WSX-C06 –
Enhancement costs
– Strategic
Resource Options
(SROs)

Response to
Ofwat's PR24 draft
determination



Representation reference: WSX – C06

Representation title: Enhancement costs – Strategic Resource Options (SROs)

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1. Summary

This document comprises a joint response to the draft determination issued by Ofwat on 11 July 2024 on behalf of Wessex Water (WSX) and South West Water (SWB) for the three strategic resource options (SROs) in the West Country. It sets out the changes required at both scheme level and company level.

There are three SROs in the West Country:

- Poole water recycling and transfer
- Cheddar 2 source and transfer
- Mendip quarries.

We are pleased that Ofwat have continued to provide ring fenced funding for the development of the SROs. In summary Ofwat's draft determination comprises £114.64m of development funding for the three SROs plus £29.72m of contingent funding, giving a total of £144.36m – as set out in Table 8 of Ofwat's supporting document *PR24 Draft determination Major projects development and delivery*. In addition, an allowance has been made for SRO modelling of £0.53m for WSX only.

We are requesting additional funding to address changes over the past year and in response to the draft determination and discussions with RAPID. The principal changes relate to:

- Development cost increases due to changes in timing of gate three, carry-over from previous gates and revised scope of the projects Table 1 below.
- Contingent cost increases due to land acquisition costs for Cheddar Table 2 below.

Table 1 - Summary of changes requested to development allowances (including DPC funding)

SRO	Ofwat DD £m ¹	Increase requested £m	Revised development allowance £m	Reason
Poole water recycling and transfer	23.24	3.18	26.42	Delayed gate three date will now be in AMP8 plus increased cost due to revised scope
Cheddar 2 source and transfer	52.73	5.25	57.98	Delayed gate three date will now be in AMP8 plus increased cost due to revised scope
Mendip quarries	38.68	3.80	42.48	Carry over of gate two underspend
Total	114.64	12.24	126.88	
SRO Modelling	0.53	1.50	2.03	Funding was only allocated to WSX. Additional funding is required for SWB's share of the work

Notes:

^{1.} Includes an uplift by Ofwat to SWB's business plan of £9.06m to ensure consistency with WSX.

Table 2 – Summary of changes requested to contingent allowances for Cheddar

SRO	Ofwat DD £m	Increase requested £m	Revised contingent allowance £m	Reason
Poole water recycling and transfer	5.11	0	5.11	No change
Cheddar 2 source and transfer	18.71	5.00	23.71	Increased land costs due to additional infrastructure (service reservoirs etc.) and additional flood compensation area
Mendip quarries	5.90	0	5.90	No change
Total	29.72	5.00	34.72	

The share of the costs of each scheme by company are unchanged from gate 2 and the draft determination. Tables 3 & 4 below presents the revised overall position by company. A detailed breakdown is given in the body of the response.

Table 3 – Summary of overall position by company

SRO	Company	Revised development allowance £m ¹	Revised contingent funding £m	Total
Total for all three SROs	WSX	56.64	15.04	71.68
	SWB	70.25	19.68	89.92
	Sub Total	126.88	34.72	161.60

Notes:

Table 4 – Summary of changes to CW3 tables (Including SRO modelling)

Data table line			Our requested allowance	Further details
CW3.56	WSX	£64.64m	£72.18	Throughout the whole document
CW3.58	WSX	£64.64m	£72.18	Throughout the whole document
CW3.56	SWB	£80.25m	£91.42	Throughout the whole document
CW3.58	SWB	£80.25m	£91.42	Throughout the whole document

We also have some comments on the changes in delivery incentives that are set out in Ofwat's supporting document *PR24 Draft determination Major projects development and delivery*.

We are committed to developing the SROs such that they are ready to put into operation when required. All the evidence collected during the preparation of the revised Regional water resources plan for the West Country points towards the need for additional water resources in the future in order to ensure that our customers have a drought resilient supply and to protect and enhance the environment through reduced abstraction from sensitive

^{1.} Excluding SRO modelling

catchments. The drivers of environmental destination and protection of chalk streams are the most pressing requirement, indicating the need for the SROs to be in service as soon as possible.

Thus we believe that it is in the best interests of customers and the environment that the additional funding is provided at PR24. Not providing the funding risks delay in delivery which is counter to the overall purpose of the strategic resource option development programme. The delivery incentives and the trust established through our joint working with RAPID provide safeguards against inefficient expenditure.

2. Ofwat's approach to setting allowances

In Ofwat's draft determination all three SROs have been funded with some adjustments as follows:

- SWB's contribution was adjusted upwards by £9.06m to ensure consistency with WSX.
- The allowances for running a DPC procurement process have been substantially increased.
- Some of the funding has been allocated as "contingent funding" which is for post planning consent / preconstruction cost, primarily for land acquisition.

A summary of the draft determination is shown in Table 5 below.

Table 5 – Summary of Ofwat's draft determination

SRO	Development allowance / Baseline funding £m 1	Contingent funding £m	Total £m	Comment
Poole water recycling and transfer	23.24	5.11	28.35	
Cheddar 2 source and transfer	52.73	18.71	71.44	
Mendip quarries	38.68	5.90	44.58	
Total	114.64	29.72	144.36	
SRO Modelling	0.53		0.53	WSX only

Notes:

3. Required adjustment to cost allowance

We request that Ofwat adjusts the cost allowances due the following aspects:

- Changes in timing of gate three and carry over from previous gates
- Development of the scope of the projects
- Land acquisition costs
- SRO modelling.

Further details are provided in the following sections. We also provide a summary of the changes by SRO and by company.

^{1.} Includes an uplift by Ofwat to SWB's business plan of £9.06m to ensure consistency with WSX.

4. Rationale

4.1. Changes in timing of gate three and carry over from previous gates

All three SROs have successfully passed through gates one and two and are now progressing towards gate three. The table below summarises the gate submission dates and the dates of the decisions from RAPID that allow us to proceed to the next gate. The gate submissions and RAPID decision documents for each gate are all published on RAPID's website: the-rapid-gated-process. Table 6 summarises the dates of our submissions and decisions from RAPID:

Table 6 - Gate submissions and RAPID decisions

	Gate one		Gate	Gate three	
SRO	Submission	Final decision from RAPID	Submission	Final decision from RAPID	Proposed submission
Poole water recycling and transfer (formerly West Country South sources & transfers)	July 2021	Dec 2021	Nov 2022	July 2023	Originally proposed Mar 2025 but delayed - see below
Cheddar 2 source and transfer (formerly West Country North sources & transfers)	Sept 2020	Jan 2021	Nov 2022	July 2023	Originally proposed Mar 2025 but delayed - see below
Mendip quarries	Dec 2021	May 2022	July 2023	Feb 2024	June 2028

West Country - Southern Water transfer SRO ceased at gate one and was merged with Poole water recycling and transfer SRO.

In the final decision for the Cheddar SRO RAPID inserted a conditional review hold point at which point they required the project sponsors to provide evidence of the need for the scheme, which it hadn't been possible to provide in the gate two submission. This evidence of need will be provided by SWB's Water resources management plan (WRMP24). However there have been delays in the release of SWB's WRMP24 due to revisions arising from a review of the impact of the drought in Cornwall in summer 2022 and two rounds of consultation on the draft WRMP. At the time of writing SWB's revised final WRMP24 has been submitted to Defra seeking approval to publish as a final plan, which is awaited.

As noted in the table above originally it was proposed that the gate three submission for Cheddar would be in early 2025 i.e. in AMP7. However due to the delays in the date of the conditional review for Cheddar it was agreed with RAPID that the gate three date would be decided at the conditional review. These changes mean that the Gate three submission for Cheddar will be in AMP8 and funding is required for the work.

Furthermore it was agreed with RAPID the Poole and Cheddar submissions will be at the same time in order to streamline as much as possible the submission dates across the portfolio. Therefore the Gate three submission for Poole will be in AMP8 and funding is required for the work.

There are currently no changes to the gate three submission dates for the Mendip quarries SRO. However the gate two work substantially underspent its allowance and in line with RAPID's guidance we are requesting that the underspend from gate two is carried over to gate three in AMP8.

These changes are set out in Table 7 below.

Table 7 – Adjustments to development allowances due to changes in timing of gate three and carry over from previous gates

SRO	Additional gate three allowance £m	Reason
Poole water recycling and transfer	2.91	Delayed gate three date will now be in AMP8
Cheddar 2 source and transfer	2.85	Delayed gate three date will now be in AMP8
Mendip quarries	3.80	Carry over of gate two underspend
Total	9.56	

4.2. Revisions to the scope of the projects

As is to be expected the scope of the projects has continued to be developed and refined after gate two. The main developments relate to the Cheddar and Poole SROs as described below.

4.2.1. Cheddar 2 source and transfer

The gate two submission concentrated on an in-region option to transfer the water to Wessex Water, as an option to be assessed in Wessex Water's WRMP decision making. However the scheme was not selected in Wessex Water's draft WRMP. The gate two work was also carried out prior to the drought in South West Water's area during summer 2022.

Subsequently it was identified that the scheme may have a role in providing additional supplies to the Devon area.

In order to meet this need the revised scope of the scheme is as follows:

- Construction of second reservoir at Cheddar (9,000 MI) unchanged from gate two
- Water treatment works
- A transfer to South West Water (SWW) by displacement comprising:
 - o Potable water bulk transfer to Wessex Water in the Taunton area
 - Network reinforcement in Wessex Water's Somerset area
 - o A bulk transfer from Maundown into SWW's Wimbleball water resource zone during droughts.

This proposal provides additional benefits including:

- Additional drought resilience to South West Water's Devon and Cornwall area as identified in their revised draft WRMP (which is awaiting Defra permission to publish)
- Additional resilience benefits to Wessex Water's West Somerset area.

In engineering terms the additional scope, compared with the gate two scope, comprises:

- Approximately 25 km of additional pipelines
- Additional service reservoirs at the reception point in South West Water's area and within Wessex Waters Supply area.
- More complex inter-connecting pipework and infrastructure.

We have assessed the additional technical input (modelling and engineering) required to develop this scope to a gate three standard. We have also scoped the necessary environmental surveys and assessments for the increased scope.

The diagram in Annex 1 illustrates the scheme and the changes.

4.2.2. Poole water recycling and transfer

The gate two scheme was based on a single discharge location to the River Stour just downstream of Corfe Mullen. The water would then be abstracted on a "put and take" basis at Longham for supply to Bournemouth Water, thus enabling a reduction in abstraction from the River Avon which will deliver environmental improvements required by Natural England.

The main change since gate two is the introduction of a second discharge point to the River Stour further upstream near Sturminster Marshall. The benefit of this proposal is that in addition to original benefit accruing to the River Avon it will enhance flows in the River Stour, therefore mitigating the need to cap the abstraction licences for Wessex Water's ground water sources adjacent to the River Stour. In effect the same water will be able to deliver two sets of environmental benefits: to Wessex Water for the River Stour and to South West Water for the River Avon. These benefits only became apparent once river accretion modelling had been done using the approved Wessex basin groundwater model as part of WINEP studies that were following a different timeline to the SROs.

In engineering terms the additional scope, compared with the gate two scope, comprises:

- additional pumping station at the proposed water recycling plan (~ 12 Ml/d)
- additional 6 km of pipeline from the water recycling plan to the new discharge point
- additional outfall with headwall.

We have assessed the additional technical input (route selection, modelling and engineering) required to develop this scope to a gate three standard. We have also scoped the necessary environmental surveys (terrestrial, aquatic, utilities etc.) and assessments for the increased scope, as well as increased consultation and stakeholder engagement.

The diagram in Annex 1 illustrates the scheme and the changes.

These changes are set out in Table 8 below.

Table 8 – Adjustments to development allowances due to revisions of the scope of the projects

SRO	Additional gate three allowance in AMP 8 £m	Reason
Poole water recycling and transfer	0.28	Pipeline to second discharge point on River Stour, which gives rise to increased design and environmental assessment costs
Cheddar 2 source and transfer	2.40	Increased lengths of pipeline and associated infrastructure (service reservoirs etc.) which gives rise to increased design and environmental assessment costs
Mendip quarries	0.00	-
Total	2.68	

Both of these changes were discussed in detail with RAPID at checkpoint meetings in April 2024. We followed up the meeting with an email dated 18 April 2024, and received approval in principle from RAPID by email dated 26 April 2024.

4.3. Land acquisition costs

We are pleased that Ofwat have allocated contingent funding for post consent / pre-construction activities such as finalising land acquisition. Our business plan submission included our best estimate of the cost of land acquisition at the time of business plan preparation. Since then there are some changes in scope for the Cheddar scheme that give rise to additional land acquisition costs, as summarised in Table 9 below. The changes are:

4.3.1. Sites for an additional service reservoirs

As mentioned above the revised scope of works for the Cheddar scheme now includes additional service reservoirs at the reception point in South West water's area and within the Wessex Waters supply area. It will be necessary to purchase additional land for these service reservoirs.

4.3.2. Additional land for flood compensation

As part of the ongoing work for gate three we have reviewed the previous planning application in detail and in particular the proposals for flood compensation that received planning permission in November 2014.

The proposed footprint of the reservoir includes some land within Flood Zones 2 and 3. Therefore, it is necessary to provide compensatory floodplain storage. In the 2014 planning application, this compensatory floodplain storage was provided through a Flood Compensation Nature Area, located to the west of the proposed reservoir. This would provide volumetric storage at a lower level to the level of floodplain storage lost due to the proposed development, but this approach was agreed with and accepted by the EA during the initial planning application.

Updated modelling, ground terrain and Climate Change policy mean that it is likely that the volume of floodplain storage lost through the proposed development is higher than the volume of storage lost as calculated as part of the 2014 application. Furthermore, it is possible that the Environment Agency will now require "level for level" floodplain storage compensation rather than the "volume for volume" compensation.

We anticipate that additional land will be required to discharge these requirements.

At the current time we are content with the contingent allowances for the other two SROs.

Table 9 – Adjustments due to additional land costs

SRO	Additional gate three contingent funding £m	Reason
Poole water recycling and transfer	-	-
Cheddar 2 source and transfer	5.00	Increased land costs due to additional infrastructure (service reservoirs etc.) and additional flood compensation area
Mendip quarries	-	-
Total	5.00	

4.4. SRO modelling

SRO modelling costs were allowed by Ofwat in the draft determination for WSX but not for SWB. To correct this additional funding is required for SWB. Unlike the SROs it has been agreed to split the costs of this work proportional to each companies population.

Table 10 – Revisions to SRO modelling allowances

SRO	Development allowance / £m	Increase	Revised allowance £m	Comment
SRO Modelling	0.53	1.5	2.03	We have no objection to this cost being spread across the SROs if that is easier

5. Summary of changes

5.1. For each SRO by gate and category

Applying the changes requested above to each scheme and by the gates and other cost categories gives the values in Table 11 below.

Table 11 – Summary of each SRO by Gate and category

SRO	Gate Three in AMP8 £m	Gate Four £m	Other Costs £m	Total Baseline costs £m	Contingent funding £m	Total £m
Poole water recycling and transfer	3.18*	14.16	9.08	26.42	5.11	31.53
Cheddar 2 source and transfer	5.25*	14.14	38.58	57.98	23.71	81.69
Mendip quarries	20.14*	22.32	0.02	42.48	5.90	48.38
Total	28.57	50.62	47.68	126.89	34.72	161.6

^{*}We note that costs for DPC stage 2 have been allocated to Gate 4 rather than Gate 3, we propose that this is reprofiled in discussions with RAPID.

5.2. For each SRO by company

The share of the costs of each scheme by company are unchanged from gate 2 and the draft determination.

Using the company share percentages and the requested revised allowances gives a revised overall position by company as shown below.

Table 12 – Revised allowances by company (SRO modelling not included)

SRO	Company	Revised development allowance £m	Revised contingent funding £m	Total
Poole water recycling and transfer	WSX	11.04	2.14	13.18
	SWB	15.38	2.97	18.35
	Sub Total	26.42	5.11	31.53
Cheddar 2 source and transfer	wsx	24.35	9.96	34.31
	SWB	33.63	13.75	47.38
	Sub Total	57.98	23.71	81.69
Mendip quarries	WSX	21.24	2.95	24.19
	SWB	21.24	2.95	24.19
	Sub Total	42.48	5.90	48.38
Totals	WSX	56.64	15.04	71.68
	SWB	70.25	19.68	89.92
	Sub Total	126.88	34.72	161.60

The changes will be reflected in the revised business plan tables submitted as part of our representation:

- SWB business plan to be uplifted by £9.06m as per the adjustment made by Ofwat in the draft determination
- Development allowances and contingent funding to be adjusted as set out above.

Both SWB and WSX will update the CW3 tables to reflect the above changes for the total AMP 8 proposal.

6. Commentary on delivery incentives

We note that Ofwat have proposed some changes to customer protections and performance incentives for the SRO programme.

The customer protections outlined on pages 23 and 24 of Ofwat's supporting document *PR24 Draft determination Major projects development and delivery* are largely a continuation of the arrangements put in place at PR19 and through the current RAPID programme, which we are familiar with and support.

We have some comments on the arrangements for contingent allowances and cost sharing, and on the DPC delivery incentives, as set out below.

6.1. Contingent allowances and cost sharing

We are content with the split between baseline funding and contingent funding set out in the draft determination. As discussed in the draft determination there is uncertainty about the quantum of the post-consent activities such as land acquisition, enabling works, diversions, highway works etc.

We note that the default mechanism will be to log up contingent expenditure once triggered for reconciliation at PR29. In our case land purchase will be subject to receipt of planning permission so the land acquisition costs are likely to fall in 2028/29 or 2029/30. Prior to this there will be costs associated with land purchase option agreements.

Given the substantial sums that may be involved and the cash flow implications for companies, it would be helpful if there was a mechanism to "pre-approve" the log up claims. Proceeding with land acquisition without prior approval of the funding mechanism may run into challenges with companies' own financial rules.

We have concerns about the proposal for 25:25 cost sharing of the contingent funding. Issues include:

- The draft determination states that contingent funding covers post-consent activities such as land
 acquisition, enabling works and interface works (e.g. highways works, service diversion etc), and completing
 the DPC procurement process. Regarding the first three of these activities, whilst ensuring timely and
 efficient management of the tasks is clearly a project team responsibility, the actual cost is largely outside of
 the control of the project sponsor. Once defined the cost can be clearly demonstrated (although commercial
 confidentiality will need to be preserved).
- The cost of completing the DPC process overlaps with the DPC delivery incentives set out in section 3.5
- It is possible that land costs will increase at a higher rate than the CPI-H index that is used for indexing price control allowances
- Uncertainty about the funding treatment of the cost of land acquisition and enabling works may act as a disincentive to concluding the issues prior to AMP9.

We suggest that an alternative approach would be to treat these costs as "pass through" costs at actual cost, subject to a review of their basis and subject to pre-approval of the log up claim.

We welcome the ability to adopt a portfolio approach across the three SROs.

6.2. DPC delivery incentives

The allowances for DPC work are set out in the draft determination model with each stage allocated a percentage of the assessed allowances as follows: stage 1 - 15%, stage 2 - 30%, stage 3 - 45% and stage 4 - 10%. The DPC allowances are set out in Table 13 below.

Table 13 – DPC draft determination allowances

SRO	DPC stages in AMP8	DPC development allowance £m	
Poole water recycling and transfer	2, 3 and 4	9.08	
Cheddar 2 source and transfer	2 and 3	10.21	
Mendip quarries	2 and 3	13.88	
Total		33.17	

Our reading of section 3.5 is that the DPC development costs are to treated as ring fenced for DPC and for each project, although actually there are a sub-set of the development allowances.

We consider that it would be beneficial if a similar approach was adopted to the development incentives including:

- A portfolio approach. In our case with the same partners on all the SROs there are likely to higher costs on the first project to develop aspects such as bulk supply agreements and operating agreements, which can then be re-used on subsequent projects
- Carry over of underspend for one stage to the next.
- There are also a number of issues that could benefit from being developed at an industry level (e.g. system operation).

We note the proposal for a success fee. Clearly this could be a substantial sum of money which would act as a great incentive to conclude signing of the CAP agreement and financial close on time. However it is quite possible that despite the best efforts of the project sponsor the financial climate at the time prevents concluding the agreement on programme.

7. Why the change is in customers' interests

We are committed to developing the SROs such that they are ready to put into operation when required. All the evidence collected during the preparation of the revised Regional water resources plan for the West Country points towards the need for additional water resources in the future in order to ensure that our customers have a drought resilient supply and to protect and enhance the environment. The drivers of environmental destination and protection of chalk streams are the most pressing requirement, indicating the need for the SROs to be in service as soon as possible.

The table below summarises the potential long term benefits from the SROs.

Table 14 - Long term benefits of the SROs to customers and the environment

SRO	More resilient supplies to customers in droughts	Enhanced operational resilience for customers	Enhanced flow in chalk streams, protection of designated sites	Biodiversity net gain, environmental enhancement
Poole water recycling and transfer	✓		√ River Avon & Poole Harbour	✓ incl. wetland
Cheddar 2 source and transfer	√	✓ Transfer thro' Somerset		√
Mendip quarries	√		✓ Rivers Stour and Avon	√

We believe that it is in the best interests of customers and the environment that the additional funding is provided at PR24.

Not providing the funding risks delay in delivery which is counter to the overall purpose of the strategic resource option development programme.

The delivery incentives and the trust established through our joint working with RAPID provide safeguards against inefficient expenditure.

Annex 1 – SRO diagrams

Poole:



2nd Discharge Pt – Key Benefits / Funding

Key Benefits

- Potential 2nd discharge to River Stour, upstream of Sturminster Marshall, increase river flow levels towards the natural flow levels of the river.
- Potential to mitigate need to cap 3x WW groundwater licenses @ Shapwick / Sturminster Marshall & Corfe Mullen.
- · More cost-effective solution to need

Additional Scope

- · New transfer pump station @ WRP
- 6-7km of pipeline @ 450mm Dia ~ 15MI/d
- New headworks @ discharge point
- Additional landowner's consultations
- Additional Environmental Surveys both land and river
- Additional Permit to discharge & DWSP actions relating to 3x WW BH sites
- Impacts on EIA to consider



Cheddar:

(3)

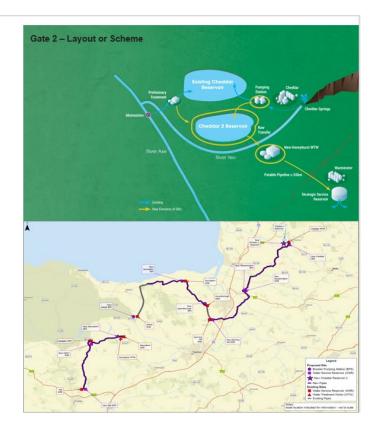
Change of need in SWW WRMP

Need / Benefit

- Need in Wimbaball Supply Zone
- Resilience benefit to WW Maundown WTW

Additional Scope / Funding

- Approximately 25km additional pipeline
- · Increase in Environmental surveys
- · Impact on EIA assessment
- Increased landowners / consultation
- More complex route M5 & River Parrot crossing
- Complex interaction with Somerset Supply Zone
- Additional Service Reservoirs
- Additional booster pumping stations
 - · Associated Land Purchase



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