



Severn Trent Water

Jennifer Suggate
Consumer Council for Water
1st Floor, Victoria Square House
Victoria Square
Birmingham
B2 4AJ

Severn Trent Centre
2 St John's Street
Coventry
CV1 2LZ

Tel 02477 715000
Fax 02477 715871

11 January 2017

Dear Jennifer

CCWater's draft forward work programme

We welcome the opportunity to comment on CCWater's forward work programme for 2017-2020.

Overall comments

We believe it is important that CCWater plays a distinctive role in the water industry as the statutory customer representative body.

We recognise that one of the challenges of creating a work programme of this nature is that not all of CCWater's strategic objectives are within your direct control to achieve, and relies on companies and other stakeholders to deliver. This is reflected in some of your proposed 2017-18 measures, which could be more specific to CCWater's contribution. For example, "the number of consumers accessing water company tariff schemes, such as WaterSure and social tariffs, increases by 10% by 2018" – which we would expect to be achieved if companies deliver the commitments they have made in their plans and is not necessarily a measure of CCWater's impact in this area (for example, pressing underperforming companies to improve).

That said, overall the plan is focused on where CCWater can deliver a distinguishable impact for customers, and we are broadly supportive of it.

Detailed comments

Our remaining comments relate to more specific elements of the work programme.

- We welcome CCWater's commitment to work more collaboratively with a broader range of related consumer stakeholders.
- Under the section titled 'informing consumers' we note that there are a range of different sources of information, measures and publications cited that could be used to inform customers across the industry. We would welcome the sector as a whole continuing to

work to ensure that customers are not confused or baffled by the range of performance measures published.

- We are supportive of CCWater's commitment to use the insight it has (its research programme and complaint/customer contact data) to highlight and press for where improvements can be made. It should consider if it has the potential to do more in this area. With regards to the proposed programme of research:
 - it would be helpful to explore how research for PR19 can be used to complement that of companies and address gaps that might not otherwise be filled – for example, presenting a national picture, and
 - the proposed piece on willingness to pay is welcome, but we believe a number of companies will be undertaking their own research shortly, and prompt publication would be helpful if it is to inform their approach.

As you will be aware, our responsibility for providing retail services to non-household customers has now transferred from us (Severn Trent Water Limited) to Water Plus, so we have not provided any specific comments in relation to areas of the work programme that relate to retail services to business customers. However, we are supportive of CCWater playing a proportionate role that we would expect to evolve with the prevailing conditions of the market.

Finally, we have a constructive working relationship with CCWater particularly on local issues and as a dedicated member of our CCG. We look forward to this continuing.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Leah Fry'.

Leah Fry
Head of Customer Strategy & Experience