

Sarah Thomas  
Policy Manager  
Consumer Council for Water

19<sup>th</sup> October 2023

Dear Sarah

**The Guaranteed Standards Scheme: Call for Evidence**

I apologise for the delayed response to this call for evidence.

UKWRC is the representative body for water retailers in the two UK water markets. It has 16 members who together serve around 98% of the non-household (NHH) supply points (i.e. customer connections) in England and Wales.

We provide below a high-level response covering some key principles and concerns of our retailer members, rather than specific responses to the questions asked in the consultation.

As the representative body, we welcome the research into the Guaranteed Standards Scheme. It should be acknowledged however that the needs of business customers are different to those of household customers and we believe there is value in reviewing whether the Scheme is fit for purpose for business customers.

In completing the review it would be beneficial to consider the other protections available to NHH customers. When the competitive water market opened in 2017, Ofwat introduced the Customer Protection Code of Practice which provides protection on customer service-related matters. Furthermore, the Water Industry Act does offer some protection for businesses; they can already apply for compensation in the event of loss of revenue for example from water outages. However the response and compensation can vary across different wholesalers.

Whilst the research undertaken identifies some of the challenges experienced by the household market, we believe that there would be a benefit to CCW undertaking a wider survey of the NHH market, to understand what currently happens under the Scheme and the demands of business customers. From this, CCW will be able to determine what is important to a business customer and identify whether the Scheme remains appropriate for businesses.

## UK WATER RETAILER COUNCIL

From a retailer perspective, the needs of a small sole trader are very different to a large multi-site organisation, and we do not believe that the current research fully addresses this. We would encourage CCW to consider similar schemes from outside of the water industry to support with this review.

We understand that a working group is being set up to further explore the Scheme and representatives from the UKWRC would be happy to lend our support.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Phillip Mills', written over a light blue horizontal line.

Phillip Mills  
Chair  
UK Water Retailer Council