

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

Dear Robert,

I would like to thank you for providing the opportunity to respond to CCWater's *Draft Forward Work Programme for England and Wales 2020-23*.

As market operator for the non-household (NHH) water market in England, MOSL has a key role to play in ensuring that the market and the ambitions of the wider water sector deliver benefits to customers in a way that is fair, reliable and sustainable. In our role, it is crucial that we work with our members, the wholesalers and retailers who operate in the market, and key stakeholders to ensure that this young market is efficient, reputable and provides real value to business customers.

MOSL supports the work of CCWater and its mission of 'securing a safe, reliable service, and a fair deal for water consumers'. We also support the campaigns and activities outlined in the *Draft Forward Work Programme* and are keen for CCWater to play an active and central role in continuing to shape the water retail market across 2020-2023 for the benefit of customers.

I am encouraged by how closely CCWater's strategic ambitions align with our own and those outlined in our [draft 2020/21 Business Plan](#). We too would like to see better value for customers in terms of the service they receive, which, as you say, must be balanced with investment in the sector. Specifically, we believe our organisations have a joint role in ensuring excellent service for consumers, as this was one of the core commitments set out prior to market opening.

While markets and competition are referenced in your draft programme, I would like to see greater clarity about the role CCWater intends to play in the non-household market – specifically in areas such as NHH customer awareness and the potential benefits available. While customer complaints are a key measure of the customer experience, there is a potential gap for customers engaging with the market and understanding how they can get a better deal.

With reference to how you plan to deliver your strategic ambitions, we think more work needs to be done to ensure that the incentives in the market, both operational and reputational, are aligned to customer outcomes. As we look to develop our three-year strategic roadmap for the Market Performance Framework (MPF) which monitors and reports on wholesaler and retailer performance, we would

welcome CCWater's input and suggest that we work more closely to ensure the framework effectively holds water companies to account for poor performance and customer complaints.

As the custodian of central market data, we have access to a vast dataset which can provide greater insight into key areas of focus for CCWater, for example, understanding the root causes of customer complaints, particularly those related to billing and charges. As we continue to work closely with trading parties on their performance, most notably in the areas of vacancy and long unread meters, we would welcome greater collaboration with CCWater, to better understand how we might resolve some the market's most ingrained and complex issues.

Equally, research undertaken by CCWater can support MOSL having greater visibility of the full customer experience. This visibility could better enable us to facilitate and lead projects which will provide value to the market and its customers. We are seeing great evidence of this already through CCWater having an active voice, and now full voting rights, on the Market Arrangements Code (MAC) Panel.

I see real benefit in stronger alignment between MOSL and CCWater in driving strategic change in both the non-household market and the wider water industry, to ensure that it is fit for the future. In our 2020/21 business we have committed to 'getting the basics right' in providing seamless and efficient services to our members. We hope that this will, in turn, enable water companies to focus on delivering great customer service and safe and reliable water and wastewater services. However, we also believe that through greater collaboration, we have a key role to play in addressing some of the industry's wider challenges, for example, water scarcity. Moving forward, we will be committing to a three-year business plan in order to support these strategic industry-wide goals.

We look forward to working more closely with CCWater in the future and offer our full support in the development of CCWater's *Forward Programme 2020-23*.

Kind Regards,



Sarah McMath