



# Statement of Board Assurance provided to the Water Services Regulation Authority 2020-21 Final Wholesale Charges

13 January 2020

# Contents

Statement of Board Assurance provided to the Water Services Regulation Authority: 2020-21 Final Wholesale Charges.....	3
Annex to wholesale charges assurance statement - compliance with Ofwat's wholesale charging rules.....	4
Statement regarding the Board's assessment of bill increases.....	19
Statement regarding changes to the indicative charges published in October 2019.....	20

# Statement of Board Assurance provided to the Water Services Regulation Authority: 2020-21 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 2020-21 charging year.

The final wholesale charges as published are based on the final determination published by Ofwat on 16 December 2019. They have also been updated to reflect the final CPIH released on 18 December 2019.

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.



**Ian McAulay**  
Chief Executive Officer



**Keith Lough**  
Chairman

## 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 14 January 2020. 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"> <li>(a) the replacement of lead service pipes;</li> <li>(b) the provision and maintenance of fire hydrants;</li> <li>(c) damage to apparatus;</li> <li>(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;</li> <li>(e) site inspections;</li> <li>(f) the provision and use of standpipes;</li> <li>(g) the testing of meters; and</li> <li>(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.</li> </ul>	<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 14 January 2020.</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 2020-21, our “Wholesale Statement of Principles and Charges” document provides explanatory narrative for each area of charging.</p>

Rule no.	Wholesale charging rule	Compliance statement
<b>13</b>	<b><i>General charging principles</i></b>	
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"> <li>(a) fairness and affordability;</li> <li>(b) environmental protection;</li> <li>(c) stability and predictability; and</li> <li>(d) transparency and customer-focused service.</li> </ul>	<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. However, implementing this basis of charge will create significant bill impacts, and for some classes of customer it may not be practicable or affordable for them to modify their surface water drainage arrangements in order to mitigate the charge.</p> <p>Based on our high-level assessment of costs and benefits, we currently don't see a compelling case for moving to area-based charges.</p>
<b>14-18</b>	<b><i>Principles for determining the amount of charges</i></b>	
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>Charges based on volume best reflect the long-run costs associated with providing the service. With the exception of a small number of properties that attract a fixed annual charge, our wholesale water supply revenue from customers not on our large user tariff is recovered by variable charges. The costs of providing surface water drainage and highway drainage are recovered by fixed annual charges (see 13 above).</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>Our non-household water charges include a fixed charge. In accordance with the assurance of our 2017-18 wholesale charges, it remains our intention to phase out this structure over time. However, in order to contain bill increases within the 5% threshold (rules A1(b) and A5(b)), our Board has decided not to commence the phasing out process in 2019-20. The equivalent charge for wastewater has been removed.</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.</p> <p>The differences are supported by our cost model, and are broadly in line with the rest of the sector.</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.
<b>19</b>	<b><i>Unmetered charges</i></b>	
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 Statement of Principles and 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
<b>20-21</b>	<b><i>Wastewater charges</i></b>	
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> <p>(a) foul water;                      (b) trade effluent;                      (c) surface water draining from Eligible Premises; and                      (d) surface water draining from highways.</p>	<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>
<b>22</b>	<b><i>Trade effluent</i></b>	
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.</p>

Rule no.	Wholesale charging rule	Compliance statement
<b>23-24</b>	<b><i>Concessionary drainage charges</i></b>	
23	<p>The Wholesale Charges published by each sewerage undertaker must set out:</p> <p>(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</p> <p>(b) the reductions allowed.</p>	<p>N/A</p> <p>We do not offer concessionary drainage charges, and this is explicitly stated in our “Wholesale Statement of Principles and Charges” document.</p> <p>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.</p>
24	<p>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:</p> <p>(a) Wholesale Charges must be reduced in relation to the same classes of community group; and</p> <p>(b) the reductions in Wholesale Charges must be the same and apply for the same period.</p>	<p>N/A.</p> <p>As rule 23.</p>
<b>25</b>	<b><i>Special agreements</i></b>	
25	<p>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.</p>	<p>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.</p>

Rule no.	Wholesale charging rule	Compliance statement
26	<b>Small companies</b>	<b>N/A</b>
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.	<b>N/A</b>

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): Oxera Consulting 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 retain the fixed non-household charge for water non-household customers, which the company had previously indicated it would discontinue. This was done to ensure no customers' bills increased by more than 5%. As a result no customers will experience bill increased greater than 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 Wholesale Charges is accurate;	Compliant. Deloitte LLP provided assurance on the appropriateness of our systems and processes for the assurance of our 2018-19 wholesale charges, and our Head of Group Accounts has advised that there have been no material changes to those systems and processes that would affect the setting of indicative and final wholesale charges for 2020-21. Deloitte audited our 2018-19 statutory and regulatory accounts. While they were unable to adopt a control

	<p>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: “Based on the work performed, we concluded satisfactorily in regards to management override of controls 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>Oxera Consulting LLP have assured our 2020-21 indicative and final charges. As part of their work, Oxera 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, Oxera checked the base data used for forecasting purposes back to source systems.</p>
<p>(d) the company has consulted with relevant stakeholders in a timely and effective manner on its Wholesale Charges; and</p>	<p>Compliant.</p> <p>We commenced engagement with CCWater on 2020-21 charges in July 2019.</p> <p>The engagement to date has comprised an on-going exchange of emails, including the provision of information to CCWater both proactively and in response to their queries.</p> <p>In addition to publishing our preliminary Statement of Significant Changes on our website in July 2019, our Wholesale Services Team proactively contacted retailers to make them aware of the Statement and to offer them the opportunity to provide feedback and seek clarification.</p> <p>A summary log of our consultation with CCW is provided with this Annex.</p>
<p>(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 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.</p>	<p>Compliant.</p> <p>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 2019’ attached to this Annex.</p>

Rule no.	Wholesale charging rule	Compliance statement
<b>A2-A5</b>	<b><i>Indicative charging information</i></b>	
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.	Compliant. We published a preliminary Statement of Significant Changes on our website in July 2019.
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 2020-21 on our website in October 2019, and notified Ofwat 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 2019, and notified Ofwat 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): Oxera Consulting 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)	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	<p>Oxera Consulting LLP have assured our 2020-21 indicative charges. As part of their work, Oxera 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, Oxera checked the base data used for forecasting purposes back to source systems.</p> <p>Deloitte audited our 2018-19 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: “Based on the work performed, we concluded satisfactorily in regards to management override of controls risk.”</p> <p>The revenue analysis and wholesale control reconciliation published for March 2019 in table 2I of the APR showed a variance of 0.2%R between allowed wholesale revenues and actual revenues for 2018-19. The data in this table was assured by Deloitte and the variance was within acceptable tolerance levels.</p> <p>In addition there were no material issues raised in Deloitte’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 indicative Wholesale Charges.	Compliant. We commenced engagement with CCWater on 2020-21 charges in July 2019. The engagement to date has comprised an on-going exchange of emails, including the provision of information to CCWater both proactively and in response to their queries. In addition to publishing our preliminary Statement of Significant Changes on our website in July 2019, our Wholesale Services Team proactively contacted retailers to make them aware of the Statement and to offer them the opportunity to provide feedback and seek clarification.

## 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%.

Without intervention by our Board, the increase in wholesale charges for some classes of business customer would exceed 5% for the two reasons set out below.

The first reason is the level of Wholesale Water Allowed Revenues granted by Ofwat in our Final Determination, which reflects a year-on-year increase including the November CPIH of 1.5%.

The second reason is in connection with the structure of fixed wholesale charges for business customers that we implemented with effect from 1 April 2017, following consultation with retailers and other stakeholders in 2016. Full details of this consultation can be found on our website <https://www.southernwater.co.uk/media/default/PDFs/consultation-non-household.pdf>. In our published draft charges we initially intended to remove the fixed element of our water wholesale charges, reverting to wholesale charges that are entirely volumetric. However, the effect of removing this charge is to reduce bills for some customers, but increase them for others.

In accordance with the assurance of our 2019-20 wholesale charges, our intention remains that these fixed charges should be phased out, because they do not relate to specific fixed wholesale costs. However, given the underlying increase in our wholesale water charges set out above, commencing this process in 2020-21 would result in wholesale water charges increasing by significantly more than 5% for some classes of business customer.

The Board has given these matters due consideration, and decided to:

1. Remove the fixed charge structure in respect of wastewater non-household charges
2. Commence the phasing out of the fixed charge structure for water charges in 2021-22.

These decisions are aimed at ensuring that retailers did not experience an increase in wholesale water charges above 5% for any class of business customer. The position regarding commencing the phasing out of the fixed charge structure will be reviewed when indicative wholesale charges for 2021-22 are set.

## Statement regarding changes to the indicative charges published in October 2019

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

### Changes from the draft determination to the final determination

Our indicative charges were based on the allowances in the draft determination. There have been significant movements from the draft to the final determination in our revenue allowances. This has led to a slight increase in our water average bill of +2% and a reduction in our wastewater average bill of -18%.

### Retention of the non-household fixed charge for water

In our published draft charges we initially intended to remove the fixed element of our water wholesale charges, reverting to wholesale charges that are entirely volumetric. The effect of removing this charge is to reduce bills for the smallest customers, but increase them for larger customers.

Within the draft determination there was sufficient headroom that, despite this impact, no customers' bills increased by more than 5%. In the final determination Ofwat has allowed an increase in water revenues and has re-profiled bill reductions. The effect is to reduce this headroom. Our impact analysis shows that a large number of non-household customers using less than 5,000m<sup>3</sup>/a would see bills would breach the 5% threshold if we removed the fixed charge in its entirety this year. The analysis also showed that customers on unmeasured and assessed measured charges would also see bill increases greater than 5%. We have therefore retained a fixed charge for this year at a reduced level for customers in the 0-1,000m<sup>3</sup>/a band, the 1,000-4,999m<sup>3</sup>/a band, unmeasured and assessed measured. This ensures that the largest bill increases are below 5%. The fixed charge has been removed for all other water customers, in line with our draft charges.