



CCW
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Email: Sarah.Thomas@ccwater.org.uk

13 October 2023

Dear Sarah,

CCW Call for Evidence: Guaranteed Standards of Service

I am writing to you in response to CCW's call for evidence relating to the current Guaranteed Standards of Service. Having considered the paper and questions detailed, we have shared our views below.

1. Within the current standards what works well and why?

The current standards align well to the most important areas of delivery and are also consistent with GSS schemes operated across the energy industry.

2. Should the standards be refreshed and, if so, how?

It would seem reasonable to revisit GSS payment amounts to account for increases in inflation and would recommend that any such changes may be best aligned to the price control reviews.

Across incumbents and NAVs there is a mixed picture in regard to GSS payment values and voluntary standards. Consistency should be achieved in regard to both of these areas in the interests of treating all customer's fairly, especially given the fact that customers are unable to choose their water supplier.

It is our view that aiming to introduce GSS standards for common areas of customer complaints will create added complexities to the scheme and notwithstanding all companies operate complaints handling procedures that should enable goodwill gestures to be issued to customers for any lack of service irrelevant as whether this is a GSS failure or not

Having considered repeat service failures, this should be compensated as is currently required under GSS by recognising each GSS failure and making an additional payment where a GSS failure has not been recognised and the customer has not been recompensed in accordance with the current scheme.

3. What needs to be changed and why?

Extended periods of service failure – the current GSS scheme should be set up in a way that relevant incidents should be resolved within certain time periods and failure to do so results in a GSS payment however this equally should be reflective of fair and reasonable timescales that are achievable by most companies.

4. Are there new standards we should add, are there others that are out of date and need revising?



No

5. Should payments better reflect the impact of service failures on customers, considering both the direct financial costs and the inconvenience?

No, I don't believe this was the purpose or intent of GSS payments originally and should not be a method of recompensing financial losses, especially for upstream incumbent faults where we do not have any control unless there is a reciprocal scheme between incumbents and NAVs whereby GSS compensation for service failures are recognised and incumbents are obligated to compensate every NAV customer for the failure under the bulk agreements.

6. Should different service standards apply for customers who need extra help or who have been identified as needing extra help, especially those on the priority services register?

No, in the interest of treating customers fairly we should not introduce different standards for vulnerable customers, all customers should expect to receive the same level of service.

7. Has your company asked customers for their views on GSS and, if so, what did they say? Can you share the research with us?

No

8. How do you use GSS data internally to drive performance?

With the implementation of a new billing system, we are expanding our GSS reporting to better monitor trends to highlight business wide areas for improvement.

9. All companies have, at some point, voluntarily enhanced their GSS. What triggered this decision for your company?

This decision was made by SSE and inherited by Leep upon acquiring the SSE Water Networks; we do note though disparity between GSS payment values and voluntary standards between NAV's and the wider industry and do encourage consistency to create a level playing field for all.

10. Faced with the changes arising from climate change, how should we consider the issue of 'extreme weather'?

Exemptions should be in place similar to the electricity industry, so companies avoid being penalised for large-scale weather-related events that are outside of their control.

I hope that this response is helpful. If you have any questions or would like to discuss these in more detail, please feel free to get in touch.

Yours sincerely

A handwritten signature in blue ink that reads "V Bell".

Vicky Bell
Head of Regulation and Compliance