

Water Forum - Response to CCW Consultation April 2020

Known as the Water Forum, we are the Customer Challenge Group (CCG) for Northumbrian Water Limited (NWL) and cover its two operating areas, Northumbrian Water (NW) and Essex & Suffolk Water (ESW). We are a balanced blend of industry regulators, subject experts and independent members whose challenges are always from the starting point that we want the company to deliver for its customers.

In response to the Consumer Council for Water (CCW) Consultation on 'Changing the structure of our Regional English and Wales Committees' published on 2 March 2020, and in line with our role in the industry, we have considered how the proposed changes might affect water customers.

We believe that CCW plays a vital role on behalf of consumers; and we have welcomed the insightful, meaningful contribution that the Regional Committee Chairs (RCCs), Local Consumer Advocates (LCAs) and CCW officers have made to the work of the Water Forum. They are extremely knowledgeable, well informed and in touch with consumers' needs and expectations; and their understanding of what is happening in the sector and in the areas that they represent and work in is exemplary. Should the proposals contained in the Consultation document be implemented, we would like CCW to be able to maintain their positive, independent contribution to the work of the Water Forum.

Regarding the proposal to move to a single council for England (and one for Wales), and for a more 'risk-based' approach, we note the proposed benefits – essentially, focusing on improvement in poorer performing companies, and providing a 'lighter touch' for the better performing ones. A national approach may support the non-household market, given the current nature of that market.

In addition to the benefits, there are some important potential challenges to overcome; we therefore make the following observations for deliberation:

- There are regional differences in the social, economic and environmental context of the different regions – we strongly urge consideration of the fact that the regional structure has built up knowledge and understanding of local context and how it affects consumers, retail customers and indeed companies themselves. This knowledge is invaluable and should be maintained in the future – groups such as ours rely on an LCA with a strong regional understanding to enable us to most effectively challenge NWL on behalf of water and wastewater customers.
- The Regional Committees have been strong and influential advocates for customers in a wide range of ways. Should the proposed changes be progressed, we urge CCW to ensure that the LCAs have the powers, resources and depth of knowledge of their localities to take forward what will need to be strengthened roles, to avoid a diminution of the important role that CCW plays for customers.
- Customers currently attend their local CCW meetings, which are important events for both parties. We consider that it would be unfeasible for these same customers to attend a national open event, so would be keen to understand how CCW proposes to provide local engagement opportunities in the proposed national structure.

In conclusion, we believe that from a strategic perspective the proposals appear logical; but that consideration should be given as to how the positive regional interventions that RCCs, LCAs and CCW officers make can continue to be as valuable as they are today.