

README: Representations on July Draft Determinations

Document Reference: J000

This document contains an overview and listing of all submitted representations.

United Utilities Water Limited



J000 – README: Representations on draft determinations

README: United Utilities Water representations on Ofwat’s PR19 slow track draft determinations

This document sets out the structure of the response by United Utilities Water (UUV) to the PR19 draft determinations for the slow track and significant scrutiny companies, published on 18 July. These representations have been aligned to the structure of the draft determinations, each with their own supporting documentation:

- Outcomes – these documents set out our representations to Ofwat on aspects of its PR19 July draft determinations relating to outcomes;
- Cost assessment – these documents contain our representations on the Draft Determinations of the slow track and significant scrutiny water companies relating to cost assessment;
- Risk and return – these documents contain our representations on the Draft Determinations of the slow track and significant scrutiny water companies which impact the risk and return of our plans;
- Past delivery & SIM – these documents contain UUV’s representations on the Draft Determinations of the slow track and significant scrutiny water companies relating to the application of SIM and of our customer experience outcome delivery incentive;
- Delivering customer value in large projects – these documents contain UUV’s representations on the Ofwat document ‘PR19 draft determinations – Delivering customer value in large projects’;
- Strategic regional solutions - these documents contain UUV’s representations on the strategic water resources elements of the slow track draft determinations; and
- Developer Services - these documents contain UUV’s representation on the draft determinations of the slow track and significant scrutiny water companies relating to the regulation of developer services.

Submission content structure

As part of our September business plan submission, we provided a structure to our submission. Main document chapters, supplementary documents and third party documents all had different signifiers. From the IAP feedback in January, we adopted a different signifier for our IAP responses.

For our representations in April to the fast track determination we used the signifier ‘D’ to classify these documents. Supporting documents are signified with a letter in alphabetical order.

For this set of representations in response to the July Fast Track determinations we will be using the signifier ‘J.’ Supporting documents are signified with a letter in alphabetical order.

See all signifiers in the table below:

Submission	Document type	Signifier
Full business plan (September 2018)	Main document chapter	Chapter [x]
	Supplementary document	S[x]
	Third party document	T[x]
IAP Feedback (February 2019 – present)	All documents	I[x]
April fast track Draft Determination representations	All documents	D[x]

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July slow track Draft Determination representations	All documents	J[x]
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Table of contents for July Draft Determination representations

Our representations are listed along with a short description below:

Ref	Filename	Short description
29th August 2019		
J000	README - Representations on July draft determinations	This document contains an overview and listing of all submitted representations.
J000a	PR19 draft determinations Company representations pro forma U UW	Completed pro forma containing tables RP1, RP2, RP3 and RP4.
J001	Exec Summary	This document contains a short summary of U UW’s representation on the draft determinations of the slow track and significant scrutiny water companies, and provides signposting to our representation documents.
J002	Outcomes	This document sets out our representations to Ofwat on aspects of their PR19 July draft determinations relating to outcomes.
J002a	DD Representations Data Template_Final_UU	Completed template containing tables OC1, OC2.1, OC2.2, OC2.3, OC3 and OC4
J002b	Assessing the statistical validity of CMEX	3 rd party report from Frontier economics, which summarises its review of the C-MeX mechanism and provides recommendations for improvement.
J003	Cost assessment	This document contains U UW’s representations on the Draft Determinations of the slow track and significant scrutiny water companies relating to cost assessment.
J003a	WINEP cost adjustment mechanism	This document contains U UW’s proposal to enable a two-sided mechanism for the WINEP cost adjustment mechanism in order to minimise the potential risk resulting from the inclusion of a specific ‘red’ scheme within the final WINEP.
J003b	Revised cost tables	This document sets out updated tables WS1, WS2, WWS1, WWS2, and R1. These tables consolidate previous submissions to Ofwat, for example through the query process, and do not contain any new representations. We have not updated AMP6 costs for 2018/19 actuals, as we don’t consider these to be material to our forecast of costs for AMP7.
J004	Risk and return	This document contains U UW’s representation on the Draft Determinations of the slow track and significant scrutiny water companies which impact the risk and return of our plans.
J004a	App26	Copies of revised App26 business plan tables, reflecting Ofwat’s slow track DD interventions. We also provide a copy of App26 which reflects our slow track DD representations.
J005	SIM methodology and reconciling past delivery	This document contains U UW’s representation on the Draft Determinations of the slow track and significant scrutiny water companies relating to the application of SIM and of our customer experience outcome delivery incentive.

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Ref	Filename	Short description
J006	Delivering customer value in large projects	<p>This document contains U UW’s representations on the Ofwat document ‘PR19 draft determinations – Delivering customer value in large projects’.</p> <p>In particular it sets out a proposed approach to managing uncertainty in the event of a DPC exit, as a preferable alternative to Ofwat’s proposal for a Notified Item.</p>
J007	Strategic regional water resource solutions	<p>This document is United Utilities representation on the strategic water resources elements of the slow track draft determinations.</p> <p>In this document we focus on areas of specific concern to United Utilities.</p>
J007a	All company working group joint document FINAL	<p>This document is the joint representation with the other companies with strategic water resources schemes: Affinity Water, Anglian Water, Severn Trent Water, Southern Water, South West, Thames Water, Wessex and Water Resources South East.</p> <p>It covers matters which are combined or overlap between the companies and reflects the agreed position of all the parties.</p>
J008	Developer services	<p>This document contains U UW’s representation on the draft determinations of the slow track and significant scrutiny water companies relating to the regulation of developer services.</p>
J008a	Developer services data table	Developer services data request