WSX-M03 – Guide to reading representations

Response to
Ofwat's PR24 draft
determination



## **Guide to reading representations**

This guide sets out the documents that form our response to Ofwat's PR24 draft determination.

Our response consists of 8 main documents that together summarise the key aspects of our response. These are underpinned by a series of representations (grouped by theme), data tables, models, commentary, and assurance.

The full list of documents is given below, along with a link to the web version of each document.

Each document has a reference number to assist readers.

| Main documents |   |
|----------------|---|
| WSX-M01        | Cover letter  |
| WSX-M02        | Summary of WSX response to Ofwat's PR24 Draft Determination |
| WSX-M03        | Guide to reading representations                            |
| WSX-M04        | Company representation proforma                             |
| WSX-M05        | Quality and ambition assessment                             |
| WSX-M06        | Long-term delivery strategy                                 |
| WSX-M07        | Uncertainty mechanism                                       |
| WSX-M08        | Briefing document for company representation meeting        |

| Assurance of response |                           |
|-----------------------|---------------------------|
| <u>WSX-A01</u>        | Board assurance statement |
| <u>WSX-A02</u>        | Assurance reports         |

| Cost assess    | Cost assessment representations                       |  |
|----------------|---|--|
| WSX-C01        | Step up in capital maintenance and base costs         |  |
| WSX-C02        | Enhancement costs                                     |  |
| <u>WSX-C03</u> | Overall approach to costing                           |  |
| <u>WSX-C04</u> | Retrospective nature of draft determination           |  |
| WSX-C05        | Enhancement costs - water quality improvements        |  |
| WSX-C06        | Enhancement costs - Strategic Resource Options (SROs) |  |

| Cost assess        | Cost assessment representations                           |  |
|--------------------|---|--|
| WSX-C07            | Enhancement costs - leakage and smart metering            |  |
| WSX-C08            | Enhancement costs - supply schemes                        |  |
| <u>WSX-C09</u>     | Enhancement costs - wastewater treatment                  |  |
| <u>WSX-C10</u>     | Enhancement costs - Water Recycling Centre (WRC) growth   |  |
| <u>WSX-C11</u>     | Enhancement costs - storm overflows                       |  |
| <u>WSX-C12</u>     | Enhancement costs - pollutions                            |  |
| <u>WSX-C13</u>     | Enhancement costs - resilience                            |  |
| <u>WSX-C14</u>     | Enhancement costs - greenhouse gas emissions              |  |
| <u>WSX-C15</u>     | Enhancement costs - water investigations                  |  |
| WSX-C16            | Enhancement costs - wastewater investigations             |  |
| WSX-C17            | Enhancement costs - biodiversity and conservation         |  |
| WSX-C18            | Bioresources and the Industrial Emissions Directive (IED) |  |
| WSX-C19            | Retail costs  |  |
| WSX-C20            | Cost adjustment claims                                    |  |
| WSX-C21            | Real price effects  |  |
| WSX-C22            | Frontier shift  |  |
| WSX-C23            | Business rates  |  |
| WSX-C23 - appendix | Business rates model                                      |  |

| Risk and ret      | Risk and return representations          |  |
|-------------------|--|--|
| WSX-R01           | Risk and return                          |  |
| WSX-R02           | RoRE modelling                           |  |
| WSX-R03           | Ofwat's proposed gearing cap             |  |
| WSX-R04           | Consultation on equity listing mechanism |  |
| WSX-R05           | Financeability and financial resilience  |  |
| WSX-R06           | Affordability                            |  |
| WSX-06 - appendix | Table SUP15                              |  |

| Risk and return representations |                        |
|---------------------------------|------------------------|
| WSX-R07                         | Cost recovery plan     |
| WSX-07 - appendix               | RCV run-off rate model |

| Outcomes representations |   |
|--------------------------|---|
| WSX-001                  | Performance and outcomes                  |
| WSX-002                  | Price control deliverables                |
| WSX-003                  | Measures of experience                    |
| WSX-004                  | Ofwat's reporting and assurance proposals |

| Data tables a  | Data tables and commentaries                                  |  |
|----------------|---|--|
| WSX-D00a       | August 2024 data tables                                       |  |
| WSXD00b        | ADD1-21 data tables   |  |
| WSXD00c        | ADD24 data table  |  |
| WSX-D01        | Commentary on data table changes - Outcomes                   |  |
| WSX-D02        | Commentary on data table changes - Risk and return            |  |
| WSX-D03        | Commentary on data table changes - Costs wholesale water      |  |
| WSX-D04        | Commentary on data table changes - Costs wholesale wastewater |  |
| WSX-D05        | Commentary on data table changes - Water resources            |  |
| WSX-D06        | Commentary on data table changes - Bioresources               |  |
| WSX-D07        | Commentary on data table changes - Retail                     |  |
| WSX-D08        | Commentary on data table changes - Developer services         |  |
| WSX-D09        | Commentary on data table changes - Long-term strategies       |  |
| <u>WSX-D10</u> | Commentary on data table changes - Supplementary tables       |  |
| <u>WSX-D11</u> | Commentary on data table changes - Summary tables             |  |
| WSX-D12        | Commentary on data table changes - Past delivery              |  |
| WSX-D13        | Data tables commentary - Additional tables                    |  |
| WSX-D14        | Data tables summary - company response                        |  |

| Technical m    | Technical models   |  |
|----------------|--|--|
| WSX-T01        | Financial model – Draft Determination response                             |  |
| WSX-T02        | Revenue reconciliation model   |  |
| WSX-T03        | RCV reconciliation model   |  |
| WSX-T04        | Revenue forecasting incentive model  |  |
| <u>WSX-T05</u> | 2023-24 ODI performance model for use in the PR24 business plans           |  |
| <u>WSX-T06</u> | 2024-25 ODI performance model for use in the PR24 business plans           |  |
| WSX-T07        | Residential retail reconciliation model                                    |  |
| WSX-T08        | Developer services model   |  |
| <u>WSX-T09</u> | Water industry national environment programme (WINEP) reconciliation model |  |
| WSX-T10        | Cost of new debt reconciliation model                                      |  |
| <u>WSX-T11</u> | Cost reconciliation model  |  |
| WSX-T12        | Tax reconciliation model   |  |
| WSX-T13        | Land sales model   |  |
| WSX-T14        | RPI-CPIH Wedge True Up model   |  |
| <u>WSX-T15</u> | Strategic regional water resources reconciliation model                    |  |
| <u>WSX-T16</u> | Bioresources reconciliation model  |  |