

Supporting document

Markets and competition









Markets and competition

We continue to support the expansion of markets and competition within the water industry. This section of our plan summarises how we have applied that to our PR24 business plan.

Fairer Charges

Our fairer and progressive charges approach provides the opportunity to expand on how the supply chain are engaged. We want to provide customers with choice in service provision, and part of our strategy includes providing some consumer segments with green eco tariffs, linked to the provision of retrofit water efficiency and drainage services, such as smart water butts.

These plans will evolve over the remainder of AMP7 and AMP8. They provide the opportunity though for third parties to develop retrofit and water efficiency options, with a clear path to market - society will benefit from water and wastewater efficiency (contributing to the delivery of our outcome incentives), and the consumer will gain a choice of service provision. We also gain the efficiency benefits of innovation and service delivery through this market route.

Developer services

We support the decision Ofwat has made to remove developer services from the PR24 price controls.

Consistent with this approach, we can confirm that no connection agreements made after 1 April 2024 will allow for any income offset to be paid on connections completed after 1 April 2025.

Our developer services strategy supports the development of the market by:

- The Introduction of a new portal for improved New Appointment and Variation (NAV) and Self Lay Providers (SLP) service provision
- Continued engagement with NAVs, SLPs and other developers through our market engagement sessions.
- Increasing cost and tariff transparency
- Engaging NAVs on our progressive charging proposals to support them with any equivalent options they may wish to develop
- Development of environmental incentives to reduce demand.

Developers are very important customers as they bring growth across the South West, Bournemouth and Bristol through the delivery of new housing and commercial development. These developers range in size from large national housebuilders to property owners making home improvements. We also deliver our services to new appointees (NAVs) and Self Lay Providers (SLPs) and therefore it is important that we tailor our service to meet all of our customers' needs. This is best done through engagement and using feedback and insight to focus upon the things that customers value most.

It is critical that our services are delivered as effectively as possible to align with developer customer's timescales but with consideration to minimise the impact to our existing domestic customers particularly by maintaining capacity within our existing networks and when working within public highways.

Ensuring that we understand the growth expectations of Local Authorities and developer customers is critical so that we can continue to ensure that our networks can accommodate the regional growth without having a detrimental impact upon the environment or service to our existing customers. We do this by maintaining excellent relationships with these stakeholders so that we understand their future plans and can align our investment programmes to meet those needs.

We also ensure that we respond to planning applications to ensure that our assets are not impacted by new development being built too close to our pipes and assets which could impact their integrity and also out ability to maintain them effectively in the future.

Customer engagement

During the year we have held several technical 'Developer Days'. These have focussed primarily on training and learning, and have offered participants the opportunity to engage with us. These days have been structured in response to feedback from our developer customers, and considered two areas that we understood would benefit from knowledge sharing.

One area was the Codes for Waste Adoption and the standards within this. This was identified following misunderstandings within the developer community regarding the submission requirements, leading to additional time constraints for both parties. This has successfully reduced the number of issues. We intend to continue to offer a mix of technical and forward-looking knowledge sharing days to our developer customers.

In addition to the developer engagement, we have also recently delivered training for two of the larger groundworker contractors operating within the South West. This training has helped to increase awareness and understanding of the quality of installation that we require prior to adoption and ensures that house buyers can be confident that the infrastructure serving their property is fit for purpose and will provide reliable performance for years to come.

We have engaged with our customers who have told us that:

- they want us to improve the ease of contacting our teams and keep them better informed. To meet these expectations, we have already made improvements to provide new communication channels to allow our customers to contact us through different routes and at times that suit them. This has included improvements to our customer help desk, introducing the use of technology platforms such as WhatsApp, SMS messaging and LivePerson and increasing resources to make customer contacts more proactive.
- they would like us to improve the quality of information on the website. Our domestic customers have also told us that we could improve our Company website and this initiative has been included within the scope of the project. We will improve the information held on our website to introduce new customer guides, forms and workflows and will explore the use of animation and video guides.
- we should improve the current Environmental Incentive Scheme to encourage developer customers to build water efficient homes to reduce water consumption and reduce discharges to our wastewater networks helping the Company's water resources and environmental performance.
- we should improve the current Environmental Incentive Scheme to encourage developer customers to build water efficient homes reducing water consumption and discharges to our wastewater networks supporting our water resource and environmental performance.
- We are also proactively supporting the work of Water UK to develop a national incentive scheme in preparedness for the launch of our 2024/25 Charges Scheme.

Since the licence merger between Bristol Water and South West Water we have focussed our improvement plans to take the "best of the best" from both organisations in order to deliver an improved service to our developer customers, NAVs and SLPs. This has already delivered customer benefits with action plans in place to continue our improvement journey.

In addition, we hold monthly operational key account meetings with all national housebuilders. The purpose of these meetings is to discuss site progress and agree outstanding actions for both parties. We also hold quarterly strategic meetings with the Technical Directors of these developers. Naturally these meetings also provide excellent opportunities for us to engage and for our customers to raise any queries or concerns they may have. During the year we have also increased proactive communication with smaller developers to increase awareness, drive progress and provide engagement opportunities.

Supporting markets

To provide developers with choices in how services to their sites are delivered, we ensure that we offer consistent service standards to NAVs and SLPs across all of our operating areas. We do this through our consolidated Charging Arrangements and by ensuring that our teams understand our obligations and the needs of these customers.

The integration of Bristol Water has resulted in cross team workshops to identify best practice to develop consistent policies and approaches and we continue to focus on this to ensure that NAVs and SLPs can expect the same service levels regardless of the location of their sites.

Our contract delivery arrangements ensure that our Developer Services are ring-fenced from the Company's other delivery activities to maintain cost independence so that our services to NAVs and SLPs are delivered on a level playing field. Our contract arrangements for Bristol and South West are currently delivered by different supply chain partners but we will review this when they are due for renewal in 2026 with the likelihood that we will combine the contracts to maximise efficiencies and economies of scale.

To ensure that our developer customers are aware of the delivery choices we ensure that all quotations contain clear and concise messages to promote the contestable and non-contestable activities and encourage customers to consider their choices so that they can make informed decisions on their service providers.

To support this, we have also ensured that our website and literature contains prominent messaging to support promotion of the market.

Historically, we have seen lower NAV and particularly SLP involvement with the South West when compared to other parts of the country, including Bristol. We proactively engaged with Ofwat, SLPs and NAVs to understand whether their exogenous drivers that have influenced the level of activity within the region. An independent consultant was appointed to engage with SLPs and investigate whether there were areas that we could focus upon to improve this.

This review did not identify anything significant, and provided assurance that the Company was meeting expectations. A list of targeted best practice interventions resulted which we have delivered. These recommendations included:

- improving articulation of the comparative advantages of a developer using an SLP rather than an incumbent.
- increasing the quality and frequency of engagement mechanisms such as Developer Days.
- ensuring that AMR shared procurement rates are wellunderstood and promoted across existing SLPs with existing/historic sites in South West Water's network.
- undertaking engagement with developers across their two supply areas and assess if there is a variance in the views that developers have towards South West Water or SLPs

Whist the NAV and SLP activity in Bristol has remained consistent we have seen a significant market increase in the South West with level of activity now being roughly split 50/50 between South West Water and alternative providers.

One difference that we have seen is a shift away from 'pure' SLP enquires to a more collaborative approach between NAVs and SLPs to offer developers a 'one stop shop' service which has, based upon the increased activity levels, seemed to be a more attractive offering to developer customers particularly those national housebuilders who generally deliver the larger development sites across our operating areas.

We have continued to strengthen our dedicated NAV/SLP team to ensure that we can continue to help provide the excellent market support we strive to give, and the team holds monthly key account meetings with NAVs and SLPs operating within our region. We are confident that our relationships with NAVs and SLPs are positive, and we can discuss areas of concern with trust and transparency to develop collaborative outcomes.

We have created the opportunity for SLPs to procure meters direct from our own supplier, enabling them to take advantage of our competitive purchasing power. We introduced this arrangement following direct feedback from the SLP community and we will continue to seek further opportunities to offer similar arrangements as we renew our procurement contracts.

Bioresources

The way that sludge is treated and disposed of has implications for our carbon footprint. As part of our commitment to Net Zero, and broader environmental responsibilities, we are investigating sludge treatment options with the view to an entirely new process that will mitigate our process and fugitive carbon footprint and offer maximum environmental protection. We are currently engaging in extensive and advanced modelling to achieve this goal and ensure that our Net Zero commitment is reached.

Our bioresources strategy will make the South West resilient to future legislation, including supporting sustainable economic growth, protecting our environment and reducing our carbon footprint, whilst generating low carbon fuels from waste materials aiding the circular economy.

We have considered market options carefully for our Bioresources strategy. As a Peninsula we have considered trading with our neighbour (Wessex Water), but there lack of long-term capacity and distance from Cornwall precludes this as a sustainable option. We continue to provide short-term mutual resilience, which will be boosted by our proposed investment.

There is little third-party capacity in the region and codigestion is not permitted. New third-party capacity is unlikely for the same reasons we seek investment, due to uncertainty over access to current disposal routes. Our biodiversity bid framework¹ allows third parties access to information on our plans and to participate in bids with more competitive offers. We have not had any interest to date.

For further information see our separate bioresources strategy.

¹ For more information visit bioresources bid assessment framework.pdf (southwestwater.co.uk) Our Business Plan 2025-2030 • Markets and competition

Net zero markets

We have updated our Promise to the Planet and set out our priorities until 2030 that will deliver lower operational carbon emissions. We have responded to customer feedback and know they don't think they should necessarily pay very much for us to achieve net zero ahead of other industries – so we have used the power of our group to fund some of these changes.



We will continue to focus on transitioning to renewable energy by shifting from fossil fuels to renewable energy sources to power water treatment works and other facilities. Customers expect us to innovate in preference to increasing bills to achieve net zero. Therefore, we have not asked for net zero enhancement funding through the Ofwat bidding process. Instead, we will strive to reach net zero through our base activities and commercial opportunities.

Local authorities are now required to produce Local Area Energy Plans which aim to identify and join up energy needs and decarbonise the entire energy supply chain from energy generation to distribution and consumption in homes and businesses at least cost. As we engage in this process, we will explore opportunities to forge new trading and collaboration opportunities with energy suppliers.

Carbon trading platforms are also emerging across the region as more and more businesses move toward action planning how to decarbonise their operations and achieve their net zero targets. Companies and landowners are increasingly looking for opportunities to buy carbon credits and South West Water, as a significant landowner, has an opportunity to supply.

Catchment markets and biodiversity

Our work on biodiversity and catchment markets includes a wide range of partners, building on the original catchment co-ordination through our *Upstream Thinking* programme. We will continue to work with our established delivery partners to expand our Upstream Thinking catchment management programme and peatland restoration, including hosting the South West Peatland Partnership.

We will also promote nature-based sustainable drainage solutions for new developments and ensure that local networks have sufficient capacity when new homes are built.

We will continue our partnership in the national Ofwat Innovation Funded CaSTCo project exploring the role of citizen science in catchment management, as well as implementing our Water Net Gain Ofwat Innovation Funded project with Westcountry Rivers Trust, as the lead delivery partner.

Biodiversity Net Gain will be mandated in the planning system from November 2023 which is likely to create a market for the purchase of Biodiversity units, particularly in areas where it will not be possible to deliver the required net gain within the red line boundary of planning application. As a significant landowner, we may be in a position to create and sell Biodiversity units, however this will be carefully considered given the associated time commitment of 30 years. In addition, as well as a developer applying to a planning authority, we may need to buy Biodiversity units if we cannot deliver the required net gain within the red line, either from a local provider or from Defra.

Our Promise to the Planet programme has a challenge to reach Net Zero by 2030. To meet part of this, SWB may invest in carbon sequestration on part of its own landholding or beyond in collaboration with others. Furthermore, investment choices could lead to land purchase where income sources are available – grants, green finance, etc – to pay for land management which results in greater carbon sequestration or habitat restoration. Units could both be sold on if additionality can be proven and verified.

Markets are also emerging in relation to nutrient trading, with developers, industry and others paying landowners to manage their land differently to stop or reduce the amount of nutrients impacting on sensitive, environmental habitats.

If emissions cannot be completely reduced, then we may need to purchase some form of offset. Where offsetting is required our strategy would be to invest in accredited native habitat creation or restoration within the region. Investors are increasingly interested in the environmental ambitions of water companies, with those able to demonstrate a strong environmental track record potentially more likely to attract funding. The Taskforce for nature-related Financial Disclosures, which we are engaged with, is enabling South West Water to demonstrate how the company is integrating nature into decision making.

Through our Upstream Thinking delivery programme model operating since 2010, we have an established supply chain of third sector environmental organisations who employ farm advisers to deliver catchment management solutions for water quality and other outcomes. This supply chain, with its experience of catchment management and a presence at the local level on the ground, is well placed to deliver solutions to additional water management challenges, such as surface water separation on a wider landscape scale to reduce spills from storm overflows. Third sector delivery partners have consistently proven to be better value than other potential providers.

Water resources markets

In line with Ofwat's PR24 methodology, new water resource markets are not expected to develop during 2025-2030. There has been no bidding in or third party water resource trading options identified over 2020-25, and no new water resource trades qualifying under the Water Trading Incentive. This is consistent with water resource planning assumptions.

Our Water Resources Management Plans (WRMPs) set out our vision for the South West Water and Bristol Water areas over the next 25 years (2025 – 2050). These set out how South West Water will ensure there continues to be a secure supply of water to customers in the future whilst also protecting and enhancing the environment. It shows how we intend to manage water resources, and our understanding how customer demand for water and supplies of water will change over time.

However, we are committed to identifying opportunities to develop markets and to work with others to co-develop innovative solutions. These include:

- Westcountry Water Resources Group
- Didcot innovation fund project
- Bidding markets and trading and procurement code
- Managing existing water trading arrangements

South West Water and Westcountry Rivers Trust are currently undertaking a "Water Net Gain" Ofwat Innovation Fund project to better understand how a series of ecologically connected smart ponds, sometimes referred to as "water batteries", on test sites in the region could be incentivised. Theoretically farmers and landowners could store more water on their land in a digital smart pond for a range of biodiversity and water resilience benefits. This water could then be traded with neighbouring farms or potentially sold to us to top up rivers or put into supply. The project is exploring a number of angles, including the development of a trading mechanism and willingness of farmers to build ponds.

More information is available here.

Westcountry Water Resources Group

South West Water is a core member of Water Country Water Resources Group (WCWR). Established in 2017, West Country Water Resources exists to allow improved collaboration in water resources management in the South West of England.

Comprising core and associate members, West Country Water Resources' purpose is to support a coordinated approach to water resources planning, to balance water supply with demand through a common regional understanding, while dealing with a range of challenges in the region.

WCWR engages with a wide range of stakeholders and seeks to identify opportunities for water trading with other abstractors and bulk supplies with other water companies and regions.

In response to calls from government and regulators, and in recognition of the long lead-in time and challenges of developing new strategic water resources, at PR19 Ofwat allocated £469m nationally for companies to investigate and develop 17 strategic water resource solutions (SRO) during 2020-25. In the West Country there were three water resource solutions that were funded to follow a gated process to be overseen by a new regulatory alliance called RAPID.

All of the West Country SROs have now passed through gate two. There have been a number of refinements of the portfolio of schemes and scope of the solutions during the process.

The three schemes are now moving to detailed planning and procurement phases, and are the schemes that South West Water will progress through Direct Procurement for Customers (DPC)

Direct Procurement for Customers

Ofwat established Direct Procurement for Customers (DPC) at PR19 as an alternative delivery approach for large capital schemes. It involves the procurement of a



Competitively Appointed Provider (CAP) to Design, Build, Finance, Operate and Maintain (DBFOM) the required infrastructure.

DPC currently applies to large, discrete projects in the water and wastewater wholesale value chain. We have applied Ofwat's guidance and considered the size and discreteness of the projects in our business plan. The schemes we have that are suitable for DPC are the three Strategic Water Resource schemes that are progressing through the RAPID gateway process. These schemes are being developed by West Country Water Resources and are aligned to our final Water Resource Management Plan.

The three schemes where the cost in our plan includes the preparatory and planning work to enable the project to be delivered through DPC are:

- Cheddar 2 a new strategic regional reservoir with treatment works and connection to Bickham Moor. This benefits South West water resources and is planned to be commissioned from 2033 with the reservoir fully operational in 2035. The resilience to Wessex and Bristol areas provide additional benefits, with the operational use date driven by the connection to the South West area. The Cheddar scheme will see in construction start in AMP8
- Poole Water Recycling and transfer recycling and transfer to supplement water resources as part of the environmental destination In the Wessex / Bournemouth Water area, with planned operational use In 2035
- Mendip Quarries a new strategic regional reservoir and refill abstractions with planned operational use In 2042.

We retain our view that the removal of the restriction on incumbents participating in out of area DPC will support the development of this market.

What is it?

 A pilot to test the commercial viability of using multi-use abstraction licences and package treatment plants to supply business customers and help to solve water resources needs in a low carbon way

Where is it?

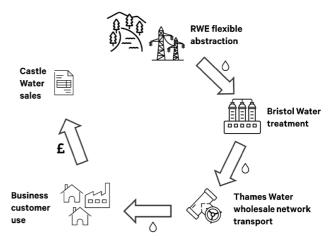
 A pilot is based on a real scheme at Didcot, and is exploring potential for scale-up elsewhere

What do we want to achieve?

- Identify how to improve existing water resource markets
- Work in partnerships with regulators, water companies and abstractors to solve challenges
- Show how big the market opportunity may be & showcase this for investors

Didcot innovation fund project

Our Flexible Local Water Supplies market innovation fund project continues to explore with Castle Water, RWE, Binnies and the University of the West of England the



potential for water resource and treatment markets linked to the Business Retail Market. Based on a pilot project at Didcot, we are testing how this theoretical water market can become a reality.

In April 2023 we ran an industry dissemination workshop, and are in the process of exploring scale up across England for such schemes using Environment Agency open data on abstraction sites.

The project explores the potential for smaller water supply resources to be used, bringing competition and water efficiency potential to the business retail market. The pilot has tested the commercial viability of using multi-use abstraction licences and package treatments to supply business customers in a low-carbon way.

This has involved working in partnership with regulators, water companies and abstractors to solve challenges. The project has explored various case studies (including abstraction management, abstraction licence trading and network access), the regulatory and commercial barriers, and the opportunities to improve existing water resource markets.

The report by Frontier Economics that forms part of this project (*Review of Cross Sector Charging Case Studies* –



30 May 2022) explored a range of access pricing frameworks in other sectors, the learning from which should inform the development of water resource and business retail markets.

The final report for the project will be delivered by the end of March 2024.

Bidding markets and trading and procurement code

The water resources bidding market is open to third party providers to submit bids to water companies to provide solutions to help meet future water needs set out in the WRMPs. These third-party providers can be either other water companies or companies from outside the sector.

In a related field, incentives are available to water companies to export or receive new bulk transfers of water. The incentives in place at PR19 remain unchanged at PR24. Water companies can only receive these Water Trading Incentives if they produce, and are compliant with, an approved trading and procurement code.

We keep our water bid assessment framework up to date, as well as our trading and procurement code and published water resources market information². As noted above, however, there have been no bidding in or third-party water resource trading options identified over 2020-25, and no new water resource trades qualifying under the Water Trading Incentive. This is consistent with water resource planning assumptions in the WRMPs.

Managing existing water trading arrangements

While we do not foresee new bulk supply trading emerging over AMP8 our existing arrangements have worked well and will continue to be in place.

The main bulk supply transfer we have is to Wessex Water at Newton Meadows, near Bath. The major potable water bulk export at Newton Meadows can supply Wessex Water with up to 11.37 Ml/d, the annual daily average for this supply is 4.4Ml/d. Co-ordination through WCWRG for the regional plan means the use of this bulk supply may be changed in the future, providing less water on average and more water in peak periods, reflecting the different water use characteristics between the Bristol area and Wessex Water areas.

Customer service and experience for business retailers and developers

We highlight in *Addressing Affordability and Delivery for* Customers how we have built a customer experience strategy that is focused on ensuring we provide this service. At its heart, we have undertaken to:

- Serve provide excellent customer service to all our customers, supported by effortless, automated customer journeys
- **Conserve** work with our customers to help care for the environment, leading behaviour change
- Care supporting all our customers and ensure inclusive, consistent services
- Share build trust by proudly showing who we are and what we are doing. Working with customers, communities and partners through purposeful engagement to learn

² For instance, for South West Bournemouth visit water_resources_bid_assessment_framework.pdf (southwestwater.co.uk) and for Bristol Water visit Water Resources (bristolwater.co.uk)

We are working with retailers, business customers and developers as part of our 'serve' and 'conserve' pillars. Success will be measured as part of our D-MeX and BR-MeX scores.

Serve

We have developed a customer and digital vision of how we want customers to experience our organisations and engage with our services. This will help to provide a service, both digitally and face to face, to customers across all areas that is responsive and easy to use. We are planning investment between now and 2030 to support this digital vision.

Developers in our region have growing expectations and want to receive better value for money. They want service on time, at a good price and with clear communication. Our digital vision, combined with consistent customer service, will achieve a reliable service that our developers need.

Our business customers and their retailers also want us to deliver on our promises, on time and to keep them informed. These objectives are key to our customer vision. We will continue to provide a tailored, individual relationship with our retailers, seeking their feedback and proactively updating them on their key priorities, including changes to our charges, operational events and water efficiency support. We will continue to strive to deliver a consistent service, completing the work on time, for their customers.

Conserve

Our research on water resilience shows that our business customers are more reluctant to prioritise water efficiency due to their business needs. Throughout the drought we have engaged with businesses, including the tourism industry, to reduce water usage. We will continue to build on this going forward, with supporting efficient water use by businesses one of our core performance commitments.

Our priorities include:

- targeting local businesses and retailers to educate and encourage them to use water carefully while supporting them to run strong, resilient businesses
- addressing tourism and peak summer demand by engaging with businesses most reliant on this economy, helping them to reduce demand and delivering the right information and support so they can be water efficient.

Innovation

As well as having the right supply chain in place, we need to be resilient to the changes happening around us and meet the demands asked of us by our customers and Government.

To do this, we need to not only continuously improve our processes and the quality of our services, but actively seek new solutions with long-reaching and cross-cutting benefits, for example, innovations that deliver a stepchange in reducing carbon emissions, make environmental improvements, secure a resilient service and, where possible, lower our costs.

Fast, flexible innovation, coupled with long-term research is essential if we are to respond to this changing landscape and meet the needs of our customers, stakeholders and environment now and for the future. Fostering an innovative mindset is at the heart of our business.

Using innovation to drive efficiency, we can make significant improvements to performance. We have a dedicated innovation team that works to support our business and external partners who deliver and realise the benefits from our latest innovations.

The Centre for Resilience in Environment, Water and Waste – CREWW

Work to construct the new CREWW research building entered its final phases during the first half of 2023 and it is very close to occupation when it becomes fully operational.

The dedicated research and innovation hub will include laboratory space, housing new, world-leading analytical, field-monitoring and computing facilities, plus training and collaboration space. It has been designed to promote interaction between South West Water, our supply chain and researchers from a range of academic disciplines at the University of Exeter.

A dedicated microplastics research lab will be housed in the building.

We are also building a pipeline of research projects that will form the overall research programme. This activity will continue over the 25-year partnership between the University and South West Water, supported by £20m funding from South West Water. Employing innovation methods such as design sprints and other collaborative initiatives, researchers and colleagues have been busy pinpointing areas of interest for further investigation.

Our key themes:

- Resilient water resources through healthy catchments
- High quality water supplies
- Trusted customer and community experience
- Controlled and managed drainage
- Maximising value through wastewater recycling.

Open Data

Our vision is to publish data publicly to stimulate new ideas and partnerships so we can provide better services for customers and protect the environment.

We will make this happen through:

Promoting Collaboration: Collaborate with partners and customers, fostering innovation to drive efficiencies within SWW.

Providing Transparency: Transparent with our data and services to increase trust in the organisation with our stakeholders.

Changing Mindsets and Culture: Creating an Open Data Mindset with a culture of considered data sharing for any new data.

Creating Good Governance: Implement a guided ecosystem to ensure users' autonomy whilst working to best practices and guidance.

Providing Useful Context: Provide context with our data in the interest of clarity to increase understanding, avoiding misuse and misinterpretation.

Focusing on Customer Needs: Ensure we action users' needs and demand to maintain use and relevance of Open Data Sharing.

Ensuring Good Data Quality: Create trust in SWW data by ensuring the accuracy, timeliness and consistency provided to our stakeholders.

Ease of Access and Usability: Ensure ease of use of the platform so that stakeholders can find and access the data at the time they need it.

Some of our priorities for Open Data are currently:

- Storm overflow spills we will build on our WaterFit Live which provides live information about the CSO monitors that may impact bathing waters
- Pollution awareness providing data on pollution incidents and their wider causes to aid with prevention
- Fairer and progressive charges sharing the results of our tariff trials
- Vulnerable customers protected data shared in a secure way between utilities and other trusted parties.