



Independent Networks  
Association

Sarah Thomas  
CCW

Email: [Sarah.Thomas@ccwater.org.uk](mailto:Sarah.Thomas@ccwater.org.uk)

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Dear Sarah

### **CCW Call for Evidence on Guaranteed Standards Scheme**

I am writing to you on behalf of the Independent Networks Association (INA), in response to your call for evidence. I can confirm that this response is not confidential.

The INA represents the UK's Independent Network Operators which play a vital role in heating and energising homes and businesses, as well as providing water and wastewater services. Our members have delivered significant improvements in competition, choice and service for customers in the utility market and, together, own and operate utility infrastructure and networks that provide energy, heat, power, water and wastewater to over four million households and thousands of businesses right across the UK. While the competitive market for last-mile networks in water and wastewater, is relatively less mature than in energy, experience to date has demonstrated the significant potential for further development of the NAV sector to deliver more substantial and wide-ranging benefits to both developer and end customers.

### **General principles**

The INA and its NAV members support the principle of consistency of compensation payments across the regions. As NAVs operate under the no worse off principle, they need to mirror any payments made in relation to compensation. The lack of consistency produces a postcode lottery for customers and moving to the same payments levels across England and Wales should be the aim.

We agree that payments should be updated periodically and the price control reviews could be the time to review this. This places certainty on the companies as to any costs and



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effectively sets a target for service delivery so that the need for compensation payments should be on an exceptional basis.

Openness and transparency as to the level of service should be easy to find for customers. This is also an issue facing NAVs in terms of discovering standards and compensation payments of incumbents on their websites. All INA members have signed up to the INA Customer Commitment, part of this relates to making it easier for customers to communicate with us and get the information they need. This will be a priority for NAV members to review their own websites and communications to ensure this remains clear for their customers.

### **Specific INA views on the questions posed by CCW**

Q5. Should payments better reflect the impact of service failures on customers, taking into consideration both the direct financial costs and the inconvenience?

As NAVs operate the last mile infrastructure for their customers, events upstream in incumbent water companies assets can impact downstream NAV customers. Currently the bulk supply / discharge agreement between incumbents and NAVs may have clauses around compensation for downstream effects caused by upstream issues, however, this is neither mandatory nor consistently applied. Further, to ensure all customers are treated equally, we consider compensation should be paid to each NAV customer, rather than seeing the NAV network as one customer. This will allow for fairness and consistency for all water customers and should be clarified in any changes to the GSS.

I hope that this letter is helpful. If you have any questions on any of the issues I have raised or would like to discuss these in more detail, please feel free to get in touch.

Yours sincerely,

**Keith Hutton**  
**Chair of the INA Water Sub-Committee**