

Response ID ANON-XXU5-KJZE-E

Submitted to Independent Water Commission – Call for Evidence
Submitted on 2025-03-04 13:21:02

About you

1 Would you like your response to be confidential?

No

2 If you answered yes, which information would you like to keep confidential and why?

Please explain here:

3 Do you consent to being contacted by the Independent Water Commission about your response?

Yes

4 If you consented above, please provide your full name.

Name:
Helen Dewdney

5 If you consented above, please provide your email address.

Email:
helen@thecomplainingcow.co.uk

6 In what capacity are you completing this Call for Evidence?

Other

7 What is the name of the organisation or interested group that you are responding on behalf of?

Organisation:
The Complaining Cow (consumer champion)

8 Where do you live?

England

Water System Outcomes Top Priorities

10 Thinking ahead to what you would like the water system to look like in the future (e.g., in 25 years time), what outcomes from the water system are most important to you? (Please select your first priority here)

Not Answered

If you selected other, please specify below:

Nationalise before more money is wasted. Since privatisation in '89 more than 85 billion pounds was paid in dividends to shareholders
<https://www.bbc.co.uk/news/articles/cw4478wnjdpo> The Gov. says that it will cost too much to nationalise but the public needs to see the breakdown of costs.

Shareholders have been allowed to pollute our waterways and be paid millions in bonuses whilst the public can't swim in public spaces. If water is to continue to be privately owned then board members must be held personally accountable and face prison time for breaches of strict targets and guidelines.

Water System Outcomes: Second Priority

10b Thinking ahead to what you would like the water system to look like in the future (e.g., in 25 years time), what outcomes from the water system are most important to you? (Please select your second priority here)

Limiting increases to water bills

If you selected other, please specify below. Where possible, please describe the extent to which this already being done.:

It is ridiculous to request priority when people hold them of equal importance. None of these suggestions should be stand alone.

Second Priority: Limiting Increases to Water Bills

11r To what extent do you believe the overall water framework already delivers your chosen outcome: limiting increases to water bills?

Not at all

Water System Outcomes: Third Priority

10c Thinking ahead to what you would like the water system to look like in the future (e.g., in 25 years time), what outcomes from the water system are most important to you? (Please select your third priority here)

Improved water environment (e.g. healthy habitats for aquatic plants and animals)

If you selected other, please specify below:

These should not be in isolation.

Third Priority: Improved Water Environment

11u To what extent do you believe the overall water framework already delivers your chosen outcome: an improved water environment (e.g. healthy habitats for aquatic plants and animals)?

Very little

Management of Water

12 Who do you believe should be responsible for making decisions about what outcomes to prioritise from the water system?

This is not intended to be an exhaustive list. Apart from the above, please think about other bodies you consider to be relevant. :

The water system should be nationalised and therefore should be overseen by government.

13 Do you believe there should be changes to roles and responsibilities for water management across local, regional and national levels?

Changes are needed

If you selected changes are needed, please explain below. Consider how you believe roles and responsibilities should be better organised across local, regional, and national levels, including who you believe should be the lead authority at each level and why. :

A new body. Ofwat has shown itself to not be fit for purpose allowing the water companies to get away with breaching rules and allowing bills to rise due to incompetency and greed. Needs to be a body that is quick to act and quick to fine and quick to prosecute.

14 Do you believe changes are needed to help reduce the siloed approach to water management across different sectors? If so, what changes do you believe would be beneficial? (Please select up to 5 options)

Government providing clearer national strategic direction and targets on water, Streamlining or aligning existing water plans and planning processes across the water system, Pooling together existing funding streams at a spatial level***, Changes to how regulators regulate sectors involved in the water system (e.g. through monitoring, advice, enforcement, etc.)

If you selected other, please specify below:

15 Do you believe there are barriers to money being spent more effectively and efficiently across different sectors to deliver the best outcomes for the water system? If so, what do you believe are the key barriers? (Please select up to 3 options)

Unclear targets and objectives, The monitoring and classification system (e.g. how the quality of water bodies is assessed), Other

If you selected other, please specify below:

Greed

16 In your opinion, is it more important that regional water system governance aligns with hydrological or local government boundaries?

Don't know

Management of the Water Environment

17 Do you believe changes are needed to the WFD Regulations, including for 2027 onwards? If so, which areas would benefit the most from change? (Please select all that apply)

Don't know

18 If you feel the WFD Regulations would benefit from change, please expand on where you feel changes are necessary and the reasons why.

Please expand below:

Measuring and Assessing the Water Environment

19 Do you believe changes are needed to improve how we monitor and report on the health of the water environment? If so, what changes do you believe could lead to improvements? (Please select all that apply)

Reporting on wider outcomes than ecological status (e.g. public health)

If you selected other, please specify below:

Once nationalised it should be centrally monitored

Strategic Direction for the Water Industry

20 What role do you believe the government can play in providing strategic direction for the water industry?

By 'strategic direction' we mean, for example: the Strategic Policy Statement / the Strategic Priorities and Objectives Statement; Government targets (e.g. in the Environment Act 2021 and the Plan for Water in England only); the Price Review Forum (Wales only). This is not an exhaustive list. Please answer below. :

Introduce legislation swiftly to nationalise water.

21 What changes, if any, should be made to how the government provides strategic direction for the water industry?

Changes are needed

If you selected that changes are needed, please describe what changes you feel are needed and why.:

As above

22 Do you believe there are barriers to effective long-term water industry planning? If so, what factors do you believe are preventing effective long-term water industry planning? (Please select all that apply)

Limited clear guidance from UK and Welsh Governments on priorities and how to manage trade-offs, Regulators are not adequately supporting effective planning (e.g. through guidance, scrutiny)

If you selected other, please specify below:

Shareholders greed and ability to "get away" with not meeting targets mean there is no incentive to do so.

23 What changes, if any, would help water companies to use planning frameworks more effectively to fulfil their duties and deliver their functions?

Please answer and explain below:

Regulators need to fine and take legal action where duties are not fulfilled.

The Regulators

24 How would you rate the performance of the water regulatory framework?

Performing very poorly

25 To what extent do water regulators coordinate effectively in the regulation of the water industry?

Not at all

26 What changes, if any, do you consider are needed to the framework of water regulators to improve the regulation of the water industry? Please consider both potential benefits and costs of any proposed changes.

Please answer and explain below, providing supporting examples or evidence, where possible:

Nationalise water.

If not done then see answers above

27 To what extent do you think the water industry regulators have the capacity, capabilities and skills required to effectively perform their roles?

Please provide information to support your views on the capacity and capability of regulators, including, where possible, supporting evidence and examples :

Poor. Continued failure of water companies, financial difficulties, pollution the rise in bills are due largely to poor regulation.

Economic Regulation

28 To what extent do you think the economic regulatory framework is delivering positive outcomes?

Not at all

29 How do you think the Price Review process should balance the need to keep customer bills low with the need for infrastructure resilience? (Infrastructure resilience is the ability of an organisation's infrastructure, and the skills to run that infrastructure, to avoid, cope with, and recover from disruption in its performance)

Please answer and explain below, providing supporting examples or evidence, where possible:

Nationalisation. The Price Review process has failed thus far. Bills are high and there is infrastructure resilience is failing. Quite simply the money is not going where it should do and therefore the process is failing.

30 What, if any, changes could be made to the Price Review process to better enable the water industry to deliver positive outcomes?

Please answer and explain below, providing supporting examples or evidence, where possible:

See above answers

31 What, if any, changes could be made to the Price Review process on assessing and setting base expenditure to effectively support infrastructure maintenance?

Please answer and explain below, providing supporting examples or evidence, where possible:

See above

32 What, if any, changes could be made to the Price Review process on assessing and setting enhancement expenditure to effectively support infrastructure improvements?

Please answer and explain below, providing supporting examples or evidence, where possible.:

See above

33 What, if any, changes could be made to the Price Review Process on assessing and setting the Weighted Average Cost of Capital (WACC) to effectively attract investment in the water industry?

Please answer and explain below, providing supporting examples or evidence, where possible.:

See above

34 What, if any, changes could be made to the Price Review process on assessing and setting performance incentives to effectively secure infrastructure delivery? This could be across Outcome Delivery Incentives (ODIs) to effectively deliver for customers, the environment and public health; and/or across Price Control Deliverables (PCDs), for example

Please answer and explain below, providing supporting examples or evidence, where possible.:

See above

Customer Bills

35 To what extent does the economic regulatory framework deliver acceptable water bills for customers?

Not at all

36 What, if any, changes would help ensure customers are paying fairly for the water they use? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalisation standardising prices across the country

Customer Protections

37 To what extent does the regulatory framework protect customers from poor service?

Not at all

38 To what extent does the regulatory framework ensure that vulnerable customers are effectively supported?

Not at all

39 What, if any, changes to the regulatory framework would better incentivise water companies to deliver and maintain high customer standards? (Please select all that apply)

Greater accountability for water companies' handling of complaints, Other (please specify)

If you selected other, please specify below:

Nationalise water. Privatisation has been proven not to work

40 What, if any, changes to the regulatory framework would improve support for customers in vulnerable circumstances? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalise

Financial Resilience

41 To what extent is change required to the economic regulatory framework to support water companies' financial resilience?

To a great extent

42 Which of the following changes to the economic regulatory framework, if any, would improve outcomes for the water industry? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalise

43 Do you think there is evidence on the historical relationship between debt, dividends, and expenditure at water companies that the commission should be looking at?

Please answer and explain below, providing supporting examples and evidence, where possible.:

<https://www.bbc.co.uk/news/articles/cw4478wnjdpo>

<https://edm.parliament.uk/early-day-motion/62338/public-ownership-of-water>

See above for previous article on 85 billion in profits whilst consumers go into debt.

Investment

44 To what extent does the economic regulatory framework support or hinder investment into the sector?

Don't know

45 How do financial returns in the water sector compare to other similar sectors (for example, energy)?

Please answer and explain below, providing supporting examples or evidence, where possible.:

Water is an essential part of life in order for humans to survive. No-one should be making a profit from that. It's immoral and unethical. It is not necessary to compare to other sectors which also have their own flaws so it is an irrelevant question.

46 What options, if any, would incentivise investment in the water sector?

Please answer and explain below, providing supporting examples or evidence, where possible.:

Nationalise. There shouldn't be a need to incentivise into a public service.

47 How does the public and political portrayal of water companies in the media and elsewhere affect the attractiveness of the water sector to investors?

Negatively affects the attractiveness of the water sector to investors

If you selected other, please specify below:

Competition

48 To what extent should further competition in the water industry be encouraged through regulation?

Please answer below and provide evidence and examples, where possible:

There is no competition currently. "Further" is a ridiculous statement because there is no competition and no choice for consumers. A consumer can't choose a better and cheaper water company. Nationalisation will bring that fairness to consumers.

If looking at competition between companies to hold a contract there has been little to no competition because it has been the same companies providing water.

49 Which of the following schemes, if any, have failed to provide effective levels of competition and efficiency? (Please select all that apply)

Don't know

50 Which of the following changes to competition schemes, if any, would improve outcomes for the sector? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalise

51 To what extent would greater market tendering of infrastructure delivery projects improve outcomes?

Please answer and explain below, providing evidence and examples, where possible:

Worse as it will all be about profits. Nationalise to provide best outcomes.

Water Industry Public Policy Outcomes

52 Do you believe that legal and/or regulatory requirements would benefit from review or consolidation?

Please answer and explain below, providing evidence and examples, where possible:

Essential as above

Protecting the Environment

53 Do you believe that the system of environmental regulation, monitoring and enforcement is ensuring water company compliance with environmental standards?

Not at all

54 Which of the following changes to water industry environmental regulatory requirements, if any, would improve outcomes from the sector? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalisation as above

55 Which of the following changes to the water industry environmental regulation, monitoring and enforcement framework, if any, would improve outcomes for the sector? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalisation

Delivering Clean Drinking Water

56 What changes, if any, could be made to the drinking water regulatory system to maintain world leading drinking water quality? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalisation

Securing Resilient Water Supply

57 To what extent is the overall water regulatory framework securing resilient long-term supplies of water?

Very little

58 What changes, if any, could be made to the overall water regulatory framework to ensure it can secure a resilient long-term supply of water? (Please select all that apply)

If you selected other, or want to provide additional views, please specify below:

Nationalisation

Infrastructure and Supply Chain Resilience and Security

59 To what extent does the overall water regulatory framework support or hinder infrastructure resilience? When considering your answer, please think about future pressures including factors such as climate change and population growth.

Significantly hinders infrastructure resilience

60 To what extent does the overall water regulatory framework support or hinder infrastructure security? When considering your answers, please think about evolving security threats such as cyber security.

Significantly hinders infrastructure security

61 To what extent does the overall water regulatory framework support or hinder effective management of supply chain risks? When considering your answers, please think about disruption in and constraints from supply chains.

Significantly hinders effective management

62 What changes, if any, could be made to the overall water regulatory framework to better support infrastructure resilience? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalise

63 What changes, if any, could be made to the overall water regulatory framework to better support infrastructure security? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalisation

64 What changes, if any, could be made to the overall water regulatory framework to better manage risks from supply chains? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalisation

Innovation and technology

65 To what extent does the overall water regulatory framework currently support or hinder innovation?

Significantly hinders innovation

66 Which of the following changes in the sector, if any, would enable innovation outcomes? (Please select all that apply)

Other (please specify)

If you selected other, please specify below:

Nationalisation

67 What opportunities, if any, do new technologies present for companies and the regulators?

Please answer and explain below, providing evidence and examples, where possible. :

Ownership

68 What impact, if any, has consolidation of water companies had on their performance?

Please answer and explain below:

Terrible. There is nothing positive to say about the water companies. There is nothing positive to say about how they have been regulated.

As a consumer champion I am regularly told by consumers that they want water companies nationalised.

69 What impact, if any, does whether or not a water company is listed on the stock exchange have on their performance?

Please answer and explain below:

70 What impact, if any, do complex company structures like Whole Business Securitisation have on water company performance?

Please answer and explain below:

71 What impact, if any, does the type of investor (for example, private equity firms, pension funds) have on water company performance?

Please answer and explain below:

Poor - it's all about profits and not what is best for consumers.

Ownership (for Wales only)

72 How effective has Dŵr Cymru Welsh Water's not-for-profit model been in driving improved outcomes?

Please explain below:

73 What are the risks associated with Dŵr Cymru Welsh Water's not-for-profit model?

Please explain below: