

A large, stylized teal wave graphic that spans across the middle of the page. It consists of three main peaks, with the second peak being the highest and most prominent. The wave has a thick, rounded stroke and a slight shadow effect, giving it a three-dimensional appearance.

CCW

The voice for water consumers
Llais defnyddwyr dŵr

Business Customer Complaints

2024-25

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Business Customer Complaints 2024-25

Introduction

CCW is the independent voice for water consumers in England and Wales. We help household and non-household customers who have not been able to resolve a complaint against their water company and retailer. We also provide free advice and support. Every year, we help thousands of customers reach a satisfactory conclusion to their complaint, including securing financial redress or changes that lead to an improved service.

All of CCW's work is informed by extensive research, which we use to champion the interests of consumers and influence retailers, water companies, governments, regulators, and other key industry stakeholders.

In April 2017, the water retail market fully opened in England meaning that non-household customers – typically business customers, public sector organisations and charities – have been able to choose who provides their water retail services¹.

Retailers handle complaints and enquiries, bill non-household customers for water and wastewater services, and read water meters. Wholesalers, also known as 'water companies', look after the pipework and take care of the supply of water, and removal of wastewater.

This report looks at complaints made to both CCW and to retailers, focusing on the experiences of non-household customers, referred to in this report from this point onwards as 'business customers'. Complaints data provides crucial evidence for CCW's work with retailers to drive forward improvements in their services and standards. We work with retailers to address business customers' concerns and help improve the service they receive.

¹ IN WALES, ONLY BUSINESS CUSTOMERS THAT USE FIFTY MEGALITRES OF WATER A YEAR ARE ELIGIBLE TO ACCESS THE WATER RETAIL MARKET AND CHOOSE THEIR WATER RETAILER. THEREFORE, FOR MOST BUSINESS CUSTOMERS IN WALES, THEIR RETAIL SERVICES ARE PROVIDED BY DWR CYMRU WELSH WATER AND HAFREN DYFRDWWY.

Approach to this report

This is the second year CCW has looked at retailer performance based on both total complaints received directly by retailers and total complaints escalated to us. It is also the second year we are reporting total complaints across all the contact channels used by retailers. These include complaints made in writing, by telephone and raised via social media. This has enabled us to compare all data across the two-year period.

Following an update to our systems in 2024, we have changed the way we record and categorise business customer complaints to CCW. Administration complaints are now recorded as a subset of billing, water or sewerage complaints, depending on which aspect of service they relate to. We will continue to record complaints in this manner going forward.

Most business customer complaints during the period covered by this report were made to large and medium retailers, who each supply more than 5,000 connections, known as supply point IDs (SPIDs). We have compared their performance using the median (mid-point) and quartiles calculated from the normalised submissions data supplied by retailers.

Small retailers are defined as those with less than 5,000 SPIDs. There are currently five retailers in this category: ConservAqua, Smarta Water, The Water Retail Company, Veolia Water Retail and Yu Water.

In most cases, we present the complaint numbers as a figure per 10,000 SPIDs. Some smaller retailers receive very few complaints. As a result, normalising their figures can make their performance appear extreme. We, therefore, consider these retailers separately.



Key findings

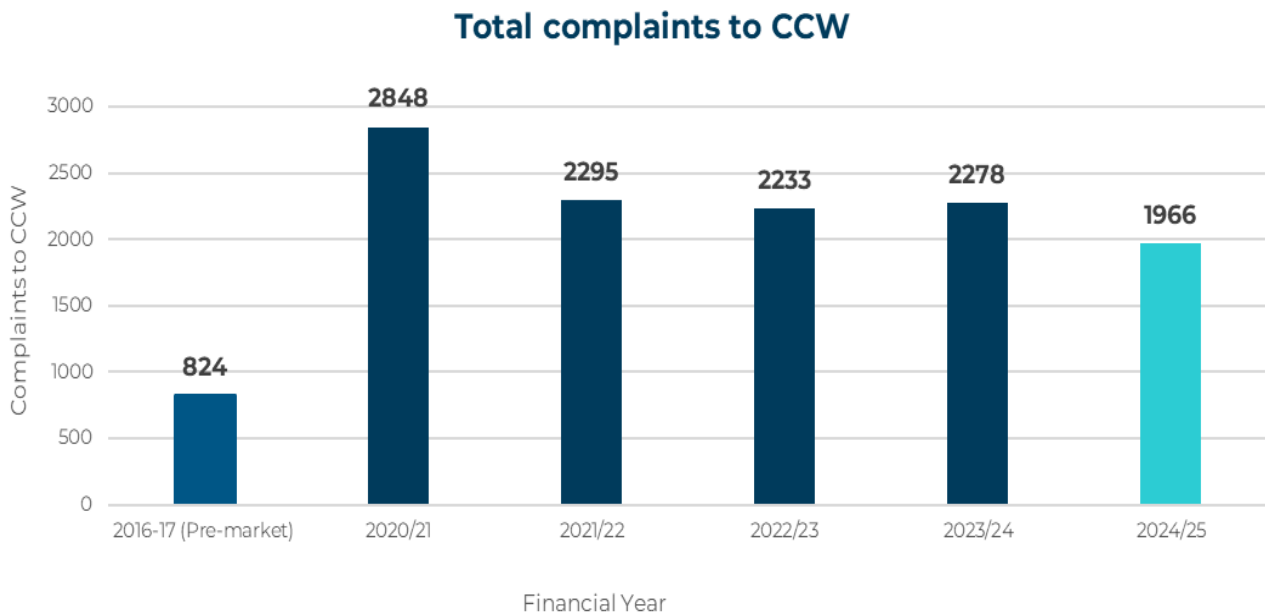
- The number of complaints to CCW about retailers has fallen in 2024-25 but remains too high.
- Complaints from business customers direct to CCW fell by 14% in 2024-25 compared to 2023-24, from 2,278 to 1,966.
- The number of complaints to CCW remains significantly higher (+139%) than the levels seen before the market fully opened in England in 2017.
- Billing is by far the main cause of most customer issues.
- Most complaints received by CCW in 2024-25 related to billing issues (92%). Measured bills are the main reason for billing complaints (55%) as customers dispute the accuracy of the bills they receive from retailers.
- There have been increases in complaints to CCW about affordability (+31%), eligibility for the water retail market (+44%), switching (+14%) and unmeasured billing (+106%).
- In addition, while there was a slight reduction in the number of complaints CCW received about debt activity (-8%), this was still the cause of the third highest number of complaints.
- We are pleased to see a drop in complaints from business customers to retailers.
- There was a 4% drop in the total number of complaints received by retailers, with numbers falling from 20,749 in 2023-24 to 20,005 in 2024-25.
- 74% of complaints raised by business customers are reported as retailer driven issues rather than operational matters associated with the water companies.
- 51% of complaints to retailers relate to billing issues and a further 33% are caused by administration matters.
- The better performing retailers in 2024-25 were Water2Business and Pozitive Water, while the poorer performing retailers were SES Business Water, Clear Business Water and Castle Water. These poorer performers generate the highest number of complaints per 10,000 SPIDs to both retailers and CCW among large and medium-sized providers.

Complaints from business customers to CCW

When a business customer is not satisfied with the service they receive, they should raise a complaint directly with their retailer. After a retailer has had two chances to resolve a business customer's complaint, if the customer is not satisfied, they are entitled to bring it to us at CCW. We keep records of the numbers and types of complaints we receive to build our evidence base. This gives us an understanding of the water retail market areas that need to improve and helps to inform the research we carry out to understand the views of business customers.

Complaints from business customers direct to CCW fell by 14% in 2024-25 compared to 2023-24. We are pleased that the number of complaints we received about the water retail market has decreased by more than 10%. This is a welcome move in the right direction for the market, as it has now reached the targets we set for reducing complaints by 10% in our 2022-23 and 2023-24 Forward Work Programmes.

Figure 1: Total complaints to CCW in 2024-25 (including 'Other' unattributed complaints), compared to previous years



Despite the welcome improvement we have seen this year, the number of complaints we received at CCW remained significantly higher than the levels seen before the market fully opened in England in 2017. Compared to 2016-17, complaints to us are 139% higher. We want to see the industry continue the downward trajectory in complaints, with improved customer service delivery from both retailers and water companies.

Figures 2, 3 and 4 show the numbers of complaints received by CCW about each retailer.

Figure 2: Complaints to CCW about large and medium retailers per 10,000 SPIDs in 2024-25 (Welsh companies highlighted in purple)

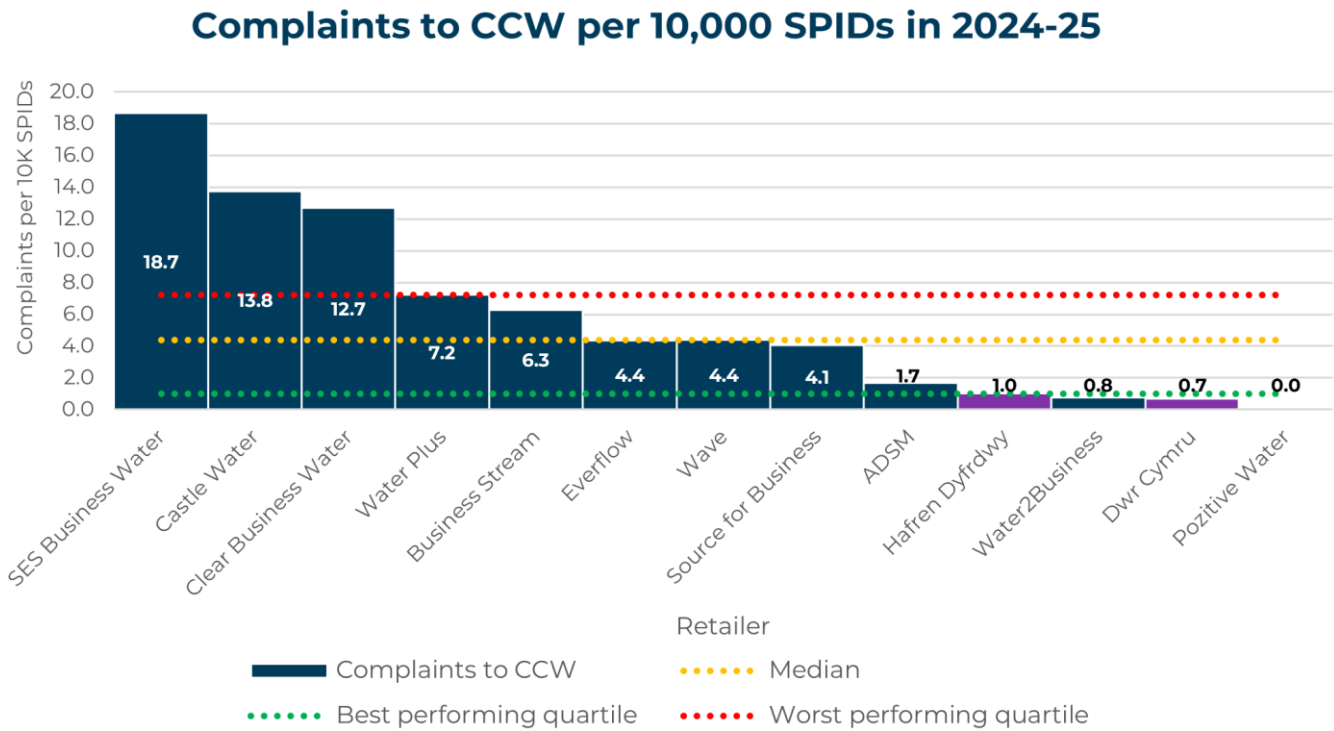


Figure 3: Complaints to CCW about large and medium retailers in 2024-25

Retailer	Total number of complaints to CCW	Normalised complaints per 10K SPIDs
SES Business Water	67	18.7
Castle Water	638	13.8
Clear Business Water	33	12.7
Water Plus	508	7.2
Business Stream	245	6.3
Wave	172	4.4
Everflow	76	4.4
Source for Business	62	4.1
ADSM	2	1.7

Hafren Dyfrdwy	1	1.0
Water2Business	14	0.8
Dwr Cymru	13	0.7
Pozitive Water	0	0.0

Key
Red = Poorer Performers
Amber = Worse than Median
Yellow = Better than Median
Green = Better Performers
Welsh Retailers

Figure 4: Complaints to CCW about small retailers in 2024-25

Retailer	Total number of complaints	Normalised complaints per 10K SPIDs
ConservAqua	1	2.8
Smarta Water	4	8.2
The Water Retail Company	0	0.0
Veolia	0	0.0
Yu Water	13	114.8

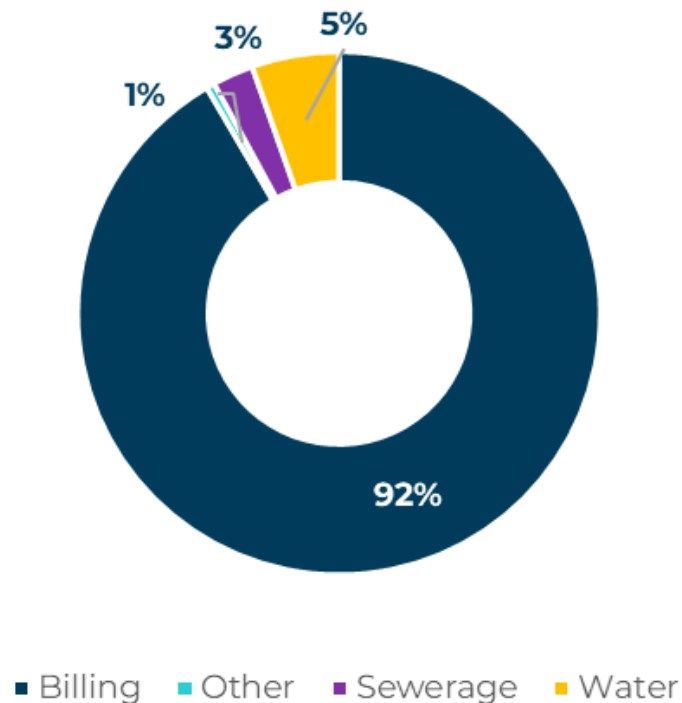
Types of complaints to CCW

This year we have changed the way we categorise complaints. The most notable change is that administration complaints are not recorded as a separate category but form a subset of billing, water or sewerage complaints, depending on which aspect of service they relate to. This means we are not able to directly compare some of the complaint categories to last year's figures.

We now categorise complaints to CCW under billing, water, sewerage and other.

Figure 5: Complaints to CCW by complaint category in 2024-25

Complaints to CCW by category in 2024-25



Due to rounding, numbers do not add up to 100%

Complaints categorised as billing include issues around charging, meter reading, affordability and debt recovery, as well as complaints about measured and unmeasured bills (where a customer is not billed by a water meter). The billing category also contains complaints about competition issues, such as eligibility for the water retail market and switching, metering and billing related administrative issues, like refunds and incorrect account information.

Sewerage complaints concern issues related to environmental pollution, flooding from sewers and repairs to sewerage pipes and drains.

Where the cause of complaint is attributed to water operations, it can include water quality issues, low pressure and water pipe repairs and connections.

Complaints recorded as 'other' for 2024-25 covered General Data Protection Regulation (GDPR) requests and issues that did not relate to the water retail market and fell outside of CCW's remit.

Despite the changes in categories, the number of complaints we received in 2024-25 show a reduction across all categories. The vast majority of complaints that we received in 2024-25 related to billing issues (92%), making up nine out of every ten complaints that reached us. As billing is by far the biggest cause of customer dissatisfaction among business customers, we are focussing on these complaints in this report.



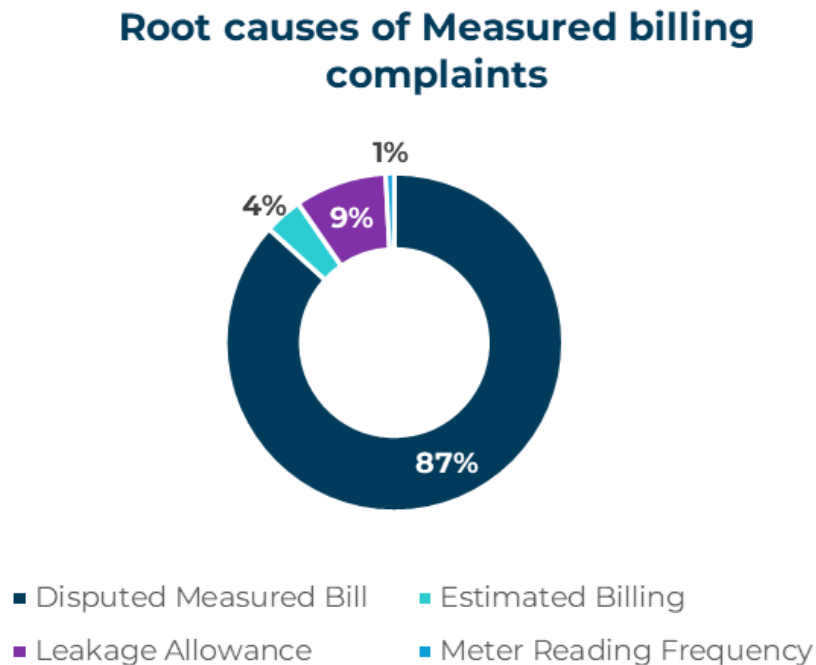
Analysis of billing complaints

When categorising billing complaints to CCW, we record further information about the nature of the customer's dissatisfaction to help us to identify specific issues of concern within the water retail market.

Although we cannot directly compare overall billing complaints year on year after our change in categorisation, we can compare the root causes of these complaints. In 2024-25 we have seen reductions in complaints about estimated bills and leakage allowances compared to 2023-24. These have reduced by 51% and 16% respectively. These reductions are encouraging as they reflect areas of focus for CCW in recent years to help improve customer service. Following the publication of our Five-Year Review² of the water retail market, including our recommendations for change, we have been working with water companies to ensure that details about wholesale leakage allowance policies are more consistent and easier to locate and understand for customers.

We are also working with the market to limit the use of estimated billing by retailers. Our previous research into customer preferences for meter reading³ demonstrated the importance to business customers of receiving a bill based on an actual read. Our recent Testing the Waters⁴ tracking survey also showed that over a third of customers surveyed said that inaccurate billing was the reason for their dissatisfaction with their retailer.

Figure 6: Root causes of measured billing complaints to CCW in 2024-25



Due to rounding, numbers do not add up to 100%

² [CCW: FIVE YEAR REVIEW OF THE RETAIL MARKET 2023](#)

³ [CCW: SME CUSTOMERS PREFERENCES FOR METER READING FREQUENCIES \(2021\)](#)

⁴ [CCW: TESTING THE WATERS \(2024\)](#)

Measured billing remains the area which generates the most complaints, with nearly 1,000 complaints being made to CCW in 2024-25. The main area driving complaints in these categories is disputed measured bills, where customers with a water meter disagree with their liability for the amount they are being charged. Estimated bills and leakage allowances still make up a proportion of complaints to CCW.

Customer case study: Billing issue

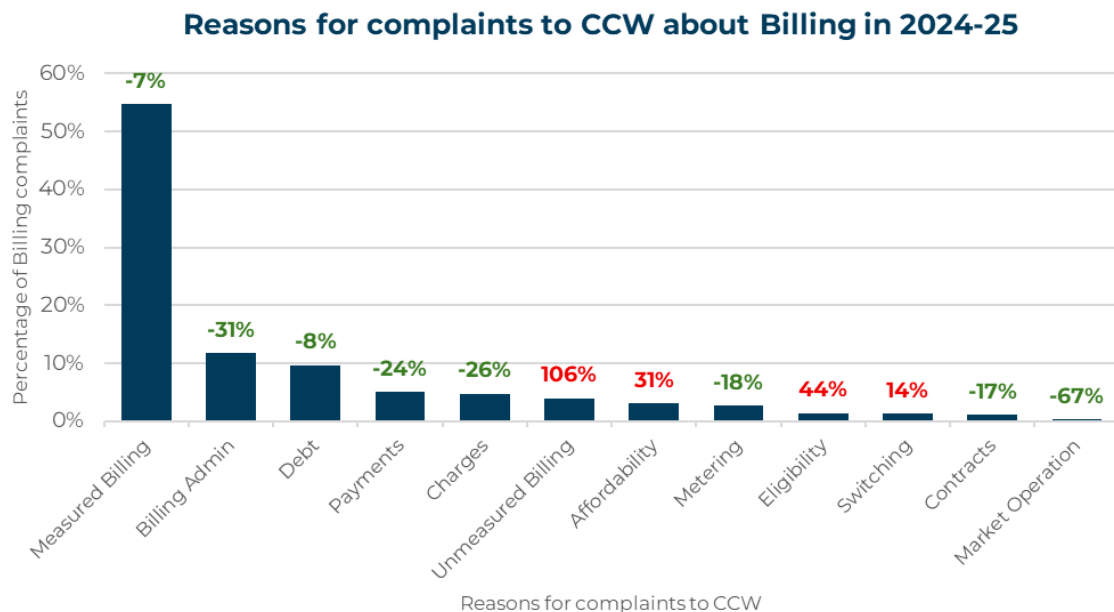
In 2024 CCW received a complaint from a business customer who was unhappy that their retailer had failed to reassess their bill in a reasonable timescale.

The customer had challenged the size of the unmeasured bill when they moved into the property in 2023 and asked for a meter to be installed. The meter survey and installation were not completed until 2024. The delay meant the customer accrued an outstanding bill of £3,000, as charges were based on the higher unmeasured charge until the reassessment took place. CCW contacted the retailer highlighting the delay in taking action to correct the charges.

As a result, the customer’s account was rebilled based on consumption charges for 2023 and 2024 reducing the outstanding amount to £222.

Customers will expect to see continued improvement in retailers’ handling of billing issues. The rollout of smart metering will offer retailers and customers greater access to, and control over, water usage data, which should help lead to more accurate bills and a reduction in complaints disputing the accuracy of bills.

Figure 7: Reasons for complaints to CCW about billing in 2024-25, including percentage change from last year



Although complaints to CCW about billing issues have decreased overall, we have seen increases in complaints about affordability (+31%), eligibility (+44%), switching (+14%) and unmeasured billing (+106%) compared to 2023-24.

The 2024 Price Review⁵ required water companies to deliver an unprecedented level of investment to water and sewerage services to protect the environment and safeguard future supplies of water over the next five years. The cost of these programmes results in a significant increase in bills for business and household customers, meaning more and more customers will struggle to afford their bills. We expect retailers to deal sympathetically with any business customers who are having financial difficulties, talking to them about the options available and offering flexible payment options to help them manage their bills. Although there was a slight reduction in the number of complaints we received about debt activity (-8%), it still accounted for the third highest number of complaints received (175) about billing in 2024-25. This indicates that retailers need to improve their support for customers who are struggling to keep up with payments.

Eligibility complaints increased by 44% in 2024-25 compared to the previous year. These complaints often arise from disputes over mixed-use premises — properties that contain both household and non-household elements — and whether they qualify for participation in the competitive water retail market. CCW has been working with the market operator, MOSL, the Retailer-Wholesaler Group (RWG) and others to help clarify the guidance determining eligibility. The goal is to achieve consistency across the market and reduce the occurrence of these types of complaints.

Additionally, disputes about unmeasured billing have more than doubled in 2024-25, although they only account for 4% of the complaints we receive. This increase may, in part, be due to the use of rateable value (RV) for unmeasured charging and the increase in charges that has occurred.

⁵ EVERY FIVE YEARS OFWAT, THE WATER REGULATOR, SETS THE PRICE, SERVICE AND INVESTMENT PACKAGES THAT CUSTOMERS RECEIVE, INCLUDING LIMITS ON WHAT WATER COMPANIES CAN CHARGE CUSTOMERS

The Alternative Dispute Resolution process

On 1 December 2023, CCW took over the Alternative Dispute Resolution (ADR) process. When a complaint cannot be resolved through the usual process with retailers⁶, we assist customers in determining whether mediation or adjudication through the ADR scheme is the most suitable option for their case.

There has been a 66% reduction in complaints reaching the ADR stage in 2024-25. The chart below shows the referrals to ADR schemes made by retailers in the last year.

Figure 8: ADR referrals in 2024-25 by retailer (from retailer submissions)

Retailer	ADR referrals
ADSM	0
Business Stream	0
Castle Water	9
Clear Business Water	3
Dwr Cymru	0
Everflow	0
Pozitive Water	0
Hafren Dyfrdwy	0
SES Business Water	0
Source for Business	1
Water Plus	16
Water2Business	0
Wave	2

⁶ MOST WHOLESALERS AND RETAILERS ARE SIGNED UP TO CCW'S ADR PROCESS, BUT SOME USE AN ALTERNATIVE PROVIDER FOR THIS SERVICE. THE LIST OF REAILERS AND THE SCHEME THEY ARE SIGNED UP TO CAN BE FOUND ON OUR [WEBSITE](#), ALONG WITH MORE INFORMATION ABOUT THE ADR SCHEME

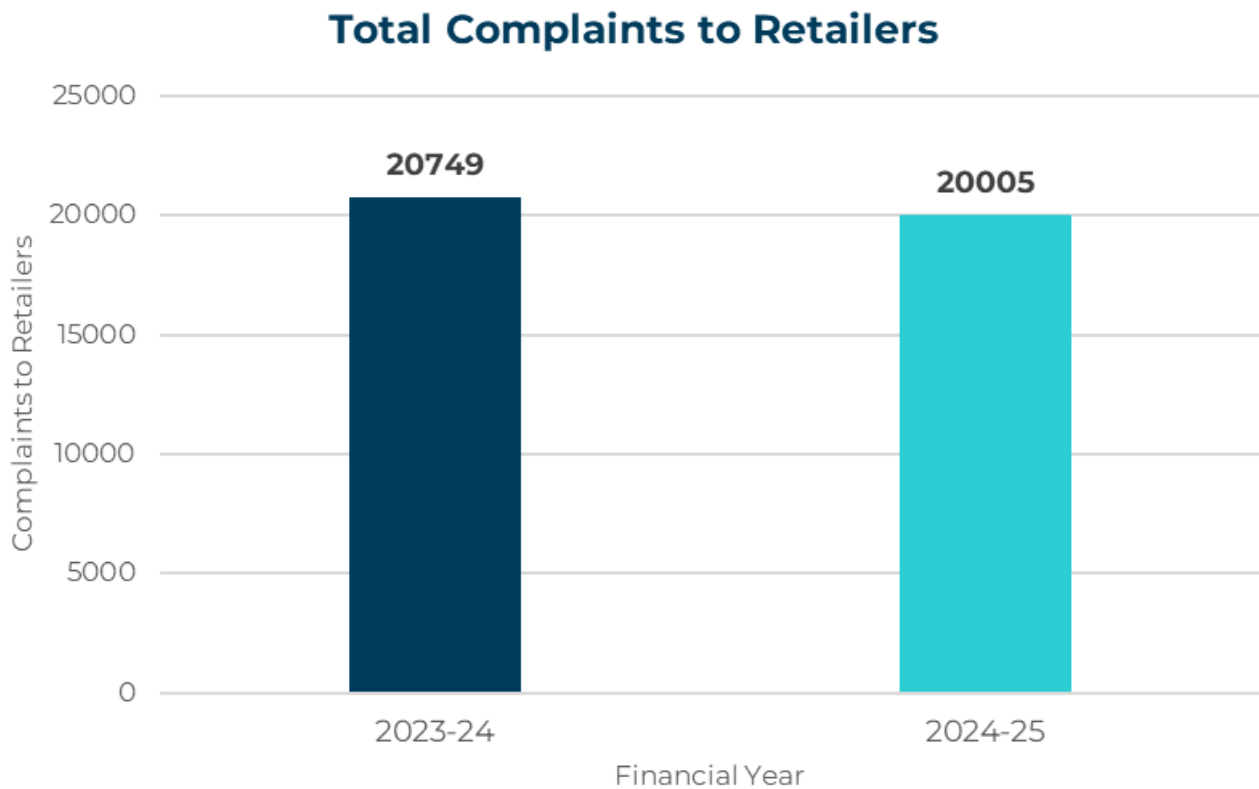
Complaints from business customers to retailers

In addition to tracking complaints to CCW, we also gather data on the numbers and types of complaints that retailers receive directly from their customers.

In 2024-25, there was a 4% decrease in the total number of complaints across all contact channels received by retailers in the water retail market. The number of complaints dropped from 20,749 in 2023-24 to 20,005.

Figure 9 shows the total complaints received by retailers from business customers in 2024-25 compared to last year.

Figure 9: Complaints to retailers in 2024-25, compared to the previous year



Figures 10, 11 and 12 show the numbers of complaints received by each retailer.

Figure 10: Complaints made through all channels to large and medium retailers per 10,000 SPIDs in 2024-25 (Welsh companies highlighted in purple)

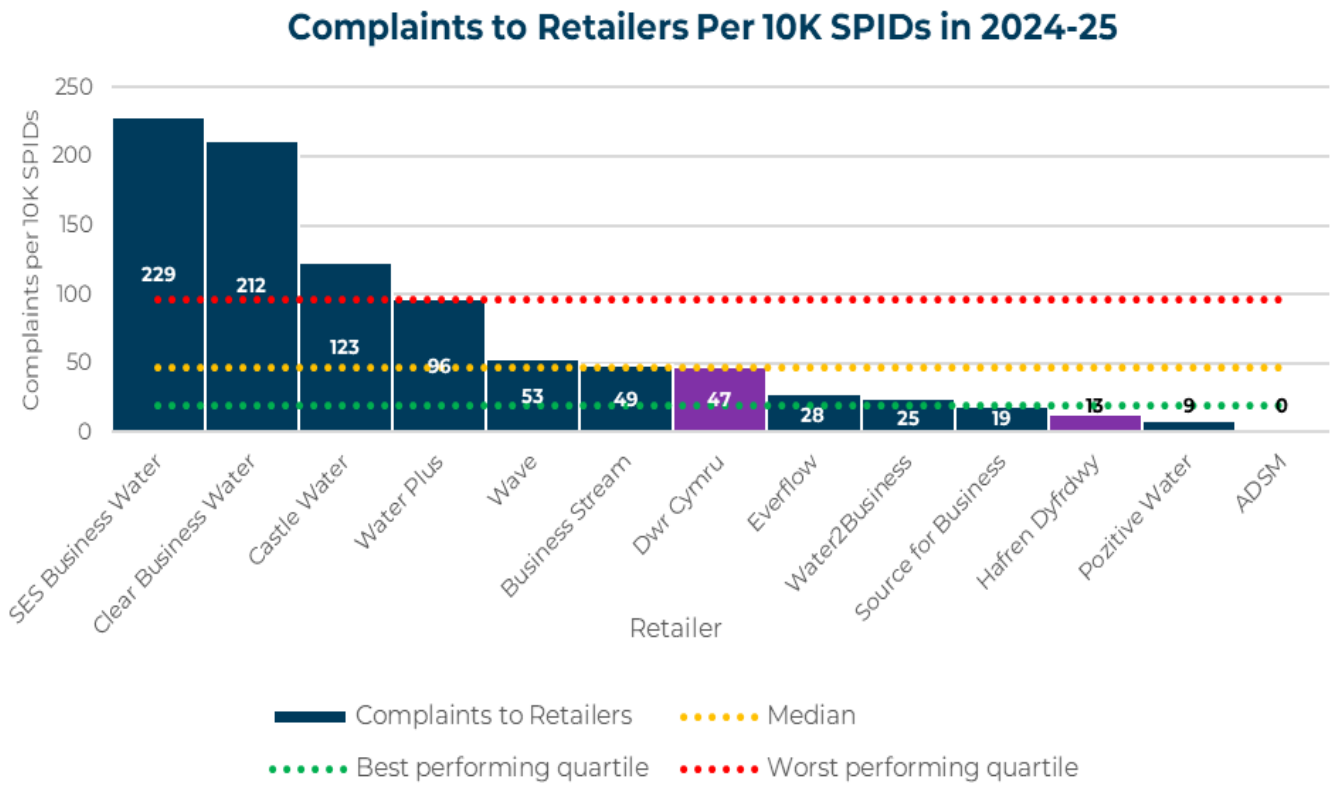


Figure 11: Complaints to large and medium retailers in 2024-25

Retailer	Total number of complaints	Normalised complaints per 10K SPIDs
SES Business Water	822	228.8
Clear Business Water	551	211.8
Castle Water	5699	122.9
Water Plus	6767	96.2
Wave	2069	52.7
Business Stream	1897	48.7
Dwr Cymru	916	47.0
Everflow	493	28.3
Water2Business	444	24.8

Source for Business	296	19.4
Hafren Dyfrdwy	13	13.0
Pozitive Water	11	8.8
ADSM	0	0.0

Key
Red = Poorer Performers
Amber = Worse than Median
Yellow = Better than Median
Green = Better Performers
Welsh Retailers

Figure 12: Complaints to small retailers in 2024-25

Retailer	Total number of complaints	Normalised complaints per 10K SPIDs
ConservAqua	10	27.6
Smarta Water	3	6.1
The Water Retail Company	0	0.0
Veolia Water Retail	0	0.0
Yu Water	14	123.7

Complaints to retailers by contact channel

We record the method by which customers choose to contact retailers to raise their complaints. The majority of complaints are received either in writing (by post or email) or by telephone. Retailers are increasingly utilising alternative contact methods such as webforms and SMS/WhatsApp communications, which are recorded as 'Other'.

In 2024-25 there was a 19% increase in written complaints received by retailers compared to the previous year. This increase was seen across all retailers, except for ADSM, who recorded zero complaints in 2024-25, and Hafren Dyfrdwy and Dŵr Cymru Welsh Water, which provide water retail services to all but a few business customers who have chosen to switch water retailer in Wales.

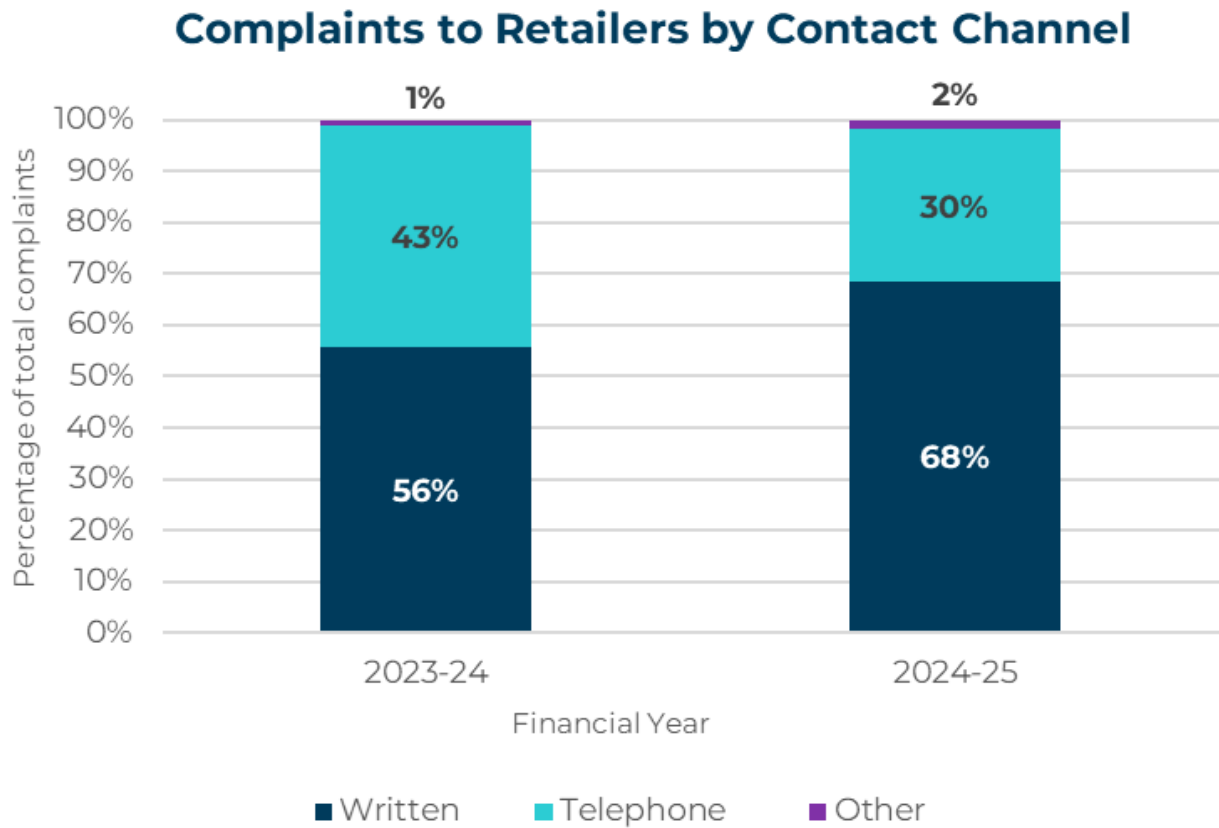
While we now report total complaints to retailers, it is of interest to see an increase in written complaints this year after a fall in previous years.

Figure 13: Total written-only complaints to retailers in 2024-25, compared to previous years



By contrast, 2024-25 saw a 33% reduction in telephone complaints. This year we have provided greater clarity in the CCW complaints guidance on how and when to record a telephone contact as a complaint. Where an issue is resolved to the customer's satisfaction by the end of a call, even if they began the call dissatisfied, then retailers should not include these contacts in their complaint figures.

Figure 14: Complaints to retailers by contact channel in 2024-25, compared to the previous year



We held complaints assessments with three retailers in 2024-25. This allowed us to look at their complaint handling practice in depth and provide detailed feedback on this and their interpretation of our complaint guidance. We plan to carry out further assessments with retailers in 2025-26 to drive improved customer service delivery. The assessments are valuable in helping us to understand the retailer’s processes and promote a customer focussed culture.

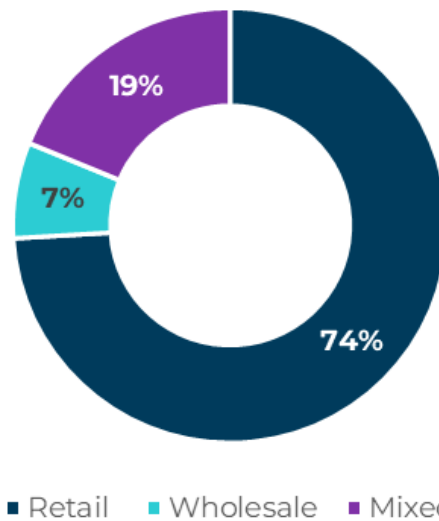
To ensure all retailers understand our complaint guidance and how to complete our reporting template, we will also be offering training sessions. These sessions will help retailers correctly interpret our guidance and address any questions about specific complaint examples.

Types of complaints to retailers

In 2024-25, 74% of complaints raised by business customers were reported as retailer driven. This indicates that the majority of complaints in the market stem from the interaction between the customer and retailer, rather than being driven by operational issues caused by the wholesaler.

Figure 15: Complaints to retailers broken down by retail/wholesale/mixed complaint type as a percentage in 2024-25

Complaints to Retailers by Type in 2024-25



In 2024-25, 6% of all complaints received by retailers related to leakage allowances, maintaining the same percentage as the previous year. These complaints typically arise when customers experience a loss of water due to leaks in their pipework. Leakage allowance policies are set by water companies and can vary between companies. A customer may raise a concern about how the retailer handled their leakage allowance application, or where they feel the water company did not take all the relevant circumstances into account when deciding on the leakage allowance.

CCW has been working with water companies to improve the leakage allowance process, which could see these complaints decrease in future. As mentioned, we have already seen a reduction in the number of these complaints that end up with CCW.

Figure 16: Leakage allowance complaints to retailers (excluding Welsh companies) across all contact channels in 2024-25

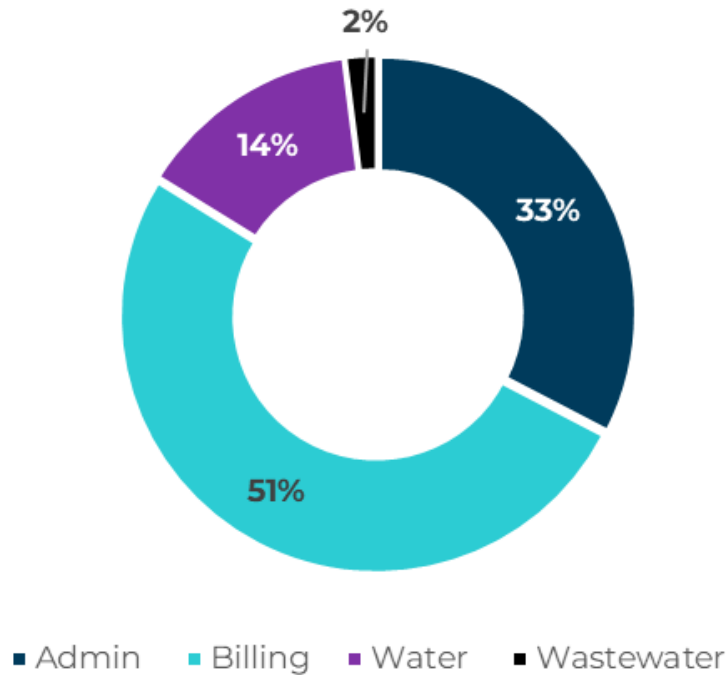
Retailer	Number of Allowance complaints to retailers	% of total complaints to retailer
ADSM	0	0%
Business Stream	259	14%
Castle Water	198	3%
Clear Business Water	14	3%
Everflow	60	12%
Pozitive Water	3	27%
SES Business Water	21	3%
Source for Business	84	28%
Water Plus	338	5%
Water2Business	34	8%
Wave	82	4%

Complaints to retailer by category

The drivers of complaints to retailers have remained largely unchanged from previous years. Billing issues remain the biggest cause of complaints, accounting for half of all complaints (51%) made to retailers in 2024-25. In 2023-24 this figure was 48%.

Figure 17: Complaints to retailers by complaint category in 2024-25

Complaints to Retailers by Category in 2024-25



We continue to work with the market to improve performance in delivering accurate bills to customers. Bill inaccuracies can be caused by meters not being read for a long time. Almost 10% of meters in the market are currently classed as Long Unread Meters (LUMs)⁷. However, this varies considerably between retailers and the wholesaler area in which the meters are located, with the rate being much higher in some cases. We expect retailers to do all they can to ensure every meter is being regularly read. The rollout of smart meters provides a clear opportunity for the market to improve its performance in this area by obtaining more regular, actual meter reads on which to base customers' bills.

Administration complaints comprise a third of the complaints (33%) made to retailers in 2024-25. This figure was 34% in 2023-24. Work is continuing across the market to assure and improve the quality of data, which can cause incomplete or inaccurate customer information and result in complaints.

⁷ A LONG UNREAD METER IS ANY METER ASSOCIATED WITH AN OCCUPIED PREMISES WHERE A METER READING HAS NOT BEEN ENTERED INTO CMOS (THE CENTRAL MARKET OPERATOR SYSTEM, WHICH HOLDS AND MANAGES DATA IN THE MARKET) FOR MORE THAN 12 MONTHS - [METERING DASHBOARD - MOSL](#)

Stage 2 Complaints to Retailers

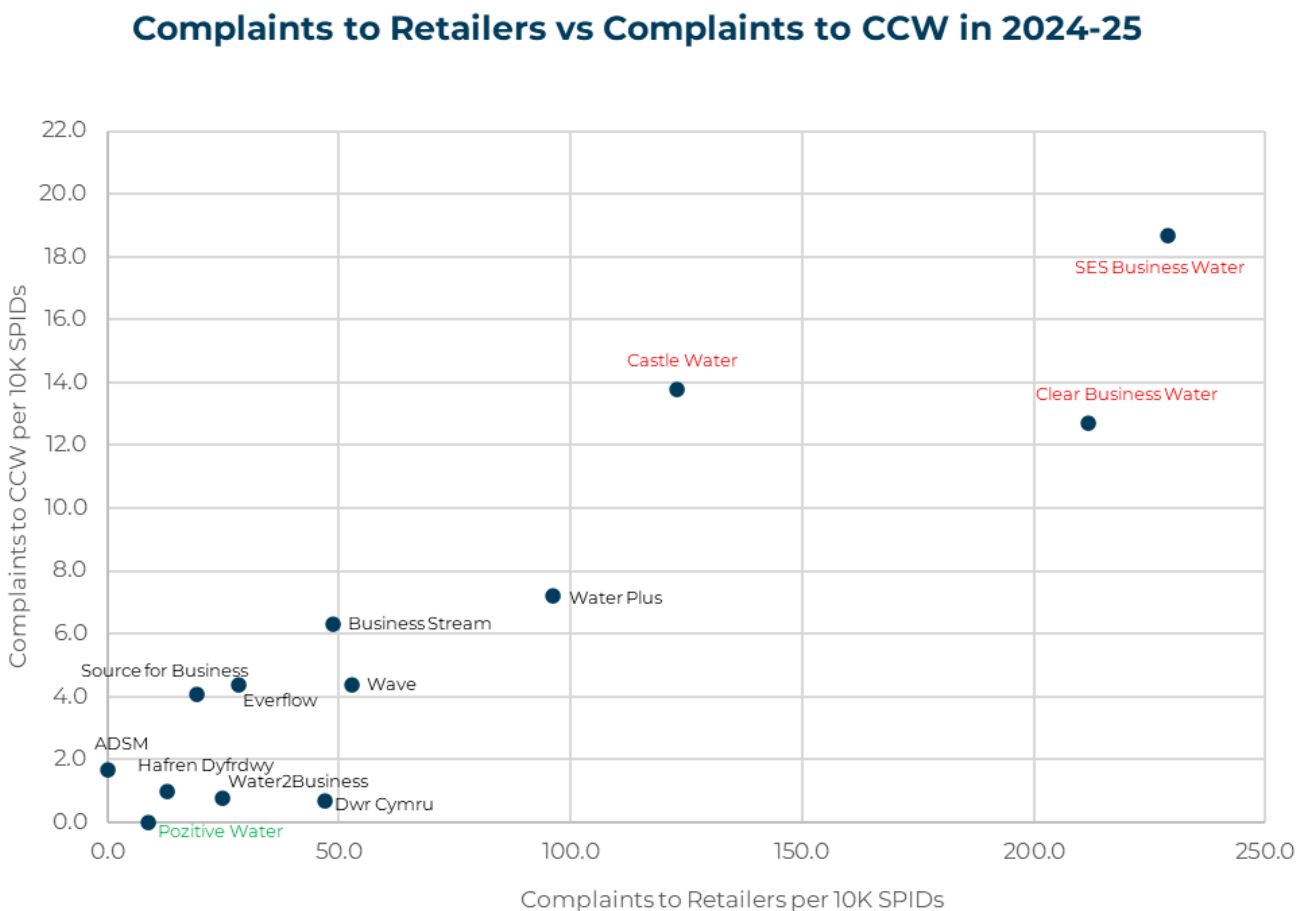
Stage Two complaints are those escalated by retailers when a customer remains dissatisfied after the retailer's initial attempt to resolve the issue raised. There has been a 9% reduction in the number of stage two complaints recorded by retailers between 2023-24 and 2024-25. This is a welcome indication that retailers are improving their performance in resolving complaints before they are referred to CCW.

Individual retailer performance

CCW examines the performance of individual retailers by comparing them with other retailers of a comparable size. Our comparison considers two distinct metrics for performance: the total number of complaints made by business customers to CCW and to retailers. The complaint handling metric provides a holistic picture of how well retailers are dealing with complaints from their customers.

This section provides additional commentary on the performance of individual retailers that demonstrated better or poorer than average performance in both metrics.

Figure 18: Complaints from all channels to retailers plotted against complaints from all channels to CCW in 2024-25 per 10,000 SPIDs



Poorer performing retailers

SES Business Water

SES Business Water continues to be the worst performing retailer per 10,000 SPIDs. Its poor complaints performance is primarily due to a backlog of 'gap sites'⁸ that have not yet been investigated. The legacy billing issues resulting from these gaps sites also drove up complaints to SES Business Water last year. Customer dissatisfaction can be caused by disputes over the identity of the occupier, or the length of occupancy. Investigating these sites has also led to billing disputes regarding who is responsible for the bill. Additionally, there has been an increase in debt collection activities resulting from some of these disputes, which has added to customer dissatisfaction. SES Business Water continue to work towards resolving these issues, but it is disappointing that complaints to the retailer and to CCW remain so high. We have offered our support to SES Business Water and we look forward to working with them this year.

Clear Business Water

Clear Business Water has faced challenges in processing customer queries promptly, leading to a backlog, and subsequent complaints. A renewed focus on debt recovery activity has also prompted more customer interactions, which can lead to dissatisfaction. It is working to improve its communication processes for debt recovery activities by increasing site visits to identify the correct occupier and find vacant properties.

Castle Water

Castle Water remains a poorer performer despite an improvement in the total number of complaints reaching CCW over the last year. Complaints from customers are mainly driven by slow handling of a high volume of contacts, debt recovery action, and charges disputes. To address this, Castle Water is continuing to develop and promote alternative contact channels to telephone and email (where the high contact volumes sit) so basic customer queries can be addressed more quickly. In addition, it is working to increase oversight of quality and timeliness of responses to queries and complaints.

Better performing retailers

Pozitive Water

Pozitive Water has reported receiving minimal complaints from its customers, and CCW has not received any complaints from customers about this retailer in the last year. This indicates a high level of customer satisfaction and effective complaint management.

⁸ A 'GAP SITE' IS A PROPERTY CONNECTED TO THE WATER NETWORK THAT IS NOT CURRENTLY REGISTERED WITH A RETAILER AND, THEREFORE, NOT BEING BILLED FOR WATER AND/OR WASTEWATER SERVICES.

Water2Business

Despite there being an increase in complaints about Water2Business this year, it remains one of the best performers. The main driver behind the increase has been the proactive work Water2Business has carried out on debt recovery action, including more disconnections and finding occupiers of properties previously thought to be vacant. The market wide data cleansing initiative to improve the quality of customer data held by retailers has also resulted in customer contact and complaints. Water2Business is working to resolve the issues with customers directly and expects to see complaints come down again once it has completed the current programme of work.



Other retailers' performance

Water Plus' complaints performance has been a concern for several years, but it has shown improvement and is trending in the right direction. The main drivers of customer complaints have been billing issues, debt recovery and the process when there is a change of occupier. Water Plus has introduced several new processes to improve the way it handles customer contact, and this has resulted in improvements and a move out of the poorer performing quartile. We want to see a continuation of this trend in future.

Other retailers have been sharing with CCW some of their initiatives aimed at improving customer service. These include: an annual review of customers' tariffs to identify if they could save money by moving to a new tariff (Wave); raising a code change to improve the way customers receive refunds under the settlement process between water companies and retailers (Water Plus); and a focus on addressing customer issues on first contact (Source for Business).

All retailers are introducing new requirements under the Customer Protection Code of Practice. These include developing vulnerability strategies for publication in July 2025 and improving the information on their bills to make customers aware of their ability to switch retailer or renegotiate their contract.

Conclusion and next steps

Overall, we see evidence of positive improvements in the handling of complaints in the water retail market in 2024-25, with a welcome reduction in the number of complaints made to retailers and those received by CCW.

There is still work to do to further reduce the number of complaints in the market and bring them closer to the levels seen before the market fully opened in England in 2017. This includes focussing on complaints where there has been an increase compared to the previous year.

CCW will continue to work with the market to deliver improvements to result in better service for customers. We will offer complaint assessments to more retailers so we can look in detail at how complaints are being handled and how our complaints guidance is being interpreted. These sessions offer us the opportunity to highlight good practice and to offer help and advice on how retailers can improve.

Additionally, we will be contacting all retailers to understand the changes they have made to comply with the new requirements in the revised Customer Protection Code of Practice. We will also discuss our revised complaint guidance to ensure the complaint information we receive is accurate and consistent across all retailers.

We will monitor the improvements made under the recommendations from our Five-Year Review of the market. We believe that delivering these recommendations will have a positive effect on the market and improve the experience for customers, helping to drive down complaints. We are encouraged to see the market come together to help deliver a number of these recommendations. We will publish a report outlining the progress made later in 2025.

Finally, we are supportive of, and contributed to, the developments in the market, including the Market Performance Framework (MPF) reform⁹, the [new BR-Mex measure](#) and the Strategic Panel's Roadmap to a Flourishing Market¹⁰. We expect to see BR-Mex drive improvements by incentivising water companies to provide better services to retailers and business customers. CCW owns and supports a number of the actions within the roadmap, and we believe that delivering these actions will benefit business customers of all sizes.

⁹ MPF IS A SET OF KEY PERFORMANCE INDICATORS (KPI) AGAINST WHICH RETAILERS' AND WHOLESALERS' PERFORMANCE IS MEASURED WITH CHARGES LEVIED FOR FAILING TO MEET THE REQUIRED STANDARD.

¹⁰ STRATEGIC PANEL ROADMAP TO A FLOURISHING MARKET

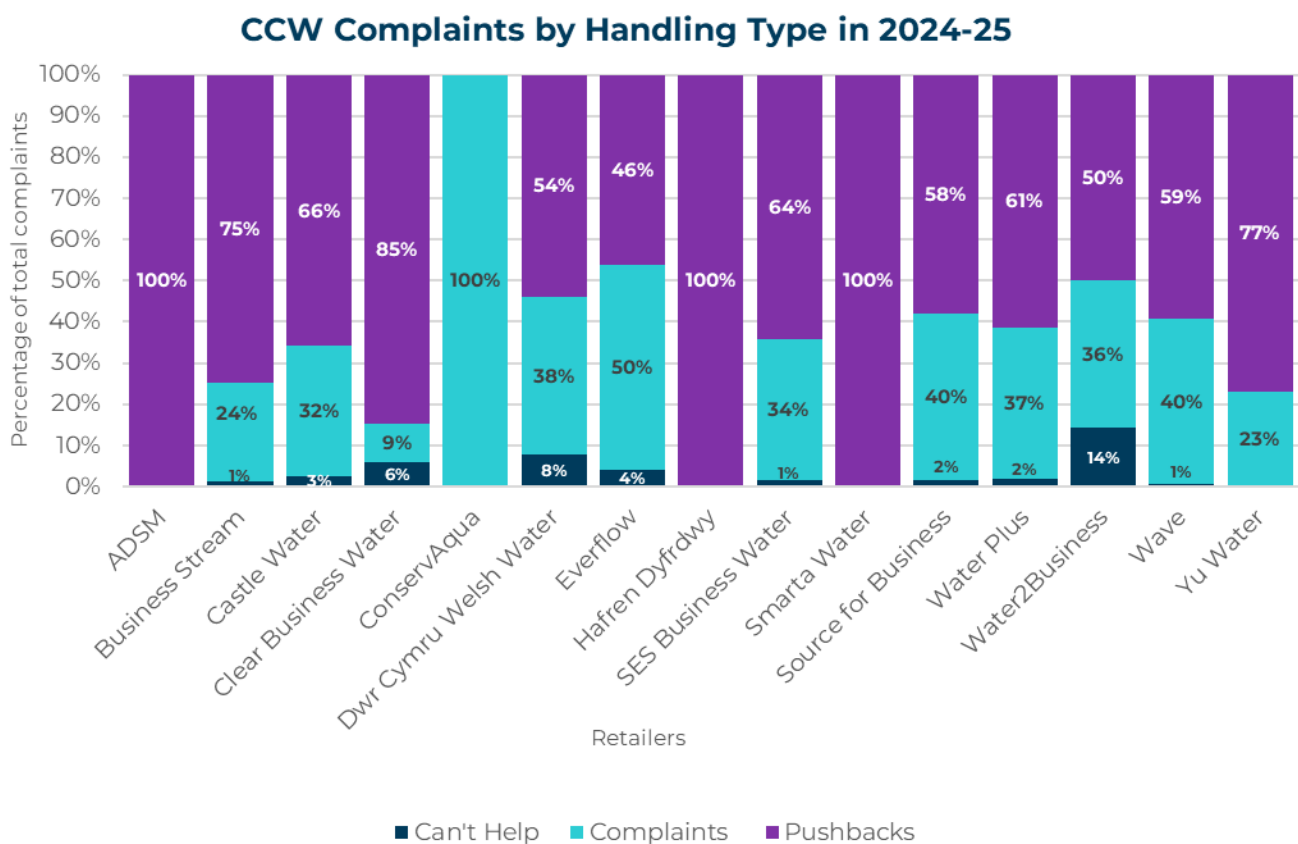
Appendix 1

Exhausted and non-exhausted complaints to CCW

We define a non-exhausted complaint as any complaint that gets raised with CCW by a business customer before all stages of a retailer’s complaints procedure have been exhausted. This could be due to unclear signposting of the complaints procedure, making it difficult for customers to follow; dissatisfaction with how the retailer handled the complaint; or frustration with the level of communication received in response. In last year’s Business Customer Complaints report, we said we would refine our definitions of exhausted and non-exhausted complaints to reduce the number of complaints recorded where it was unclear which category they fall into.

This year, we have been able to categorise all complaints received as either complaints (which CCW should handle) or 'pushbacks' (where a retailer’s complaints process has not yet been exhausted and the issue should continue to be handled by the retailer in line with its published procedure). There are also a small number of complaints that fall outside of our jurisdiction where we are unable to help. A breakdown of the complaints is handling type is set out below.

Figure 19: Complaints to CCW by handling type in 2024-25



[See appendix 2 for the data tables to support this report](#)

CCW

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