group. Analysis of smaller providers is largely explained through the narrative of the report.

Every two years, CCW commissions its Testing the Waters satisfaction survey of business customers in England and Wales. This year we tailored our approach to better understand the impact of Covid-19 and many of the findings from this research resonate with our analysis of complaints. Where appropriate, we make reference to these at key points throughout the report.

<sup>4</sup> A Supply Point ID (SPID) is a reference number for each supply point to a business customer premises and applies only to retailers. For water providers we use connections instead of SPIDs for normalising complaints.





# Changes and Challenges 2020-21

**April 2020 began with all non-essential businesses in lockdown due to Covid-19. That made it imperative for business customers to receive clear communication from their providers about the help and support available to them.**

A number of providers were quick to contact their customers and ensure their websites made clear the support on offer. This included suspending bills where businesses had closed between 16 March and 31 July 2020 and were using no water or had vastly reduced their usage.

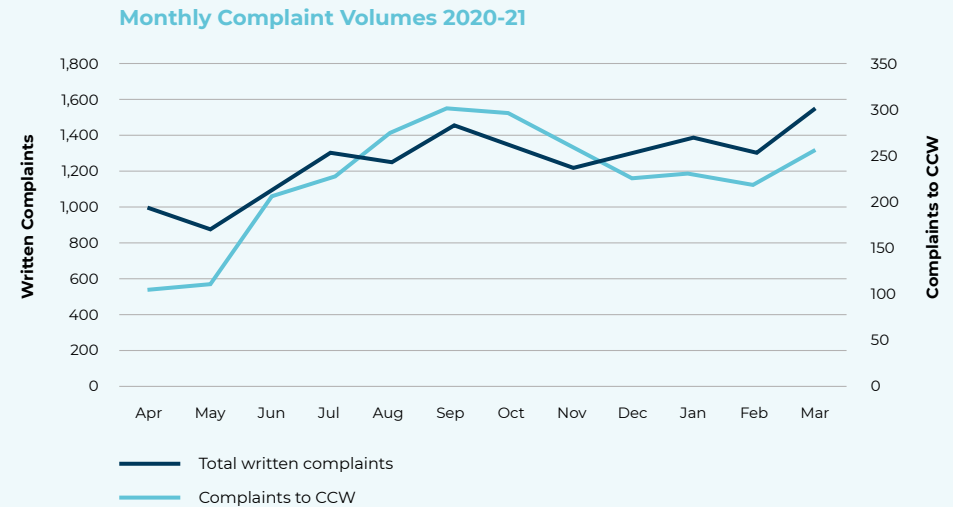
Clear information was also provided about the protection against debt recovery action for closed businesses, and the repayment plans available for those who were struggling.

In addition, some retailers such as Everflow went further by quickly offering payment holidays to their customers, with others like Clear Business Water providing information on the types of government financial support available to businesses.

**Complaints to providers and CCW fell significantly over the initial lockdown period but increased as Covid-19 restrictions were eased and businesses re-opened.**

This may be due, in part, to support being in place for business customers. But with many businesses shut and facing significant commercial and operational pressures at the outset of the pandemic, water services may have been regarded by some as a low priority. However, providers were then contacted as bills started to go out in the wake of lockdown and then again following the second wave of Covid-19 restrictions at the end of 2020.

**Chart 1: Written complaints and complaints to CCW by month**



Mid-June onwards saw an increase in complaints, coinciding with non-essential businesses starting to re-open. Of particular concern was the sharp rise in estimated billing complaints and debt recovery, which was largely due to Castle Water. Complaints in these categories from Castle Water customers rose by 263% and 78% respectively, compared to overall market rises of 61% and 7%.

In addition, the number of Castle Water customers approaching CCW significantly increased throughout the summer. Customers turned to us having been unable to get a response from the retailer - a problem highlighted more generally in our Testing the Waters research. It is particularly disappointing so many of Castle Water's customers had to escalate their complaints to CCW, given that the quality of support information on its website was better than a number of its competitors.



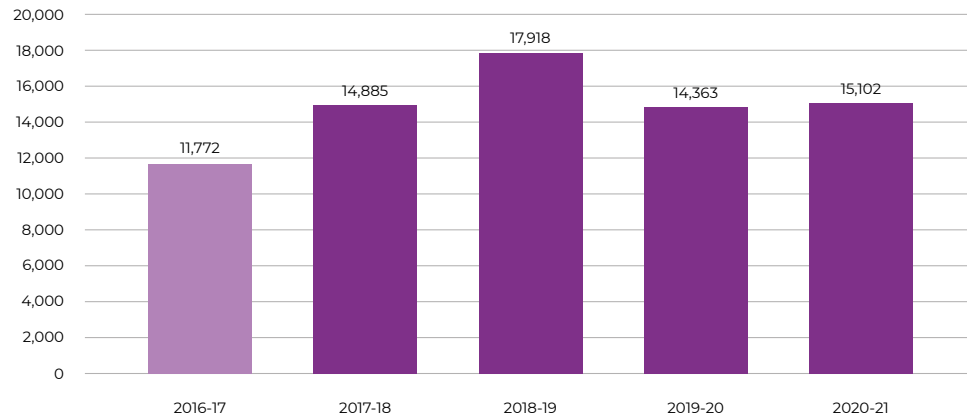


# Overall Rise in Written Complaints to Providers

The total number of written complaints made to all providers increased by 5% compared to 2019-20 and was 28% higher than the pre-market complaint level. All but six of these complaints were made to medium to large providers.

**Chart 2:**  
**Written complaints to providers**

### Written Complaints

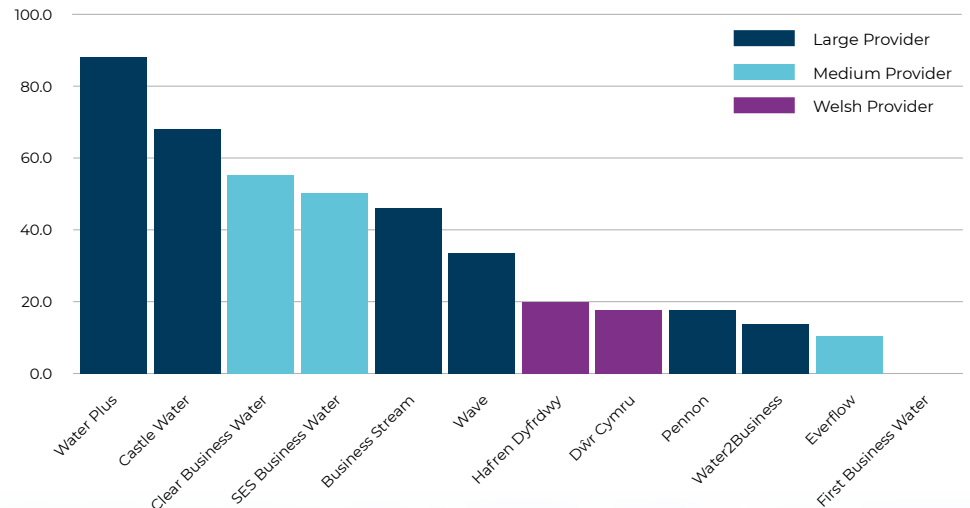


While total written complaints increased, 7 of the 12 medium and large providers operating in the business sector reduced or maintained their complaint rate.

This helped to lower the median value from 32.2 to 26.4 complaints per 10,000 SPIDs. However, significant differences between provider complaint rates continued, the overall distribution being very similar to that seen in 2019-20.

**Chart 3:**  
**Written complaints normalised distribution across medium and large providers**

### Written Complaints per 10,000 SPIDs 2020-21





## Complaints Involving Wholesalers<sup>5</sup>

We continue to ask retailers to provide the number of complaints it considers the wholesaler to be partially or fully responsible for.

Retailers reported that **2,169 complaints they received from business customers were caused**, in some part, **by wholesaler activity**.

However figures provided by the central market operator, MOSL<sup>6</sup> show that retailers raised 2,643 complaints with wholesalers, in line with the non-household market codes, which is 22% higher.

Therefore, it is possible that wholesalers have a greater role in resolving complaints than that reported to CCW.

**2,169 complaints retailers received from business customers were caused, in some part, by wholesaler activity.**



<sup>5</sup> The provision and maintenance of water and wastewater services remains the responsibility of regional water providers, referred to as 'wholesalers' in the business sector.

<sup>6</sup> F5 Non-Household Customer complaints data extracted from Operational Performance Standards dashboard 25 June 2021.





# Complaints Involving Wholesalers

Taken at face value, reporting by retailers indicates that only 15% of complaints across the market were partially or fully caused by the wholesaler - down from 22% in the previous year. MOSL data indicates the number of complaints with wholesaler involvement is 18%. This shows retailers had the power to prevent the majority of complaints.

Table 1 illustrates that there was significant variance in the role of wholesalers causing complaints across the market. This may provide some evidence of differences in the relationships and processes between different wholesalers and retailers. CCW is working closely with MOSL and the water industry's Retailer Wholesaler Group to better understand issues that occur in this area and to help find solutions.

**Table 1: Written complaints broken down by responsibility<sup>7</sup>**

Provider	Total Written Complaints	Deemed to be a Retail Issue	Deemed to be a Wholesale Issue	Deemed to be a Mixed Issue	% of Complaints with Wholesale Involvement
<b>Business Stream</b>	1853	1684	87	82	9%
<b>Castle Water</b>	3893	3432	92	369	12%
<b>Clear Business Water</b>	102	90	3	9	12%
<b>Everflow</b>	75	50	5	20	33%
<b>Pennon</b>	296	132	34	130	55%
<b>SES Business Water</b>	209	152	8	49	27%
<b>Smarta Water</b>	2	1	0	1	50%
<b>Water Plus</b>	6677	5737	106	834	14%
<b>Water2Business</b>	225	184	32	9	18%
<b>Wave</b>	1360	1065	172	123	22%
<b>Yu Water</b>	4	0	0	4	100%
<b>Total</b>	<b>14696</b>	<b>12527</b>	<b>539</b>	<b>1630</b>	<b>15%</b>

<sup>7</sup> Excludes retailers who have reported zero complaints.



**CCW is working closely with MOSL and the water industry's Retailer Wholesaler Group.**

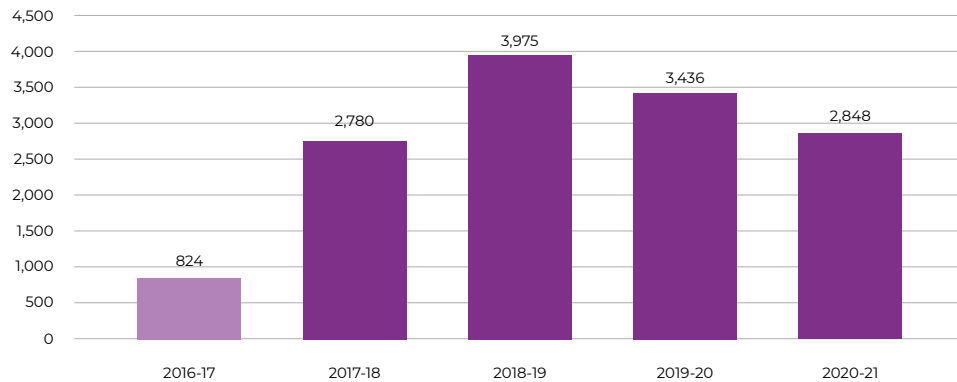
# Complaints Made to CCW Fall

Complaints made about providers to CCW reduced by 17% when compared to 2019-20.

The temporary or complete closure of some businesses during Covid-19 would account for some of the reduced contact. It may also provide evidence that some providers are improving their resolution of customer complaints without the need for escalation. This improvement is welcome but the rate remains three times greater than the pre-market level of 2016-17.

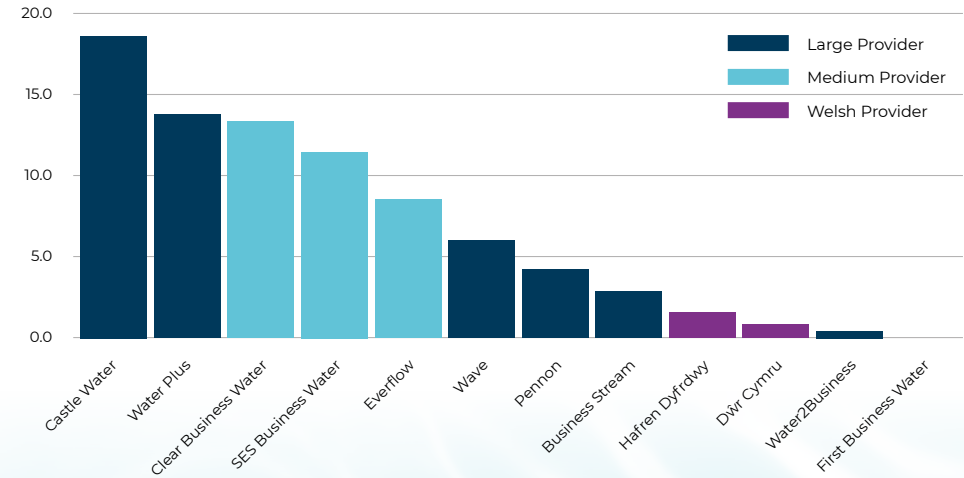
**Chart 4:**  
Complaints made directly to CCW

## Complaints to CCW



**Chart 5:**  
Distribution of complaints to CCW across medium and large providers

## Complaints to CCW per 10k



Although complaints to CCW fell, the overall distribution in Chart 5 illustrates that there is far from uniformity across the industry.

# Investigations Reduce

**Further signs that providers are improving complaint handling is provided by a 66% reduction in the number of investigations raised by CCW in 2020-21.**

Investigations are our most serious involvement in complaints and are instigated under the following criteria:



When the provider procedure has been exhausted and **issues remain that the customer has raised** and should be addressed by the provider;



Where there are **long-standing service failures** that the provider was aware of but **failed to action**. This includes a provider not responding to repeated points the customer is raising unless it falls under an exemption; or



Where the provider has **not correctly escalated a complaint in line with its complaints procedure** and CCW would have investigated it if the provider had done so.

**66% Reduction** in the number of investigations raised by CCW



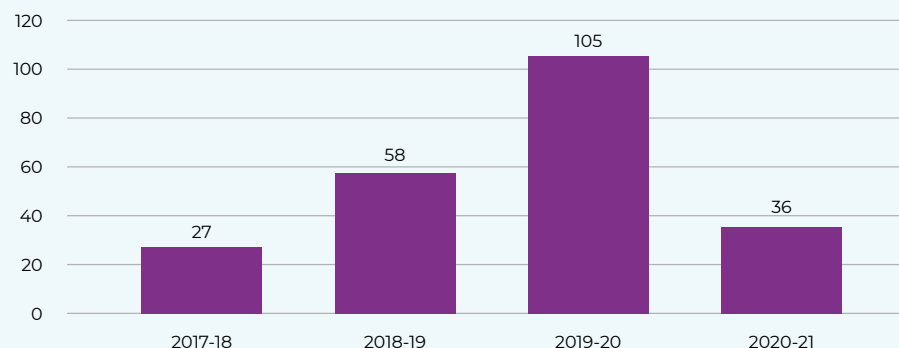
All but one provider improved against this measure with the total number of complaint investigations being the second lowest since the market opened.

Retailer Wave provides a good example of successful efforts to reduce the need for investigations. It introduced a new internal escalation process that provided Director oversight for escalated complaints.

CCW saw a significant reduction in the need to investigate as the process was first piloted in Wave's Peterborough office and we are pleased that this has now been rolled out across the rest of its business. As a result investigations raised against Wave fell by 72%.

**Chart 6: CCW Investigations**

## CCW Investigations



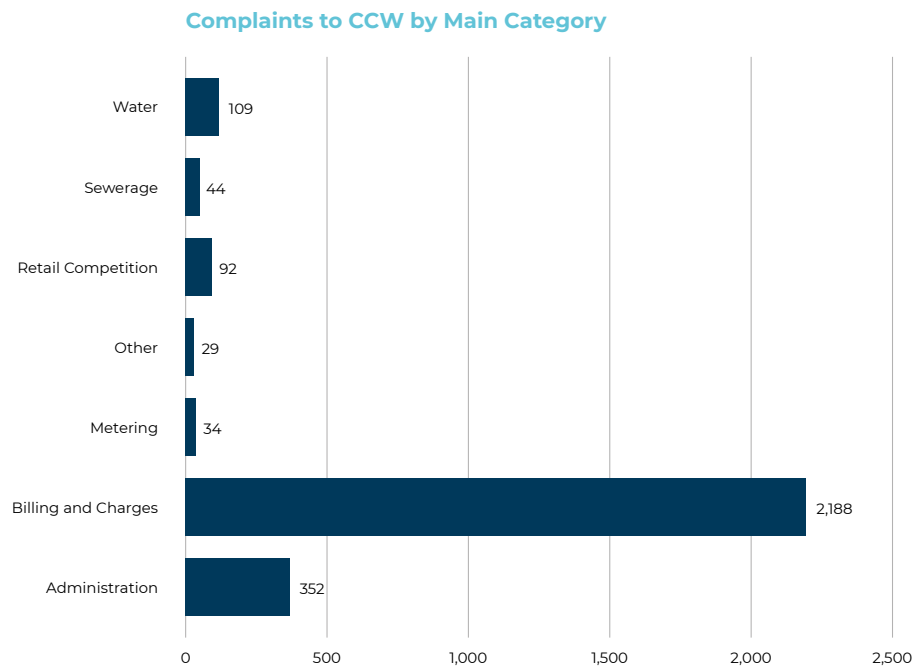
Although the reduction in investigations is encouraging, the business retail market still accounts for a disproportionate number.

It generated 50% more investigations than the household sector in 2020-21. We therefore look to providers to improve further in this area in 2021-22.

# Root Causes of Complaints Made to CCW

For complaints made to CCW we break them down into seven main categories. Chart 7 shows the breakdown of complaints received in 2020-21 by these categories.

**Chart 7: NHH Complaints received by CCW by main category 2020-21**



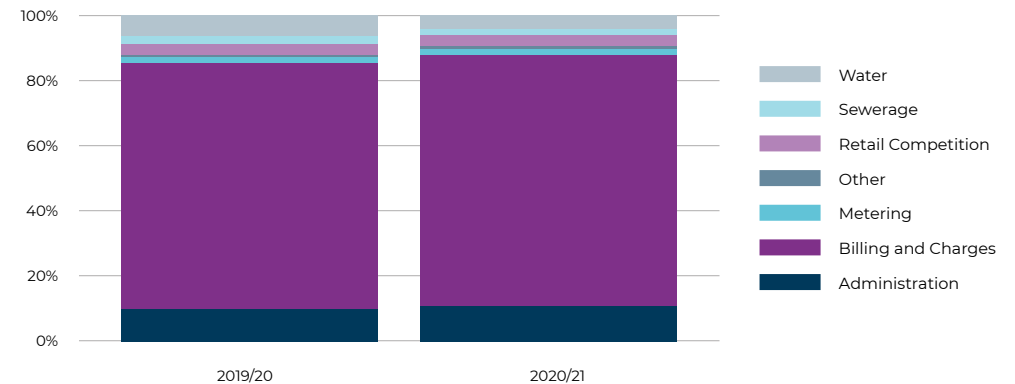
While Covid-19 brought many unique challenges, the overall profile of complaints received by CCW was very similar to that seen in previous years.

The majority of complaints received were related to billing and charging issues, covering a range of areas such as disputed liability, bill accuracy, leakage allowance and debt recovery.

Billing and charging complaints accounted for 77% of the total, with Administration – covering areas such as failure to respond to customers, refunds and account accuracy - the second largest cause at 12%. Our Testing the Waters research stresses the importance for providers to get bills right first time, every time with 84% of all contact to providers relating to billing enquiries.

**Chart 8: Root cause of complaints to CCW 2019-20 to 2020-21**

**Root Cause Comparison**



Although the impact of Covid-19 is difficult to accurately measure, there is evidence that the inability to read meters during lockdown periods and the subsequent knock-on effects from this have impacted the market.

Though the proportion of billing and charges complaints remains similar, within these concerns about estimated bills increased by 61% over the year. They accounted for 10% of all billing complaints. Debt recovery activity complaints also rose by 7% in 2020-21 and we saw some increase in complaints about refunds and providers failing to respond to customer queries. Disputed liability remained the most complained about billing issue but decreased by 26% compared to 2019-20.

A proportion of all complaints that are raised to CCW about providers result in the customer being referred back to the individual provider procedure to achieve resolution. In 2020-21 this proportion increased to 41% of all complaints, almost double the level of 22% in 2019-20.

Our Testing the Waters research identified some confusion about whether to contact the wholesaler or retailer. Problems contacting providers as a result of the Covid-19 pandemic may have also contributed to customers contacting CCW earlier in the process. Evidence from individual cases also suggests there is more scope for providers to fully exhaust all opportunities to resolve business customer complaints before customers feel the need to escalate to CCW.

# Individual Provider Performance

## Medium and Large Providers

Our main focus is on medium and large providers as these supply 99% of the retail market. We compared providers directly in both written complaints and complaints to CCW and allocated their performance to a respective quartile. Smaller providers were assessed separately due to the effect that very small changes can have in their respective normalised rates.

**The performance of each medium and large provider is summarised in Table 2.**

Water Plus, Castle Water and Clear Business Water were the worst performing providers in both key measures, as they were in 2019-20.

Clear Business Water however saw a significant improvement year-on-year in both measures. Business Stream saw a significant

increase in the number of written complaints that it received - 91% of which were deemed to be solely caused by the retailer.

However, in October 2019, Business Stream took over Yorkshire Water Services. This means that the 2019-20 figures included six months of data from the merged providers. In 2020-21, there were 12 months of data from the merged providers. This may explain the year-on-year increase in complaints seen for Business Stream.

As in 2019-20, First Business, Water2Business and Everflow had the lowest written complaint rates. Water2Business and First Business Water were also in the best performing group for complaints to CCW and Dŵr Cymru retained its place in this group.

**Table 2: Complaint performance of medium and large providers 2020-21**

Provider	Written Complaints per 10,000 SPIDs		Complaints to CCW per 10,000 SPIDs	
	2020-21	% Change	2020-21	% Change
<b>Water Plus</b>	88.2	+6	14.2	-18
<b>Castle Water</b>	69.9	+29	18.3	+17
<b>Clear Business Water</b>	57.2	-32	13.5	-29
<b>SES Business Water</b>	50.5	-3	11.6	-26
<b>Business Stream</b>	45.9	+149	3.3	-11
<b>Wave</b>	32.7	-20	6.0	-46
<b>Hafren Dyfrdwy</b>	20.1	-43	2.0	N/A
<b>Dŵr Cymru</b>	19.1	+1	1.1	-26
<b>Pennon</b>	18.3	-38	4.3	-44
<b>Water2Business</b>	14.8	+1	0.6	-62
<b>Everflow</b>	9.1	-44	8.3	-37
<b>First Business Water</b>	0.0	0	0.0	-100

Key

Quartile 1

Quartile 2

Quartile 3

Quartile 4

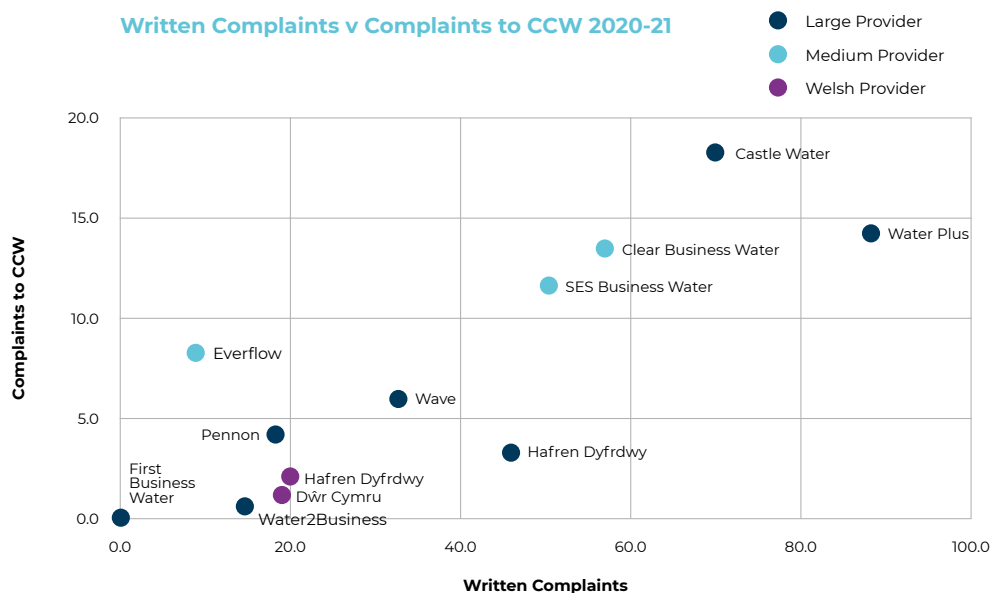
# Individual Provider Performance

## Medium and Large Providers

The relative performance of each provider can be seen in Chart 9. This clearly illustrates a strong correlation between both measures and highlights the poor performance of Castle Water and Water Plus. It also helps to explain the impact they had on the overall market.

Collectively they share approximately 50% of the retail market but were responsible for 70% of all written complaints and 77% of complaints raised directly with CCW. These high levels of complaints significantly skewed the performance of the whole market.

**Chart 9: Written complaints plotted against complaints to CCW**



## Small Providers

There are a number of small retailers actively providing services and collectively these account for just 1% of the market share in the retail market. Table 3 details the respective performance of each small retailer.

**Table 3: Performance of small retailers**

Provider	SPIDs	Written Complaints		Complaints to CCW	
		Total Complaints	Complaints per 10,000 SPIDs	Total Complaints	Complaints per 10,000 SPIDs
<b>ADSM</b>	2926	0	0.0	0	0.0
<b>ConservAqua</b>	660	0	0.0	0	0.0
<b>Regent Water</b>	137	0	0.0	0	0.0
<b>Smarta Water</b>	1493	2	13.4	0	0.0
<b>The Water Retail Provider</b>	378	0	0.0	0	0.0
<b>Yu Water</b>	972	4	41.2	2	20.6

Yu Water is the only small retailer currently active in the market that also recorded complaints in 2019-20. It is disappointing that despite having a very low customer base, customers still felt the need to contact CCW to resolve their complaints.

# Conclusion

## Covid-19 has brought unique challenges for the sector and CCW has seen first-hand how some providers have stepped up to tackle these difficulties head on.

Many offered clear information and support to their business customers, the majority of whom were moderately or severely impacted by the pandemic. However, our research suggests that in reality this information did not filter through to all customers.

One important lesson to take from the pandemic is that regardless of market conditions in England and Wales it is important for providers to be proactive in informing and supporting the business sector. They should also be adapting payments and their services during extended challenging periods such as lockdowns. For example, the quick information and support response to business customers in Wales and from some retailers in England at the beginning of the pandemic demonstrated good practice but this could have been extended with clear and regular updates to the information provided to customers about the support available.

As we move out of the pandemic, we will be working with providers to see if any lessons can be learned from their response to the crisis. These may help them to improve their communication and target their support to those customers who are most in need.

Despite these challenges many of the themes and findings to emerge from our analysis of complaints in 2020-21 remain unchanged from previous years. Billing and charging continued to make up the bulk of complaints but there was a shift towards those associated with estimated bills and debt recovery. Retailers continued to be responsible for the majority of complaints generated in the retail market, the proportion of these increasing year on year. This indicates that there is scope for the industry to do more for customers in identifying the root causes of these everyday complaints and take proactive action to stop them occurring. We will work proactively with providers through our ongoing involvement with the industry-led Retailer Wholesaler Group (RWG), our quarterly forums and provider liaison meetings to identify common themes and share best practice.

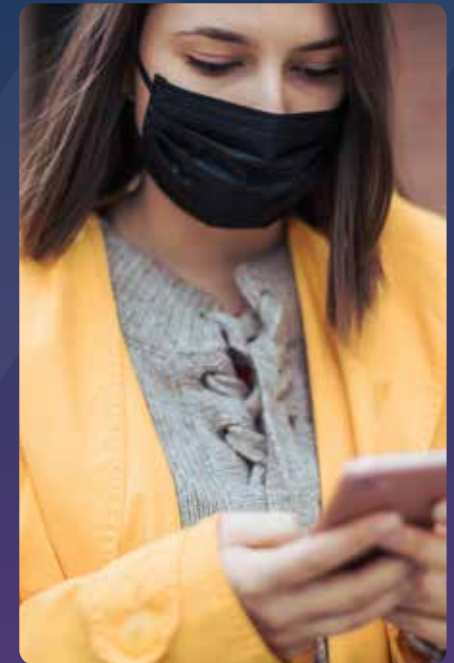
It is disappointing that Castle Water and Water Plus continued to generate high volumes of complaints and remained among the worst performers in the market in both measures. This demonstrates real failure in the underlying service provided to their customers and the ability to resolve customer complaints without the need for escalation. The spike in complaints to CCW once non-essential businesses

began to reopen during the pandemic caused substantial concern. It also had a significant impact on CCW, creating a large backlog of complaints that we are still recovering from in 2021-22. This has undermined our ability to help other providers' customers.

Clear Business Water was once again positioned in the bottom three providers for both measures but we recognise that it significantly improved its performance on both measures and this needs to be sustained in 2021-22.

There was encouraging evidence that medium and large providers can provide services that do not generate large levels of complaints. Water2Business is a large retailer that has consistently generated low levels of complaints and was again identified in the top three performing providers for both key measures. First Business Water, the smallest of the medium sized businesses, also made the upper quartile in written complaints and complaints to CCW.

We will work closely with these providers in 2021-22 to understand what best practice can be gleaned in order to drive improvements in outcomes for business customers across the sector. We applaud their actions and commitment during challenging operational times.



**“As we move out of the pandemic, we will be working with providers to see if any lessons can be learned from their response to the crisis.”**

## Conclusion

As the market conditions in England and Wales are significantly different, some comparison between the two is inevitable. Our research has revealed higher satisfaction levels among Welsh business customers than their English counterparts. Our complaint analysis also highlights that both Dŵr Cymru Welsh Water and Hafren Dyfrdwy are performing better than many of the medium and large retailers in England.

Overall written complaints rose across the market by 5% (739 complaints) but this was skewed by large increases in complaints to Business Stream<sup>9</sup> (+727) and Castle Water (+1,162) compared to 2019-20. However the number of complaints remained 28% higher than pre-market levels.

The reduction in complaints to CCW provides some indication that providers might be improving the way they resolve customers' concerns. The 65% reduction in investigations provides further evidence of an improvement. This gives some cause for optimism but the business retail market still generates a quarter more investigations than the much larger household sector. Helping providers improve their complaint handling remains one of CCW's top priorities. Sharing any identified best practice in this area, as well as providing regular feedback on lessons learned from complaints, will hopefully result in the decrease in investigations being sustained.

Despite mixed complaints results in 2020-21 we have started to see positive signs across the retail market. Testing the Waters found that 20% of customers cited providers not taking ownership of complaints as an issue driving poor satisfaction, sentiment that is supported by some of the cases that are escalated to CCW. We are however beginning to see some positive steps in this direction. For example Business Stream and Castle Water have implemented protocols whereby customers using both of these retailers (one for their water and the other for their wastewater retail services) are able to raise a complaint through either provider who will then own that complaint without the need for the customer to call both providers. We are further encouraged by the willingness of other retailers to adopt a similar approach across the industry.

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<sup>9</sup> In October 2019, Business Stream took over Yorkshire Water Services. This means that the 2019-20 figures included six months of data from the merged providers. In 2020-21, there was 12 months of data from the merged providers, which may explain the increase in complaints seen for Business Stream.

## Next Steps

**CCW continues to work closely with providers, Ofwat and partner agencies to drive improvement across the market. We have amended our data collection methodology for 2021-22 to help us gain a greater understanding of the role of wholesalers in the market and eagerly await developments from MOSL that will bring further insight in this area.**

We continue to use written complaints to retailers as our key measure of complaint performance as we are aware of the variance in recording and reporting those made through other channels at present.

To address this we are currently working with providers to develop robust guidance that will drive greater consistency in providers' reporting of complaints across all channels from 2022-23.

Where we have identified issues, we will use our findings to hold to account those underperforming providers to make changes that drive further improvement.

We will use our unique position in the sector to work with providers to understand what we can learn from our collective knowledge and use this to share best practice where we find it.

We are already planning to share data via our website more regularly allowing customers to view the latest performance of providers and will be consulting with providers shortly on how best we can do this.



## Appendix 1a - Written complaints from business customers against medium/large providers in Wales by month in 2020/21

Provider	Supply points/ connections	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	2020/21	Per 10K	Trends
Business Stream	403365	115	125	136	180	156	181	197	140	118	159	165	181	1853	45.9	
Castle Water	556827	213	159	333	564	504	496	336	307	268	284	207	222	3893	69.9	
Clear Business Water	17840	9	8	8	7	6	9	11	9	6	11	6	12	102	57.2	
Dŵr Cymru Welsh Water	202261		69			104			101			112		386	19.1	
Everflow	82147	3	7	2	4	3	3	6	2	4	8	12	21	75	9.1	
First Business Water	6747	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0	
Hafren Dyfrdwy	9968		7			5			5			3		20	20.1	
Pennon Water Services	161560	16	27	29	27	24	25	30	26	19	26	24	23	296	18.3	
SES Business	41412	19	15	21	10	7	11	24	26	10	14	22	30	209	50.5	
Water Plus	757303	451	354	330	365	423	476	584	585	674	775	778	882	6677	88.2	
Water2Business	151870	22	19	17	18	22	27	29	17	15	20	12	7	225	14.8	
Wave	415665	133	166	136	133	106	120	131	104	105	91	77	58	1360	32.7	
<b>Total</b>	<b>2806965</b>	<b>981</b>	<b>880</b>	<b>1088</b>	<b>1308</b>	<b>1251</b>	<b>1457</b>	<b>1348</b>	<b>1216</b>	<b>1325</b>	<b>1388</b>	<b>1303</b>	<b>1551</b>	<b>15096</b>	<b>53.8</b>	

## Appendix 1b - Written complaints from business customers to against small providers by month in 2020/21

Provider	Supply points/ connections	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	2020/21	Per 10K	Trends
ADSM	2926	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ConservAqua	660	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Regent Water	137	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0	
Smarta Water	1493	0	0	0	0	0	1	0	0	0	1	0	0	2	13.4	
The Water Retail Co	378	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0	
Yu Water	972	0	0	0	0	0	1	0	2	0	1	0	0	4	41.2	
<b>Total</b>	<b>6566</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>9.1</b>	

## Appendix 2a - Business complaints to CCW against medium/large providers by month in 2020/21

Provider	Supply points/connections	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	2020/21	Per 10K	Trends
Business Stream	403365	8	8	16	11	8	16	7	13	9	10	11	17	134	3.3	
Castle Water	556827	31	23	61	92	143	160	119	94	93	70	71	64	1021	18.3	
Clear Business Water	17840	0	3	1	2	4	2	2	1	4	3	1	1	24	13.5	
Dŵr Cymru Welsh Water	202261	0	1	2	1	3	3	2	3	3	4	1	0	23	1.1	
Everflow	82147	4	2	6	4	5	7	5	5	5	9	5	11	68	8.3	
First Business Water	6747	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0	
Hafren Dyfrdwy	9968	0	0	1	0	0	1	0	0	0	0	0	0	2	2.0	
Pennon Water Services	161560	4	8	8	8	7	3	5	7	3	4	5	7	69	4.3	
SES Business	41412	3	2	1	3	2	4	12	2	2	6	3	8	48	11.6	
Water Plus	757303	43	46	86	84	80	86	119	119	92	95	107	120	1077	14.2	
Water2Business	151870	0	2	0	0	1	1	1	1	1	2	0	0	9	0.6	
Wave	415665	15	16	24	21	23	20	25	17	14	28	15	31	249	6.0	
<b>Total</b>	<b>2806965</b>	<b>108</b>	<b>111</b>	<b>206</b>	<b>226</b>	<b>276</b>	<b>303</b>	<b>297</b>	<b>262</b>	<b>226</b>	<b>231</b>	<b>219</b>	<b>259</b>	<b>2724</b>	<b>9.7</b>	

## Appendix 2b - Business complaints to CCW against small providers by month in 2020/21

Provider	Supply points/connections	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	2020/21	Per 10K	Trends
ADSM	2926	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ConservAqua	660	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Regent Water	137	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0	
Smarta Water	1493	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0	
The Water Retail Co	378	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0	
Yu Water	972	0	0	0	0	0	0	0	0	0	0	0	2	2	20.6	
<b>Total</b>	<b>6566</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>3.0</b>	
Others*		4	5	8	8	7	18	13	7	10	15	11	16	122		

\*Wholesalers and any other non-retailers, as well as retailers who exited prior to 2020/21

### Appendix 3a - Business complaints to CCW against medium/large providers in 2020/21 by main category

Provider	Supply points/ connections	Administration	Billing and Charges	Metering	Other	Retail Competition	Sewerage	Water	Total	Per 10 K
Business Stream	403365	14	100	1	2	7	1	9	134	3.3
Castle Water	556827	153	810	8	4	25	7	14	1021	18.3
Clear Business Water	17840	2	17	1	1	3	0	0	24	13.5
Dŵr Cymru Welsh Water	202261	1	11	2	0	1	2	6	23	1.1
Everflow	82147	5	47	1	0	15	0	0	68	8.3
First Business Water	6747	0	0	0	0	0	0	0	0	0.0
Hafren Dyfrdwy	9968	0	2	0	0	0	0	0	2	2.0
Pennon Water Services	161560	2	54	4	1	1	3	4	69	4.3
SES Business Water	41412	8	34	0	0	3	0	3	48	11.6
Water Plus	757303	132	866	14	6	24	6	29	1077	14.2
Water2Business	151870	0	9	0	0	0	0	0	9	0.6
Wave	415665	23	204	3	2	6	1	10	249	6.0
<b>Total</b>	<b>2806965</b>	<b>340</b>	<b>2154</b>	<b>34</b>	<b>16</b>	<b>85</b>	<b>20</b>	<b>75</b>	<b>2724</b>	<b>9.7</b>

### Appendix 3b - Business complaints to CCW against small providers in 2020/21 by main category

Provider	Supply points/ connections	Administration	Billing and Charges	Metering	Other	Retail Competition	Sewerage	Water	Total	Per 10 K
ADSM	2926	0	0	0	0	0	0	0	0	0.0
ConservAqua	660	0	0	0	0	0	0	0	0	0.0
Regent Water	137	0	0	0	0	0	0	0	0	0.0
Smarta Water	1493	0	0	0	0	0	0	0	0	0.0
The Water Retail Co	378	0	0	0	0	0	0	0	0	0.0
Yu Water	972	0	2	0	0	0	0	0	2	20.6
<b>Total</b>	<b>6566</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>3.0</b>
<b>Others*</b>		12	32	0	13	7	24	34	122	

\*Wholesalers and any other non-retailers, as well as retailers who exited prior to 2020/21

**Appendix 4a**  
**Business complaints investigations carried out by CCW against medium/large providers in 2020/21**

Provider	Investigations	
	2019/20	2020/21
Business Stream	1	0
Castle Water	14	9
Clear Business Water	0	0
Dŵr Cymru Welsh Water	0	0
Everflow	0	1
First Business Water	0	0
Hafren Dyfrdwy	0	0
Pennon Water Services	2	0
SES Business	4	2
Water Plus	57	17
Water2Business	1	0
Wave	25	7
Affinity for Business*	1	0
<b>Total</b>	<b>105</b>	<b>36</b>

\*Affinity for Business merged with Castle Water on 1st April 2020

**Appendix 4b**  
**Business complaints investigations carried out by CCW against small providers in 2020/21**

Provider	Investigations	
	2018/19	2019/20
ADSM	0	0
ConservAqua	0	0
Regent Water	0	0
Smarta Water	0	0
The Water Retail Co	0	0
Yu Water	0	0
<b>Total</b>	<b>0</b>	<b>0</b>



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