south east water

Business retail water market
PR19 Supporting Appendix 4
3 September 2018

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What does this appendix do?

This document supports the submission of our business plan for 2020 to 2025 and provides:

- A summary of activity and targets we have set to ensure we are able to:
    - support the continued development of the business retail water market
    - provide industry leading wholesale services for water retailers identified through our retailer engagement
    - provide the support non-household customers have asked for through our non-household customer engagement

The evidence you will find in this appendix

The following evidence is included in this document:

- Non-household customer engagement
- Non-household large user customer engagement

The decisions we have made based on this evidence

We have made the following decisions based on this evidence:

- Wholesale performance targets for the non-household business retail market
- Wholesale work programme for the non-household business retail market

Where we address our plan's four key themes

Customer Service	Affordability	Resilience	Innovation
Section 2.2 Section 2.3	Section 2.3	Section 2.3	Section 2.1.4 Section 2.2

Need further information?

Please email yourwateryoursay@southeastwater.co.uk if you require further information or wish to clarify anything in this document.

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Executive summary

April 2017 saw the creation of the world's largest competitive water and wastewater retail market as businesses, charities and public sector bodies in England became eligible to choose their water and wastewater retail services provider.

This was the biggest change to the water sector in more than 25 years and, in the period prior to April 2017, we completed a comprehensive programme of work to ensure we were ready and compliant for the new market as both a wholesaler and a retailer.

This included creating a functionally separate retailer, South East Water Choice. In May 2018 South East Water Choice exited the market to its associated retailer Invicta Water Limited, trading as Water Choice. Invicta Water was a group entity which had been operating in the new market since day one. Subsequently, to enable the South East Water parent group to focus solely on its wholesale performance, Invicta Water was sold to Castle Water; this transaction was completed on the 1st July 2018.

At present, as a wholesaler we have a Wholesale Retail Contract with 32 water retailers, with 18 of these retailers actively operating in our area. There has been a relatively low level of switching within our supply area which has meant that the number of customers with each retailer is limited with Castle Water now the dominant retailer with 94 per cent of our customer base. The other retailers operating in our supply area reflect a mix of associated retailers and new entrants; they are of different sizes, with different levels of experience of water and each with different needs.

To ensure our non-household customer and retailer views have been incorporated into our 2020 to 2025 business plan we have used the insight from our daily transactions and conversations with them, and included key segments in our engagement including: Large volume users of water and a range of SME's and – see Appendix 1: Engagement.

We recognise as a wholesaler we can help facilitate an effective and efficient market and we perform this role for retailers and customers alike in a non-discriminatory way. Following the first year of the market we carried out a review of how we performed and what issues exist in the market, and have recognised our market process performance requires improvement and have developed our plan to achieve an improvement by 2020 and beyond.

Whilst our market processes embed and improve, one thing is clear from our ongoing and business plan-specific engagement with retailers and non-household customers - our flexible and open approach is supported and welcomed. Their feedback has also confirmed what their issues and priorities are and how they see our role in supporting the achievement of not only the market outcomes, but their business-led aspirations.

To ensure we play our part we have made a number of commitments to the market, to retailers and to non-household customers:

To support the continued development of the business retail water market, by: • Improving data quality and accuracy • Holding the percentage of non-household void properties below 8.1 per cent • Completing over 90 per cent of our market processes on time • Providing a quarterly performance report for retailers and transparent annual performance reporting via our Performance, People and Planet' report and Company Monitoring Framework • Contributing to the development of market systems and processes
To provide an industry leading wholesale service for water retailers, by: • Providing technical support and advice including a range of services and engagement approaches • Simplify tariffs and charges and ensuring credit terms enable equal opportunity to access and compete • Providing performance transparency through quarterly and annual reporting • Implementing a new retailer experience survey – target 10!
To ensure all our non-household customers receive the service and support they expect, by: • Ensuring the level of service provided is the same regardless of whether it is provided directly or via a water retailer • Improving engagement and communications with non-household customers • Incorporating our non-household customer engagement into our Customer Insight Database

- Introducing greater water management support and technical advice, to help non-household customers become more resilient too - a key element of delivering our resilient customer concept (see Appendix 9: Resilience in the round)

1. First year of the market

1.1 Background

April 2017 saw the creation of the world's largest competitive water and wastewater retail market as businesses, charities and public sector bodies in England became eligible to choose their water and wastewater retail services provider.

This was the biggest change to the water sector in more than 25 years and in the period prior to April 2017, we completed a comprehensive programme of work to ensure we were ready and compliant for the new market, as a wholesaler and a retailer.

We currently have approximately 52,000 supply points registered in the non-household market, this represents approximately 42,000 non-household customers. Our non-household customers represent 5 per cent of our total customer base but they consume approximately 10 per cent of the water we produce.

For market opening we created a functionally separate retailer, South East Water Choice. As we had not exited the market to an associated or non-associated retailer, it was critical that strong processes and controls were put in place to ensure we were compliant with market codes and as a wholesaler we provided a level playing for all retailers.

In May 2018 South East Water exited the retail market to its associated retailer Invicta Water Limited, trading as Water Choice. Invicta Water, another group entity, had been operating in the market since day one. Exiting meant that all our retail activities were brought under one roof.

To enable the South East Water group to focus on its wholesale performance, Invicta Water was subsequently sold to Castle Water, this transaction completed on 1 July 2018.

At present, as a wholesaler we have a Wholesale Retail Contract with 32 water retailers with 18 retailers actively operating in our area. There has been a relatively low level of switching within our supply area which has meant that the number of customers with each retailer is limited with Castle Water now the dominant retailer with 94 per cent of our customer base. The other retailers operating in our supply area reflect a mix of associated retailers and new entrants, they are of different sizes, with different levels of experience of water and each with different needs.

Retailer	% of SPIDs
Castle Water	94%
Business Stream	3%
Water Plus	<1%
Everflow	<1%
Other	<1%

To ensure our non-household customer and retailer views have been incorporated into our 2020 to 2025 business plan we have used the insight from our daily transactions and conversations with them, and included key segments in our engagement including: Large volume users of water and a range of SME's and – see Appendix 1: Engagement.

1.2 Our market process performance

We recognise that as a wholesaler we help facilitate an effective and efficient market and we perform our role for retailers and customers alike in a non-discriminatory way.

Following the first year of the market we carried out a review of how we performed and what issues existed in the market.

Our review showed that our processes are robust and compliant and are fit for purpose, and our engagement with retailers (see Section 1.3) shows they are satisfied with the service we have provided.

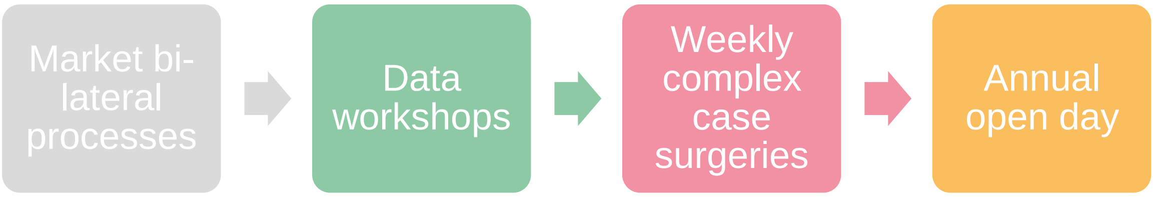
Our review has however shown our performance in regards to the market processes requires improvement. During 2017-18 we completed 54 per cent of our tasks on time. There are a small number of data issues at present which are impacting our performance and we recognise can cause difficulties for retailers.

To address this we are delivering an immediate action plan to improve our data and resulting performance against market processes and have developed our forward plan for the 2020 to 2025 period to include continuous improvement in this area.

1.3 Our interactions with retailers

If there is poor or sub-standard interaction between wholesalers and retailers, it will make it difficult for retailers to operate and offer services in the market, for example in identifying location of meters and other customer data. This is why we have deliberately operated a very open and engaging approach with retailers during the first year of the market.

During the year we have engaged with retailers via the following channels:



Our bi-lateral processes have generally worked well during the year, by adopting a flexible approach and ensuring each retailer can engage with us on daily basis in an efficient and effective way that meets their requirements.

We also encourage retailers and customers to register for our online portal. The portal gives live updates about planned and unplanned works geographically so those registered can easily identify if their supply will be impacted. The portal provides the ability to track activity and also set up text and email alerts.

During the year we held a number of data workshops, with both retailers and wholesalers who may provide a waste service to our customers. These workshops have successfully helped pair supply points and confirm eligibility in the market.

Our weekly case surgeries offer retailers an opportunity to flag complex cases and discuss the best outcome for the customer. Typical cases have included shared supplies, unable to access premise or customer side leak situations.

The annual open day last year included an introduction to the wholesale team, discussed policies such as the new assessed charge and leak allowances and the topical theme for last year's event was drought. There was limited retailer attendance at the event, which is a reflection of the immaturity of the market and the limited number of retailers currently operating in our supply area.

As well as our annual retailer open day we also invite our retailers to our treatment works open days, where we invite stakeholders to walk through the treatment process and gain a better understanding of how the water is treated and distributed to their tap. This all helps with the knowledge and understanding of the water supply service we offer.

Following the sale of our associated retailer to Castle Water, we have recently conducted 1-2-1 engagement with Castle Water to understand its expectations, now it retails for 94 per cent of our customer base. The outcome of these discussion have been built into our plan and commitments for 2020 to 2025, and are detailed in Section 2.2.

Also when our associated retailer exited the market, we took the opportunity to bring a number of our retail experts back into the wholesale service desk to bring knowledge and experience of operating as a retailer into the wholesale team. This knowledge and experience will help the design and delivery of effective improvements in our wholesale service going forward.

Throughout this engagement with retailers we have gained insight into their expectations and priorities. In summary they have told us:

- Our flexible and open approach is supported and welcomed
- inconsistency in wholesaler's bi-lateral approaches, policies and practices is a big issue for them
- for non-associated retailers, knowledge and experience of water needs wholesale support
- retailers would welcome support to promote water efficiency and help non-household customers become resilient
- wholesale tariffs are complex and cumbersome
- data remains an issue.

1.4 Our interactions with non-household customers

Whilst we recognise the importance for us to engage with our non-household customers via their retailers, we also recognise that at certain times it is in the best interests of these customers to offer direct contact with us as their wholesaler e.g. during water supply incidents and events. If we do not engage appropriately at these times, customers will not view the new market favourably.

As described above, we encourage non-household customers to directly register for our online portal, giving them the direct visibility on planned and unplanned works that may affect their supply.

From April 2017 to March 2018 we had the following interactions with non-household customers:

- Total contacts - 15,436
- Total complaints - 53

These contacts were all water supply related (as the billing and meter reading is the responsibility of the retailer); and the quantity of contacts also reflects a number of errors being sent to the wholesaler i.e. South East Water, as this was the first year of retail competition.

That said, we continue to monitor contact types from non-household customers and retailers to identify any trends that may be emerging, which we can then subject to root-cause analysis (the approach we have taken for household customers and which has seen a significant reduction in complaints).

Throughout this direct engagement with our non-household customers we have also gained insight into their expectations and priorities; often they are consistent with those expressed by our household customers. This is not a surprise given the majority of our customer base are SMEs and their use of water is similar to households. Full details of the research findings from our engagement with non-household customers is set out in Appendix 1: Engagement.

Our conversations with non-household customers – and the learnings from those – have primarily occurred through the contacts received via our wholesale services desk; through our water regulations inspections on non-household premises; and from direct conversations after water supply incidents. A summary of the findings include:

- Service received by non-household customers generally seen as good
- the wholesale service is considered reliable, reputable and honest
- following market opening some customers have found it difficult to understand the separation and wholesale is seen as distant
- communications are not tailored to non-household customers
- wholesale should do more to advise on water consumption and the wider environmental impact

That said, during the last year we have experienced two significant events, the beast from the east in early in 2018 and the recent summer heatwave. During both of the events, as well as engaging with retailers, we engaged directly with our non-household customers affected.

Of the non-household businesses in our supply area, there are three types that are most severely impacted by extended, unplanned water supply interruptions – farms, pubs and restaurants and schools.

Type of business	Impact of water supply interruption	How we are addressing
Farms	Requirements for water are different depending on types of livestock. Some animals can be moved more easily to alternative sources of water e.g horses whereas dairy herds and chicken farms cannot – and are at greater risk.	Updating address base to better define supply points (e.g. troughs) and flag the customers' specific water dependency. Addressing alternative supplies by deploying more towable bowsers and static tanks for farms to self-serve.
Pubs and restaurants	Health and hygiene impact – particularly from being unable to prepare and wash food so typically forced to close.	As main concern is loss of profit and having to make a claim on their insurance, we have a `no-quibble' policy and cover any excess payment required by their insurance.
Schools	Health and hygiene impact – particularly food preparation and inability to flush toilets so typically forced to close.	Site visits to first tranche of 60 schools to advise on how to improve storage contingency plans and undertake water audits.

We identified key issues which increased the severity of the event and the impact on non-household customers:

- a lack of knowledge on how to prevent supplies from freezing particularly rural cattle trough supplies and the impact this can have. 80 per cent of the additional demand placed on our network during the Beast from the East was caused by leaking customer supplies and rural areas were impacted more.
- a lack of resilience to cope with even short duration supply interruptions. Because water supplies have been so reliable customers now have very little storage and therefore no ability to cope when the water supply is not available. Most farms and livestock owners have no business continuity plans and need help with guidance on simple steps they can take to make themselves more resilient.

Improvements can be made in both these areas and in summary we know we can do more to liaise with customers and retailers during such events and ensure a better co-ordinated approach.

All of these findings have been used to develop our wholesale service for 2020 to 20-25. More details on the learnings from the freeze thaw event, and how we intend to develop a more resilient non-household customer, can be found in Appendix 9: Resilience in the round.

2. Wholesale service from 2020 to 2025

2.1 Development of the market

2.1.1 Market processes

As a wholesaler we want to ensure our non-household customers receive the same level of service as household customers do (as we have a direct relationship with them). With the introduction of retailers now operating in the market we also want to ensure they too receive a 10 out of 10 service because we understand that the service we provide to retailers operating in our area, has a direct link to the service they can provide their customers. Ensuring a consistent good performance for all will also enable the benefits of a competitive market to be realised.

As described above we have thoroughly reviewed our market process performance and identified the causes, primarily data issues, for missing the target timeframes. An action plan is in place and improvements are underway to target at least 90 per cent of processes completed on time. This target assumes all historic data issues are resolved.

2.1.2 Transparent performance reporting

Feedback from our retailers has identified that there is currently a gap in our incentive framework when it comes to retailers and our non-household customers. We are aware of discussions amongst the retailer group regarding the introduction of a business experience type measure i.e. 'B-Mex'. With this in mind we considered including an Outcome Delivery Incentive (ODI) in our package of 2020 to 2025 ODIs that is designed to cover our performance in the non-household market and our performance to retailers and non-household customers. For example an ODI could consist of four measures:

1. Retailer satisfaction
2. Non-household customer satisfaction
3. Non-household customer complaints
4. Market processes completed on time.

In considering the development of such a metric, and being able to determine a performance commitment that we can target to achieve it, it very quickly becomes apparent there is a lack of robust baseline data for retailer and non-household customer satisfaction; indeed given the number of retailers operating in our area we question the validity of such a survey.

Therefore, in the absence of such an ODI we have made a number of commitments in our plan, and they are shown in the boxes highlighted in this appendix, Sections 2.1.5, 2.2.1 and 2.3.1. This is not dissimilar to our innovative approach to introduce a suite of additional `Responsible Business' metrics for our 2020 to 2025 plan – the ODIs of the future (see Appendix 3: Responsible Business for more detail).

We will report against these new commitments in our 'Performance, People and Planet' annual review. We believe that our customers and stakeholders value the transparency that we provide by publishing our strengths, risks and weaknesses statement and assurance plans in our Company Monitoring Framework each year, so will include our performance against these new business commitments there too.

To provide a greater level of transparency to retailers we will also be introducing a quarterly retailer report that will show our market performance, by retailer. This will enable each retailer to see the performance they receive from us compared to that provided to other retailers, ensuring a transparent level playing field.

2.1.3 Working with market participants to evolve the market

In our preparations for the market opening in April 2017 we actively participated in the market design and development activities, via the Open Water Programme and latterly via the MOSL working groups. Our commitment to the market has continued beyond April 2017 and we are an active member of the user group.

As the market matures and evolves we will continue to be an active participant in its development, contributing to market changes and improvements. We are committed to working with MOSL and other related parties to ensure the non-household market operates efficiently and effective.

We also believe we have a part to play in enabling retailers to widen and mature their service offering to customers, as the market matures and issues around data and margin are resolved. We are committed to working with our retailers to provide the necessary support as these services evolve.

One particular area where we are committing to supporting retailers relates to non-household gap sites and voids. We believe this is important for affordability and fairness of charging and is a benefit to all customers, household and non-household.

We have committed to an ODI on percentage of non-household void properties, with a reputational incentive. Our historical average performance is 8.1 per cent of non-household properties are void. Our judgement is that we are likely to be upper quartile in this measure, as we are in the household measure. Given this position we have committed to maintaining this performance. The full details of this ODI are set out in Appendix 2: Performance commitments and outcome delivery incentives.

2.1.4 Translating market learnings to household customers

One of the benefits of the non-household market will be that service improvements and learnings from the competitive market are translated into improvements for all water company customers.

We have already seen in the first year of the market areas where learnings are being translated, particularly in the areas of data cleansing and formal service reviews.

Following the introduction of the market we established a 'Wholesale Markets Steering Group' and this group has a standing agenda item to discuss learnings from the non-household market, amongst others. This will continue during 2020 to 2025.

2.1.5 In summary - our market commitment

To support the continued development of the business retail water market, by:

- **Improving data quality and accuracy**
- **Holding the percentage of non-household void properties below 8.1 per cent**
- **Completing >90 per cent of our market processes on time**
- **Providing a quarterly performance report for retailers and transparent annual performance reporting via our Performance, People and Planet' report and Company Monitoring Framework**
- **Contributing to the development of market systems and processes**

2.2 Service to retailers

Using the findings from our everyday engagement with retailers outlined above and our engagement outlined in Appendix 1: Engagement, we have developed our plans for 2020 to 2025 as follows:

What retailers have told us……	What we will do…….
Our flexible and open approach is supported and welcomed	Our current approach to engagement, as shown in Section 1.3, is supported by our retailers and we will continue this in 2020 to 2025. This includes the annual open day, the theme for the 2018 open day has been agreed to be 'learnings from the freeze/thaw event'. In addition to our approach to engagement we will introduce a new retailer Experience Measure (Rex) survey. The Rex survey will ask our retailers to rate their experience with our wholesale service out of 10 and ask for feedback on areas for improvement.

	We will continue to improve and develop our online portal to ensure customers and retailers can access up to date activity information.
Inconsistency in wholesalers' bi-lateral approaches, policies and practices is a big issue for them	We will work with the industry to develop a best practice approach and contribute to the debate on a central portal for bi-lateral forms. We have recently introduced an accredited entity scheme for disconnections and we will review the option of expanding this further for e.g. meter installs and exchanges based on the maturity of the existing scheme. We will clarify our approach to leak allowances for business customers and offer allowances for quick fixes. We will work with retailers to improve customer complaints and complaint handling by offering to engage directly with the customer. We will work with all retailers to ensure credit terms offer an equal opportunity to access and compete in the market.
For non-associated retailers, knowledge and experience of water needs continued wholesale support	Our technical service desk will provide support for retailers and a suite of improved literature will be developed e.g. around the resilience part they can play. We have recently introduced a dedicated field resource to provide technical expertise for complex non-household customer issues. Our 'themed' open days will continue and we will use these themes to explain some technical aspects of the service.
Retailers would welcome support to promote water efficiency and help non-household customers become resilient	As we develop our plans for greater water efficiency and customer resilience, (see Appendices 4 Resilience, Appendix 6: Water Resources and Appendix 16: Innovation), we will engage with retailers and in particular the recently established Waterwise Retailers Leadership Group. We believe engagement with retailers on water efficiency is an underdeveloped part of the market and as such we will also include retailers in our innovative partnership toolbox.
Wholesale tariffs are complex and cumbersome	We will review our tariff structures and aim to simplify for retailers and customers to understand. We will also engage with retailers
Data remains an issue	Complete our data cleansing programme to ensure by 2020 we have minimised exceptions. Improve data quality and accuracy in particular on properties and meters.

2.2.1 In summary - our commitment to retailers

To provide an industry leading wholesale service for water retailers, by:

- **Improving our data quality and accuracy**
- **Providing technical support and advice including a range of services and engagement approaches**
- **Simplify tariffs and charges and ensure credit terms enable equal opportunity to access and compete**
- **Providing performance transparency through quarterly and annual reporting**
- **Implementing a retailer experience survey – target 10!**

2.3 Service to non-household customers

Our non-household customers receive water through 52,000 supply points across our water supply area and represent 5 per cent of our total customer base, but they consume approximately 10 per cent of the water we produce so it is key that we continue to provide them the same high level of service they expect.

Our non-household customers operate a number of different business models. We have considered what services our customers want from their Wholesale provider and how we can support our retailers in ensuring the customers' needs are met. An overview of the types of businesses operating in our area and the proportion of the supply points we supply, is shown below.

Business segments[1]	Proportion of supply points
Retail	36%
Agriculture	16%
Mixed/domestic (home business, care homes)	16%
Industrial	14%
Community (Village Hall, Church)	6%
Educational	<5%

[1] Source: Address Base

Business segments[1]	Proportion of supply points
Leisure (gym, swimming pool)	<5%
Medical (hospital, doctors, dentist, vets)	<5%
Hotels	<5%
Other	<5%

As our ongoing engagement and research for our 2020 to 2025 business plan shows, all of our non-household customers value the wholesale service we provide, and rely on us to provide an uninterrupted supply of high quality drinking water. Whilst each non-household segment has similar needs, we identified that non-household customers who are larger users of water have slightly different priorities; indeed there is an appetite among the more water-engaged large non-household users for a more proactive/partnership approach - which is why greater resilience delivered via our partnership toolbox is a key theme of our plan.

Our non-household customers also operate in a competitive market place and understand inflationary cost pressures, but they also expect us to meet these challenges with improved efficiency and innovation to ensure bills remain affordable. For large non-household customers particularly, delivering the business plan with no increases to bills was seen as very acceptable, although some concern was raised about whether we can be truly innovative with limited additional revenue. The results from our engagement on the acceptability of our plan with non-household customers is set out below.

Customer service, remains an important priority but with market opening, the way that these services are provided has changed. There is still a mixed level of awareness in the market about the roles of wholesalers and retailers but it was clear from our research with non-household customers that they want wholesalers to continue to provide advice and support; we have an important role to play in ensuring we can respond to their technical queries and provide water efficiency advice when needed.

Non-household customers also showed a keen interest in our wider environmental and social responsibilities. A large number of our non-household customers operate within local communities and understand the need for us to be a both a custodian of the environment; and a good local employer focused on developing excellent staff capable of delivering the innovation required to maintain resilient but affordable services.

Using the findings from our everyday engagement with retailers outlined above and our engagement with non-household customers outlined in Appendix 1: Engagement, we have developed our plans for 2020-25.

What non-household customers have told us……	What we will do…….
Service received by non-household customers generally seen as good	We will continue to provide the level of service non-household customers expect. Offering a resilient water supply meeting the highest water quality standards. We will continue to offer an 'open door' policy and engage directly with non-household customers where the customer and the retailer are happy for us to do this.
The wholesale service is considered reliable, reputable and honest	Target service levels and performance commitments for all our customers.
Following market opening some customers have found it difficult to understand the separation and wholesale is seen as distant	We will improve customer service, communication and alternative water support when services fail. In particular we will introduce specific: • Support for Strategic infrastructure – Business continuity plans are already in place for most Tier 1 premises (water critical infrastructure; hospitals, prisons) but these all need to be tested. Tier 2 business customers, (strategic infrastructure; care homes, medical centres, fire stations, police stations, national infrastructure) plans need to be developed • Support for schools and care homes • Support for agriculture and livestock We will also offer a direct complaint response service on wholesale services
Communications are not tailored to non-household customers	We will improve our non-household customer engagement to ensure their views and priorities are incorporated into our Customer Insight Database (see Appendix 1: Engagement and Appendix 8: Vulnerability - affordable, accessible and protective services). We will use this feedback to improve and tailor our communications for each customer type.
Wholesale should do more to advise on water consumption	We will introduce innovation to ensure delivery of water efficiency targets – helping non-household's become resilient customers (see Appendix 9: Resilience). Specifically we will investigate:

and the wider environmental impact	1. Smart water networks alerting customers to leaks or a change in use 2. Rewards for customers that reduce their water requirements e.g. refunded infrastructure charges We will also expend our water regulations inspections service to support resilience and water efficiency as well as safety. Appendix 10: Environment sets out our environmental strategy we will ensure communication and engagement with communities around this plan is inclusive of non-household customers.

2.3.1 Non-household customer acceptability

We carried out acceptability testing with our non-household customers to get their views on our overall business plan, including their views on our proposed bill levels and ODIs.

We surveyed 100 customers through a mix of online and in-home surveys. The main findings of this are shown below.

Acceptability of the plan	Businesses
Perfectly acceptable	39%
Acceptable	49%
Neither acceptable nor unacceptable	8%
Unacceptable	1%
Completely unacceptable	3%
Don't know	0%

This shows that only 88% of customers found our plan acceptable. With the survey results showing this high level of acceptability we are confident that it shows that our overall plan for 2020 to 2025 is the right one for our customers – balancing a bill that remains stable over the five years while at the same time improving service across every performance commitment.

The full results from this research can be found in Appendix 1 Engagement.

2.3.2 In summary - our commitment to non-household customers

To ensure all our non-household customers receive the service and support they expect, by:

- **Ensuring the level of service provided is the same regardless of whether it is provided directly or via a retailer**
- **Improving engagement and communications with non-household customer**
- **Incorporating our non-household customer views into our Customer Insight Database**
- **Introducing greater water management support and technical advice**

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