

south east water

# Board Assurance Statement

For wholesale charges 2019/20

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## Board Assurance Statement

As Directors of South East Water we recognise that it is our responsibility to provide strategic leadership, and to promote good corporate governance within a framework of effective controls, enabling compliance with our obligations and the management of risks.

In order to assess bill stability we have calculated the changes in bills between 2018/19 and 2019/20 over a wide range of bill types and confirmed all increases are below 5%. To achieve this, the Board has chosen to defer part of the revenue allowance.

When introducing new non-household assessed charges last year, we recognised that in certain cases, the revised assessment of consumption applying the new methodology may result in increases in charges to non-household customers for particular premises. Some of these increases could be in excess of 5% when compared with end-user bills based on the previous method of assessing consumption. We designed and consulted on handling strategies to be applied in such cases and which are set out in our statements of significant changes published last year and also in our wholesale tariff document for 2019/20. We will continue to apply these handling strategies including in cases where the new assessed charge is first applied on or after 1 April 2019.

In setting our charges we have engaged with the Consumer Council for Water to ensure that they have been able to fully comment on our charges and charges schedule.

In this statement, we describe the systems of internal control we operate to ensure that we comply with our statutory, regulatory and licence obligations relating to our charges and our charges documents.

In setting our charges we ensure that they comply with the price controls determined by Ofwat and their wholesale charging rules, that our charges are defined following consistent principles and methodologies, and that no undue preference is shown to, and that there is no undue discrimination against, any class of customers or potential customers or water supply licensees.

We have relied on comprehensive and transparent controls and assurance mechanisms which set out clear accountability for setting our charges. The data and assumptions used, our charging models and our control processes themselves have been thoroughly reviewed by external financial auditors and our independent assurance partner.

This enables us to have a high degree of confidence in the information presented in this statement and supporting data on which the declarations of compliance set out at the end of this statement are based.

This statement should be read in conjunction with our statement of significant change and the board assurance statement made pursuant to Ofwat's charges scheme rules.

## Our internal controls and Board oversight

### Board oversight

We have established a strong governance and management framework ensuring statutory requirements are met and that the data we publish is robust and of a high quality.

A specific governance and assurance process was put in place by the Board for the preparation of our charges supplementing the well-established systems of internal control already in place followed for all regulatory submissions and customer focused publications.

This process incorporated oversight by the Board, review and approval by Senior Management and the Executive Directors.

The Board, in September 2018, considered the overall approach for setting charges for 2019/20 (for both wholesale and retail charges) compared to the process adopted in 2018/19.

The Board also approved the company's indicative wholesale charges and these were published on 11 October 2018. These charges and the associated Board assurance statement can be found using the following link:

<https://wholesale.southeastwater.co.uk/our-network/our-charges>

In December 2018 the Board approved the wholesale (and end user) charges subject to finalisation using the relevant RPI and the final approach for producing wholesale (and end user) final charges for 2019/20, including the external assurance to be undertaken. In doing so the Board had regard in particular to the wholesale charging rules (as subsequently confirmed by Ofwat on 21 December 2018). It also prescribed that charges and relating documents should take due account of the consultation with the Consumer Council for Water. The Board also considered extensive bill scenarios for a large number of customer groups, encompassing different types of charges (e.g. measured, unmeasured and assessed) and consumption which confirmed that there would not be any increase of 5% or more (other than as set out above in relation to the change of the assessment methodology for assessed charges).

The Chairman of the audit and risk committee and the Executive Directors were jointly authorised to finalise the charges, charges documents and the Board assurance statements subject to strict conditions and in particular that no customer bill would increase by 5% or more or subject to the handling strategies referred to above in the case of the non-household assessed charge.

Further external assurance by Frontier Economics and Deloitte LLP was also carried out on the final charges based on the full year RPI that was published in December.

### Internal control processes

The development of our charges for 2019/20 builds on the approach undertaken in previous years which included involvement in the UKWIR project into charging principles and adoption of best practice principles recommended in this research to develop our charging model, improving quality control, readability and auditability.

The key components of the charging model, namely properties and consumption, have specific owners within South East Water who are responsible for ensuring the data and any forecast are robust and reliable.

These key components are rigorously reviewed through a series of reviews with final approval by Senior Management reporting to an Executive Director.

### Our external assurance

The Board focused on the process followed to prepare and review data, the clarity of the charges documents, and obtained additional information and analysis from the Executive Directors.

In addition to the internal control processes described above, the Board has also obtained certain assurance from our external auditors Deloitte LLP, covering inputs and outputs of the tariff model and from Frontier Economics as outlined below.

Specifically, Frontier Economics were asked to review the tariff model calculations and functionality, and to assess compliance against the determinations and charging rules. They produced a detailed assurance statement, which concluded:

*“Frontier Economics has reviewed the 2019/20 charges scheme model. The review did not identify any issues with the calculations or modelling, and the approach adopted by South East Water in the model remains transparent and reasonable. South East Water has produced final wholesale charges and household retail charges that are compliant with the price control determinations set by Ofwat for 2019/20. Our review of the tariffs across customer types does not identify any specific concerns in relation to the principle of no undue preference or discrimination and the proposed tariff structures do not raise any obvious concerns in relation to the*

*economic principles that underpin competition law. Open Water costs are recovered through non-household wholesale charges, which is in line with Ofwat's requirements. The assessment of bill impacts on different customer types is comprehensive and robust."*

## Our external engagement

### Charges and tariff documents

In developing our wholesale charges and the wholesale charges schedule (and other tariff documents) for 2019/20 we have engaged with the Consumer Council for Water (CCW).

We consulted CCW in the process of drafting our charging proposals and provided our draft wholesale charges as well as our draft charges schedule for 2019/20 to CCW for comments.

Our non-household charges were discussed and CCW recommendations were taken into account in finalising the wholesale charges and charges documents.

CCW wrote to the Company on 7 January 2019 confirming the outcome of our engagement which did not raise any outstanding issue based on ensuring that no bill increase would be exceeding 5%.

Retailers were consulted in respect of wholesale indicative charges which were presented to them at a retailer open day and the presentation was sent to all retailers operating in South East Water's supply area and MOSL and no issues were raised on charging structure or tariffs.

### Bill impact assessment

In order to assess bill stability, and ensure increases do not exceed 5%, we have calculated the changes in charges between 2018/19 and 2019/20. We have assessed the impact of wholesale charges increases on retailers and their end-user customers. For this assessment we reviewed a large number of customer groups, encompassing different types of charges (e.g. measured, unmeasured and assessed) and consumption. To keep all wholesale charges below 5% the Board has chosen to defer part of the revenue allowance from 2019/20.

We have shared this analysis with the Consumer Council for Water.

## Board Statement

For the preparation of this statement we have considered compliance with our statutory, regulatory and licence obligations relating more particularly to setting charges and publishing our wholesale charges.

Our governance and oversight processes, our review of our wholesale charges, of our statement of significant changes and wholesale charges have not identified any material deviation from or non-compliance with these obligations and to the best of the Board’s knowledge after reasonable enquiries the company has complied in all material respects with these obligations and the company is taking appropriate steps to ensure compliance and manage and/or mitigate the relevant risks.

Based on the scope and outcome of the process review detailed in this statement and the engagement with the Customer Council for Water the Board is able to confirm that:

- a) The company complies with its legal obligations relating to the wholesale charges it has published;
- b) The Board has assessed the effects of the new wholesale charges on water supply licensees (as a whole or in groups) who are retailing wholesale services and on customers occupying eligible premises (as a whole or in groups), and approves the impact assessments and handling strategies developed in instances where bill increases for licensees (as a whole or in groups) who are retailing wholesale services and on customers occupying eligible premises (as a whole or in group) exceed 5%;
- c) The company has appropriate systems and processes in place (including up-to-date models and data) to make sure that the information published about its wholesale charges is accurate;
- d) The company has consulted with relevant stakeholders in a timely and effective manner on its wholesale charges; and
- e) The final wholesale charges published are not significantly different from the indicative wholesale charges published for the same period.

Signed on behalf of the Board by:



Chris Girling  
Chair of the Audit Committee



Paul Butler  
Managing Director



Andrew Farmer  
Finance Director



David Hinton  
Asset and Regulation Director

## Contact Us

South East Water  
Rocfort Road  
Snodland  
Kent  
ME6 5AH

[southeastwater.co.uk](http://southeastwater.co.uk)

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