

Action Tracker

Company: Affinity Water Limited

Actions details				Business plan adjustment									
Test area	Action reference	Action type	Action	Date required	Nature of adjustment	Revised business plan reference	Data table reference	Additional evidence (please elaborate/reference)	Assurance (please elaborate/reference)				
Companies to copy from their actions summary table and detailed actions documents				Summarise how you have						Document name(s), page number(s), paragraph number	App number(s), line description(s), cell reference	Please include where appropriate	Please include where required (see cover) or if it is deemed appropriate
Addressing affordability and vulnerability	AFW.AV.A1	Required	Affinity Water proposed a higher bill than what it tested with customers and it also proposed a different bill profile for the 2020 to 2025 period. The company should provide sufficient and convincing evidence that it has engaged with its customers on affordability and acceptability of its proposed bill profile for the 2020 to 2025 period. Affinity Water should demonstrate that its customers find its proposed bill profile acceptable and affordable. This should include testing of the combined water and wastewater bill. Affinity Water should confirm that testing will be assured by its CCG and conducted in line with social research best practice.	01-Apr-19	Alternative approach	AFW Addressing Affordability and Vulnerability Evidence Document Section 1.1 Pages 3-4 Section 2.1 Pages 5-8	App 4, line 1 (bill profile tested with customers) and supporting commentary WS18, H13 (number of customers engaged around business plan) and supporting commentary	AFW Addressing Affordability and Vulnerability Appendix AV.A1.1 - Verve research report - published 11 March 2019 Appendix AV.A1.2 - South East Water Bill Profile Testing for Comparison AV.A1.3 - Threshold of acceptability research prepared for CCWater AV.A1.4 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 3 AV.A1 & annex B for evidence AFW Addressing Affordability and Vulnerability Evidence Document Section 3.1 Page 18 Section 3.2 Pages 18-19	AFW Addressing Affordability and Vulnerability Appendix: AV.A1.1 - Verve research report - published 11 March 2019 - social research best practice compliance provided within Appendix AV.A1.1, page 3 CCG assurance				
Addressing affordability and vulnerability	AFW.AV.A2	Required	Affinity Water has provided insufficient evidence that it has engaged with customers on bills beyond 2025. For example, although it has provided a long-term view of its forecast bills for the next three asset management plan (AMP) periods to 2040, there is insufficient evidence of engagement with its customers on these long-term bill profiles after the 2020 to 2025 period. Furthermore, there is insufficient evidence of how acceptable customers find the long-term bill profile. The company should undertake customer engagement on long-term bill profiles for the 2025-30 period and provide sufficient evidence to outline customer support for each of the profiles tested. Affinity Water should confirm that testing will be assured by its CCG and conducted in line with social research best practice.	01-Apr-19	Action completed	AFW Addressing Affordability and Vulnerability Evidence Document Section 1.1 Pages 3-4 Section 2.2 Pages 8-10	App 4, line 2 (bill profile tested with customers) and supporting commentary WS18, H13 (number of customers engaged around business plan) and supporting commentary	AFW Addressing Affordability and Vulnerability Appendix: AV.A1.1 - Verve research report - published 11 March 2019 AV.A1.3 - Threshold of acceptability research prepared for CCWater AV.A1.4 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 3 AV.A2 & annex B for evidence	AFW Addressing Affordability and Vulnerability Appendix: AV.A1.1 - Verve research report - published 11 March 2019 - social research best practice compliance provided within Appendix AV.A1.1, page 3 CCG assurance				
Addressing affordability and vulnerability	AFW.AV.A3	Required	Affinity Water has provided insufficient evidence on social tariff cross-subsidy research - little evidence has been provided on what customers were asked, the different levels of cross-subsidy they were presented with, and the levels of support these gathered. The company should undertake customer engagement on different levels of social tariff cross-subsidies and provide sufficient evidence to outline customer support for the same.	01-Apr-19	Action completed	AFW Addressing Affordability and Vulnerability Evidence Document Section 1.1 Pages 3-4 Section 2.3 Pages 11-14	n/a	AFW Addressing Affordability and Vulnerability Appendix: AV.A1.4 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) Section 1 Summary, Section 4 AV.A3 & annex B for evidence AV.A3.1 - Reference of evidence submitted in September submission AV.A3.2 - Ipsos Mori & Arup phase 1 Social Tariff Survey Appendix AV.A3.3 - Ipsos Mori & Arup phase 2 Affinity Business Plan Acceptability Survey Appendix AV.A3.4 - Ipsos Mori & Arup phase 3 Final Acceptability Survey Appendix AV.A3.5 CCG Report September 2018	CCG assurance				
Addressing affordability and vulnerability	AFW.AV.A4	Required	Affinity Water has stated that it will achieve the British Standards Institution (BSI) standard for inclusive services by 2020 but has not provided a Performance Commitment or plan on how it will do so. The company should propose a Performance Commitment on achieving the BSI standard for fair, flexible and inclusive services for all and maintaining it throughout the 2020 to 2025 period.	01-Apr-19	Action completed	AFW Addressing Affordability and Vulnerability Evidence Document Section 1.1 Pages 3-4 Section 2.4 Pages 14-15	App1 - Line 23 (BSI accreditation)	AFW Addressing Affordability and Vulnerability Appendix: AV.A1.4 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) Section 1 Summary, Section 4 AV.A4 & annex B for evidence AV.A3.5 - CCG Report September 2018 AV.A4.1 - Framework for BSI 18477 AFW Delivering Outcomes for Customers Evidence Document Section 2.1 AFW_OC.A1 Pages 5-8	CCG assurance				
Addressing affordability and vulnerability	AFW.AV.A5	Required	Affinity Water has not proposed a performance commitment on Priority Services Register (PSR) growth. It is proposing to increase its PSR reach from 2.5% in 2019/20 to 6.3% of households in 2024/25. We consider this to be an insufficiently ambitious target. In addition, the company has checked no PSR data over the past two years. We propose to introduce a Common Performance Commitment on the Priority Services Register (PSR): The company should include a Performance Commitment which involves increasing its PSR reach to at least 7% of its customer base (measured by households) by 2024/25 and committing to check at least 90% of its PSR data every two years. For further information on the performance commitment definition, and reporting guidelines, please refer to 'Common performance commitment outline for the Priority Service Register ("PSR")', published on the initial assessment of plans webpage	01-Apr-19	Action completed	AFW Addressing Affordability and Vulnerability Evidence Document Section 1.1 Pages 3-4 Section 2.5 Pages 16-17	App 4 - Section B, 23-29 and supporting commentary App1	AFW Addressing Affordability and Vulnerability Appendix: AV.A1.4 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) Section 1 Summary, Section 4 AV.A5 & annex B for evidence AV.A3.5 - CCG Report September 2018 AFW Delivering Outcomes for Customers Evidence Document Section 2.33 AFW_OC.A33 Pages 52-53 AFW Addressing Affordability and Vulnerability Evidence Document Section 3.3 Pages 19-21 Section 3.7 Pages 22-25	CCG assurance				
Delivering outcomes for customers	AFW.OC.A1	Required	Appendix 2 of the PR19 methodology states "Companies must propose bespoke PCs to address their own particular resilience challenges." Therefore, the company should include resilience as part of its overall package of bespoke PCs.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.1 Pages 5-8	Line 10, App1 (Properties experiencing longer or repeated instances of low pressure (non-DG2)) Line 20 App1 (Unplanned interruptions to supply over 12 hours) Line 23 App1 (BSI accreditation) Line 24 App1 (Strategic resource development) Line 25 App1 (Cyber security & resilience) Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.1 - PR19 Resilience & Environmental Bespoke Commitments Working Group Minutes (Nov 17) OC.A1.2 - CCG Update on Bespoke Commitment (13 Dec 17) OC.A1.3 - PR19 SteerCo: Bespoke Commitments Resilience Paper (Feb 18) OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A1.5 - Verve Customer Research Report March 2019 OC.A1.6 - Cyber Security and Resilience PC Definition	Atkins (via Business Plan Data Table audit)				
Delivering outcomes for customers	AFW.OC.A2	Required	The company should consider the selection of further bespoke asset health measures that reflect the unique challenges faced by Affinity Water. This should include but not be limited to the two customer contacts measures from the asset health long list. Where the company proposes additional PCs it should provide evidence to support the selection of these PCs and customer engagement evidence to support any associated outperformance or underperformance payments.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.2 Pages 8-10	Line 5, App 1 (Unplanned outage) Line 6, App 1 (Number of burst mains) Line 18, App1 (Properties experiencing longer or repeated instances of low pressure (DG2)) Line 21 App1 (Customer contacts for discolouration) Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.1 - PR19 Resilience & Environmental Bespoke Commitments Working Group Minutes (Nov 17) OC.A1.2 - CCG Update on Bespoke Commitment (13 Dec 17) OC.A1.3 - PR19 SteerCo: Bespoke Commitments Resilience Paper (Feb 18) OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A2.1 - Ofwat Delivering Water 2020: Consultation on PR19 methodology, Appendix 3: Outcomes technical definitions, 11 July 17	Atkins (via Business Plan Data Table audit)				
Delivering outcomes for customers	AFW.OC.A3	Required	The company should provide justification for discontinuing its PR14 Value for Money PC (R-A2: Value for money survey). If sufficient justification for discontinuing the PC cannot be provided, the company should continue its PR14 Value for Money PC.	01-Apr-19	Alternative approach	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.3 Pages 10-11	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.1 - PR19 Resilience & Environmental Bespoke Commitments Working Group Minutes (Nov 17) OC.A1.2 - CCG Update on Bespoke Commitment (13 Dec 17) OC.A1.3 - PR19 SteerCo: Bespoke Commitments Resilience Paper (Feb 18) OC.A3.1 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 4 OC.A3 & annex B for evidence	Atkins (via Business Plan Data Table audit) CCG				

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Delivering outcomes for customers	AFW.OC.A4	Required	The company should reconsider the ODI rates proposed and provide further evidence, either from its own customer base or wider industry studies, to demonstrate that the marginal benefit estimates used are reflective of its customers' preferences and valuations, or conduct further engagement to develop triangulated ODI rates that are based on a broader range of customer evidence. In cases of rejection or revisions to enhancement expenditure or a cost adjustment claim, the company should consider the implications, if any, for the associated level of the PC and ODI incentive rates proposed, and provide evidence to justify any changes to its business plan submission. In cases where a scheme will no longer be undertaken, the company should consider the removal of the associated scheme-specific PC. The company should provide further evidence to detail the estimation of forecast efficient marginal costs within its ODI rate calculations, in line with our PR19 Final Methodology. In particular, the company should provide evidence to demonstrate how these marginal cost estimates relate to the cost adjustment claims or enhancement expenditure proposed by the company.	01-Apr-19	Alternative approach	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.4 Pages 12-14	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A4.1 - Ofwat, technical Appendix 1: Delivering Outcomes for Customers January 2019, pg 28	Atkins (via Business Plan Data Table audit)
Delivering outcomes for customers	AFW.OC.A5	Required	The company should provide further explanation of how its ODI package incentivises it, through better aligning the interests of management and shareholders with customers, to deliver on its PCs to customers or it should revise its package to do so. The company should provide further evidence, such as its initial engagement and acceptability research, to confirm that the package is aligned with both customer and company priorities or it should revise its package to do so.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.5 Pages 14-17	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)
Delivering outcomes for customers	AFW.OC.A6	Required	The company should increase its asset health underperformance payments in order to protect customers from poor performance or provide convincing evidence to demonstrate that its current proposals are in the interests of its customers (over the long and short term). The company should provide sufficient evidence that its customers support its proposed asset health underperformance payments. If it cannot do this, the company should remove the outperformance payments. The company should provide a clear list of what it considers to be its asset health PCs, and state its P10 underperformance payments and P90 outperformance payments for each of its asset health ODIs in Em and as a percentage of RoRE. In general underperformance payments should be higher than outperformance payments.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.6 Pages 17-20	Line 5, App 1 (Unplanned outage) Line 6, App 1 (Number of burst mains) Line 18, App1 (Properties experiencing longer or repeated instances of low pressure (DG2)) Line 21 App1 (Customer contacts for discolouration) Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 AFW Delivering Outcomes for Customers Evidence Document Section 2.4 Pages 12-14 (OC.A4) Section 2.1 Pages 5-8 (OC.A1) Section 2.2 Pages 8-10 (OC.A2)	Atkins (via Business Plan Data Table audit)
Delivering outcomes for customers	AFW.OC.A7	Required	The company should apply additional protections through an appropriate outperformance payment sharing mechanism and by implementing caps on individual PCs which could result in material outperformance payments. The payment sharing mechanism and caps to material ODIs should be applied in accordance with guidance provided in the 'Technical appendix 1: Delivering outcomes for customers'.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.7 Pages 20-21	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)
Delivering outcomes for customers	AFW.OC.A8	Required	Supply interruptions greater than 3 hours: For this common PC we expect all companies' service levels to reflect the values we have calculated for each year of the 2020 to 2025 period.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.8 Page 21	Line 1, App1, Columns AQ:AU Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)
Delivering outcomes for customers	AFW.OC.A9	Required	Supply interruptions greater than 3 hours: The company should explain why its proposed rates differ from our assessment of the reasonable range around the industry average (as set out in 'Technical appendix 1: Delivering outcomes for customers') and demonstrate that this variation is consistent with customers' underlying preferences and priorities for service improvements in supply interruptions. The company should also provide the additional information set out in 'Technical appendix 1: Delivering outcomes for customers' to allow us to better understand the causes of variation in ODI rates for supply interruptions and assess the appropriateness of the company's customer valuation evidence supporting its ODI.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.9 Pages 22-23	Taken Ofwat rates from Ofwat, "Technical appendix 1: Delivering outcomes for customers" January 2019, see Line 1, App1 Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)
Delivering outcomes for customers	AFW.OC.A10	Required	Supply interruptions greater than 3 hours: The company should remove the proposed outperformance deadband and propose appropriate incentives that are supported by its customers. The company should reconsider whether to apply an underperformance collar to this PC, taking account of its broader approach to customer protection. If the company decides to retain the deadband or the collar, it should provide a convincing ODI-specific justifications for these decisions.	01-Apr-19	Alternative approach	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.10 Pages 23-24	We have removed the deadband which means underperformance results in financial exposure immediately. We have amended our underperformance collar to be at the equivalent of 5 minutes above the Ofwat proposed PC level. Given the underlying increase in incentive rates any operational underperformance now carries more financial risk. See App1, Line 1 Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A4.1 - Ofwat, technical Appendix 1: Delivering Outcomes for Customers January 2019, pg 31 AFW Delivering Outcomes for Customers Evidence Document Section 2.4 Pages 12-14 (OC.A4)	Atkins (via Business Plan Data Table audit)
Delivering outcomes for customers	AFW.OC.A11	Required	Leakage: The company should reconsider its proposed service levels and ensure that they are stretching and meet the upper quartile values or provide compelling evidence to demonstrate why this level cannot be achieved. Based on the forecast data provided by companies in the September 2018 business plan submission the upper quartile values are 75 litres/property/day and 5.42 m3/km of mains/day. The company should clearly set out the evidence and rationale for the revised targets.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.11 Pages 24-26	Targeting 18.5% reduction (in absolute terms) over AMP7 (lower in 3-yr average terms). Based on PR19 BP submissions this should put us as UQ. Line 2, App1 Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A11.1 - rdWRMP Atkins Report OC.A11.2 - NERE Economic Consulting - Assessing Ofwat's funding and incentives targets for leakage reduction OC.A3.1 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 4 OC.A11 & annex B for evidence AFW Securing Cost Efficiency Evidence Document Section 2.1 Page 4-14 (CE.A1)	Atkins (via Business Plan Data Table audit) CCG
Delivering outcomes for customers	AFW.OC.A12	Required	Leakage: The company should provide further evidence to justify the use of an outperformance payment for this PC, including evidence of customer support.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.12 Pages 26-27	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A1.5 - Verve Customer Research Report March 2019 OC.A12.1 - Leakage Customer Engagement Evidence	Atkins (via Business Plan Data Table audit)
Delivering outcomes for customers	AFW.OC.A13	Required	Leakage: The company should explain why its proposed rates differ from our assessment of the reasonable range around the industry average (as set out in 'Technical appendix 1: Delivering outcomes for customers') and demonstrate that this variation is consistent with customers' underlying preferences and priorities for service improvements in leakage. The company should also provide the additional information set out in 'Technical appendix 1: Delivering outcomes for customers' to allow us to better understand the causes of variation in ODI rates for leakage and assess the appropriateness of the company's customer valuation evidence supporting its ODI.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.13 Pages 27-28	Taken Ofwat rates from Ofwat, "Technical appendix 1: Delivering outcomes for customers" January 2019, see Line 2, App1 Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A4.1 - Ofwat, technical Appendix 1: Delivering Outcomes for Customers January 2019, pg 28	Atkins (via Business Plan Data Table audit)

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Delivering outcomes for customers	AFW.OC.A14	Required	Leakage: The company should provide further ODI-specific evidence to support its use of a cap and a collar, whilst also considering how its use of these features aligns with its broader approach to customer protection. The company's evidence should include justification for the levels at which the cap and collar are set, with the company explaining why these levels are appropriate and in customers' interests. The company should consider a more appropriate balance of risk by amending the cap and collar.	01-Apr-19	Alternative approach	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.14 Pages 28-29	We have amended our underperformance collar but not removed it. We have set it symmetrically in line with the underperformance cap i.e. both the collar and cap set to apply 0.5 Ml/d beyond P10 and P90 performance forecasts. See App1, Line 2 Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A4.1 - Ofwat, technical Appendix 1: Delivering Outcomes for Customers January 2019, pg 10 AFW Delivering Outcomes for Customers Evidence Document Section 2.7 Pages 20-21 (OC.A7)	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A15	Required	Per capita consumption: The company should explain why its proposed rates differ from our assessment of the reasonable range around the industry average (as set out in 'Technical appendix 1: Delivering outcomes for customers') and demonstrate that this variation is consistent with customers' underlying preferences and priorities for service improvements in per capita consumption. The company should also provide the additional information set out in 'Technical appendix 1: Delivering outcomes for customers' to allow us to better understand the causes of variation in ODI rates for per capita consumption and assess the appropriateness of the company's customer valuation evidence supporting its ODI.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.15 Pages 29-30	'Taken Ofwat rates from Ofwat, "Technical appendix 1: Delivering outcomes for customers" January 2019, see Line 3, App1. Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A4.1 - Ofwat, technical Appendix 1: Delivering Outcomes for Customers January 2019, pg 10	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A16	Required	Gaps & Voids: The company should revise its target to include reductions in the first year of the plan and to target more stretching reductions. It should clearly set out the evidence and rationale for the revised target or if it retains the original targets it should set out why this is in the customers interests.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.16 Pages 30-31	Line 14, App1, Columns AQ:AU Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A17	Required	Gaps & Voids: The company should provide evidence to demonstrate that an outperformance payment would benefit customers and that it is designed in such a way that does not create perverse incentives with respect to the timely and accurate registration of void sites.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.17 Pages 31-32	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A18	Required	Gaps & Voids: The company should outline the basis on which its ODI rates have been calculated and demonstrate that they do not exceed the reduction in bills that customers would experience from a reduction in void sites.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.18 Pages 32-33	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A19	Required	Risk of severe restrictions in a drought PC: The company should explain its level of stretch and submit the intermediate calculation outputs as shown in the common definition guidance published on our website for the drought resilience metric.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.19 Page 33-35	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A11.1 - rdWRMP Atkins Report OC.A19.1 - Drought resilience metric: intermediate calculation outputs	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A20	Required	Compliance Risk Index (CRI): The company should provide the additional information set out in 'Technical appendix 1: Delivering outcomes for customers' to allow us to better understand the causes of variation in ODI rates for CRI and assess the appropriateness of the company's customer valuation evidence supporting its ODI. The company should explain and evidence how its proposed ODI rate for CRI is coherent with the rates proposed for other asset health PCs.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.20 Pages 35-36	Taken Ofwat rates from Ofwat, Technical appendix 1: Delivering outcomes for customers January 2019, see Line 7 App1 Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A4.1 - Ofwat, technical Appendix 1: Delivering Outcomes for Customers January 2019, pg 30	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A21	Required	Compliance Risk Index (CRI): We propose to intervene to ensure companies perform to the regulatory requirement of 100% compliance against drinking water standards. As set out in the methodology we noted a deadband may be appropriate. It is important that the range of underperformance to the collar is adequate to provide clear incentives for companies to deliver statutory requirements. The company should set a deadband at 1.50 and collar at 9.5 for 2020-25.	01-Apr-19	Alternative approach	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.21 Pages 36-37	See App1 Line 7 Supporting data table commentaries.	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A22	Required	Unplanned outage: The company is required to provide fully audited 2018-19 performance data by 15 May 2019. This should take the form of an early APR submission, but only for Unplanned Outages. Board assured data can be provided with the main APR in July 2019, any changes will be taken into account for the Final Determination. Based on the latest performance and updated methodologies, the company should resubmit 2019-20 to 2024-25 forecast data in the 15 May 2019 submission. The company should also report its current and forecast company level peak week production capacity (PWPC) (Ml/d), the unplanned outage (Ml/d) and planned outage (Ml/d) in its commentary for the May submission.	15-May-19	Action due later	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.22 Pages 37-38	N/A - see evidence doc	N/A	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A23	Required	Unplanned outage: The company should explain and evidence how its proposed ODI rate for unplanned outages is coherent with the rates proposed for PCs relating to the associated customer facing-impacts of the asset failure and demonstrate how the package of ODIs across the relevant group of PCs appropriately incentivises performance in the long and short-term. The company should also provide the additional information set out in 'Technical appendix 1: Delivering outcomes for customers' to allow us to better understand the causes of variation in ODI rates for unplanned outages and assess the appropriateness of the company's customer valuation evidence supporting its ODI.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.23 Pages 38-39	Taken Ofwat rates from Ofwat, "Technical appendix 1: Delivering outcomes for customers" January 2019, see Line 5, App1 Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A4.1 - Ofwat, technical Appendix 1: Delivering Outcomes for Customers January 2019, pg 33	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A24	Required	Number of burst mains: The company should reconsider its proposed service levels and ensure that they are stretching. If the company continues to propose performance that is worse than its historical levels, we will expect compelling evidence that increased active leakage control impacts the total number of mains repairs using the company's own data, including the relationship between pro-active and reactive mains repairs. As a minimum the evidence should show the historical correlation between active leakage control, pro-active and reactive mains repairs. It should also show the impact of this relationship on forecast repair rates from the output of asset performance modelling. The company should also demonstrate the reduced (worse) performance levels are in the interests of customers and the assets.	01-Apr-19	Alternative approach	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.24 Pages 39-41	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A25	Required	Number of burst mains: The company should explain and evidence how its proposed ODI rate for mains bursts is coherent with the rates proposed for PCs relating to the associated customer facing- impacts of the asset failure (including leakage, supply interruptions and low pressure) and demonstrate how the package of ODIs across the relevant group of PCs appropriately incentivises performance in the long and short-term. The company should also provide the additional information set out in 'Technical appendix 1: Delivering outcomes for customers' to allow us to better understand the causes of variation in ODI rates for mains bursts and assess the appropriateness of the company's customer valuation evidence supporting its ODI.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.25 Pages 41-42	Taken Ofwat rates from Ofwat, "Technical appendix 1: Delivering outcomes for customers" January 2019, see Line 6, App1 Supporting data table commentaries for App1	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A4.1 - Ofwat, technical Appendix 1: Delivering Outcomes for Customers January 2019, pg 32	Atkins (via Business Plan Data Table audit)			

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Companies to copy from their actions summary table and detailed actions documents				Summarise how you have					Document name(s), page number(s), paragraph num	App number(s), line description(s), cell referen	Please include where appropriate	Please include where required (see cover) or if it is deemed appropriate
Delivering outcomes for customers	AFW.OC.A26	Required	Number of burst mains: The company should reconsider whether to apply an underperformance collar to this PC, taking account of its broader approach to customer protection. If the company decides to retain the collar, it should provide a convincing ODI-specific justification for this decision, and it should consider whether to change the level of the collar. The company's justification should refer to the proposed level of the collar, and it should explain why that particular level has been chosen and how this compensates customers adequately for poor service performance.	01-Apr-19	Alternative approach	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.26 Pages 42-43	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 AFW Delivering Outcomes for Customers Evidence Document Section 2.24 Pages 39-41 (OC.A24) Section 2.7 Pages 20-21 (OC.A7)	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A27	Required	Properties experiencing longer or repeated instances of low pressure: The company should either use the original DG2 and long list definition or provide further evidence to support its view that the updated definition is a better and more appropriate measure for the company, for wider stakeholders and for customers. In particular the company should refer to trend analysis which may be potentially more difficult and the poor current levels of performance in this measure which may cause issues with transparency.	1 April 2019	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.27 Page 43-44	We have introduced a financial DG2 measure (App1, Line 18), and kept the previous low pressure PC as a non-financial resilience measure (App1, Line 10). Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A3.1 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 4 OC.A27 & annex B for evidence	Atkins (via Business Plan Data Table audit) CCG			
Delivering outcomes for customers	AFW.OC.A28	Required	Properties experiencing longer or repeated instances of low pressure: The company should revise its targets so that the starting levels for the period 2020-25 are challenging, it should also revise its stretch level for the period 2020-25 as a whole based on this. We expect compelling evidence why the levels that the company proposes are in the best interest of customers particularly if it retains the less stretching targets.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.28 Pages 44-45	App1, Line 18 - Financial low pressure DG2 measure App1, Line 10 - Non-financial low pressure measure Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A29	Required	Properties experiencing longer or repeated instances of low pressure: The company should provide further evidence to justify the use of an outperformance payment for this PC, including evidence of customer support.	01-Apr-19	No longer applicable	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.29 Pages 45-46	App1, Line 18 - Financial low pressure DG2 measure App1, Line 10 - Non-financial low pressure measure Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A30	Required	Properties experiencing longer or repeated instances of low pressure: The company should reconsider the proposed ODI rates and either provide evidence to demonstrate why the subset of values selected to formulate its marginal benefit and outperformance payment are appropriate, or resubmit lower outperformance payments in line with customer evidence. If the company retains its outperformance payments it should pay regard to the principle that underperformance payments should be higher than outperformance payments.	01-Apr-19	No longer applicable	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.30 Pages 46-47	App1, Line 18 - Financial low pressure DG2 measure App1, Line 10 - Non-financial low pressure measure Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A31	Required	Properties experiencing longer or repeated instances of low pressure: The company should reconsider whether to apply an underperformance collar to this PC, taking account of its broader approach to customer protection. If the company decides to retain the collar, it should provide a convincing ODI-specific justification for this decision. This should include justification for the level at which the collar is set, with the company explaining how this compensates customers adequately for poor service performance.	01-Apr-19	No longer applicable	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.31 Pages 47-48	App1, Line 18 - Financial low pressure DG2 measure App1, Line 10 - Non-financial low pressure measure Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A32	Required	Customers in vulnerable circumstances satisfied with our service PC: The company should split this PC into 2 PCs, one for financial and one for non-financial support scheme support. This would support more transparent measurement and reporting than the current PC proposes. In addition, the company should provide additional evidence on the sample size used in the monthly survey to determine the PC target and provide external assurance that the survey will be conducted in line with social research best practice.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.32 Pages 49-52	We have split this PC into two for financial help (App1, Line 11) and non-financial help (App1, Line 26) Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A32.1 - SMS feedback analysis (PC2) OC.A32.2 - Financially vulnerable by channel (PC1) OC.A32.3 - SMS Example process flow chart for satisfaction and ease OC.A32.4 - MRS research guidelines OC.A32.5 - Application of MRS research guidelines to our PCs OC.A32.6 - Framework for BSI 18477 OC.A3.1 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 4 OC.A32 & annex B for evidence AFW Addressing Affordability and Vulnerability Evidence Document Section 1.1 Pages 3-4 Section 2.5 Pages 16-17 (AV.A5)	Atkins (via Business Plan Data Table audit) CCG BSI 18477			
Delivering outcomes for customers	AFW.OC.A33	Required	Customers in vulnerable circumstances satisfied with our service PC: The company should revise its performance level to at least meet current satisfaction levels.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.33 Pages 52-53	We have included a more stretching target of 90% and applied it to both versions of this PC: for financial help (App1, Line 11) and non-financial help (App1, Line 26) Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A3.1 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 4 OC.A33 & annex B for evidence	CCG Atkins			
Delivering outcomes for customers	AFW.OC.A34	Required	Customers in vulnerable circumstances who found us easy to deal with PC: The company should split this PC into 2 PCs, one for financial and one for non-financial support scheme support. This would support more transparent measurement and reporting than the current PC proposes. In addition, the company should provide additional evidence on the sample size used in the monthly survey to determine the PC target for and provide external assurance that the survey will be conducted in line with social research best practice.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.34 pages 53-56	We have split this PC into two for financial help (App1, Line 12) and non-financial help (App1, Line 27) Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A32.1 - SMS feedback analysis (PC2) OC.A32.2 - Financially vulnerable by channel (PC1) OC.A32.3 - SMS Example process flow chart for satisfaction and ease OC.A32.4 - MRS research guidelines OC.A32.5 - Application of MRS research guidelines to our PCs OC.A32.6 - Framework for BSI 18477 C.A3.1 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) Section 1 Summary, Section 4 OC.A34 & annex B for evidence AFW Addressing Affordability and Vulnerability Evidence Document Section 1.1 Pages 3-4 Section 2.5 Pages 16-17 (AV.A5)	Atkins (via Business Plan Data Table audit) CCG			
Delivering outcomes for customers	AFW.OC.A35	Required	Customers in vulnerable circumstances who found us easy to deal with PC: The company should revise its performance level for this PC so that it is more stretching and provide justification for the level of stretch as well.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.35 Pages 56-58	We have included a more stretching target of 90% and applied it to both versions of this PC: for financial help (App1, Line 12) and non-financial help (App1, Line 27) Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A3.1 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) Section 1 Summary, Section 4 OC.A35 & annex B for evidence	Atkins (via Business Plan Data Table audit) CCG			
Delivering outcomes for customers	AFW.OC.A36	Required	Environmental innovation - delivery of community projects PC: The company should provide further evidence of customer support for this PC. In particular, the company should provide evidence that customers were presented with choice and context related to the design of the currently proposed PC.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.36 Pages 58-60	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.1 - PR19 Resilience & environmental bespoke commitments working group minutes (Nov 17) OC.A3.1 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 4 OC.A36 & annex B for evidence OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A36.1 - Final dWRMP Report_V3_080618	Atkins (via Business Plan Data Table audit) CCG			

Actions details				Business plan adjustment								
Test area	Action reference	Action type	Action	Date required	Nature of adjustment	Revised business plan reference	Data table reference	Additional evidence (please elaborate/reference)	Assurance (please elaborate/reference)			
Companies to copy from their actions summary table and detailed actions documents				Summarise how you have					Document name(s), page number(s), paragraph num	App number(s), line description(s), cell referen	Please include where appropriate	Please include where required (see cover) or if it is deemed appropriate
Delivering outcomes for customers	AFW.OC.A37	Required	Environmental innovation - delivery of community projects PC: The company should provide further evidence to justify the use of an outperformance payment for this PC, including evidence of customer support. The company should demonstrate how this ODI will benefit customers. The company should also explain how it prevents double counting of benefits.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.37 Page 61 Section 2.36 Pages 58-60 (OC.A36)	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A38	Required	Environmental innovation - delivery of community projects PC: The company should provide further evidence to justify that the underperformance payment reflects the overall allowance for the schemes specified.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.38 Page 62 Section 2.37 Page 61 (OC.A37)	We have responded to this challenge by amending this PC. Ofwat has disallowed all the expenditure associated with the delivery of this PC in the IAP. We have now made this a reward-only ODI which will cover the cost of delivering the schemes which our customers have told us that they want us to deliver and that they are prepared to pay the cost of. Please see App1, Line 13 and Supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A39	Required	River restoration PC: The company should revise this PC to show that the profile of work is stretching.	01-Apr-19	Alternative approach	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.39 Pages 62-63	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A40	Required	River restoration PC: The company should provide further evidence to justify the use of an outperformance payment for this PC, including evidence of customer support. The company should demonstrate how this ODI will benefit customers.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.40 pages 63-65 Section 2.41 Pages 65-66 (OC.A41)	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A41	Required	River restoration PC: The company should provide further evidence to justify the marginal benefits estimated from river restoration schemes, in particular that customers are willing to pay greater amounts for expedited scheme delivery and that this will deliver additional benefits to customers than otherwise would occur. It should also demonstrate that outperformance payments will not occur from normal reprofiling of schemes that could occur in the absence of an outperformance payment. The company should provide evidence to justify the 100 year time period used to estimate the environmental benefits delivered, in forming valuations of a delay to the proposed scheme.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.41 Pages 65-66 Section 2.40 pages 63-65 (OC.A40)	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A41.1 - Desktop Review of Approach to use EA CBA analysis (Eftec) OC.A41.2 - PC ODI Incentive Testing - Final Report (Verve)	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A42	Required	Abstraction reduction: The company should provide further evidence to justify the use of an outperformance payment for this PC, including evidence of customer support. The company should demonstrate how this ODI will provide benefits that customers value.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.42 Pages 66-67	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OCA41.1 - Desktop Review of Approach to Use EA CBA Analysis (Eftec) OC.A41.2 - PC ODI Incentive Testing - Final Report (Verve)	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A43	Required	Abstraction reduction: Should the company propose to keep outperformance payments on this ODI then the company should set out and justify the timescales over which marginal benefits have been calculated for this PC. In addition to this the company should also provide further evidence to justify the marginal benefits estimated from the expedited abstraction reduction covered by this PC, in particular that customers are willing to pay greater amounts for this expedited delivery.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.43 Pages 67-68	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A1.5 - Verve Customer Research Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A44	Required	Number of sources operating under the Abstraction Incentive Mechanism: The company should provide further evidence that the grouping of sites into sources is the best option in terms of customer and environmental benefit. If the company cannot provide this evidence the definition should be amended to be based on the number of sites.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.44 Pages 68-70	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A44.1 - Letter dated 23 April 2018 to Jon Ashley, setting out Affinity Water's AIM plans post April 2018, including the reasoning behind the groupings OC.A44.2 - Emailed recognition of letter dated 23 April 2018 from Jon Ashley OC.A44.3 - OFWAT query on the AIM- email from Jon Ashley OC.A44.4 - Follow up with of phone conversation from after AIM email from Jon Ashley, in which the groupings were discussed and subsequent note OC.A44.5 - Slides from OFWAT and water companies at workshop to discuss the future of AIM, on 17 April 2018 OC.A44.6 - Minutes from AIM workshop on 17 April 2018 OC.A44.7 - Annual AIM performance for the period 2017-2018	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A45	Required	Number of sources operating under the Abstraction Incentive Mechanism: The company should provide further evidence to justify the use of outperformance payments for this ODI and evidence of customer support for this approach. Alternatively the company could consider the use of an underperformance payment in order to sufficiently incentivise this outcome.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.45 Pages 70-71	We have made this an out/underperformance ODI, see App1, line 17, and supporting data table commentaries	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A41.2 - PC ODI Incentive Testing - Final Report (Verve)	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A46	Required	Mean Zonal Compliance (MZC): The company should remove MZC. If the company doesn't do this it should provide further evidence that customers support the provision of two very similar measures. Also see action AFW.OC.A1 as we expect the company to select the two PCs from the asset health long list that measure water quality contacts as also are reported on the Discover Water website.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.46 Pages 71-72 Section 2.1 Pages 5-8 (OC.A1)	We have removed MZC as PC.	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019 OC.A3.1 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 4 OC.A46 & annex B for evidence	Atkins (via Business Plan Data Table audit) CCG			
Delivering outcomes for customers	AFW.OC.A47	Required	Number of occupied properties not billed (Gap sites): The company should reconsider its proposed percentage target for 2020-25. The company should clearly set out the evidence and rationale for the revised target.	01-Apr-19	Alternative approach	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.47 Page 72 Section 2.48 Page 73 (OC.A48)	N/A - see evidence doc	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A48	Required	Number of occupied properties not billed (Gap sites): The company should provide evidence to demonstrate that an outperformance payment would benefit customers and that it is designed in such a way that does not create perverse incentives with respect to the timely and accurate identification of gap sites.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.48 Page 73	We have made Gap Sites an underperformance-only ODI, see App1, line 19, and table commentary.	AFW Delivering Outcomes for Customers Appendix: OC.A1.4 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit)			
Delivering outcomes for customers	AFW.OC.A49	Required	Number of occupied properties not billed (Gap sites): The company should provide evidence to demonstrate that an outperformance payment would benefit customers and that it is designed in such a way that does not create perverse incentives with respect to the timely and accurate registration of void sites.	01-Apr-19	Action completed	AFW Delivering Outcomes for Customers Evidence Document Section 1.1 Page 4 Section 2.49 Pages 73-74 Section 2.17 Pages 31-32 (OC.A17) Section 2.48 Page 73 (OC.A48)	App1 line 19 and supporting data table commentaries	N/A	Atkins (via Business Plan Data Table audit)			

Actions details				Business plan adjustment					
Test area	Action reference	Action type	Action	Date required	Nature of adjustment	Revised business plan reference	Data table reference	Additional evidence (please elaborate/reference)	Assurance (please elaborate/reference)
Companies to copy from their actions summary table and detailed actions documents					Summarise how you have	Document name(s), page number(s), paragraph num	App number(s), line description(s), cell referen	Please include where appropriate	Please include where required (see cover) or if it is deemed appropriate
Securing long-term resilience	AFW.LR.A1	Required	The company should ensure that its common and bespoke performance commitments associated with operational resilience are clearly defined, sufficiently demanding for AMP7 and the long term, and supported by the right incentives. We expect the company to satisfy the relevant actions set out in relation in the outcomes areas ensuring a line of sight between risks to resilience and package of outcomes.	01-Apr-19	Action completed	AFW Securing Long Term Resilience Evidence Document Section 1.1 Page 3 Section 2.1 Pages 4-6	App1, Column U, page 5 and supporting data table commentaries	AFW Securing Long Term Resilience Appendix: LR.A1.1 - Atkins Technical Assurance Report March 2019	App1 Data Table assured by Atkins (via Business Plan Table audit)
Securing long-term resilience	AFW.LR.A2	Required	The company should provide a commitment that it will, by 22 August 2019, prepare and provide to us an action plan to develop and implement a systems based approach to resilience in the round and ensure that the company can demonstrate in the future an integrated resilience framework that underpins the company's operations and future plans showing a line of sight between risks to resilience, planned mitigations, package of outcomes and corporate governance framework.	01-Apr-19	Action completed	AFW Securing Long Term Resilience Evidence Document Section 1.1 Page 3 Section 2.2 Pages 6-10	None	AFW Securing Long Term Resilience Appendix: LR.A2.1 - Resilience in the Round LR.A2.2 - Customer Engagement on Long-Term Resilience	N/A
Securing long-term resilience	AFW.LR.A3	Required	The company should also provide a commitment to work with the sector to develop robust forward looking asset health metrics and provide greater transparency of how its asset health indicators influence its operational decision making.	01-Apr-19	Action completed	AFW Securing Long Term Resilience Evidence Document Section 1.1 Page 3 Section 2.3 Pages 11-12	None	AFW Securing Long Term Resilience Appendix: LR.A3.1 - UKWIR Asset Health Indicators Project Proposal	N/A
Securing long-term resilience	AFW.LR.A4	Required	The company's assessment of financial stress scenarios extends only to 2025. The company should commit to demonstrating that its assessment of financial resilience extends beyond 2025 in its next Long Term Viability Statement.	01-Apr-19	Action completed	AFW Securing Long Term Resilience Evidence Document Section 1.1 Page 3 Section 2.4 Page 13	None	N/A	N/A
Securing long-term resilience	AFW.LR.A5	Required	Please explain: - how the company will achieve the planned reduction of gearing to 70% referred to in the plan; RED - how the company will maintain Baa1/BBB+ credit ratings if its planned gearing reduction does not proceed as planned; GREEN and - the company's assessment of the impact of the gearing outperformance mechanism for PR19 on its financial metrics in case the planned gearing reduction is not achieved. GREEN	01-Apr-19	Alternative approach	AFW Securing Long Term Resilience Evidence Document Section 1.1 Page 3 Section 2.5 Pages 14-15	Financial model	N/A	N/A
Targeted controls, markets and innovation	AFW.CMI.A1	Required	The company should ensure that the business plan sets out the potential strategic supply options that it has assessed and explain how it will engage with interested parties and other stakeholders to progress these options. We also expect the business plan to align with the revised water resources management plan.	01-Apr-19	Action completed	AFW Targeted Controls, Markets and Innovation Evidence Document Section 1.1 Page 3 Section 2.1 Pages 4-7	App21, all lines and commentary for SESR option (the only DPC scheme) WR7, block C1 and commentary (inclusive of SESR and transfers) WS2, Line 24 and commentary (for the total IAP funding allowance for strategic regional solutions) WS2a, Line 24 WS1 Supporting data table commentaries	AFW Targeted Controls, Markets and Innovation Appendix: CMI.A1.1 - rdWRMP Assessment of Options and alignment of rdWRMP and Business Plan CMI.A1.2 - Stakeholder engagement plan AFW Targeted Controls, Markets and Innovation Evidence Document Section 3 Page 10 AFW Engaging Customers Evidence Document Appendices: EC Summary 1 AFW Addressing Affordability and Vulnerability Appendix AV.A1.4 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - Section 1 Summary, Section 4 CMI.A1 & annex B for evidence	CCG Atkins data table assurance PwC data table assurance
Targeted controls, markets and innovation	AFW.CMI.B1	Advised	The company should explore sharing resources to form common research outcomes and innovations, aligned to the common challenges that the company and others face.	01-Apr-19	Action completed	AFW Targeted Control, Markets and Innovation Evidence Document Section 1.1 Page 3 Section 2.2 Pages 7-9	N/A	AFW Targeted Controls, Markets and Innovation Appendix: CMI.B1.1 - Leakage - Fast logging and task force visits CMI.B1.2 - Catchment Management CMI.B1.3 - Water quality research, innovation and collaboration	N/A
Securing cost efficiency	AFW.CE.A1	Required	We have provided our view of efficient costs for the company along with our reasoning. We expect it to address areas of inefficiency, or lack of evidence, in the revised business plan. Where appropriate, we expect it to withdraw investment proposals if either: - the need for investment is not compelling; or - there is no need for a cost adjustment claim beyond our existing cost baseline.	01-Apr-19	Action completed	AFW Securing Cost Efficiency Evidence Document Section 1.1 Page 3 Section 2.1 Page 4-14	WS1 lines 12-16 WS2 WS2a and supporting data table commentaries	AFW Securing Cost Efficiency Appendix: CE.A1.1 - Response to Ofwat IAP CE.A1.2 - Strategic supply transfer scheme_Supply2040 CE.A1.3 - Catchment Management Drinking Water Quality Plans CE.A1.4 - Catchment Management Groundwater Pesticides CE.A1.5 - Catchment Management Nitrate Affected Sources CE.A1.6 - Catchment Management River Thames Pesticides CE.A1.7 - Sustainability Reductions Brett Community (WRZ8) CE.A1.8 - Sustainability Reductions Misbourne Community (WRZ1) CE.A1.9 - Sustainability Reductions Colne & Pinn (WRZ2 & WRZ4) CE.A1.10 - Sustainability Reductions Lee Community (WRZ3) CE.A1.11 - Sustainability Reductions Stort Community (WRZ5) CE.A1.12 - AFW PR19 Technical Assurance Report - Final Investment Case Supplement CE.A1.13 - Regional Wages Study CE.A1.14 - First Economics Report on frontier efficiency CE.A1.15 - Transience study CE.A1.16 - Leakage enhancement need and wider benefits CE.A1.17 - NERA Economic Consulting - Assessing Ofwat's funding and incentive targets for leakage reduction CE.A1.18 - Cost Allocation Paper	Atkins (via Business Plan Data Table audit)
Securing cost efficiency	AFW.CE.A2	Required	Strategic regional solution development - We have identified from the plans that at least one strategic supply solution is required over the next 5-15 years to secure drought resilience in the south-east. The strategic regional solution development allocation is to allow the delivery of consistent and transparent investigations, planning and development of strategic options with the overall aim of optimum solutions being construction ready by 2025. The company's allocation is made on the basis of having clear deliverables and customer protection for the gated delivery of the development of Abingdon reservoir, a regional transfer from Thames Water, and an eastern regional solution/transfer. The following actions are required to ensure the efficient delivery of this development programme: - In conjunction with the other companies involved, jointly propose methods for collaborative working including setting up the joint working group for individual schemes, and how consistent assumptions and decisions will be made within these groups and between them. - Provide more detail on the gated process, the deliverables, timings and expenditure allocations at each gate - Propose ODI-type mechanisms to allow allocated funding to be recovered by customers in the event of the scheme not progressing through each gate and for the non-delivery or late delivery of outputs.	01-Apr-19	Alternative approach	AFW Securing Cost Efficiency Evidence Document Section 1.1 Page 3 Section 2.2 Page 15-17	APP21, Wr6, Wr7, WS1, WS2 and WS2a and supporting data table commentaries	AFW Securing Cost Efficiency Appendix: CE.A2.1 - All Company Working Group (ACWG). Joint statement on strategic regional solution development CE.A2.2 - Affinity Water Scheme Review	Atkins (via Business Plan Data Table audit) PwC (via Business Plan Data Table audits)

Actions details				Business plan adjustment								
Test area	Action reference	Action type	Action	Date required	Nature of adjustment	Revised business plan reference	Data table reference	Additional evidence (please elaborate/reference)	Assurance (please elaborate/reference)			
Companies to copy from their actions summary table and detailed actions documents				Summarise how you have					Document name(s), page number(s), paragraph num	App number(s), line description(s), cell referen	Please include where appropriate	Please include where required (see cover) or if it is deemed appropriate
Securing cost efficiency	AFW.CE.A3	Required	We require further clarity on the company's proposals for a cost adjustment mechanism for the Amber WINEP schemes included in its investment programme. The company should therefore advise how the sustainability reductions and 28 river morphology projects referred to in section 10.19 of Appendix 10 map on to the 13 Amber schemes listed in WINEP3. The company should also provide a breakdown of the expenditure (capex and Opex) allocated for these 13 schemes between lines in Tables WS2. We also need clarity on how the volumes and costs set out in the tables in section 10.19.1 relate to the corresponding data in the table on p68 of Appendix 6. Finally, the company should explain why it considers it appropriate to propose a single unit cost for supply and demand-side measures rather than separate unit costs given the differing nature of the work and costs involved.	01-Apr-19	Action completed	AFW Securing Cost Efficiency Evidence Document Section 1.1 Page 3 Section 2.3 Page 18-23	N/A	AFW Securing Cost Efficiency Appendix: CE.A3.1 - Amber WINEP Queries Response	Atkins (via Business Plan Data Table audit)			
Securing cost efficiency	AFW.CE.A4	Required	There may be significant impacts in terms of investment or type of investment as a result of the metaldehyde ban. The company should investigate and agree with the DWI the scale and timing of any potential changes compared to its submitted plans. Significant changes and uncertainty may require an outcome delivery incentive to protect customers in the instance of expenditure not being required. Should the company propose a performance commitment and outcome delivery incentive, the company should provide evidence to justify the level of the performance commitment and the outcome delivery incentive rates proposed, in line with our Final Methodology. We expect to receive evidence of customer support for outperformance payments, where proposed, and that the incentive rates proposed are reflective of customer valuations.	01-Apr-19	No longer applicable	AFW Securing Cost Efficiency Evidence Document Section 1.1 Page 3 Section 2.4 Page 24-25	N/A	AFW Securing Cost Efficiency Appendix: CE.A4.1 - DWI Letter CE.A4.2 - Metaldehyde follow-up letter CE.A1.4 - Catchment Management Groundwater Pesticides CE.A1.6 - Catchment Management River Thames Pesticides	N/A			
Aligning risk and return	AFW.RR.A1	Required	The company should revise its business plan and associated financial modelling to be based on our 'early view' of long term CPIH of 2.0% and RPI of 3.0%, or provide compelling evidence why this is not appropriate.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.1 Page 5	App 23 Financial model output data tables. Supporting data table commentaries	AFW Aligning Risk and Return Appendix: RR.A1.1 - KPMG Assurance Report: financial model RR.A1.2 - PwC (financial) data table assurance	KPMG assurance of financial model - included in AFW Risk and Return Evidence Document Appendix section RR.A1.1 PwC (financial) data table assurance - included in AFW Risk and Return Evidence Document Appendix section RR.A1.2			
Aligning risk and return	AFW.RR.A2	Required	The company should provide further explanation to underpin the assumptions made on water trading in the RoRE analysis.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.2 Pages 6-7	App 26 Supporting data table commentaries	N/A	Atkins assurance report - Covered in appendix RR.A1.2 PwC (financial) data table assurance - included in AFW Risk and Return Evidence Document Appendix section RR.A1.2			
Aligning risk and return	AFW.RR.A3	Required	The company should amend its overall assessment of RoRE outcomes, or provide convincing evidence to explain why it is reasonable to assume totex outcomes should be asymmetrically skewed to the downside for the notional company within an incentive based regime.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.3 Pages 7-8	App 26 Supporting data table commentaries	N/A	Atkins assurance report included in AFW Risk and Return Evidence Document Appendix section RR.A1.1 PwC			
Aligning risk and return	AFW.RR.A4	Required	The company should remove the uncertainty mechanism for metaldehyde or provide further evidence to demonstrate why the uncertainty mechanism is required - specifically whether the cost item will remain uncertain at the time of draft and final determinations. The company should remove the uncertainty mechanism for sustainability reductions or provide convincing evidence that adequate protections are not already in place given totex cost sharing arrangements and scope for transitional arrangements at PR24. If the company retains an uncertainty mechanism in its revised business plan, it should ensure the proposal is underpinned by RoRE assessment in accordance with section 10.4.3 of the PR19 methodology.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.4 Pages 9-12	App26 Supporting data table commentaries	AFW Aligning Risk and Return Appendix: RR.A4.1 - Affinity Water rdWRMP Pre-consultation Focus Groups 1 - A report on outcomes of customer focus groups run in December 2018. RR.A4.2 - Affinity Water rdWRMP Pre-consultation Customer Focus Groups 2 Report. A report on outcomes of customer focus groups run in January 2019. RR.A4.3 - SR Brett - 20 Ml per Day. A summary of the options considered and preferred option selected. RR.A4.4 - Correspondence with the Environment Agency	PwC (financial) data table assurance - included in AFW Risk and Return Evidence Document Appendix section RR.A1.			
Aligning risk and return	AFW.RR.A5	Required	The company should provide further evidence to reconcile the financial ratios set out in the business plan tables to those produced in the official financial model and explain why these are appropriate for the company's assessment of financeability.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.5 Pages 12-13	App 10 Supporting data table commentaries	AFW Aligning Risk and Return Appendix: RR.A1.1 - KPMG assurance report: financial model RR.A1.2 - PwC (financial) data tables assurance report	KPMG assurance of financial model - included in AFW Risk and Return Evidence Document Appendix RR.A1.1			
Aligning risk and return	AFW.RR.A6	Required	The company should assess the financeability of the notional company in relation to financial ratios produced by the official financial model for the notional company as set out in the methodology including the component parts of the early view cost of capital.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.6 Pages 13-16	App 10 App 11a App 12a App 15a Supporting data table commentaries	AFW Aligning Risk and Return Appendix: RR.A1.1 - KPMG assurance report: financial model RR.A1.2 - PwC (financial) data tables assurance report RR.A6.1 - Moody's Financial Ratio Guidance AFW Aligning Risk and Return Evidence Document: Section 2.1 Page 5 (RR.A1) Section 2.7 Pages 17-20 (RR.A7) Section 2.9 Pages 21-26 (RR.A9)	KPMG assurance of financial model - included in AFW Risk and Return Evidence Document Appendix section RR.A1.1 PwC (financial) data table assurance - included in AFW Risk and Return Evidence Document Appendix section RR.A1.2			
Aligning risk and return	AFW.RR.A7	Required	The company should set out the steps taken and the assurance obtained by the board in order to assess financeability of the business plan.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.7 Pages 17-20	N/A	AFW Aligning Risk and Return Appendix: RR.A1.1 - KPMG assurance report: financial model RR.A7.1 - PR19 Actual Structure Financial Stress Tests AFW Aligning Risk and Return Evidence Document Section 2.1 Page 5 (evidence for RR.A1)	KPMG assurance of financial model - included in AFW Risk and Return Evidence Document Appendix RR.A1.1			
Aligning risk and return	AFW.RR.A8	Required	The company should provide further evidence to support its view that the key financial ratios are consistent with the target credit ratings including how the threshold levels for each of the ratios have been determined.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.8 Page 21	N/A	AFW Aligning Risk and Return Evidence Document Section 2.7 Pages 17-20 (evidence for RR.A7)	N/A			
Aligning risk and return	AFW.RR.A9	Required	The company should set out how the approach to setting PAYG and RCV run-off rates reflects the forecast costs and the depreciation of the underlying RCV for the company for each wholesale control and provide further evidence to demonstrate that the rates are consistent with the company's approach.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.9 Pages 21-26	WN4 WR4 Financial model output data tables. Supporting data table commentaries	AFW Aligning Risk and Return Appendix: RR.A1.1 - KPMG assurance report: financial model RR.A1.2 - PwC (financial) data tables assurance report	KPMG assurance of financial model - included in AFW Risk and Return Evidence Document Appendix section RR.A1.1 PwC (financial) data table assurance - included in AFW Risk and Return Evidence Document Appendix section RR.A1.2			
Aligning risk and return	AFW.RR.A10	Required	The company should set out the steps taken to address the concerns raised by the Customer Challenge Group in relation to the late addition of the final bill profile to the business plan, providing evidence that the annual bill profile set out in the business plan is consistent with customer preferences.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.10 Pages 26-29	N/A	AFW Aligning Risk and Return Appendix: RR.A10.1 - Ipsos Mori Triangulation Report June 2018 RR.A10.2 - Supplementary report to Ofwat from the Affinity Water Customer Challenge Group (29 March 2019) - section 1 summary, section 1.4 approach & section 4 RR.A10 & annex B for evidence RR.A10.3 - Verve customer research report March 2019	CCG - this is described in CCG's Supplementary Report to Ofwat			
Aligning risk and return	AFW.RR.A11	Required	The company should provide convincing evidence that its exposure to revenue variation is as wide as its RoRE risk analysis suggests, particularly with regard to the regulatory protections in place.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.11 Pages 30-31	App 26 Supporting data table commentaries	N/A	PwC (financial) data table assurance - included in AFW Risk and Return Evidence Document Appendix section RR.A1.			
Aligning risk and return	AFW.RR.B1	Advised	The company should provide a clearer link between its internal risk management and mitigation procedures and the RoRE analysis.	01-Apr-19	Action completed	AFW Aligning Risk and Return Evidence Document Section 1.1 Pages 3-4 Section 2.12 Page 31	App 26 As a result of ant change, all financial model output data tables will be affected Supporting data table commentaries	N/A	PwC (financial) data table assurance - included in AFW Risk and Return Evidence Document Appendix section RR.A1.			

Actions details				Business plan adjustment								
Test area	Action reference	Action type	Action	Date required	Nature of adjustment	Revised business plan reference	Data table reference	Additional evidence (please elaborate/reference)	Assurance (please elaborate/reference)			
Companies to copy from their actions summary table and detailed actions documents				Summarise how you have					Document name(s), page number(s), paragraph num	App number(s), line description(s), cell referen	Please include where appropriate	Please include where required (see cover) or if it is deemed appropriate
Accounting for past delivery	AFW.PD.A1	Required	PR14 Land sales: Affinity Water is required to provide sufficient evidence to support the forecast trajectory in table App9.	01-Apr-19	Action completed	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.1 Pages 4-5	App9 (line 2) Supporting data table commentaries	AFW Accounting for Past Delivery Appendix: PD.A1.1 - PwC (Financials) Data Table Assurance Report	PwC (via Business Plan Data Table audit)			
Accounting for past delivery	AFW.PD.A2	Required	PR14 Outcome delivery incentives: Affinity Water is required to update its forecast for 2019-20 performance to take account of the actual 2018-19 performance for all its performance commitments. We expect the company to pay particular focus where we found the evidence provided in its business plan for the 2018-20 forecasts to be insufficient which was for: W-A2: Average water use W-A3: Water available for use W-B1: Compliance with water quality standards (mean zonal compliance) W-B2: Customer contacts for discolouration W-C2: Number of burst mains W-A1: Leakage W-C1: Unplanned interruptions to supply over 12 hours.	15-Jul-19	Action due later	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.2 Pages 5-6	N/A	N/A	APR assurance			
Accounting for past delivery	AFW.PD.A3	Required	PR14 Residential retail: Affinity Water is required to clarify what the correct number of unmetered water customers in 2016-2017 is; and clarify the justification for its table R9 2019-2020 forecast which departs from the previously observed trends.	01-Apr-19	Action completed	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.3 Pages 6-8	R1 (line 16), R9 (lines, 13, 16, 19, 45 & 46), App30, WS3 and App4 Supporting data table commentaries	AFW Accounting for Past Delivery Appendix: PD.A3.1 - Atkins Technical Assurance Report March 2019	PwC (via Business Plan Data Table audit)			
Accounting for past delivery	AFW.PD.A4	Required	PR14 Totex: Affinity Water is required to provide an explanation on why 2017-18 expenditure values differ in the annual performance report and the submitted business plan table WS15 making corrective changes as appropriate in its annual performance report data or business plan table WS15 data; and provide a detailed and numerically supported explanation to accompany its forecasted performance for years 2018-19 and 2019-20.	01-Apr-19	Action completed	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.4 Pages 8-11	WS15 Supporting data table commentaries	N/A	PwC (via Business Plan Data Table audit)			
Accounting for past delivery	AFW.PD.A5	Required	PR14 Wholesale revenue forecasting incentive mechanism: Affinity Water is required to provide an explanation to support the table WS13 forecasted performance for years 2018-19 and 2019-20.	01-Apr-19	Action completed	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.5 Pages 12-15	WS13 (lines 15-20 and 24) Supporting data table commentaries	AFW Accounting for Past Delivery Appendix: PD.A1.1 - PwC (Financials) Data Table Assurance Report PD.A5.1 - P47 of setting price controls for 2015-20: final price control determination notice: policy chapter A3 - Wholesale water and waste water cost and revenue	PwC (via Business Plan Data Table audit)			
Accounting for past delivery	AFW.PD.A6	Required	PR14 reconciliations: Further to the actions we have set out to address our concerns over the evidence provided in its business plan for the individual reconciliations, we will require the company to refresh all of its PR14 reconciliations to replace its 2018-19 forecast performance with 2018-19 actual performance and update the evidence for its forecast 2019-20 performance taking into account of the actual 2018-19 performance.	15-Jul-19	Action due later	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.6 Page 15	N/A	N/A	N/A			
Accounting for past delivery	AFW.PD.B1	Advised	Affinity Water should produce and provide additional evidence that it has identified: • the drivers of its performance past and current outcomes performance, including financial and reputational performance commitments; • lessons learnt from good and poor past and current performance; • the performance gap between current performance and proposed performance in the 2020-25 business plan; and • measures to ensure deliverability of the 2020-25 business plan.	24-May-19	Action due later	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.7 Page 16	N/A	N/A	N/A			
Accounting for past delivery	AFW.PD.B2	Advised	Affinity Water should produce and provide an action plan that sets out: • how Affinity Water will continuously monitor performance against PR14 and PR19 performance commitments, including how this relates to section 3 of the Annual Performance Report and what evidence it will look for beyond itself and the sector; • how Affinity Water will identify drivers of performance and lessons learnt from both good and poor performance; • how Affinity Water will identify measures to improve performance and integrate these into its business; and • how Affinity Water will ensure that this is a continuous rather than one-off process.	24-May-19	Action due later	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.8 Page 16	N/A	N/A	N/A			
Accounting for past delivery	AFW.PD.B3	Advised	Affinity Water should produce and provide additional evidence that it has identified: • the drivers of its complaints handling performance both in terms of the number of complaints and how well complaints are dealt with, • lessons learnt from good and poor past and current performance; • the performance gap between current performance and proposed performance in the 2020-25 business plan; and • the measures planned or already in place to ensure deliverability of the 2020-25 business plan.	24-May-19	Action completed	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.9 Pages 17-20	N/A	AFW Accounting for Past Delivery Appendix: PD.B3.1 - Complaints Root Cause Analysis and Action Plan Examples PD.B3.2 - Chart showing reduction in complaints response time for all business areas PD.B3.3 - Chart showing improvement to CSAT score April 15 - Jan 19 PD.B3.4 - Chart showing reduction in Stage 1 complaints (all business areas) April 15 - Jan 19 PD.B3.4 - Chart showing reduction in Stage 2 complaints (all business areas) April 15 - Jan 19 PD.B3.6 - Volume of complaints per 10,000 properties by provider - 17/18 PD.B3.7 - Volume of complaints per 10,000 properties 18/19 (Q1-Q3) PD.B3.8 - Percentage of complaints resolved at Stage 1 Q1 15/16 - Q4 18/19 PD.B3.9 - Chart showing percentage of calls answered within 30 seconds PD.B3.10 - Case study - Applying lessons learnt from poor, good and acceptable performance in customer communications PD.B3.11 - Drivers of improvement to complaints performance PD.B3.12 - Our Journey to Zero	N/A			
Accounting for past delivery	AFW.PD.B4	Advised	Affinity Water should produce and provide an action plan that sets out: • how Affinity Water will continuously monitor performance, including with reference to CCWater analysis and targets, and those related to the delivery of C-Mex, including what evidence and best practice it will look for beyond itself and the sector; • how Affinity Water will identify drivers of performance and lessons learnt from both good and poor performance; • how Affinity Water will identify measures to improve performance and integrate these into its business; and • how Affinity Water will ensure that this is a continuous rather than one-off process.	24-May-19	Action completed	AFW Accounting for Past Delivery Evidence Document Section 1.1 Page 3 Section 2.10 Pages 20-22	N/A	AFW Accounting for Past Delivery Appendix: PD.B4.1 - Letter from Sir Tony Redmond Jan 2018 PD.B4.2 - Benchmarking best practise beyond the water sector PD.B4.3 - Table to show drivers of improvement to complaints performance PD.B4.4 - Ensuring a continuous improvement process now and in the future PD.B4.5 - Ensuring a continuous improvement process now and in the future	N/A			
Securing confidence and assurance	AFW.CA.A1	Required	The company is required to restate a forward looking Board assurance statement. Please see 'Affinity Water: Securing confidence and assurance detailed actions.'	01-Apr-19	Action completed	AFW Securing Confidence and Assurance Evidence Document Section 1.1 Page 3 Section 2.1 Pages 4-6	N/A	AFW Securing Confidence and Assurance Appendix: CA.Summary.1 - Assurance Plan CA.A1.1 - Supplemental Board Assurance statement. CA.A1.2 - Atkins Limited: PR19 assurance report investment case supplement CA.A1.3 - Atkins Technical Assurance Report March 2019 CA.A1.4 - Summary of Board Governance relating to the Revised Plan	Atkins (via Business Plan Data Table audit)			

Actions details				Business plan adjustment					
Test area	Action reference	Action type	Action	Date required	Nature of adjustment	Revised business plan reference	Data table reference	Additional evidence (please elaborate/reference)	Assurance (please elaborate/reference)
Companies to copy from their actions summary table and detailed actions documents					Summarise how you have	Document name(s), page number(s), paragraph num	App number(s), line description(s), cell referen	Please include where appropriate	Please include where required (see cover) or if it is deemed appropriate
Securing confidence and assurance	AFW.CA.A2	Required	On dividend policy the company is required to confirm/explain the statement in their plan that annual dividends are not to exceed 5%, as our calculations have resulted in yield figures above 5% in some years (noting that on average yield is below 5%). Please provide an update on the steps you are taking to fully meet the expectations as set out in our putting the sector in balance position statement.	01-Apr-19	Action completed	AFW Securing Confidence and Assurance Evidence Document Section 1.1 Page 3 Section 2.2 Pages 7-8	App 18 App 11 App 15 Supporting data table commentaries	AFW Securing Confidence and Assurance Appendix: CA.A2.1 - Affinity Water Limited Dividend Policy March 2019 CA.A2.2 - KPMG Assurance Report: Financial model CA.A2.3 - PwC (financial):Data Tables Assurance Report	PwC (via Business Plan Data Table audit) Atkins (via Business Plan Data Table audit) KPMG (via financial model audit)
Securing confidence and assurance	AFW.CA.A3	Required	On executive pay the company is required to confirm that it is committed to adopt the expectations on performance related pay for 2020-25 as set out in 'Putting the sector in balance' to include: •Clear explanation of stretching targets and how they will be applied. •Commitment to report how changes, including the underlying reasons, are signalled to customers. Please provide an update on the steps you are taking to fully meet the expectations as set out in our putting the sector in balance position statement.	01-Apr-19	Action completed	AFW Securing Confidence and Assurance Evidence Document Section 1.1 Page 3 Section 2.3 Pages 9-11	N/A	AFW Securing Confidence and Assurance Appendix: CA.A3.1 - Executive Remuneration Policy	N/A
Securing confidence and assurance	AFW.CA.A4	Required	Provide a revised financial model (based on version 16z released on 31 January 2019) and data tables on 1 April 2019 that: a) uses the Ofwat model; b) addresses the material inaccuracies in financial ratios based on the actual company structure; and c) ensures consistency of allowed revenues.	01-Apr-19	Action completed	AFW Securing Confidence and Assurance Evidence Document Section 1.1 Page 3 Section 2.4 Page 12	All financial model output data tables Supporting data table commentaries	AFW Securing Confidence and Assurance Appendix: CA.A2.2 - KPMG Assurance Report: financial model CA.A2.3 - PwC (financial):Data Tables Assurance Report CA.A4.1 - Ofwat email on new financial model dated 6 March 2019	PwC (via Business Plan Data Table audit) Atkins (via Business Plan Data Table audit) KPMG (via financial model audit)
Securing confidence and assurance	AFW.CA.A5	Required	The company should revise its business plan and associated financial modelling to be based on our 'early view' of long term CPIH of 2.0% and RPI of 3.0%, or provide compelling evidence why this is not appropriate.	01-Apr-19	Action completed	AFW Securing Confidence and Assurance Evidence Document Section 1.1 Page 3 Section 2.5 Page 13	App 23 Financial model output data tables. Supporting data table commentaries	AFW Securing Confidence and Assurance Appendix: CA.A2.2 - KPMG Assurance Report: financial model CA.A2.3 - PwC (financial):Data Tables Assurance Report	PwC (via Business Plan Data Table audit) KPMG (via financial model audit)
Securing confidence and assurance	AFW.CA.A6	Required	Provide revised tables Wr6 and Wr7 that reconcile and address the following issues: - The benefit from the Sundon treatment should not appear as a post 2020 capacity increase because the company is already entitled to this water resource and the current constraining issue is the treatment of the water. Therefore it does not represent an increase in water resources capacity. - Identified benefits appear to be included from 2020-21 onwards in Wr6 and this does not reconcile with the dates for delivery of benefit as shown in table Wr7. The benefits identified under the zone titles in Wr7 appear to be associated with different zones in Wr6. The company has provided a range of asset lives but the 5 year asset life for a building is unexpectedly low. - The company does not follow the definition of bilateral entry capacity and confuses it with bilateral trades. The company has explained that it has assumed third party and neighbouring water company trades should be recorded in bilateral capacity. These are not bilateral entrants and therefore should be removed from this line and included in the company post 2020 capacity lines if they represent new trades or increases of existing trades and in the pre-2020 capacity line if they are associated with the capacity from renewal of an existing trade.	01-Apr-19	Action completed	AFW Securing Confidence and Assurance Evidence Document Section 1.1 Page 3 Section 2.6 Pages 14-15	Wr6 lines 12 & 13. Supporting data table commentaries There is no change needed to WR7 in this respect.	AFW Securing Confidence and Assurance Appendix: CA.A1.3 - Atkins Technical Assurance Report March 2019	Atkins (via Business Plan Data Table audit) for Wr6 & Wr7