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BY EMAIL: Sarah.Thomas@ccwater.org.uk

11 October 2023

**Modern Standards for a Modern Sector: Improving how the Guaranteed Standards Scheme (GSS) works for people**

Dear Sarah

I write in response to your Call for Evidence dated August 2023, detailing our response to the questions raised.

We believe this is a timely review, and are keen to be an integral part of your proposed working group, looking to review how the GSS works and how we, as an industry, can enhance this moving forward. We see this as a really positive step and the right thing to do for our customers.

**1. Basic service failures**

We're keen to gather the thoughts of the wider industry and are certainly open to looking at introducing new standards, working collaboratively to make sure the right standards are introduced, these are reflective of the opinion of customers and that any additional payments are reflective of the inconvenience and/or distress felt.

I'm sure like us, several of the 'Basic service failures', are effectively dealt with by companies on a case-by-case basis and/or within the current standard for complaints however we recognise the need for new or improved standards in other areas.

Following two recent events where we have made goodwill payments to all affected customers, we are keen on introducing a new standard for Boil Notices. Whilst we're keen on introducing a standard around this, we do feel it should be clear on what the standard will cover and ensure that the amount is reflective of the inconvenience.

**2. Common complaints**

Whilst we're not opposed to introducing new standards, we feel that the areas picked out from your 2018 review are queries which we deal with on a case-by-case basis – where we can better understand the individual's circumstances, distress and inconvenience and apply any necessary payment based on this. There is also a concern that with the 'Disputed liability for measured bills' we currently handle many queries that are private disputes, due to marital splits and shared supplies, as examples, should a standard be introduced for this reason we would need to be very clear on what this would cover.

### **3. Repeat service failures**

We agree that work is needed on introducing new measures around repeat service failures, as we acknowledge that the level of impact, distress and inconvenience for these customers can be much greater. We already have in place our 'worst served' processes for, both, Water Networks and Water Recycling Networks and are continuing to look at ways of enhancing these processes to benefit our customers.

We welcome the opportunity to being part of the working group and helping shape and design what new standards could be introduced.

### **4. Areas where the existing standards could be improved**

As with repeat service failures, we are keen to work with you, and the wider industry, on improving current standards, acknowledging that extended periods of service failure have a much greater impact on customers.

**Pressure failures** – we agree that a review would be beneficial around this element, however we feel that getting down to appliance level will come with its own complications, due to age of appliance, fitting of appliance and several other factors – so would recommend there is some criteria set around this, should this standard be improved.

### **5. Extreme weather exemption**

As outlined in your report, this element has been removed for repeat sewer flooding events, through the End Sewer Flooding Misery campaign. As a company, one of our core values is 'doing the right thing' – so we're certainly open to reviewing this on a wider scale.

### **6. Changes to appointment requirements**

We are open to reviewing the commitments in place for appointments as we are currently as flexible as possible, in order to meet our customers' needs. Any changes to current working practices/hours will take time to embed and could increase operating costs substantially therefore gaining alignment across the industry could prove difficult. Many of our technicians are available for emergency

work out of hours, to ensure we're supporting our customers in the most need and to help protect the environment.

### **7. Greater visibility and clarity of service standards**

We're looking forward to working with the working group on this and to see what ideas others have around giving better visibility of our GSS, as well as sharing ideas of our own. We agree that better visibility is required, in particular; relevant standards to the customer and those that are not automatic.

### **8. Proposed increase to payments**

We have reviewed the proposed increase to payments set out in the report, and whilst we agree that a review is certainly required, our initial thoughts are below, which we'd like to discuss further with the working group for consideration.

Any cost increases agreed throughout the process will be borne by our customers, in the round, so we want to work with you, and the industry, ensuring that fairer payments are offered, whilst reflecting the inconvenience and distress customers have experienced. We feel that it would be more appropriate to look at the level of inflation since the 2008 GSS Regulations and amend payments based on what the rate of pay would be today.

We agree that it would be positive for our customers to review the payments relating to appointments and, we feel, there is an opportunity to carry out some benchmarking on this type of payment, as there will likely be a variation across differing industries – but it will absolutely give us a steer on what is right for the water industry, and our customers.

### **Internal & External Flooding**

These standards currently compensate customers based on their billed charges. This takes into consideration the occupancy of a property, rather than the distress of the occupants and damage caused. Whilst we're not against increasing the maximum end of the scale, we feel that increasing the minimum level offered would be better placed, as this would benefit far more customers, including those lower water users. We feel that these standards have the potential to be set differently, potentially with a scheme similar to WATRS, to include a level of banding for payments – Moderate, Substantial, Severe & Extreme – certainly something that could be considered within the working group.

### **Interruption to Supply**

Following previous conversations with yourselves we voluntarily enhanced the amount we pay on this standard, to £30 for every 12 hours, – and as part of the working group look to review, design and shape any proposed amendments. It

would be useful to understand the context behind the £75 proposal i.e – is the £75 for the first 12 hours and £10 every 24 hours following?

We feel that all other payments need to better reflect the level of inconvenience and/or distress experienced by the customer. For example, a missed appointment is of far greater inconvenience than not receiving a substantive response within the allotted timescale and we believe payments should be reflective of that.

## **9. Non-Household (NHH)**

The NHH Retail market operates using many (NHH end user) customer focussed delivery incentives for Wholesalers, both financially (fines for poor performance) and reputationally in areas such as OPS & MPS. These both fall under the overarching Market Performance Framework which is currently under review in line with the proposed BRMeX measure for the start of the 2025 financial year. Our view is that these incentives along with the current GSS framework for NHH customers is sufficient to ensure NHH customers get good service and are fairly recompensed when occasionally issues arise from a Wholesalers perspective.

Here at Anglian we share a weekly schedule of all GSS payments with all of our Retailers and the payments are passed over as part of the monthly settlement activities. After this it is over to Retailers to facilitate the payments to their customers in line with the market codes (GSS standards). As a wholesaler we don't have visibility of how and when the payments are processed, however, we don't receive any negative feedback with regard to GSS failures that would indicate a problem with payments being made by Retailers.

We feel that setting up a separate working group, to cover the NHH element, would also be beneficial.

I hope that all of the information above helps to reinforce the commitment that Anglian Water has to doing the right things for our customers at the heart of what we do. We are really excited to be part of the working group and look forward to reviewing, and amending, the standards throughout the course of the process.

Regards



Danny Green  
Customer Support Delivery Manager

