



Statement of Board Assurance provided to the Water Services Regulation Authority 2023-24 Final Wholesale Charges

13 January 2023

Contents

Statement of Board Assurance provided to the Water Services Regulation Authority: 2023-24 Final Wholesale Charges.....	3
Statement regarding the Board's assessment of bill increases.....	4
Annex to the wholesale charges assurance statement – compliance with Ofwat's wholesale charging rules.....	5
Statement regarding changes to the indicative charges published in October 2022.....	20

Statement of Board Assurance provided to the Water Services Regulation Authority: 2023-24 Final Wholesale Charges

The Company, under the direction of the Board, has undertaken a thorough process of internal and external assurance with regard to the setting of wholesale charges for the 2023-24 charging year.

As a result of the assurances it has received, the Board has satisfied itself to the best of its ability that:

- a. the Company complies with its legal obligations relating to the final wholesale charges it has published;
- b. the Board has assessed the effects of the new charges on potential licensees (as a whole or in groups) who are retailing wholesale services to eligible customers, and to business end-users (as a whole or in groups), and approves the impact assessments and handling strategies developed in instances where bill increases for potential licensees (as a whole or in groups) who are retailing wholesale services to eligible customers and eligible business end-users (as a whole or in groups) exceed 5%;
- c. the Company has appropriate systems and processes in place (including up-to-date models and data) to make sure that the information published about its indicative wholesale charges is accurate; and
- d. The Company has consulted with relevant stakeholders in a timely and effective manner on its wholesale charges;
- e. Where final Wholesale Charges are significantly different from the indicative Wholesale Charges published for the same period, the Board has considered the reasons why those changes occurred and has issued a statement explaining why those charges were not anticipated and/or mitigated.

We provide information on our compliance with Ofwat's wholesale charging rules in the Annex to this assurance statement.



Lawrence Gosden
Chief Executive Officer



Keith Lough
Chairman

Statement regarding the Board's assessment of bill increases

In accordance with Ofwat's wholesale charging rules, the scope of this statement is restricted to the wholesale charges made to retailers participating in the business customer retail market.

Under Ofwat's wholesale charging rules (rules A1 and A5), our Board are required to provide assurance to Ofwat that they have assessed the effects of the new charges on water supply and sewerage licensees, and that they approve the impact assessments and handling strategies developed in instances where bill increases for licensees exceed 5%.

Wholesale charges

Due to high inflation at 9.4%, all charges are expected to increase by more than 5%. When combined with the impact of prior year performance, our final wholesale water and wastewater bills are projected to increase by slightly more than inflation in 2023-24. Having considered the likely future pressure on our customers' household incomes, as well as the pattern of future bills in the current regulatory period, the Board has taken the decision to defer £4m water revenue and £4m wastewater revenue, in addition to the £15m water revenue deferred from year 2, to the final year of the AMP so that the average household bill increase is in line with inflation (when combined with retail charges). We have engaged with our customers on their views of bill increases at this level, and they are in agreement that an increase broadly in line with inflation is reasonable.

Without this further revenue deferral, our wholesale water charges are projected to increase by 12.7% and the wholesale wastewater charges are projected to increase by 11.6%. As the increase in both cases exceeds Ofwat's threshold of 5%, the Board has considered the impact on customers (both in the current and future years) and the need for handling strategies to mitigate the level of increase.

The Board has determined that it should defer a further £8.0m revenue to later years. This reflects a number of considerations:

- i. To enable the significant investment beyond the Final Determination whilst maintaining financial resilience
- ii. To counter the real price effect of costs increasing materially higher than inflation
- iii. The fact that we are already deferring £15m of water supply revenues to year 5, from year 2 of the AMP

As a result of this decision, wholesale water charges will increase will by 11.0% and wholesale wastewater charges will increase by 10.6%.

Impact on household bills

We are putting in place a number of steps to mitigate the bill increase for household customers, in addition to our existing provisions, which include payment schemes, debt matching, a capped WaterSure tariff and a Hardship Fund. We also allow customers to take payment breaks and agree flexible payment plans to suit their circumstances.

We have a suite of tariffs and schemes that provide financial assistance to customers who find our charges to be unaffordable. Customers with affordability issues who have a meter and live in one

of our water supply areas are pro-actively targeted by our water efficiency advice and retrofit programme.

Social tariff: We have also increased the funding available to those most in need via our Social tariff. This increased funding allows the minimum discount for eligible customers to increase from 20% up to 45%. It will also allow for an additional 21,000 on top of the 107,000 customers currently benefitting from it.

We are also increasing our activities to engage with customers most in need and publicise the support and payment schemes available.

- Out and about in our communities, providing direct support at locations such as Food Banks and Job Centres.
- Data Sharing Agreements with Housing Associations to target help for financially vulnerable
- Partnership with KCC to use Government Household Support Funding to help with water bills – over 2000 customers helped to date
- Secured £0.6m from Ofwat to look at sophisticated statistical modelling techniques to help identify the financially vulnerable

Wholesale trade effluent charges

Trade effluent bills are expected to increase on average by 10.6%.

We are continuing to phase in the increased charges for the use of ammonia in the charges. This was first introduced in 2021-22. The Board believe that the charge is set at a level that appropriately balances the competing demands of cost-reflectivity and bill stability. In order to move to a more cost-reflective basis it is expected that the ammonia charge will increase each year.

Annex to wholesale charges assurance statement - compliance with Ofwat's wholesale charging rules

Rule no.	Wholesale charging rule	Compliance statement
1-6	<i>Introduction and Interpretation</i>	N/A
7-12	<i>Publication</i>	
7	Each water undertaker must publish the Wholesale Charges payable by a water supply licensee for the supply of water to Eligible Premises that are connected to the undertaker's supply system. This includes the Eligible Premises to which a Special Agreement would otherwise apply (although nothing in these rules requires the publication of a customer's name or address).	Compliant. We have published our wholesale charges, including those subject to a special agreement, on our website by the prescribed deadline of 13 January 2023. We have published the charges in our "Wholesale Statement of Principles and Charges" document, which includes wholesale charges for residential customers, non-primary wholesale charges for retailers and special agreements in accordance with Ofwat's wholesale charging rules.
8	Each sewerage undertaker whose area is wholly or mainly in England must publish the Wholesale Charges payable by a sewerage licensee in respect of the provision of sewerage services to Eligible Premises that are connected to the undertaker's sewerage system. This includes the Eligible Premises to which a Special Agreement would otherwise apply (although nothing in these rules requires the publication of a customer's name or address).	Compliant. As rule 7.

Rule no.	Wholesale charging rule	Compliance statement
9	<p>Each relevant undertaker must also, as a minimum, publish the Wholesale Charges (or the methodology for calculating such charges where the charges cannot be determined in advance) that would, where relevant, be payable by a water supply or sewerage licensee for:</p> <ul style="list-style-type: none"> (a) the replacement of lead service pipes; (b) the provision and maintenance of fire hydrants; (c) damage to apparatus; (d) the carrying out of inspections to ascertain whether any provision contained in or made or having effect under the Water Industry Act 1991 with respect to any water fittings or with respect to the waste or misuse of water is being or has been contravened; (e) site inspections; (f) the provision and use of standpipes; (g) the testing of meters; and (h) the disconnection of a service pipe (or for otherwise cutting off a supply of water) to any premises and the reconnection of such premises to a water main. 	<p>Compliant.</p> <p>Our “Wholesale Statement of Principles and Charges” document includes all Non-Primary charges that we will make to retailers in the business retail market.</p> <p>This includes all the charge types listed in rule 9 ((a) to (h)).</p>
10	<p>Wholesale Charges must be published at least eleven weeks before the start of the period for which the charges will be imposed.</p>	<p>Compliant.</p> <p>We have published our wholesale charges by the prescribed deadline of 13 January 2023.</p>
11	<p>Wholesale Charges must be published on a relevant undertaker’s website and in such other manner as the undertaker considers appropriate for the purpose of bringing it to the attention of persons likely to be affected by it.</p>	<p>Compliant.</p> <p>As rule 7, we have published our “Wholesale Statement of Principles and Charges” document on our website.</p>
12	<p>Wholesale Charges must be published with such additional information or explanation as is necessary to make clear what services are covered by each charge.</p>	<p>Compliant.</p> <p>In addition to setting out the financial value of our wholesale charges for 2023-24, our “Wholesale Charges” document provides explanatory narrative for each area of charging.</p>

Rule no.	Wholesale charging rule	Compliance statement
13	<i>General charging principles</i>	
13	<p>Relevant undertakers whose areas are wholly or mainly in England must determine what types of charges may or may not be imposed and the amount of any charges that may be imposed in accordance with the principle that Wholesale Charges should reflect:</p> <ul style="list-style-type: none"> (a) fairness and affordability; (b) environmental protection; (c) stability and predictability; and (d) transparency and customer-focused service. 	<p>Compliant.</p> <p>Our charges for the surface water drainage service use meter size as a proxy for surface area.</p> <p>We recognise that using actual surface area to set surface water drainage charges is more cost-reflective and has the potential to provide a stronger environmental price signal.</p> <p>We are currently undertaking a project to move to this basis of charge by 2025-26 when the relevant analysis has been completed and we can engage with customers to mitigate bill shock. In recognition of this, we have adjusted the balance of revenue recovered via surface water drainage charges versus foul water treated for 2023-24.</p>
14-18	<i>Principles for determining the amount of charges</i>	
14	<p>Consistent principles and methodologies must be applied to the calculation of charges for different classes of Eligible Premises, regardless of the services provided.</p>	<p>Compliant.</p> <p>We apply consistent principles and methodologies to the calculation of charges for different classes of Eligible Premises, regardless of the services provided.</p>

Rule no.	Wholesale charging rule	Compliance statement
15	Charging structures must reflect the long-run costs associated with providing the relevant service.	<p>Compliant.</p> <p>We have removed our fixed non-household charges to become more cost reflective thus now all our wholesale water supply revenue from customers not on our large user tariff is recovered by variable charges.</p> <p>The costs of providing surface water drainage and highway drainage are recovered by fixed annual charges.</p> <p>Our water and sewerage large user tariffs comprise a lower volume charge and a fixed annual charge. The fixed annual charge is volume-related and is set to ensure parity of the unit charge at the band threshold volumes.</p> <p>In the case of wholesale trade effluent revenue, the majority is recovered by variable charges based on the Mogden formula, with the costs of monitoring consents recovered by a fixed annual charge structure, which better reflects the risk presented by the discharge and the associated monitoring requirements.</p> <p>A new trade effluent charge for ammonia was introduced in 2021-22. This was initially set at a level below the associated costs to mitigate the impact of bill increases on some customers. We intend to continue to phase in an increased charge to a level that better reflects the underlying treatment costs in future years.</p>
16.	Differences between charges for services provided to Eligible Premises that are larger users of water and sewerage services and charges for services provided to Eligible Premises that are smaller users of water and sewerage services must only be based on cost differences associated with differential use of network assets, differential peaking characteristics, different service levels and/or different service measurement accuracy.	<p>Compliant.</p> <p>The difference in charges between our standard charges and large user charges are based on cost differences associated with differential use of network assets. The differences are supported by our cost model and are broadly in line with the rest of the sector. As we continue to refine our cost model, we note the cost of water resources are causing increasing financial pressure, and we have commenced phasing out these discounts gradually over several years starting in 2023-24.</p>

Rule no.	Wholesale charging rule	Compliance statement
17	Where cost differences associated with differential peaking characteristics are used as a basis for differences between charges for services provided to Eligible Premises that are larger users of water and charges for services provided to Eligible Premises that are smaller users of water, the charges fixed on that basis must be structured on an appropriate peak demand basis.	N/A. We do not have charges associated with differential peaking characteristics.
18	Charges for sewerage services must take into account the different pollutant loads associated with foul water, trade effluent, surface water draining from Eligible Premises and surface water draining from highways.	Compliant. We have separate charges for foul drainage, surface water drainage, highway drainage, and trade effluent.
19	<i>Unmetered charges</i>	
19	No unmetered Wholesale Charges may be imposed unless the basis on which those charges are fixed or determined is clear and, in the case of Rateable Value Charges, it is clear: (a) which Rating Valuation List charges are fixed or determined by reference to; and (b) if the undertaker uses a different value or other amount to that specified in such a list, the methodology or other basis on which that different value or other amount is calculated.	Compliant. Our “Wholesale Charges” document specifies the Rating Valuation List that unmetered charges are fixed or determined by reference to. Additionally, the document sets out how we may apply a notional Rateable Value in certain circumstances.

Rule no.	Wholesale charging rule	Compliance statement
20-21	<i>Wastewater charges</i>	

20	<p>Sewerage undertakers whose area is wholly or mainly in England must, in relation to each period beginning on or after 1 April 2020, separate Wholesale Charges for sewerage services provided to Eligible Premises into separate charges for the reception, treatment and disposal of:</p> <ul style="list-style-type: none"> (a) foul water; (b) trade effluent; (c) surface water draining from Eligible Premises; and (d) surface water draining from highways. 	<p>Compliant. As rule 18. We have separated sewerage charges in this way since April 2000.</p>
21	<p>Sewerage undertakers must provide for an appropriate reduction in the Wholesale Charges payable for the provision of sewerage services to any Eligible Premises where the sewerage undertaker knows, or should reasonably have known, that surface water does not drain to a public sewer from those premises.</p>	<p>Compliant. We have provided customers with a rebate of the surface water drainage charge, upon successful application, since April 2000. Where we make a rebate, we proactively apply the rebate to other properties in the immediate vicinity. Prior to 2015-16, we only backdated the rebate to the start of the charging year in which the claim was made. With effect from 2015-16, we make the rebate effective from 1 April 2015 or the customer's occupation date if this is later.</p>
22	<i>Trade effluent</i>	
22	<p>Charges to be paid in connection with the carrying out of a sewerage undertaker's trade effluent functions must be based on the Mogden Formula, a reasonable variant of the Mogden Formula or on a demonstrably more cost-reflective basis.</p>	<p>Compliant. Our trade effluent charges are based principally on the Mogden formula, supplemented by our fixed annual consent monitoring charge structure, which better reflects the risk presented by the discharge and the associated monitoring requirements. In 2021-22 we introduced a further modification in relation to ammonia, to better reflect the costs of ammonia treatment, which are not reflected in the Mogden formula. We continue to phase in this charge in our 2023-24 charges to ensure it will achieve cost-reflectivity over a number of years while avoiding large bill increases to customers.</p>

Rule no.	Wholesale charging rule	Compliance statement
23-24	<i>Concessionary drainage charges</i>	
23	The Wholesale Charges published by each sewerage undertaker must set out: (a) the classes of community group (if any) in relation to which the undertaker allows reductions in the Wholesale Charges payable by a sewerage licensee in respect of surface water drainage from Eligible Premises; and (b) the reductions allowed.	N/A We do not offer concessionary drainage charges, and this is explicitly stated in our “Wholesale Charges” document. We note that these concessionary charges are principally offered by those water and sewerage companies that have implemented area-based charges for surface water drainage to mitigate the impacts of those charges on groups such as schools, churches, and community organisations. We will seek to introduce these concessions in line with Defra guidance as part of our project to move to site-area based charges.
24	Where a sewerage undertaker’s charges scheme under section 143 of the Water Industry Act 1991 includes a provision designed to reduce charges to community groups in respect of surface water drainage from their Eligible Premises, the amount of Wholesale Charges payable by a sewerage licensee in respect of the provision of sewerage services to Eligible Premises occupied by community groups must be determined in accordance with the principles that: (a) Wholesale Charges must be reduced in relation to the same classes of community group; and (b) the reductions in Wholesale Charges must be the same and apply for the same period.	N/A. As rule 23.
25	<i>Special agreements</i>	
25	Where a Special Agreement would apply to the provision of services to Eligible Premises if the undertaker continued to provide the services, a relevant undertaker must impose on a water supply licensee or, as the case may be, a sewerage licensee only such charges as would enable the licensee to charge for those services at the same rate or rates as would have applied if the Special Agreement had applied.	Compliant. For each of our special agreements, the special agreement only relates to the wholesale element of the total charges. Since the opening of the non-household retail market in April 2017, there has been no change to the way we set the wholesale charges that we pass on to retailers in respect of special agreements. This allows the retailer to charge for those services at the same rate.

Rule no.	Wholesale charging rule	Compliance statement
26	Small companies	N/A
27	Subject to paragraphs 28, 29 and 30, relevant undertakers whose areas are wholly or mainly in England must set and publish their Wholesale Connection Charges as if: (a) those charges related to services in respect of household premises rather than non-household premises, and (b) the Charging Rules for New Connection Services (English Undertakers) applied to them.	Compliant. The charges set out in our Charging Arrangements document also apply where a developer or a customer requests new connection services through a retailer of water supply and/or sewerage services, rather than directly.
28	The obligation in paragraph 27 excludes the rules in paragraphs 44 to 46 of the Charging Rules for New Connection Services (English Undertakers).	Compliant. As per Rule 27 Compliance statement.
29	Relevant undertakers must publish their initial Wholesale Connection Charges in their Charging Arrangements by 1 June 2019.	Compliant. We updated our Charging Arrangements document to the effect that the charges set out in the document also apply where a developer or a customer requests new connection services through a retailer of water supply and/or sewerage services, rather than directly.
30	Thereafter, relevant undertakers must consult on their Wholesale Connection Charges at the same time as their charges under the Charging Rules for New Connection Services (English Undertakers), and must publish them in their Charging Arrangements.	Compliant. The charges set out in our Charging Arrangements document also apply where a developer or a customer requests new connection services through a retailer of water supply and/or sewerage services, rather than directly.
31	The provisions for Small Companies in paragraph 17 of the Charging Rules for New Connections Services (English Undertakers) apply in relation to Wholesale Connection Charges as they apply in relation to the charges covered by those rules.	N/A

Rule no.	Wholesale charging rule	Compliance statement
<i>Annex</i>	<i>Information requirements</i>	
<i>A1</i>	<i>Assurance statements</i>	
A1	Each undertaker should provide to the Water Services Regulation Authority an assurance statement from its Board of Directors and publish its statement no later than the time of publication of its final Wholesale Charges confirming that:	Compliant. We have submitted our assurance statement to Ofwat and published it at the same time we published our wholesale charges.
(a)	the company complies with its legal obligations relating to the Wholesale Charges it has published;	Compliant. Licence Condition B (compliance with price controls): KPMG LLP has provided assurance that our wholesale charges are compliant with the wholesale price controls. Licence Condition E (undue discrimination and undue preference): In some areas our cost allocation is necessarily based on assumption as opposed to actual data. Where assumptions have been used these have been verified by subject matter experts within the Company. Compliance in this area is subjective, and therefore cannot be stated absolutely.
(b)	the Board has assessed the effects of the new charges on water supply and sewerage licensees (as a whole or in groups) who are retailing wholesale services and on customers occupying Eligible Premises (as a whole or in groups) and approves the impact assessments and handling strategies developed in instances where bill increases for licensees (as a whole or in groups) who are retailing wholesale services and on customers occupying Eligible Premises (as a whole or in groups) exceed 5%;	Compliant. On the basis of our impact assessment the Board took the decision to defer a further £8.0m revenue, in addition to the wholesale water revenue deferred from year 2, to subsequent years in order to reduce the pressure on customer bills. It has also decided to retain the fixed non-household charge for water non-household customers, which the company had previously indicated it would discontinue. The Board also supported further mitigating actions such as re-balancing more revenue recovered via surface water than foul water, and a phased reduction to large user discounted volumetric rate. As a result of these

		steps, charges will increase approximately 1.3% greater than inflation.
(c)	the company has appropriate systems and processes in place (including up-to-date models and data) to make sure that the information published about its Wholesale Charges is accurate;	<p>Compliant.</p> <p>Deloitte audited our 2021-22 statutory and regulatory accounts. While they were unable to adopt a control reliance strategy for their audit, due to IT issues, they undertook substantive testing and made the following comment in their report to our Audit Committee: “Our procedures have not identified any evidence of management override of controls and we have nothing else to report on this significant risk.”</p> <p>In addition there were no material issues raised in Deloitte’s report, and they issued an unmodified audit statement on our financial statements.</p> <p>KPMG LLP have assured our 2022-23 indicative and final charges. As part of their work, KPMG performed checks on the base data used for forecasting the number of billed properties and volumes of water and wastewater. For the most material charges in terms of revenue yield, KPMG checked the base data used for forecasting purposes back to source systems.</p>
(d)	the company has consulted with relevant stakeholders in a timely and effective manner on its Wholesale Charges; and	<p>Compliant.</p> <p>We commenced engagement with Ofwat and CCWater on 2023-24 charges in June 2022.</p> <p>The engagement to date has comprised an on-going exchange of emails and virtual meetings, including the provision of information to CCWater both proactively and in response to their queries.</p> <p>We sent a paper to both Ofwat and CCW entitled “Outlook for 2023-24 water and wastewater charges” in July 2022 and we had a virtual meeting with them to discuss our indicative charges. Our Wholesale Services Team proactively arranged a virtual meeting with retailers to make them aware of increases to charges and to offer them the opportunity to provide feedback and seek clarification.</p>
(e)	where final Wholesale Charges are significantly different from the indicative Wholesale Charges published for the same period, the	Compliant.

Board has considered the reasons why those changes occurred and has issued a statement explaining why those changes were not anticipated and/or mitigated. For these purposes, “indicative Wholesale Charges” means the information referred to in A3 below and charges are “significantly different” if a reasonable person would consider the changes to be material.

The Board has considered why the final wholesale charges are significantly different to the indicative charges and the reasons are explained in the ‘Statement regarding changes to indicative charges published in October 2022’ attached to this Annex.

Rule no.	Wholesale charging rule	Compliance statement
A2-A5	<i>Indicative charging information</i>	
A2	No later than six months before publishing its final Wholesale Charges, each undertaker (other than a small company), should if considering making any significant changes to its primary Wholesale Charges publish information that, at a minimum, informs stakeholders of the scope of its proposed changes. For these purposes, changes will be “significant” if a reasonable person would consider them to be material. The information provided does need not be as detailed as that referred to in A3 and A4 below.	N/A
A3	No later than three months before publishing its final Wholesale Charges, each undertaker (other than a small company) should provide to the Water Services Regulation Authority and publish indicative Wholesale Charges. For these purposes, “indicative Wholesale Charges” are the primary Wholesale Charges that the undertaker reasonably expects to fix for the following period (based on the information available to it at that time).	Compliant. We published indicative wholesale charges for 2023-24 on our website in October 2022 and notified Ofwat and CCW accordingly.

Rule no.	Wholesale charging rule	Compliance statement
A4	No later than three months before publishing its final Wholesale Charges, each undertaker (other than a small company) should, if it intends to make any significant changes to its primary Wholesale Charges, provide to the Water Services Regulation Authority and publish a statement of significant changes. For these purposes:	Compliant. We published an updated Statement of Significant Changes on our website in October 2022 and notified Ofwat and CCW accordingly.
(a)	changes to the level of primary Wholesale Charges, or to the methodology for calculating them, will be significant if a reasonable person would consider them to be material; and	
(b)	a statement of significant changes should include:	
(i)	what changes are expected;	
(ii)	how water supply and sewerage licensees (as a whole or in groups) and customers occupying Eligible Premises (as a whole or in groups) are likely to be affected; and	
(iii)	the handling strategies that may be adopted by the undertaker or why the undertaker considers that no handling strategies are required.	

Rule no.	Wholesale charging rule	Compliance statement
A5	Each undertaker (other than a small company) should provide to the Water Services Regulation Authority an assurance statement from its Board of Directors and publish its statement no later than the time of publication of its indicative Wholesale Charges confirming, using the best available information available at that time, that:	Compliant. We submitted our assurance statement to Ofwat and published it at the same time we published our indicative wholesale charges.
(a)	the company complies with its legal obligations relating to the indicative Wholesale Charges it has published;	Compliant. Licence Condition B (compliance with price controls): KPMG LLP has provided assurance that our wholesale charges are compliant with the wholesale price controls. Licence Condition E (undue discrimination and undue preference): In some areas our cost allocation is necessarily based on assumption as opposed to actual data. Where assumptions have been used these have been verified by subject matter experts within the Company. Compliance in this area is subjective, and therefore cannot be stated absolutely.
(b)	the Board has assessed the effects of the new charges on water supply and sewerage licensees (as a whole or in groups) who are retailing wholesale services and on customers occupying Eligible Premises (as a whole or in groups) and approves the impact assessments and handling strategies developed in instances where bill increases for licensees (as a whole or in groups) who are retailing wholesale services to eligible customers and on customers occupying Eligible Premises (as a whole or in groups) exceed 5%;	Compliant. We include below, as part of this assurance statement submission, a statement explaining the Board's assessment of bill increases.

Rule no.	Wholesale charging rule	Compliance statement
(c)	<p>the company has appropriate systems and processes in place (including up-to-date models and data) to make sure that the information published about its Wholesale Charges is accurate; and</p>	<p>KPMG LLP have assured our 2023-24 indicative charges. As part of their work, KPMG performed checks on the base data used for forecasting the number of billed properties and volumes of water and wastewater. For the ten most material charges in terms of revenue yield, KPMG checked the base data used for forecasting purposes back to source systems.</p> <p>Deloitte audited our 2021-22 statutory and regulatory accounts. While they were unable to adopt a control reliance strategy for their audit, due to IT issues, they undertook substantive testing and made the following comment in their report to our Board that no significant deficiencies were noted in their testing of management override of controls. “Our procedures have not identified any evidence of management override of controls and we have nothing else to report on this significant risk”.</p> <p>The revenue analysis and wholesale control reconciliation published for March 2022 in table 2M of the APR showed a variance of 0.4% between allowed wholesale revenues and actual revenues for 2021-22. The data in this table was assured by Deloitte and the details for the variance to our allowed revenues were disclosed.</p> <p>In addition, there were no material issues raised in KPMG’s audit report, and they issued an unmodified audit statement on our financial statements.</p>

Rule no.	Wholesale charging rule	Compliance statement
(d)	the company has consulted with relevant stakeholders in a timely and effective manner on its Wholesale Charges.	<p>Compliant.</p> <p>We commenced engagement with CCWater on 2023-24 charges in June 2022.</p> <p>We sent a paper to both Ofwat and CCW entitled “Outlook for 2023-24 water and wastewater charges” in July 2022, and also have a virtual meeting with CCW to discuss our Indicative charges in detail. Our Wholesale Services Team proactively arranged a virtual meeting with retailers to make them aware of increases to charges and to offer them the opportunity to provide feedback and seek clarification. We sent detailed to Ofwat and CCW of our indicative charges once they were approved by the Board in Oct 2022. We then sent Ofwat an early view of likely final charges on 8 December 2022.</p>

Statement regarding changes to the indicative charges published in October 2022

The statement describes the reasons for any changes to our wholesale charges compared with our indicative charges were published in October.

Use of November CPIH figure

Our indicative charges were based on a forecast of November CPIH of 8.8%. The actual figure, as published by the Office for National Statistics on 16 December 2022, is 9.4%

Changes to the final determination as a result of the ODI penalties

Our indicative charges were based on the forecast ODI penalties for the financial year 2021-22. Since this value has been confirmed by Ofwat in October 2022 as higher than our forecast due to the tax adjustment, this has resulted in a further year on year increase to wholesale water and wastewater charges and retail charges.

Mitigating activities

The decision was taken to defer £8.0m revenue to the final year of the AMP so as to reduce the impact of bill increases across our customer base.