

# Fair Water Connections

Seeking fairness for self-lay providers



October 2022

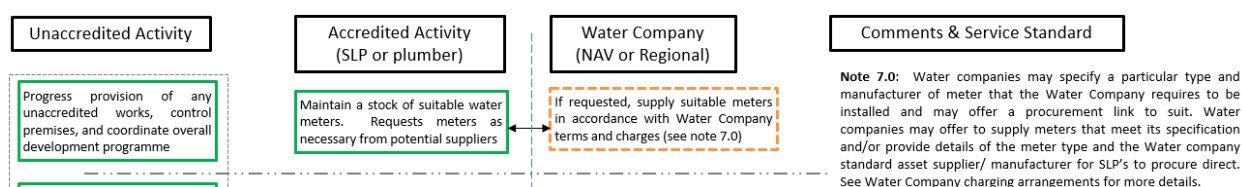
## Water Adoption Panel Change Proposal - Provision of Service Connection Meters

This note is to provide the Water Adoptions Panel with the supplementary information they have requested, in relation to this change request. Specifically this covers:-

- **Scale of issue:** it would be helpful for the Panel to understand more about how widespread the issue is and how often it is being experienced by SLPs. Does it arise in particular areas or with particular water companies, or is it a nationwide issue? Any supporting information or commentary that you can provide on this would also be helpful.
- **Problem definition:** in the Panel's view, it would be helpful to more closely define the problem that you are seeking to address with the proposed change. Could you therefore please clarify the primary issue that the proposal is seeking to address, i.e. provisions on contestable/non-contestable activities, water company practices and/or policies on meters, or charging arrangements.

### Background

Stage 7 of the Water Sector Guidance, covering 'Make Service Connections' (see extract below), states that a SLP needs to "maintain a stock of suitable meters". Even though this is a self-evident requirement for SLPs geared towards completing work in a timely and efficient way.



However the companies detailed below insist on supplying SLPs (many at cost) with meters from their own provider. So issues, which adversely impact on SLP delivery, arise when companies are not forthcoming with providing adequate stock. This has resulted in SLPs having to do extra journeys to collect individual meters just to complete service connections.

Hence the proposal is specifically geared to:-

1. Making it readily apparent (particularly for a SLP new to doing work in a particular company) where meter provision is a 'non-contestable' activity; and,
2. To place the risk of 'non-provision' more fairly with the 'supplying' (rather than 'receiving' party).

In raising this change request it is recognised that meter supply has, over recent times, been difficult and can, where a company has specific reading requirements, be impacted by the wide ranging shortage of computer chips.

Those impacted SLPs have also put much effort into getting companies to recognise the impact of meter supply shortages but are looking for appropriate safeguards to be built into the water self-lay procedures so that they are not, in the future, left susceptible to the consequences of not having the needed stock of meters.

## Current, Cross Company, Position

The following table shows what we have found regarding the cross company situation on whether meter provision is a 'contestable' or 'non-contestable' activity.

The colour coding is:-

|                    |                                                       |
|--------------------|-------------------------------------------------------|
| <b>Contestable</b> | Fully contestable – SLP buys to company specification |
| <b>Co Supplier</b> | SLP purchases but from company nominated supplier     |
| <b>Non Contest</b> | Meters provided by company to SLP                     |

| <b>Company</b>                        | <b>Contestable</b> | <b>Where Supply Specified</b>                                                                                                                                                                                                                                       |
|---------------------------------------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Affinity                              | Non Contest        | In DCS Section 22 – “All meters are to be supplied by Affinity Water”                                                                                                                                                                                               |
| Anglian                               | Non Contest        | In DCS Section 22 – “All meters shall be provided by Anglian Water”                                                                                                                                                                                                 |
| Bristol                               | Contestable        | In DCS Section 14.1 – “It is the customer’s responsibility to install a meter carrier fully in accordance with the specification”. (Specification not found in DCS).                                                                                                |
| Northumbrian (incl Essex and Suffolk) | Non Contest        | In Table in DCS Section 21 – “Only meters issued by NWG shall be installed”.                                                                                                                                                                                        |
| Portsmouth                            | Non Contest        | In DCS Section 22 – “All meters shall be provided by Portsmouth Water”                                                                                                                                                                                              |
| Sutton & E Surrey                     | Contestable        | Specification in DCS Table 21.5.2:                                                                                                                                                                                                                                  |
| Severn Trent                          | Non Contest        | Policy unclear in documents.<br>Practice is that company provides with meters not being separately charged.                                                                                                                                                         |
| South East                            | Non Contest        | In DCS Section 22 – “All meters are to be supplied by South East Water”                                                                                                                                                                                             |
| South Staffs                          | Non Contest        | Not clear with no mention in DCS (policy as provided by company)                                                                                                                                                                                                    |
| South West                            | Contestable        | In DCS Section 21<br>Specified meter is (up to 20mm) Diehl Altair V4<br>(Meters effectively have to be from company supplier)                                                                                                                                       |
| Southern                              | Co Supplier        | DCS Section 14.1 details current specified type of meter and required supplier.                                                                                                                                                                                     |
| Thames                                | Non Contest        | Separate metering policy says “we provide”.<br>No clear statement in DCS.<br>Charges give rates for meter provision.                                                                                                                                                |
| United Utilities                      | Co Supplier        | Not clear in company documents but requirement is for SLPs to purchase Diehl AMR meters themselves.                                                                                                                                                                 |
| Wessex                                | Contestable        | In DCS Section 14 – Metering requirements<br>“Meter Type to be: ELSTER V210P”                                                                                                                                                                                       |
| Yorkshire                             | Co Supplier        | In DCS 14.1.4 “all meters fitted must be sourced from Itron Metering Services (so that they meet YW specifications)”.<br>From charging “SLPs are responsible for purchasing their own meters to the appropriate specification. (Or meters can be obtained from us). |

From preparing the above table it is apparent that meter provision policies are far from clear in company documentation. This is partly because there are many places where metering arrangements can be specified so companies are not seeing the Adoption Code requirement to be sufficiently transparent to provide Customers with sufficient certainty as to what they can expect at each step in the process.

This would be addressed if the requested change to have meter provision policy stated in company Annual Contestability Statements.

#### Scale of the Issue

In addition to the widespread lack of clarity on company policies (highlighted above) SLPs have reported great difficulty in getting sufficient meters to keep their works on programme from:

Affinity Water  
South East Water  
Thames Water

Although historic supply issues, mainly caused through manufacturer supply shortcomings to companies, have now, largely, worked through, SLPs do not feel that it is reasonable to carry the risk of finding themselves in the same position, i.e. whereby their delivery of works is compromised by water company failures to provide adequate meters. Hence those impacted view it as important that the Water Adoption Procedures are changed to give them adequate safeguards. Hence the changes being proposed.

#### Issues Prompting Change Request

The change proposal to the Water Adoption Panel is aimed at:-

- a) Bringing clarity (to the currently confused way) as to how companies specify their meter provision policy. (Those companies who have had to be contacted to compile the above information have all indicated that their own documents are far from clear); and,
- b) Make companies who make meter provision 'non-contestable' responsible for the consequences when they fail to provide SLPs with meters and thereby SLPs cannot satisfy the requirement on them to "maintain an adequate stock of meters" and find their works adversely impacted by supply matters that are outside their control.

#### Prepared By

This submission has been prepared by:-

Martyn Speight,  
Fair Water Connections Managing Coordinator.

Please contact Martyn should any further information or clarification to the above comments be thought required.

Martyn can be contacted:-

via email on [martyn.speight@fwconnections.org](mailto:martyn.speight@fwconnections.org)  
by phone on 07889187717