



# SRN PR19 Outcomes Draft Determination Representation Commentary

29 August 2019

Version: 1.0 Final

| OC1 – P10 and P90 Data (levels and payments) for performance commitments included in draft determination  |  |
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| PC Name   | Commentary   |
| Water quality compliance (CRI)  | These are our p90 and p10s based on the draft determination  |
| Water supply interruptions  | These are our p90 and p10s based on the draft determination  |
| Leakage (Megalitres per day, three-year average, absolute level)  | These are our p90 and p10s based on the draft determination  |
| Leakage (Megalitres per day, three-year average, % reduction from 2019-20 baseline)                       | These are our p90 and p10s based on the draft determination  |
| Per capita consumption (Litres per person per day, three-year average, absolute level)                    | These are our p90 and p10s based on the draft determination  |
| Per capita consumption (Litres per person per day, three-year average, % reduction from 2019-20 baseline) | These are our p90 and p10s based on the draft determination  |
| Mains repairs   | These are our p90 and p10s based on the draft determination  |
| Unplanned outage  | These are our p90 and p10s based on the draft determination  |
| Risk of severe restrictions in a drought  | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be. |
| Priority services for customers in vulnerable circumstances   | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be. |
| Internal sewer flooding   | These are our p90 and p10s based on the draft determination  |
| Pollution incidents   | These are our p90 and p10s based on the draft determination  |
| Risk of sewer flooding in a storm   | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be. |
| Sewer collapses   | These are our p90 and p10s based on the draft determination  |
| Treatment works compliance  | These are our p90 and p10s based on the draft determination  |
| Drinking water appearance   | These are our p90 and p10s based on the draft determination  |
| Drinking water taste and Odour  | These are our p90 and p10s based on the draft determination  |
| Effluent re-use   | These are our p90 and p10s based on the draft determination  |

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| Renewable Generation   | These are our p90 and p10s based on the draft determination. We note you our incentive rates were amended at the draft determination but it is not clear why. We have accepted this change and updated accordingly. |
| Satisfactory bioresources recycling  | These are our p90 and p10s based on the draft determination   |
| River water quality  | These are our p90 and p10s based on the draft determination   |
| Abstraction Incentive Mechanism  | These are our p90 and p10s based on the draft determination   |
| Maintain Bathing waters at 'Excellent'.  | These are our p90 and p10s based on the draft determination   |
| Improve the number of Bathing waters to at least 'Good' (Cost Adjustment Claim). | These are our p90 and p10s based on the draft determination   |
| Target 100   | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be.                                |
| Water saved from water efficiency visits   | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be.                                |
| Access to daily water consumption data   | These are our p90 and p10s based on the draft determination   |
| Improve the bathing waters at 'Excellent' quality (Cost Adjustment Claim).       | These are our p90 and p10s based on the draft determination   |
| Void properties  | These are our p90 and p10s based on the draft determination   |
| Effectiveness of Financial Assistance  | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be.                                |
| Customer satisfaction with vulnerability support                                 | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be.                                |
| Replace lead customer pipes  | These are our p90 and p10s based on the draft determination   |
| Surface water management   | These are our p90 and p10s based on the draft determination   |
| Community engagement   | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be.                                |
| Schools visited and engagement with children                                     | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be.                                |

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| Water supply resilience                      | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be. |
| Properties at risk of receiving low pressure | These are our p90 and p10s based on the draft determination  |
| External sewer flooding                      | These are our p90 and p10s based on the draft determination  |
| Combined Sewer Overflows (CSO) monitoring    | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be. |
| Natural Capital                              | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be. |
| Gap Sites                                    | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be. |
| Thanet Sewers                                | These are our p90 and p10s based on the draft determination  |
| Distribution input                           | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be. |
| Value for Money                              | We do not believe this is practically feasible. Due to the limited time in acquiring this information, we have not been able to do full analysis on what our p90s and p10s would be. |
| Long term supply demand schemes              | These are our p90 and p10s based on the draft determination  |
| Impounding reservoirs                        | These are our p90 and p10s based on the draft determination  |
| WINEP Delivery                               | These are our p90 and p10s based on the draft determination  |

| OC2.1 – PC/ODI parameters for performance commitments included in draft determination, expressed in standardised measurement units |   |
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| PC Name  | Commentary  |
| Water quality compliance (CRI)   | Updated as per our representation – Delivering Outcomes for Customers: Compliance Risk Index ODI deadbands. This impacts our proposed deadband. |
| Water supply interruptions   | Updated the collars to our p10 levels as per our representation – delivering outcomes for customers, ODI collars.                               |
| Leakage (Megalitres per day, three-year average, absolute level)   | As per Table OC1  |
| Leakage (Megalitres per day, three-year average, % reduction from 2019-20 baseline)  | As per Table OC1  |
| Per capita consumption (Litres per person per day, three-year average, absolute level)   | As per Table OC1  |
| Per capita consumption (Litres per person per day, three-year average, % reduction from 2019-20 baseline)                          | As per Table OC1  |
| Mains repairs  | Updated the collars to our p10 levels as per our representation – delivering outcomes for customers, ODI collars.                               |
| Unplanned outage   | As per Table OC1  |
| Risk of severe restrictions in a drought   | As per Table OC1  |
| Priority services for customers in vulnerable circumstances  | As per Table OC1  |
| Internal sewer flooding  | Updated the collars to our p10 levels as per our representation – delivering outcomes for customers, ODI collars.                               |
| Pollution incidents  | Updated the collars to our p10 levels as per our representation – delivering outcomes for customers, ODI collars.                               |
| Risk of sewer flooding in a storm  | As per Table OC1  |
| Sewer collapses  | As per Table OC1  |
| Treatment works compliance   | As per Table OC1  |
| Drinking water appearance  | As per Table OC1  |
| Drinking water taste and Odour   | As per Table OC1  |
| Effluent re-use  | As per Table OC1  |

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| Renewable Generation   | As per Table OC1  |
| Satisfactory bioresources recycling  | As per Table OC1  |
| River water quality  | We have updated the performance commitment levels to match WINEP without duplicates and without water schemes as per our clarification and our representation – Delivering Outcomes for Customers: River water quality ODI targets. |
| Abstraction Incentive Mechanism  | As per Table OC1  |
| Maintain Bathing waters at ‘Excellent’.  | As per Table OC1  |
| Improve the number of Bathing waters to at least ‘Good’ (Cost Adjustment Claim). | As per Table OC1  |
| Target 100   | As per Table OC1  |
| Water saved from water efficiency visits   | As per Table OC1  |
| Access to daily water consumption data   | As per Table OC1  |
| Improve the bathing waters at ‘Excellent’ quality (Cost Adjustment Claim).       | As per Table OC1  |
| Void properties  | Updated incentive rates as per our representation – Delivering Outcomes for Customers: Void properties. The weighted incentive rates have been input although our preference is still to have separate rates per customer type      |
| Effectiveness of Financial Assistance  | As per Table OC1  |
| Customer satisfaction with vulnerability support                                 | As per Table OC1  |
| Replace lead customer pipes  | As per Table OC1  |
| Surface water management   | As per Table OC1, although we have proposed to remove this PC   |
| Community engagement   | As per Table OC1  |
| Schools visited and engagement with children                                     | As per Table OC1  |
| Water supply resilience  | As per Table OC1  |
| Properties at risk of receiving low pressure                                     | As per Table OC1  |
| External sewer flooding  | Updated the collars to our p10 levels as per our representation – Delivering Outcomes for Customers: ODI collars.   |
| Combined Sewer Overflows (CSO) monitoring  | As per Table OC1  |
| Natural Capital  | As per Table OC1  |

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|---------------------------------|------------------|
| Gap Sites                       | As per Table OC1 |
| Thanet Sewers                   | As per Table OC1 |
| Distribution input              | As per Table OC1 |
| Value for Money                 | As per Table OC1 |
| Long term supply demand schemes | As per Table OC1 |
| Impounding reservoirs           | As per Table OC1 |
| WINEP Delivery                  | As per Table OC1 |

#### OC4 – Shadow performance reporting data for performance commitments included in draft determination as well as additional bespoke performance commitments recorded in Table OC2.3

| PC Name  | Commentary   |
|--|--|
| Drinking water appearance  | Derived from Discover Water, but per 1,000 population  |
| Drinking water taste and Odour   | Derived from Discover Water, but per 1,000 population  |
| Effluent re-use  | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Renewable Generation   | This is as per our 2018/19 APR submission  |
| Satisfactory bioresources recycling  | This is as per our 2018/19 APR submission  |
| River water quality  | This is a scheme which starts in AMP7  |
| Abstraction Incentive Mechanism  | This is a scheme which starts in AMP7  |
| Maintain Bathing waters at 'Excellent'.  | This is as per our 2018/19 APR submission  |
| Improve the number of Bathing waters to at least 'Good' (Cost Adjustment Claim). | This is a scheme which starts in AMP7  |
| Target 100   | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Water saved from water efficiency visits   | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Access to daily water consumption data   | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |

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| Improve the bathing waters at ‘Excellent’ quality (Cost Adjustment Claim). | This is a scheme which starts in AMP7  |
| Void properties  | This is as per our 2018/19 APR submission  |
| Effectiveness of Financial Assistance                                      | This is only based on 7,500 customers currently, as we have only been collecting the data for a short amount of time     |
| Customer satisfaction with vulnerability support                           | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Replace lead customer pipes  | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Surface water management   | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Community engagement   | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Schools visited and engagement with children                               | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Water supply resilience  | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Properties at risk of receiving low pressure                               | This is as per our 2018/19 APR submission  |
| External sewer flooding  | This is as per our 2018/19 APR submission, but including severe weather  |
| Combined Sewer Overflows (CSO) monitoring                                  | Derived from our CSO monitoring program  |
| Natural Capital  | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Gap Sites  | We are not yet monitoring this performance commitment, as systems were not in place fully for the financial year 2018/19 |
| Thanet Sewers  | This is a scheme which starts in AMP7  |
| Distribution input   | This is as per our 2018/19 APR submission  |
| Value for Money  | This is as per our 2018/19 APR submission  |
| Long term supply demand schemes  | This is a scheme which starts in AMP7  |
| Impounding reservoirs  | This is a scheme which starts in AMP7  |
| WINEP Delivery   | This is a scheme which starts in AMP7  |