Affinity Water

Annual Performance Report 2024-25

Non-financial line commentary

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Section 2: Household affordability support and debt

Table 2N – Household affordability support and debt

2N.1-3 Number of residential customers on social tariffs

Reduced bill tariffs – Low Income Fixed Tariff

Our low-income fixed tariff (LIFT) is available to customers who are earning less than £19,995 a year or who are currently claiming certain benefits such as Universal Credit or Job Seeker's Allowance.

For 2024-25 the clean water bill was fixed at £119.50, for 2025-26 the bill will be fixed at £143.80

If a customer is eligible for LIFT and receives a council tax reduction or support, then they will be entitled to a higher rate discount, and the clean water bill is fixed at £95.80

We have increased the number of households now receiving LIFT tariff to over 127,000 as at 31 March 2025. We used our data sharing arrangement with the Department for Work and Pensions (DWP) to identify households eligible for reduced bill tariff support proactively. Throughout 2024-25 we used data such as the Index of Multiple Deprivation and our own affordability markers to triangulate our data and identify locations where we wished to focus on identifying cohorts of customers eligible for support.

2N.4-6 Number of residential customers not on social tariffs

The number of customers not on social tariffs is the total number of billed residential customers (table 2F.3) less the average number of billed customers supplied on our LIFT tariff, 118,413.

2N.7-9 Social tariff discount

We calculate the cross subsidy to be £82.57 per LIFT customer, on average.

2N.10-15 Social tariff cross-subsidy - residential customers

We calculate the total value of our social tariff cross subsidy by multiplying the difference between the LIFT tariff capped amount, £119.50 and the average household bill £202.07 by the number of LIFT customers in line 2N.1, yielding a total value for cross subsidy £9.778m.

2N.16-21 Social tariff cross-subsidy – company

During 2024-25 we did not forego revenue to support social tariff provision, so the value reported is zero. We do however meet the costs of administering our social tariff scheme.

2N.22-23 Social tariff support - willingness to pay

In our PR19 business plan, customers indicated that they were willing to pay £4.50 in 2017-18 prices to support social tariff provision. With inflation, this is £5.47 in 2024-25 prices. We report that amount here as RAG4.13 table guidance refers to support in the PR19 business plan.

However, subsequent to PR19, new research showed that a majority of customers were willing to pay an additional £1.80 per customer in 2017-18 prices. Research conducted for PR24 showed that a majority of customers were willing to pay an additional £2.00 in 2022-23 prices on top of that. Our current willingness to pay amount in 2024-25 prices is therefore £10.32. Whilst the value of social tariff cross subsidy £6.72 per customer in line 2N.13 exceeds the amount in the PR19 business plan, £5.47 it is well within the level of cross subsidy supported by the more recent PR24 research.

2N.24-26 WaterSure tariffs

Bill Cap Scheme – WaterSure tariff

The WaterSure scheme works by capping the customers' charges so additional water usage is not chargeable.

Eligible customers will be charged on a metered basis, in receipt of a qualifying benefit and either have three or more children under the age of 19 living in the property who are in full-time education or approved training, or one or more people living in the property that have a medical condition which involves the use of significant amounts of water.

In certain circumstances, on a discretionary basis, we will also support those metered households where someone lives with a medical condition that requires extra water use but does not meet the qualifying benefit criteria to receive the WaterSure tariff.

We calculate the benefit to WaterSure customers by working out what the average bill would be for WaterSure customers if they were supplied on standard tariff and comparing that to the average bill which reflects the capped WaterSure amount. Then multiplying by the total number of WaterSure customers. For this purpose, we use billing records to assess WaterSure customers' consumption, 268m3 per customer on average in 2024-25.

Wastewater charges

We have worked with the wastewater service providers in our area to streamline the process for reduced bill tariffs and to avoid the need for customers to fill out further application forms.

Where we have the correct information, we will automatically apply any wastewater discount that the customer is entitled to.

The total number of households receiving the WaterSure tariff for clean water only as at 31st March 2025 was 3,146 for family and medical reasons. The number supported on average through the year was 2,985.

We have seen only slight changes to the numbers of household supported with WaterSure as our reduced bill tariff LIFT tends to be more beneficial in many cases.

Additional Commentary

During the year we supported about 60,000 customers with £50 bill credits to help with the cost of living. In most cases we proactively identify customers for this assistance and apply credits to bills automatically. A smaller number are made reactively, for instance when third parties refer customers' cases to us.

Our WaterSave tariff trial is exploring the benefits of a rising block tariff design on affordability and water use. About 1,400 AMR metered customers in Stevenage participate and last year, we found that about three-quarters of customers had lower water service bills than if they had remained on the standard tariff. The median bill saving was £31.

We operate a payment matching scheme to help customers with significant water debt to clear their arrears. We helped 104 customers in this way in 2024-25. We also operate a crisis fund for customers who have fallen into significant payment arrears due to difficult circumstances such as serious illness. This year we helped 21 customers in this way.

Section 3: Performance Summary

As part of our PR19 final determination for AMP7 we had 28 stretching performance commitments to help ensure we deliver customer outcomes.

Each of these commitments has financial rewards, penalties, or reputational incentives. Table 3A shows our financial performance commitments and table 3E shows our reputational commitments.

We have met 18 of our 28 performance commitments, of which 11 are financial and 7 are reputational (this excludes C-MeX and D-MeX).

Table 3A shows we have received in-period rewards totalling £1.781m during 2024-25.

We have received in-period penalties totalling £7.021m for our performance on PCC, leakage and Properties at risk of receiving low pressure.

(Adjusting for covid relief our in-period penalty for the year would be £5.952m)

This resulted in a net in-period penalty of £5.241m (£4.172m covid adjusted) which will be reflected in customer charges in 2026-27.

Full AMP7 penalties and reward

We have seen an improving trend in performance across our suite of commitments in AMP7. However, we recognise that our customer services metrics have deteriorated across the years, and that we need to improve services for customers. We have initiated a full transformation programme to address these issues and are engaging with our customers to understand their frustrations and to restore their confidence in us.

For more details on our operational performance in the year, please see detailed commentary in Sections 3 -11 below, which also addresses the commentary required by Regulatory Accounting Guidance (RAG).

As discussed within the accompanying Audit Report, we confirm that all performance commitments, both financial and reputational, have been through our 'three lines of defence' assurance process, including review by our (non-financial) external assurer AtkinsRéalis.

All other technical/non-financial lines within the APR have undergone audit by our external assurers, AtkinsRéalis. Section 1 of their 2024-25 Annual Performance Assurance Report provides their scope of work and Appendix B a detailed breakdown of the tables/lines reviewed as part of the annual assurance process. This includes the financial PCs (on a PC-by-PC basis).

Internally our performance commitments have undergone significant scrutiny throughout the year. Each commitment is reviewed by its respective programme board and reported to Directors and Board monthly. We also undertake mid-year audits in preparation for the annual performance report audits. Prior to external audit, numbers and commentary are reviewed and signed off by the respective head of department. Following audit, figures and commentary for external submission are signed off by the respective director. Any issues identified that remain unresolved are raised to the board for scrutiny and declared within our APR and within our external assurers' report.

Our ICG (independent challenge group) meet regularly. As the 'voice' of water users, they challenge and support us as we develop plans and progress through the year. Performance is reviewed and queried to aid in direction of travel with our customers best interests in mind. The ICG also play a pivotal role in the sign-off of our Environmental Innovation Project performance commitment.

Our APR is published on our website for customers and other interested parties to review. A customer friendly digital summary of 'our year in review' is located on our website with a pdf version available for download. Data files are also available in an open data format for machine learning tools.

Table 3A - Outcome performance – Water common performance commitments

3A.1 Compliance Risk Index (CRI)

In 2024 (Calendar year metric), our Compliance Risk Index (CRI) score was 1.44 against our performance commitment target of 0 and below the Ofwat deadband of 2.0. The number of results that did not meet the relevant standard in 2024 was 39, which was a reduction compared to 2023 when there were 50.

At the start of the year, there were two aluminium exceedances from properties supplied by Iver Water Treatment Works (WTW) where the size score was applied to the whole population within the relevant water supply zones. In March 2024, coliform bacteria were detected in Harefield Service Reservoir (SR) 3 West, which is one of our largest storage assets with a capacity of 73 ML. We attributed the cause of the coliform detection to low turnover of water and DWI issued several recommendations that we acted on. Consequently, the CRI score for these three exceedances was 0.99, making up around 69% of our total CRI score.

As part of our Distribution Operation and Maintenance Strategy (DOMS), we are continuing a programme of pro-active mains flushing which is targeted to areas that we assess to be at higher risk of metal deposition within the distribution mains. At the start of 2025, we commissioned a new set of booster pumps that will transfer more water out of Harefield Service Reservoir No. 3 to properties in North London and help improve the turnover in that asset.

Our CRI performance in AMP7 has been below the Performance commitment deadband of 2.0 for 4 out of the 5 years. Through continuous improvements to the management and maintenance of our assets, we aim to maintain our performance below the committed deadband as it progressively reduces over the course of AMP8.

3A.2 Water supply interruptions

Performance during the 2024-2025 reporting year has remained very good, with an interruption time of 3 minutes and 21 seconds, keeping us comfortably below our target of 5 minutes for the year. We are performing within the upper quartile of companies against this metric and have outperformed our anticipated forecast in the business plan submission.

Our performance in part benefited from the relatively benign weather conditions experienced in the year and with the exception of the short freeze-thaw event in January had limited impact on our network. Our ongoing performance however can be attributed to the success we have had in enhancing our operational efficiency and thus, reducing our supply interruptions over the last five years.

Our performance has deteriorated slightly relative to the 2023-2024 reporting year, which was primarily due to two events which occurred in October and December

adding 26 and 33 seconds, respectively. In addition, we added 41 seconds across January with the freeze-thaw event. These incidents combined to contribute 49% of the total time added for the year, reflecting the fact that our background level of performance remains favourable.

We continue to respond to events rapidly, remain committed to maintaining good asset health, and drive network and asset optimisation. We strive to mitigate and reduce the length of interruptions and provide a high level of service for our customers.

We confirm we report supply interruptions that are equal to or greater than three hours and do not include cattle troughs in our connected property figures.

As in previous years we are 'green' against all the elements of the checklist contained in the reporting guidance for supply interruptions.

3A.3 Leakage

We have achieved a 19.4% reduction in the 3-year rolling average leakage value from the 2019-20 baseline value. Our performance commitment required us to achieve a 20% reduction from baseline in the 3-year rolling average by the end of the AMP period. Following year-end processes and verification this is a 0.1% change from our early forecasted submission.

Throughout the AMP we have maintained a strong focus on driving leakage down, we have utilised elevated levels of Active Leakage Control, fixed more leaks than previous AMPs, brought in the use of new technologies and expanded the role of pressure management.

Whilst we have not achieved our targeted 20% reduction in the 3-year rolling average, we have managed to increase our percentage reduction from 18.3% at the end of 2023-2024 to 19.4% at the end of 2024-25. This is a result of driving down the in-year leakage by 5.4 Ml/d from our 2023-24 position. This will see us achieve the in-year WRMP commitment.

Leakage outbreak over the summer was greater than predicted, with a significant increase in reported leaks. This led to our leakage position in the summer being higher than our glidepath profile required to achieve the 20% reduction in the 3-year rolling average. We implemented a recovery plan which bought our leakage levels down throughout the autumn period. However, due to the cold weather at the end of November into early December and then again in early January we experienced further leakage outbreak which slowed our progress. Following that outbreak we have continued to follow our recovery plan and have seen a reduction in leakage. Whilst the annual average is higher than our glide path, we are ending the year in line with that profile, which puts us into a good position entering year 1 of AMP8.

Convergence compliance

In line with our convergence compliance action plan, we have made improvements in our compliance against the component checklist. The table below shows a summary of our position and change from last year. Our improvements have not affected the baselines figures, so no restatement is required this year.

Main component	2023-24	2024-25	Change
Red	0	0	0
Amber	4	0	-4
Green	12	16	+4
Sub-component	2023-24	2024-25	Change
Red	0	0	0
Amber	8	0	-8
Green	68	76	+8

Through our action plan this year we have been able to turn the remaining amber components green:

- We have deployed 1200 loggers on non-household properties to feed a new ABV model with a stratified sample.
- We have carried out a thorough review of all DI meters to demonstrate that they are appropriately sized and located at appropriate inputs.
- We have developed a new dashboard to allow us to demonstrate the verification status of all our DI meters.
- Our water balance closure is under 2%.

We are reporting green against all component and elements. The table below confirms the compliance at both main component and subcomponent level and where changes have occurred in the year and the reasons why.

Convergence compliance

Leakage Guidance Line	PCC Guidance Line	Description	Unit	2023-24 Year End	2024-25 Year End	Change from prior year (Y/N)	Reason for Change (If applicable)	Additional Comments
A		Leakage	Ml/d (1dp)	153.5	148.1	N/A		
1. Coverage				Amber	Green	Y	All properties are now covered by continuous night flow monitoring	
1a		95% of all properties have continuous night flow monitoring through the year	R/A/G	Amber	Green	Y	See 1.0	
2. Availability				Green	Green	N	N/A	
2a		At least 90% of all properties within continuous night flow monitoring networks available for reporting night flow data through the year	R/A/G	Green	Green	N	N/A	Availability is 93.4%
3. Properties				Green	Green	N	N/A	
3a		All properties mapped to defined zones or DMAs using geo-location or similar methods	R/A/G	Green	Green	N	N/A	
3b		Consistency of property numbers contained within DMAs or zones with company billing system. Valid differences explained	R/A/G	Green	Green	N	N/A	
3c		Properties that are defined as void excluded from night use allowances unless evidence for use or losses from illegal occupation is available	R/A/G	Green	Green	N	N/A	
3d		Leakage allowance applied for properties not within DMAs or monitored zones consistent with other leakage estimates	R/A/G	Green	Green	N	N/A	
3e		Property data updated at least annually	R/A/G	Green	Green	N	N/A	
4. Night flow period and analysis				Green	Green	N	N/A	
4a		Night flow data frequency at least every 15 minutes	R/A/G	Green	Green	N	N/A	
4b		Leakage derived from a fixed period during the night of at least a one hour period and up to two hours	R/A/G	Green	Green	N	N/A	
4c		If the fixed period is varied during the year for some or all DMAs or zones to address significant changes to night use patterns such as during Ramadan evidence for this is provided	R/A/G	Green	Green	N	N/A	
4d		Leakage allowance applied for properties not within DMAs or monitored zones consistent with other leakage estimates	R/A/G	Green	Green	N	N/A	

4e		Data infilling for a single DMA or zone does not use more than six months of historic data before moving to area average	R/A/G	Green	Green	N	N/A	
4f		Data infilling where historic data is not available uses the area average in which the DMA is located	R/A/G	Green	Green	N	N/A	
4g		When a DMA is restored to operability, the subsequent leakage data is used to retrospectively update the data infilling interpolating between pre- and post- data over at least one month	R/A/G	Green	Green	N	N/A	
4h		Where NHH properties are continuously monitored, the actual values of flow over the night flow period are used in place of estimates within the night flow analysis	R/A/G	Green	Green	N	N/A	
4i		Weekly leakage estimates are used for annual reporting with no exclusions for summer months	R/A/G	Green	Green	N	N/A	
4j		Negative leakage values are used in compiling values of annual average leakage	R/A/G	Green	Green	N	N/A	
4k		The reasons for any prolonged periods of negative leakage are investigated and explained	R/A/G	Green	Green	N	N/A	
5. Household night use				Green	Green	N	N/A	
5a		The time period for HHNU is the same time period as used for night flow and NHHNU	R/A/G	Green	Green	N	N/A	
5b		Own data or shared data with proximate companies is used for HHNU	R/A/G	Green	Green	N	N/A	
5c		Plumbing losses are included and based on own data	R/A/G	Green	Green	N	N/A	
5d		Evidence that survey is representative (based on demography, property type or other factors) of the company as a whole	R/A/G	Green	Green	N	N/A	
5e		Sample size is sufficient to capture continuous and intermittent night use with reasonable confidence	R/A/G	Green	Green	N	N/A	
5f		Continual monitoring and maintenance of IHMs (individual household monitors) and SAMs (small area monitors)	R/A/G	Green	Green	N	N/A	
5g		HHNU is derived daily with regular, adjustment of values on a weekly or monthly frequency to reflect actual seasonal use. This may be done retrospectively	R/A/G	Green	Green	N	N/A	
6. Non-household night use				Amber	Green	Y	New model developed implemented with a sufficient sample size with data which is reliable and representative of the NHH customers	
6a		The time period for NHHNU is the same time period as used for night flow and HHNU	R/A/G	Green	Green	N	N/A	
6b		Own data or shared data with proximate companies is used for NHHNU	R/A/G	Green	Green	N	N/A	

6c		1999 UKWIR methodology with the appropriate time window as used for the night flow and the published outcome of further methodology development is applied	R/A/G	Green	Green	N	N/A	
6d		Stratification of non-households to a number of groups and consumption bands is representative of the varying characteristics of commercial and industrial properties	R/A/G	Amber	Green	Y	We have worked with Artesia to develop a NHHNU model. As part of the program of work we identified the properties to be logged to ensure the sample was representative.	
6e		Sample size is sufficient to capture night use by stratification with reasonable confidence	R/A/G	Amber	Green	Y	1200 loggers have been deployed which is a sufficient size to allow stratification	
6f		Reliable and representative average billed volume (ABV) model based on data logging of the representative sample sufficient to capture demand variations with further seasonal logging where relevant. Continuously logged properties not part of the sample.	R/A/G	Amber	Green	Y	Artesia have built an ABV model based on the stratified sample	
6g		ABV model linked to billing system or replacement database of billed volumes. Average billed volumes updated at least annually	R/A/G	Green	Green	N	N/A	
6h		Continuous monitoring of selected non-households is carried out where average demand of an individual non-household has a material impact on the ability for a DMA or zone to provide valid and consistent data within operability limits	R/A/G	Green	Green	N	N/A	
7. Hour to day conversion				Green	Green	N	N/A	
7a		The hour-to-day factor is derived separately for each DMA or zone using pressure logging within each DMA or zone. The factors are updated at least annually or where there are any significant changes to pressure regimes	R/A/G	Green	Green	N	N/A	
7b		As an alternative, hydraulic models reflecting latest network configuration and pressure changes, are used if they dis-aggregate in sufficient detail at sub-zone level	R/A/G	Green	Green	N	N/A	
7c		Evidence based N1 value used. Expected range is 1.0 to 1.20	R/A/G	Green	Green	N	N/A	
8. Annual distribution leakage				Green	Green	N	N/A	
8a		Average weekly data is derived from valid daily values of leakage using data points which are representative of the week. Backfilling using the methods described in Section 5.4 – night flow analysis - is done when valid data is not available for three or more data points	R/A/G	Green	Green	N	N/A	

8b		The annual value of leakage expressed as Ml/d is be derived from an average of the 52 week data	R/A/G	Green	Green	N	N/A	
9. Trunk main losses (only applicable if DMA level leakage assessment used)				Green	Green	N	N/A	
9a		Company-specific data is used to assess the value of trunk main leakage	R/A/G	Green	Green	N	N/A	
9b		Proactive leakage monitoring approach applied where trunk main losses form a significant element of total leakage or the MLE water balance gap is greater than +/-2%	R/A/G	Green	Green	N	N/A	
9c		If trunk main losses greater than 5% of total leakage estimates reviewed annually	R/A/G	Green	Green	N	We have updated our BABE assessment and that has been fed into the bottom up leakage calculation	
10. Service reservoir losses (only applicable if DMA level leakage assessment used)				Green	Green	N	N/A	
10a		Company-specific data is used to assess the value of service reservoir losses;	R/A/G	Green	Green	N	N/A	
10b		Reservoirs with known high leakage, structural deficiencies or at risk of water quality failures are investigated on an individual basis	R/A/G	Green	Green	N	N/A	
10c		Drop tests (12 hour duration depending on size) carried out every five or ten years. All valves checked for tight close; and losses through overflows investigated. Appropriate monitoring arrangements in place to control and minimise overflow events.	R/A/G	Green	Green	N	N/A	
11. Distribution input				Amber	Green	Y	N/A	
11a		Distribution input to the system is metered with at least daily readings at all defined locations	R/A/G	Green	Green	N	N/A	
11b		Meters are appropriate size for the flow to be measured and located at appropriate inputs to the network confirmed by record plans. Any treatment works take-off downstream of a meter are excluded from the DI calculations	R/A/G	Amber	Green	Y	We have carried out a thorough review of all DI meters to demonstrate that they are appropriately sized and located at appropriate inputs. We have made an allowance for treatment recirculation.	
11c		Data validity checks are carried out at least monthly	R/A/G	Green	Green	N	N/A	
11d		Missing data is infilled using both pre- and post- data for the location over at least one month, extrapolated from pump hours or use of upstream or downstream meters	R/A/G	Green	Green	N	N/A	

11e		The data transfer systems from meter output to central database are checked and validated on a risk-based frequency from one up to two years	R/A/G	Green	Green	N	N/A	
11f		Flow checks are carried out on DI meters consistent with the principles of the document 'EA Abstraction Good Metering Guide' and in particular the frequency of flow checking defined in table 6.2 of the EA guide	R/A/G	Amber	Green	N	Verification is being carried out and we have developed a dashboard which allows us to demonstrate this.	
12. Measured consumption				Green	Green	N	N/A	
12a		Metered data is derived from own billing system or from CMOS for non-households	R/A/G	Green	Green	N	N/A	
12b		Estimate of supply pipe losses is included for internally metered properties consistent with own current assumption of supply pipe losses	R/A/G	Green	Green	N	N/A	
12c		Inclusion of any leakage allowance is included where a rebate has been applied to a customer's bill.	R/A/G	Green	Green	N	N/A	
12d		Meter under-registration (MUR) is applied consistent with own estimates. Evidence of MUR available especially for MUR above 3%.	R/A/G	Green	Green	N	N/A	We carry out 3rd party independent testing of our meter and the results analysed by another 3rd party to provide an annual MUR update. Our current MUR rate for our central region is 6.36%, Southeast region 4.92% and East region 4.81%. The variation between region is predominantly due to the differing meter stock in each area.

12e		Meter replacement consistent with own replacement programme	R/A/G	Green	Green	N	N/A	
13. Unmeasured consumption				Green	Green	N	N/A	
13a	4a	Monitors follow principles set out in the UKWIR Report 'Best Practice for unmeasured per-capita consumption monitors 1999' and the more recent report 'Future Estimation of Unmeasured Household Consumption', UKWIR 2017	R/A/G	Green	Green	N	N/A	
13b	4b	Consumption is derived from own individual household monitor or small area surveys	R/A/G	Green	Green	N	N/A	
13c	4c	Evidence that survey is representative (based on demography, property type or other factors) of the company as a whole; valid data available from at least 80% of monitors as an annual average measure	R/A/G	Green	Green	N	N/A	
13d	4d	For companies using SAMs – SAM (small area monitor) comprises a representative sample of customer' characteristics. The sample size is sufficient to provide a statistically representative sample after allowing for outages. Where the proportion of metered properties in an area exceeds 50% of total properties then further data validity tests are applied or companies using IHMs – IHM (individual household monitor) comprises representative sample of customer characteristics. The sample is at least 1000 properties.	R/A/G	Green	Green	N	N/A	
13e	4e	Uncertainty allocated to unmeasured household consumption is estimated and justified	R/A/G	Green	Green	N	N/A	
13f	4f	There is continual monitoring and maintenance of IHMs and SAM monitors	R/A/G	Green	Green	N	N/A	
13g	4g	Meters are selected to provide sufficient granularity to detect low continuous flows indicative of plumbing losses or leakage short duration flow variations. The value of meter under registration is less than the company's average meter stock	R/A/G	Green	Green	N	N/A	
13h	4h	Estimate of plumbing losses is based on own data	R/A/G	Green	Green	N	N/A	
13i	4i	Where unmeasured non-household reported volume is less than 2% of total non-household demand, data from a per property consumption study is refreshed every five years	R/A/G	Green	Green	N	N/A	
13j	4j	Where unmeasured non-household reported volumes are greater than 2% of non-household demand, data from a property study is refreshed every two years	R/A/G	Green	Green	N	N/A	
14. Company own water use				Green	Green	N	N/A	
14a		All sewage treatment sites and other sites and assets supplied downstream of the DI meters using greater than 10 m3/d (0.01 Ml/d) are metered	R/A/G	Amber	Green	N	Captured as part of actions for Line 11b	

14b		An estimate of total company own use is included in the water balance, based on a clear methodology and actual data	R/A/G	Green	Green	N	N/A	
14c		Estimate of distribution operational use is evidence based and not greater than 0.6% of distribution input	R/A/G	Green	Green	N	N/A	
15. Other water use				Green	Green	N	N/A	
15a		Other use components are based on own data	R/A/G	Green	Green	N	N/A	
15b		Estimate of water delivered unbilled (legally and illegally) is evidence based and not greater than 1.8% of distribution input	R/A/G	Green	Green	N	N/A	
15c		Estimates are updated when there is a material increase or decrease to volumes	R/A/G	Green	Green	N	N/A	
16. Water balance and MLE				Amber	green	N	N/A	
16a		Fully measured components have a range from 2% to 4%	R/A/G	Green	Green	N	N/A	
16b		Mainly measured with some estimated adjustments have a range from 2.5% to 5%	R/A/G	Green	Green	N	N/A	
16c		Estimated using detailed and reliable methods have a range from 8% to 12%	R/A/G	Green	Green	N	N/A	
16d		Broad estimates not fully detailed or reliable have a range from 20% to 50%	R/A/G	Green	Green	N	N/A	
16e		Water balance discrepancy: <2% = Green >2% and <3% = Amber >3% = Red	R/A/G	Amber	Green	N	Balance under 2%	

Adjusted leakage penalty and deferred leakage reward

Following reporting in 2022-23, Ofwat confirmed that the leakage penalty and rewards for years 1-3, (and adjustments to the penalty in yrs 1 & 2) would be deferred as we were not yet compliant with all elements of the convergency methodology.

On the same basis, we voluntarily deferred our leakage reward in 2023-24 due to the amber rating of our closure error of >2%, <3%.

Our reporting for 2024-25 confirms we are now fully compliant against all components and elements of the leakage checklist, and our closure error is less than 2%. We are therefore claiming the deferred rewards and adjustments from the prior years.

We have reported in Column 7 (Total of 2020-2025) of table 3A the inclusion of the deferred penalty and rewards.

3A.4 Per capita consumption

PCC is a measure of customer consumption in the home.

Water is an essential resource. To ensure there is enough for everyone now and in the future, we have a commitment to help and encourage our customers to reduce the amount of water used each day. Our target is based on a three-year average reduction from (3-year average) base year.

We ended 2024-25 with a 12-month 'spot' PCC of 153.9 l/p/d and a 3-year average of 154.9 l/p/d. This is an increase of 0.6% from the 2019-20 baseline against a reduction target of 12.5%. Therefore, we have not achieved the performance commitment target for the year.

Since Covid, customers behavioural patterns have significantly changed. Particularly within the commuter belt areas more customers are consistently working at home. This means customers are now using more water in their domestic supply area than was the case before the pandemic. Water usage peaked during the pandemic and remains higher than that used when the base year was set. We are seeing water usage slowly reducing; however, it is still above that used during the base year point.

Despite not meeting the performance commitment, we have made reductions each year from a Covid-19 equivalent baseline. We understand that reducing customer consumption is important for both the environment and our future supplies. We are committed to delivering programmes to help improve the reductions in household consumption. During 2024-25 we continued to deliver a variety of campaigns and looked for innovative ways to engage with our customers.

Compliance against component checklist

We are green against a components and elements of the checklist.

PPC Line guidance	Description	Component RAG	Element RAG	Change from prior year (Y/N)	Reason for Change (If applicable)
1	Household Population estimates	Green		N	
1a	Household population derived using WRMP methodology		Green	N	
1b	Evidence for adjustments for clandestine population if any		Green	N	
1c	Household population updated annually		Green	N	
1d	Exclusion of non-household population in accordance with WRMP methods		Green	N	
2	Household property estimates	Green		N	
2a	Definition of household / non-household consistent with eligibility under market separation		Green	N	
2b	Evidence of void properties updated annually		Green	N	
2c	Property figures annually updated		Green	N	
3	Measured household consumption	Green		N	
3a	Metered data is derived from own billing system		Green	N	
3b	If leakage allowances are applied the process and evidence for this is clearly set out.		Green	N	
3c	Average SPL deductions for externally metered households using company own data updated annually		Green	Y	We have carried out an updated assessment of our SPL allowances.
3d	Company own estimate of MUR for revenue meters which is updated annually.		Green	N	
3e	Meter replacement consistent with own replacement programme		Green	N	
4	Unmeasured household consumption	Green		N	
4a	Monitors follow principles set out in the UKWIR Report 'Best Practice for unmeasured per capita consumption monitors 1999' and the more recent report 'Future Estimation of Unmeasured Household Consumption', UKWIR 2017		Green	N	
4b	Consumption is derived from own IHM or SAM or evidence to support other method appropriate for high meter penetration companies		Green	N	
4c	Evidence that survey is representative (based on demography, property type or other factors) of the company as whole; Valid data available from at least 80% of the monitors as an annual average		Green	N	
4d	For companies using SAMs - SAM comprises a representative sample of customer' characteristics. The sample size is sufficient to provide a statistically representative sample after allowing for outages. Where the properties in an area exceeds 50% of total properties then further data validity tests are applied For companies using IHMs – IHM comprises representative sample of customer characteristics. The sample is at least 1000 properties		Green	N	
4e	Uncertainty allocated to unmeasured household consumption is estimated and justified		Green	N	
4f	There is continual monitoring and maintenance of IHMs and SAM monitors		Green	N	

4g	Meters are selected to provide sufficient granularity to detect low continuous flows indicative of plumbing losses or leakage short duration flow variations. The value of meter under registration is less than the company's average meter stock		Green	N	
4h	Estimate of plumbing losses is based on own data		Green	N	
4i	Where unmeasured non-household reported volume is less than 2% of total non-household demand, data from a per property consumption study is refreshed every five years		Green	N	
4j	Where unmeasured non-household reported volumes are greater than 2% of non-household demand, data from a property study is refreshed every two years		Green	N	
4k	Company own estimate of MUR for monitor meters which is updated annually		Green	N	
4l	Meter replacement consistent with own replacement programme		Green	N	

Performance in the year, water saving campaigns and initiatives

We remain committed to reducing per capita consumption through a programme of established and new initiatives. We conduct home visits with customers along with installation of water-saving devices, detecting and repairing plumbing losses, and educating on sustainable usage. We've also expanded our leak video service, allowing customers to send footage of suspected internal leaks for assessment and repair. Flow regulator installations have continued into Year 5 to support operational reductions in household demand. Meanwhile, our award-winning behaviour change campaigns continue to raise awareness and drive meaningful, lasting changes. We are refreshing these initiatives for AMP8 and exploring innovative tariff options to support reductions in household water use.

For more information on our demand saving activities please see 6F.4

WaterSave (Rising block) tariff trial - expansion

Our initial trial on 1500 households in Stevenage is showing very positive results at the halfway stage. We are seeing a material reduction in per capita consumption from households on the trial and arrears and bad debt have also fallen indicating that there are affordability benefits as well. We are looking to run a larger scale trial next year and are also talking to government about the results to help their development of future policy in this area.

3A.5 Mains repairs

We have met the mains repair target for the year and are reporting our in-year performance of 113.43 mains repairs per 1000km of potable mains. This is against a target of 142.3. We have also outperformed against our anticipated forecast, made within our business plan submission.

Our baseline level of performance remains very good, comparable to the previous year, however the total number of mains repairs in 2024-25 was higher primarily due to the outbreak in January caused by the freeze/thaw event. We responded to the outbreak in the immediate aftermath, and over the following weeks our leakage teams increased their efforts to locate and repair non-visible bursts.

We have maintained our strong performance by continuing to quickly identify and respond to risks to our network. Our Control Room continues to carry out live monitoring of the network, 24/7, via our extensive network of Critical Point loggers and District Meter pressure and flow loggers. We have recently incorporated an additional ~6,000 Pressure Point loggers – located at strategic points around our distribution network – into our monitoring system. This further improves our ability to spot issues early and potentially intervene before mains bursts occur.

We continued to develop our root cause analysis of every burst. This analysis leads to the identification of actions to prevent recurrence. These actions are fed into our Network Performance Group, which meets monthly to review performance of the network and track delivery and benefits of actions. This year increased focus has been placed on holding delivery partners to account for actions identified, to improve the performance of the network in such a way as to positively impact our network-related Performance Commitments.

During AMP8, we will be creating over 200 additional pressure-controlled areas, reducing the likelihood of mains bursts in these areas. We will continue to undertake extensive hydraulic modelling to target this increased pressure control to deliver the most benefit.

Due to our current level of performance, and the improvement activities we have planned, we remain in a strong position to achieve the Mains Repairs Performance Commitments in AMP8.

We can confirm that we are 'green' against all the elements of the checklist contained in the Performance commitment reporting guidance for mains repairs.

3A.6 Unplanned outage

Unplanned outage is a means of assessing asset health, for water abstraction and water treatment activities. It is defined as the annualised unavailable flow, based on the peak week production capacity (or PWPC), for each company.

Year-end-performance for 2024-25 was 1.45% (against a target of 2.34%). We attribute this reduction to resolution of a number of issues at Iver, Debden Road and Drellingore alongside more planned work.

All our performance data comes from a single source, with standard time stamping and flow.

We have outperformed the target, but experienced spikes in May and November due to the long-term above average rainfall. We have historically seen spikes in the spring and autumn as the weather conditions become unsettled and wet.

Improvement Activities

We apply a continuous improvement approach to our Unplanned Outage activities and in this current AMP have delivered improvements in how we capture and report the measure, but also how we use the insight to drive operational improvements.

Alongside shadow reporting of water quality events in preparation for our AMP8 unplanned outage metric, we increased our focus to understand and optimise production capacity across 6 areas.

1. **Optimisation:** Managing assets to ensure that they are used to their full potential whilst minimising operational risk.

   At Springwell / Mill End Pumping Station we engaged Datumpin to improve operational efficiency by using patented software to monitor our assets to provide insights, to help optimise operations and improve reliability. DuPont Water Solutions were also engaged to conduct a system optimisation review of the ultrafiltration treatment process to identify issues affecting the process.

2. **Asset Return:** Developed a strategy to help decision-making to minimise the effects of out of service assets. Established processes to prompt quick restoration, mitigating operational disruptions.

   We identified delays caused by suppliers as a key issue impacting our operations. After reviewing the situation, we initiated a working group with our Capital Delivery team to improve supplier response times and optimise our processes through better framework agreements.

3. **Data:** Enhancing the use of data collected to better inform decision making and pro-active measures.

   We have a proactive data approach providing our teams insights to help the identification of issues and working as one team to address or mitigate as they arise.

4. **Critical Spares Provision:** Ensuring the availability of critical spares parts to minimise site downtime and quickly address any operational disruptions.

   The initiative is now fully operational. Our project team successfully conducted a spares review and has compiled a centralised inventory of available spares. This inventory includes reusable assets from the decommissioning of HS2 and where licenses have been revoked and balance sheet purchases. Additionally, funding has also been approved for borehole pump spares and associated stock holding to support operational resilience. This will be managed by our Customer Delivery Capital Maintenance team through the tried and tested process Production Reactive Capex.

5. **Capital Improvements:** Working with the Asset team to identify sites where capital solutions would benefit and improve processes.

   We have worked with our Asset Planning Team in Asset Strategy and Capital Delivery to better classify risks and solutions on our Asset Risk Manager (ARM) so they can be included in regular reviews for investment through various funding channels.

6. **Planned Maintenance Strategy:** Developed comprehensive strategies for planned maintenance activities to uphold and improve site resilience.

   A four-month trial of a mass balance optimisation tool was conducted to drive down Opex and risk, related to our short to mid-term Production Planning. This is with the intent for further commitment of £510K across the AMP to do a full roll-out of the tool within Water Resource Zones 1-5. Our current Production Planning process relies on paper-based calculations and past experience rather than data driven decision modelling. With several sustainability reductions from 1st April 2025, there is increased need for more accurate planning to understand the supply risk of outages and asset availability.

   Forecasted increases in Opex costs of our plan next year also drive the need for better optimisation of our short-mid-term plans.

Also see 3F.8, 3I.1, 6A.28 for further detail.

Compliance against the component checklist

We continue to report green against all components within the checklist.

3A.7 Environmental innovation - delivery of community projects

We had a programme of works to deliver eight environmental innovation projects in AMP7 to improve our customers' knowledge, water use and water efficiency. The goal of the programme was to bring together sector experts, charities, community and environmental groups, and other stakeholders to trial a range of innovative multi-party projects, linked to different environmental themes and water use behaviours.

The eight Environmental Innovation Projects were worth 14 project units and to be delivered in the 2020-25 period. Projects varied in size and cost, with 7 projects each worth one unit and the remaining Lee catchment project worth 7 units.

In 2024-5 (Y5) we delivered two project units associated with Lea catchment project.

Project Name	No of Project Units	Internal delivery target
Lee catchment project	7	4 units completed (Y3) 1 unit completed (Y4) **2 unit completed(Y5)**
Affordable housing (Colne)	1	Completed (Y2)
Targeted campaign (Wey)	1	Completed (Y2)
Targeted campaign (Brett)	1	Completed (Y3)
Education methods (Misbourne)	1	Completed (Y2)
New Developments (Stort)	1	Completed (Y2)
Faith groups – Grey Water Recycling (Pinn)	1	Discontinued(Y4)
Education smart meters in schools (Dour)	1	Discontinued (Y4)

Work Package 3: Catchment Systems Thinking Cooperative (1 unit)

The aim of the project was to develop a 'Citizen Science' initiative, connecting local communities to their local river, exploring the opportunities associated with open data, stimulating innovation and collaboration in the River Lea catchments.

Over 40 volunteers were recruited within 16 months of this project starting and the approach has already been extended to several other rivers, with plans to incorporate the whole River Lea catchment. Citizen Science monitoring has identified several pollution sources and built a robust dataset of evidence of key issues impacting the river. It also had wider social and wellbeing benefits such as improved mental health. The project will now inform development of national models that are relevant to Affinity Water catchments for AMP8 on monitoring techniques, data collection and sharing, incorporation of citizen science and community collaboration to meet local and catchment-scale environmental challenges.

Work Package 6: 'Rooting for Wildlife' environment fund pilot (1 unit)

The project objective was to develop a delivery model for a community-focused fund to empower local groups and communities to deliver innovative projects to protect, improve and enhance chalk streams and the wider environment. During the application phase, 48 applications across the Lea catchment were received and 17 of them were successfully awarded funding. The winning projects included pond creation and enhancement works, protected species re-introduction, river restoration, wetland rewilding, woodland management and school outreach and education. Rooting for Wildlife will now be funded as an AMP8 scheme (2025-2030) through our WINEP programme and will be expanded to cover our whole supply area.

Role of Independent Challenge Group (ICG)

The role of the ICG is to provide assurance on progress and completion of project delivery.

The below assurance process is followed involving ICG group in AMP7. In 2024-25 the ICG gave final Gate 3 assurance on 3rd June in the ICG meeting which was supported by the verification report of benefits realised.

Benefits of the Projects

Overall, the projects have delivered innovative new ways to engage with customers, stakeholders, and partners, and deliver information and/or water efficiency knowledge and interventions.

We have welcomed the opportunity to undertake this commitment. The projects were designed to investigate, research and pilot new approaches to help meet environmental obligations and improvements collaboratively with key stakeholders and customers. Without the benefit of this commitment the opportunity to undertake these test projects would not have been possible.

Details on each of our innovation projects can be viewed at https://www.affinitywater.co.uk/innovation together with their individual verification and benefits report by our external technical assurer.

3A.8 Reducing the total number of void properties by identifying false voids

Our void property rate was 2.01%, outperforming our commitment target for the year of 2.10%. We classify a property as void if it is within our supply area and connected to the water network but does not receive a charge as it is unoccupied.

To identify false voids and perform against the performance commitment, we have continued our proactive lettering to empty properties providing information on how to register, with follow up letters to suspected occupied 'empty' properties.

We use credit agency data where we do not receive responses to our letters after 4 weeks. For unmetered customers and customers where meter readings show consumption over 5m3 (potential evidence of occupation), we use a third-party credit agency to ascertain if there is any credit activity at the property. Where there is credit activity, we obtain occupier details to bring the customer into charge. Where third party credit checks do not provide occupier details or the confidence score of occupation is low, our site investigators make physical visits to the property to establish occupancy and gather customer details.

We continue to split work between our site investigators and office-based teams, allowing more time for office staff to cleanse and analyse occupation data which has led to an increase of property visits undertaken.

Whilst there is no performance commitment in AMP8 for the reduction of void properties, we propose to continue with our current process and will continue to target their reduction and to bill the occupiers as per our Charges Scheme.

3A.9 River restoration

The river restoration team completed or (financially) contributed to five additional projects in the 2024-25 year which generated 12 river restoration units of activity. This took our cumulative performance from 30 units to 42 units at the end of the 2024-25 year, an outperformance of target by 6 units.

All finished projects had sign off completed stating the units agreed with the Environment Agency, which they counter signed. Counter signed sheets are retained as record of project delivery and have been reviewed by our technical assurer.

3A.10 Abstraction reduction

The 2024-25 Abstraction Reduction PC target of 27.33 Ml/d was met on the 22nd December 2024.

The applications to vary the abstraction licences were validated by the Environment Agency prior to the WINEP measure completion date. The licence variations have now been determined with agreements in principle for two outstanding applications (Runleywood Chalk and Misbourne group). The date for implementation of the abstraction reductions was 31st March 2025. Therefore, there have been no changes in reported performance compared to the annual target.

3A.11 Number of sources operating under the Abstraction Incentive Mechanism

Annual AIM performance

The table below provides the reported annual global AIM performance scores since AIM came into effect in April 2016.

Year	AIM score (Ml - million litres)	Score description
2016-17	-1,622.21	AIM active in 7 catchments; GWLs: average to dry year
2017-18	-3,046.95	AIM active in all catchments; GWLs: dry year
2018-19	-2,383.84	AIM active in 5 catchments (10 sources). GWLs: dry year

2019/-20	-2,057.70	AIM active in 10 catchments (16 sources). GWLs: dry year
2020-21	-304.31	AIM active in 2 catchments (3 sources). GWLs: above average; increasing trend from summer 2020
2021-22	-429.63	AIM active in 1 catchment (2 sources). GWLs: above average; declining trend
2022-23	-1,277.03	AIM active in 5 catchments (8 sources). GWLs: below average/average year
2023-24	-266.54	AIM active in 1 catchment (2 sources). GWLs: above average; increasing trend from October 2023
2024-25	-193	AIM active in 1 catchment (2 sources). GWLs: above average; increasing trend from September 2024

The target for each report year is 0 Ml. The score for 2024-25 was -193 Ml. (A negative AIM score signifies an improved performance compared to historic droughts, as average abstraction was lower than the baseline at the global scale when AIM was active).

We have met and outperformed the AIM baseline figures at a global scale for each report year (2016 - 2024). This is mainly linked to low groundwater levels which provide many opportunities to score, together with long-term outages at some sources (e.g. Oughton Head and Runleywood Chalk). The requirements from Ofwat changed from 2020-21 such that we are no longer required to report the AIM performance per source. Therefore, only global AIM performance figures are given in the table above. No changes have been made in the reporting methods or assumptions since AIM was introduced in 2016.

The global performance is based on the sum of scores for all sources that are included within AIM. We put forward 23 sources in 2016 to be included in AIM, based on the environmental sensitivity of the sources identified in previous studies. From 2016 to date, eight sources have been subject to Sustainability Reductions (SRs), with the deployable output (DO) at four of these sites being reduced to zero Ml/d. These four sources were omitted from the AIM assessment at the time of the SR, in addition to one other source, which was removed following discussions with the Environment Agency (EA). Therefore, 18 sources remain to be assessed under AIM as of 2024-25.

Each AIM site has a trigger, which is typically set at the downstream gauging station in catchments where the AIM sites are located. The only exception to this is our Denge source which is assessed under AIM based on a local groundwater level trigger.

The number of active AIM triggers varies with background groundwater levels, meaning that the scores between years are not directly comparable. Therefore, year-on-year variances are expected, and we do not observe an improving/declining trend over time. The table provides a short description of the annual scores, including the number of sources active during the respective report year, and a brief comment on the background groundwater level situation. A higher negative score was accumulated during 'dry' years (e.g. 2017-18 or 2019-20) where background

groundwater levels were below the long-term average, and the AIM triggers were active in most catchments. Background groundwater levels were higher on average during 2024-25 than 2023-24. Therefore, there were fewer opportunities to accrue a negative score under AIM (-193 Ml v -266.54 Ml). In addition, proactive outage management which aims to minimise outages in the summer months helped us to maintain a consistent abstraction pattern below the AIM baseline at the AIM sites which were active in 2024-25.

Managing AIM performance

The Environment Agency email weekly to notify us if an AIM trigger(s) has been activated. We then confirm with our operations team that the abstraction at the respective source(s) is below the AIM trigger. We also have an early warning trigger in place for each source, which typically provides us with one month's notice of an AIM trigger being activated; this is communicated with our operational teams to aid in planning.

We have calculated and tracked AIM performance monthly. We undertake the assessment and provide QA of the data, so we can screen-out erroneous data that may affect the calculation (both our data and that provided by the EA). Overall, the river flow and abstraction data are classed as highly reliable and accurate. The river flow data from the EA must be validated within a certain period as specified by the data validation category. A grading is provided for each flow value by the EA and any suspect data will be flagged. The daily abstraction is routinely checked, and the instantaneous flow data is available on our telemetry system for additional checks if required. The abstraction flow meters should be accurate within ±5% as these are the parameters required to pass the flow meter calibration.

There are no interdependencies between this metric and other lines or tables in the APR tables.

Environmental benefits of undertaking AIM

We recognise that we operate in a water-stressed area where chalk stream catchments are of significant ecological importance. To reduce our effect on the local environment, we have implemented a number of permanent sustainability reductions aiming to leave more water in the environment. Whilst we consider this to be a permanent measure, we believe there is benefit in going above and beyond for the chalk stream environment and adapt the way we operate during low flow conditions. AIM allows us to reduce our environmental impact during times when the environment would be under stress. AIM contributes to leaving more water in the environment at the onset of a low flow period and reduces groundwater level recovery time in the aquifer. When AIM is active in the summer months, it is more likely to discourage peak use of sources which would otherwise have been maximised based on peak demand.

3A.12 Properties at risk of receiving low pressure

During 2024-25 4,733 properties were added and 7,766 removed from the 'properties at risk' register. This gives a net reduction of 3,033 properties, equivalent to 19.058 per 10,000 connections. Our reported figure this year is 118.569 properties per 10,000 connections.

As detailed to Ofwat previously, it is not possible for us to meet this performance commitment due to the nature of the reporting guidance and the high level of coverage of 'critical point' data loggers across our network.

2024-25 was the last year of this Performance commitment and we have therefore discontinued monitoring against this metric and will no longer maintain a 'DG2 register'.

We know that water pressure is important to customers, we will continue to report the 'average time of low pressure' bespoke performance commitment (see 3E.6) through the 2025-30 AMP8 period. This reporting criteria provides a more reliable indication of the impact and effect of low pressure on our customers.

3A.13 Number of occupied properties not billed (Gap sites)

A household supplied property is considered a gap site if it is occupied by a customer but not billed. This can occur when a new property is built, or an existing property is developed (for example into flats) to include new dwellings which are not billed.

A performance commitment for AMP7 targets the identification of gap sites, therefore allowing the household property to be added to the billing system and appropriate bills raised for consumption of water. Reducing the number of gap sites results in fairer charging and lower bills for customers who already pay their water bills.

In 2024-25 we successfully placed 99 gap sites into charge, outperforming our target to identify 50 gap sites each year.

We identify gap sites primarily through several processes. Typically, a new occupier to the property will contact us to register their details. If the property can't be located on our systems, then a visit to the property is arranged. During this visit, if the connection is found to be in order, the property will be recorded onto our systems. Other gap sites are identified by site investigators and office-based teams who are tasked with finding such properties.

We also continue to prioritise activity towards properties likely to have the largest revenue yield, to maximise customer benefits from the resources we devote to gap site activity.

Whilst there is no performance commitment in AMP8 for the identification of gap sites, we propose to continue with our current process and will continue to target identification of such sites and to bill the occupiers as per our Charges Scheme.

Audit and Assurance

Below is an extract from our performance commitment summary of audit conducted by our external assurer on Gap sites.

As required in the FD, our external assurer has confirmed that in line with the reporting and assurance requirements, we have rigorous processes that are correctly implemented to identify and bill newly built properties.

Assurance summary for APR Commentary for 3A.13 Number of occupied properties not billed (Gap sites)

Table and Line Ref.	Subject	Assurance summary		
		Methodology	Data	Findings
3A.8	Reducing the total number of void properties by identifying false voids	Green	Green	We consider the Company's reporting and methodology is robust, with embedded checks and controls throughout the processes. No issues were identified with the reporting.
3A.13	Number of occupied properties not billed (Gap sites)	Green	Green	We consider the Company's reporting and methodology is robust, with embedded checks and controls throughout the processes. No issues were identified with the reporting.

Methodology and documentation of method

The Company provided a comprehensive walkthrough of each process from end to end, highlighting any slight variations in approach, for example, the treatment of voids, and the distinction between 'measured' (based on the date of the last bill) and 'unmeasured' (based on the date the property became empty). The Company demonstrated compliance of its method with the PR19AFW definition and parameters.

The Company reported that its methodology remains unchanged in the treatment and thresholds set, for example, uneconomical to bill remains unchanged, and the further data checks it performs on customers who do not respond to letters issued, which the Company presented copies of letters issued to its customers.

Data and reporting

The Company were able to demonstrate its reported figures for each metric back to data source for each metric and we did not identify any issues in the samples we reviewed.

3A.14 Unplanned interruptions to supply over 12 hours

The Unplanned interruptions >12 hours measure is our second supply interruption performance commitment. The improvements seen in our average minutes' commitment have also been reflected in this metric. We have this year again achieved the metric.

Interruptions greater than 12 hours have typically been the result of bursts on large trunk mains and freeze-thaw events. Where supplies are restored to wider areas, other areas with a 'single point failure' and/or little or no re-zone options may continue to be affected. Such areas continue to be at risk during future incidents, and we intend to mitigate these through our resilience 'single points of failure' enhancement programme in AMP8.

As noted within our average-minutes metric, 2024-25 has also benefited to some degree from favourable weather and therefore relatively low numbers of property interruptions have been seen.

Outside of large incidents, the number of individual properties affected by avoidable interruptions such as stop taps left shut off or meter failures continues to remain low.

This performance commitment is not carried forward into AMP8, however the duration of interruptions is now reported in table 3E against the average minutes' metric.

3A.15 Customer contacts per 1000 population for Water Quality (taste, odour & appearance)

Our performance commitment (PC) for customer contacts per 1000 population for water quality (taste, odour & appearance) was met in 2024 (this is a calendar year reported metric) with the contact rate being 0.60 against a target of 0.67. This was made up of 1467 (0.38) contacts regarding appearance and 849 (0.22) contacts regarding taste and/or odour. This is comparable with our performance in 2023.

During the first half of 2024, we completed construction of the conditioning plant at Sundon Service Reservoir (SR), which takes water from Anglian Water's Grafham WTW. The chemical conditioning will mitigate the risk of discoloured water from pipework corrosion that could occur due to the difference in composition of the imported water compared to our own groundwater.

In AMP7, our contact rate per 1000 population for water quality (taste, odour & appearance) has been 0.80 in 2020, 0.78 in 2021, 0.56 in 2022, 0.58 in 2023 and 0.60 in 2024. Based on our sustained performance over the last three years, we are confident that we will continue to meet this performance commitment in AMP8.

Table 3C - Customer measure of experience (C-MeX)

We are disappointed with our C-MeX Service performance for the year 2024-25.

We recognise that customers are expressing dissatisfaction with the price increase in their bills, which are occurring as a result of the necessary investment in service improvements and environmental enhancements. Alongside this, there is rising customer expectation and dissatisfaction across a broad range of issues facing us and the water industry as a sector, including faster resolution times and increased leak reduction.

We are committed to enhancing customer satisfaction through a series of strategic initiatives which should significantly improve our performance going forward.

Key strategies include:

- Enhanced communication and improved resolution: regularly updating customers on the progress of their issues and resolving them as swiftly as possible.
- Improved billing practices: simplifying billing statements to ensure they are clear and easy to understand.
- Ongoing support for vulnerable customers: providing additional support for customers with low incomes or special needs.
- Continued leakage reduction and water quality: prioritising the reduction of leakage and maintaining high water quality standards to ensure a safe, clean, and reliable water supply.
- Technological advancements: developing user-friendly online portals and mobile apps for billing, service requests, and usage monitoring.
- Continued customer feedback integration: actively seeking and incorporating customer feedback to refine our services, including conducting customer focus groups.

Whilst the overall results are disappointing, we can see signs within the data of improvements within our Experience results which in Q4 improved, elevating both our score and our position to 7th place. Over the course of the full year, our Experience score improved to 12th place, and we believe that our marketing and customer communication programs are beginning to yield positive outcomes.

3C.5 Total household complaints

In 2023-24 the level of errors identified in our complaints reporting was deemed as high, therefore an uplift in the complaint numbers was applied. This was considered proportional to the errors found. After the publication of APR24 submission, the Consumer Council for Water confirmed that they did not expect or support this

process and requested that we report only the number of complaints recorded as such in our systems. The guidance definition for this line states "Total household complaints as reported to Consumer Council for Water for the current reporting year". Therefore, the actual 'Total Household complaints' were resubmitted to Ofwat, without the uplift.

An end-to-end review of the processes was initiated, (and is ongoing) this includes a policy and process review, colleague training and re-training, improving our mechanisms for recording complaints and the methodology of assurance testing to clearly understand where and why incorrect recording occurs and implementing processes to give better feedback to colleagues.

Since implementation, we have seen an ongoing improving trend, meaning a reduction in our error rate. Over the last quarter error rates have reduced and a corresponding increase in complaints recorded. We recognise that we still have further work to do to correct and recalibrate our approach. We continue to action and refine our improvement plan.

Over 2024 -25 an average error rate of 2.11% was calculated across the telephony contacts, when this is extrapolated against the total telephony contacts this would equate to 12,671 potential additional complaints, where 4,340 telephony complaints were recorded accurately. In social media a total error rate of 2.6% was found and when extrapolated against the total social media contacts this would equate to 2,236 potential additional complaints. In email and post a total error rate of 0.69% was found and when extrapolated against the total email and post contacts this would equate to 1,943 potential additional complaints. In total these combined error rates could potentially equal an additional 16,850 unreported complaints, when using this methodology. We continue to conduct our increased internal review of complaints and ongoing checks. Any complaint or contact incorrectly recorded is flagged and raised for review with the appropriate agent, where further training is provided.

3C.8 Confirmation of communication channels offered

We confirm that we offer last least five communication channels for receiving customer contacts and complaints, this includes three online channels.

Table 3D - Developer services measure of experience (D-MeX) table

Our D-MeX performance has gradually improved throughout this year.

We have achieved a score of 100% for D-MeX quantitative, an improvement of 0.13% from last year. Our qualitative score has also improved when comparted to last year, by 4.81. We know that pro-active communication, delivering against timescales, and

quality of works are key service elements for our customers. We have shown improvements throughout this year, but there is still room for further improvements.

This year, we changed our construction contract partner. Working with a new partner has enabled us to align more closely on shared values, particularly around delivering high-quality infrastructure and customer service during project delivery. Since the transition, we have observed a marked improvement in construction-related qualitative metrics.

We are putting a focus on improving offering 'value for money' as customer feedback from this question also links into communication, efficiency, and timescales. We have taken a data driven approach to structure our D-MeX strategy and help us understand how best to support different customer types through their journey with Development Experience.

The developer market is continually changing, and we are pro-actively looking at how we can improve our service to support all customers. We have system and process changes in our D-MeX strategy which we believe will benefit customers.

Table 3E - Outcome performance - Non financial performance commitments

3E.1 Severe Restrictions in a Drought

The performance commitment 'Risk of severe restrictions in a drought' is defined as the percentage of the customer population at risk of experiencing severe restrictions (for example, standpipes or rota cuts as part of Emergency Drought Orders - EDO) in a 1-in-200-year drought, on average, over 25 years. The population is considered to be 'at risk' if the supply-demand balance calculation in each water resource zone (as used for water resource planning) for the 1-in-200-year drought event results in a shortfall (deficit).

In our final PR19 submission to Ofwat, performance commitment levels were set for the 2020-2025 period. In their calculation the annual forecast, rather than the 25-year average, was used to calculate the expected future performance and associated targets. Future schemes that were selected in the Water Resources Management Plan 2019 (WRMP19) to manage supply and demand between 2020 and 2045 (25-year period) were also included with their expected benefits reported in future years. This inclusion resulted in the target falling to 0% by the start of AMP7 with the net movement of schemes and demand changes forecast in the WRMP keeping the target at 0% for each year of the AMP period.

Following scrutiny from our external auditors, A 'revised' methodology, taking on board the above revisions was produced to report in line with the guidance, The main differences involved the use of the 25-year average in the metric calculations and the

exclusion of benefits from planned supply-side and demand-side schemes that have not been delivered yet.

This resulted in the reported figure diverting from the way the performance commitment target was originally set at PR19. Therefore, it should be noted that the reported figures are not directly comparable with the commitment levels set.

In addition, the following data sources changed from when the performance commitment levels were originally set:

Element	Previous data source	Current data source
Outage	WRMP19 - Water Resources Planning Tables	Latest WRMP24 Outage Forecast
Target headroom	WRMP19 - Water Resources Planning Tables	Revised values from WRP Tables
Distribution input	EA Table (reporting year)	Water Resources Planning Tables – WRMP19 or EA Table (reporting year)
Transfers	WRMP19 - Water Resources Planning Tables	EA Table (based on capacities)

The use of the WRMP24 outage allowance has slightly worsened the supply demand balance in certain zones while improving it in others, resulting in a negligible net effect when considering the performance for the company area as a whole. The change to the 25-year average is mainly due to the exclusion of the expected benefits from future supply-side and demand-side schemes.

The demand-side schemes are designed to align with the company outturn data reported in Table 6F. However, this is a whole company number, produced from a top-down methodology. To apportion demand-side benefits for WRZ3, the total company demand saving was divided by the % of total company population in WRZ3.

Given these changes, a new set of commitment targets were calculated to assess what the equivalent targets would be, had we set them using the equivalent approach and data at PR19:

Target levels	Unit	2020-21	2021-22	2022-23	2023-24	2024-25
FD PC levels set in PR19	%	0.0	0.0	0.0	0.0	0.0
Revised PC Levels	%	63.9	60.6	51.9	36.6	26.0

The 2024-25 performance of 22.2% met the PC target due to the delivery of Sundon Conditioning Plant in the WRMP19 forecast. It should be noted that the delivery of Sundon Conditioning Plant is dependent on the delivery of Anglian Water interconnector options that facilitates the transfer of the full licenced amount, dictated by the Great Ouse Act

It is important to highlight that the above figure does not represent the percentage of customers who are at risk of severe restrictions in a 1:200-year drought event in the current reporting year (2023-24). Rather, this metric takes a long-term approach and shows the proportion of customers at risk over a 25-year period. In addition, the methodology adopted is very conservative as planned future schemes selected in the WRMP do not contribute to the 25-year average supply-demand balance with their expected schemes. This has the effect of overestimating the percentage of customers who are and will be in a real risk of experiencing severe restrictions. Our overall security of supply remains robust, and we maintain that the security of supply that we provide to our customers is in line with our WRMP19 planned levels.

The performance commitment targets have not formally changed in line with the change protocol. We wrote to Ofwat in October 2022 to understand the change process. It was concluded that the change protocol would not be amended but the following advice was provided:

- *Companies should report PCs in line with the definitions and guidance. However, if your PCLs are based on final plan data then the performance data you report should follow the same methodology*
- *Where this is the case, you should clearly explain this in your commentary*
- *You may choose to show the difference e.g., using final plan, the 2021/22 data is XX but, using baseline, it is YY.*

We have therefore reported the numbers in 3E.1 and 3I.2 based on the revised methodology.

For comparison, the two sets of performance figures calculated using the different methodologies are noted below:

Methodology	2020-21	2021-22	2022-23	2023-24	2024-25
Final Determination (as per target setting)	44.0%	34.2%	41.5%	49.3%	51.56%
Revised methodology	67.7%	61.5%	67.7%	68.1%	22.2%

End of year reporting requirements

We have not achieved our target for this Performance Commitment through Year 1 to 5 of the AMP. The increased percentage of customers at risk of restriction in a drought against the targets set at the end of AMP 6 is caused by unexpectedly high levels of demand due to the Covid19 pandemic at the beginning of the AMP. This has been exacerbated by the leakage position from the beginning of AMP 7.

While the annual percentage of customers at risk has decreased through the AMP, there is still a risk to some of our customers in the central zone. In WRMP19, we agreed

to look at accelerated Supply Schemes, such as additional trading schemes or reduction in external transfers, if we failed to meet our targets and implement these in AMP 8.

In WRMP24, we have sought to improve resilience in our Central Zone, which places the highest percentage of customers at risk, by developing and implementing the Connect 2050 scheme. This is a series of internal interconnectors between Zones 1 – 6, that move existing WAFU and future supply around the region. The first of these schemes, Egham to Iver Phase 1 (17 Ml/d) is expected in 2025/26, which allows the surplus of water in AFWWY6 to be moved to AFWPN4 and then around zones 1 – 5.

We are currently in discussions with Thames Water to access 15 Ml/d for the central zone in 2025/26 and through AMP 8 and AMP 9 to provide supply to the region until larger SRO projects can be delivered.

We have agreed to reduce our existing 36 Ml/d export to South East Water to 26 Ml/d in 2025/26 to help increase resilience in the beginning of the AMP.

We have rebased the Risk of Severe Restrictions Performance Commitment using WRMP24 numbers derived from the Final WRMP24 tables. The following is a comparison of PC levels based on the Business Plan, Revised and End of Year Reporting Methodologies:

End of year reporting methodology

	Unit		2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31	2031 /32	2032 /33	2033 /34	2034 /35	2035 /36	2036 /37	2037 /38	2038 /39	2039 /40	2040 /41	2041 /42	2042 /43	2043 /44	2044 /45
Total population at risk (annual)	*000s*		2,594	787	1,926	1,947	1,200	2,641	2,676	2,709	2,740	2,405	2,429	2,450	2,471	2,491	2,139	2,153	2,167	2,180	2,194	2,351	2,367	2,383	2,399	2,415	2,432
Total population at risk (annual)	*%*		67.7	20.3	49.2	49.3	30.1	81.4	81.4	81.4	81.4	70.8	70.8	70.8	70.9	70.8	60.4	60.4	60.3	60.3	60.3	64.2	64.2	64.2	64.2	64.2	64.2
Average customers at risk	*000s*	265.833																									
Average customers at risk	*%*	**63.33**																									

Business Plan methodology

	Unit		2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31	2031 /32	2032 /33	2033 /34	2034 /35	2035 /36	2036 /37	2037 /38	2038 /39	2039 /40	2040 /41	2041 /42	2042 /43	2043 /44	2044 /45
Total population at risk (annual)	*000s*		2,136	787	1,926	1,947	473	1,772	2,265	,280	2,295	2,309	2,322	2,335	2,349	2,363	2,376	2,390	2,403	2,415	1,484	1,490	2,144	2,153	3,348	3,366	3,384
Total population at risk (annual)	*%*		55.8	20.3	49.2	49.3	11.9	44.1	55.8	55.8	55.8	55.8	55.8	55.7	55.7	55.7	55.7	55.7	55.7	55.6	34.0	33.9	48.6	48.5	75.0	74.9	74.9
Average customers at risk	*000s*	2,180.368																									
Average customers at risk	*%*	51.56																									

Revised methodology

	Unit		2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31	2031 /32	2032 /33	2033 /34	2034 /35	2035 /36	2036 /37	2037 /38	2038 /39	2039 /40	2040 /41	2041 /42	2042 /43	2043 /44	2044 /45
Total population at risk (annual)	*000s*		2,594	787	1,926	1,947	1,200	1,040	1,049	1,058	1,066	-	1,083	1,092	1,100	1,109	1,118	1,126	1,135	1,143	-	-	391	394	397	400	403
Total population at risk (annual)	*%*		67.7	20.3	49.2	49.3	30.1	25.9	25.9	25.9	25.9	0.0	26.0	26.1	26.1	26.1	26.2	26.2	26.3	26.3	0.0	0.0	8.8	8.9	8.9	8.9	8.9
Average customers at risk	*000s*	942.227																									
Average customers at risk	*%*	22.96																									

3E.2-4 Priority Services Register (and other assistance available)

Supporting customers who need a little extra help (both temporarily and long term) continues to be a key priority. While the Priority Services Register (PSR) will not be a performance commitment next year we continue to promote it and the additional services available when needed.

PSR Reach

Our Priority Services Register has grown this year by just over 38K households. Alongside promotion through our website, social media and bills a significant proportion are achieved by our front-line colleagues identifying triggers during the calls that could indicate a customer is experiencing vulnerability and will proactively offer the PSR to households.

We continue to share data with both electricity Distribution Network Operators (DNO's) in our area (UK Power Networks (UKPN) and Scottish and Southern Electricity Networks (SSEN). From UKPN alone we were able to create over 8k new PSR records and update over 4K. These support our PSR reach and contribute to our attempted and actual contacts targets. Updates received from the DNO's count as an actual contact for the purposes of our reporting.

We achieved our year 5 target of 7.2% reach in August 2022 and finished this year at 13.29%.

We do not report the number of individuals on our PSR as we monitor households.

In the year, 50,648 households were added to the register and 12,576 were removed.

We also track the number of households registered under the following categories:

We also track the number of households registered under the following categories and have exceeded the predicted breakdown in most categories.

Categories	Achieved 2024-25	PR19 Business Plan forecasts
Communication	36,800	27,101
Mobility and Access	113,171	75,123
Other	14,213	9,529
Security	60,384	66,502
Supply	128,251	117,862

PSR attempted contacts and actual contacts

We continue to reach customers through our scheduled contacting plan which is a continuous process of identifying customers as they approach the renewal date.

Our contact strategy is embedded into our systems which means that although due to the size of the register, there was a significant level of contacts needed for 2024-25, we were able to continue to meet our targets.

Scheduled contact attempts have been made by email and SMS throughout 2024-25 with a small number of letters also issued to customers.

We committed to maintaining this approach for AMP8 in our vulnerability strategy ahead of the newly released PSR standards.

For year 2024-25 we achieved 90.39% for attempted contacts and 52.1% for actual contacts.

Additional help for customers

Reduced bill tariffs – Low Income Fixed Tariff

We have increased the number of households now receiving LIFT tariff to over 127K and we have used our data sharing arrangement with DWP to proactively identify households eligible for reduced bill tariff support. Throughout 2024-25 we used data such as Index of Multiple Deprivation and our own affordability markers to triangulate our data and identify locations where we wished to focus on identifying cohorts of customers eligible for support.

Wastewater charges

We have worked with the wastewater providers in our area to streamline the process for reduced bill tariffs and to avoid the need for customers to fill out further application forms. From 1st April 2025 any customer who qualifies for our Low-Income Fixed Tariff will automatically receive the wastewater discount with Thames Water where applicable. As part of this work to align our tariffs we have updated over 43K accounts receiving our clean water discount to now benefit from the Thames Waterhelp tariff.

We also share and receive data with Southern Water for households placed on our respective reduced bill tariffs and will ensure that the customer benefits from a similar reduction to the water/waste charges.

Debt respite schemes

We continue to partner with the charity 'Surviving Economic Abuse' to pilot the acceptance of an Economic Abuse Evidence Form which means that victim survivors of economic abuse do not have to repeat their story with multiple creditors.

We also offer a 'crisis fund' to provide immediate support to households facing a crisis (e.g. accidents, terminal illness, abuse, serious illness). As part of the application process, we will check to ensure that the household is receiving the most appropriate tariffs and signpost to other support.

During 2024-25 we launched our 'payment matching' scheme which is a 2-year plan which will write off the customers arrears at the end the period providing that the customer has been able to maintain the agreed payment plan for the whole time.

Cost of Living Payment

We continued to support nearly 60K households during 2024-25 with our one off £50 payment to support with cost-of-living and we have increased the number of referral partners that we work with on this scheme.

We will continue to support households in this way during 25/26 and will use various data sources to target support in the most effective way. As part of our support during annual billing 31K households have already received this support.

Data sharing agreements

We have had a data sharing agreement with Department of Work and Pensions (DWP) since January 23 and during 2024-25 we used this partnership to identify households in our most deprived areas for support.

Community Partnerships

We have recently begun our partnership with Kidney Care Uk which means that we will be able to work with the charity to ensure our customers living with chronic kidney disease have access to any relevant tariffs or support through the Priority Services Register.

We work with Herts Community Foundation who help us identify local projects to support and most recently we have supported two local groups providing support to people living with vision loss and supporting the deaf community.

We continue to work with a local foodbank and hold regular 'surgeries' to ensure households are receiving appropriate support either through reduced bill tariffs, cost-of-living support or through the Priority Services Register.

We continue to grow our partnership with a charity that provides 'gift bags' to older people in our community and colleagues have used their volunteering days to support the charity pack these bags. This has also been supported personally by our Executive Leadership Team.

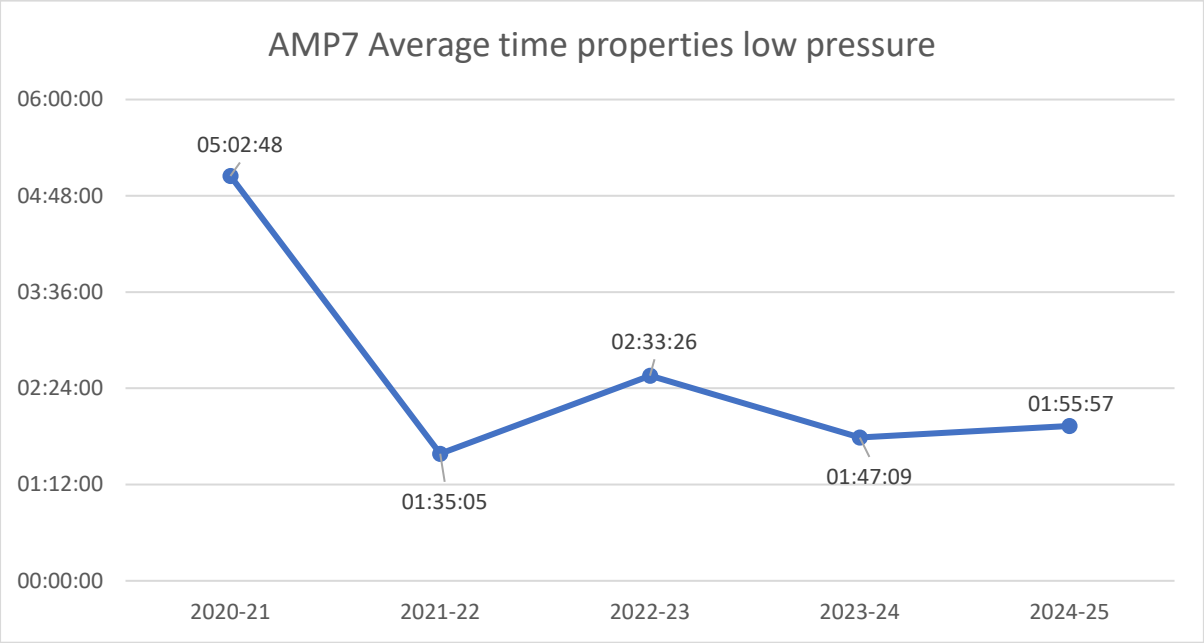
Customer vulnerability strategy

We published both the main strategy and a customer summary of the strategy in June 24. We provide promises to our customers in terms of what they can expect if they are registered on the PSR. We also provide a clear set of ambitions and targets which we will monitor and review each year.

3E.6 Average time properties experience low pressure

Our 2024-25 full-year performance is 01:55:57 against a Performance Commitment Level of 08:42:00.

Below shows where this level of performance sits in comparison to previous years in AMP7.



2024-25 was a relatively benign year in terms of the weather and environmental conditions experienced, much like 2023-24, and this is reflected in the reported performance level. We did experience a minor freeze-thaw event in January which saw a small increase in the time added in that month, however it did not have a significant impact on the year end figure.

The graph demonstrates that performance is closely aligned to the weather patterns experienced in that given year. The effect of the Covid lockdowns (in combination with hot, dry weather) can also be seen clearly in 2020-21. Analysis of monthly data also bears this out, where the effects of high temperatures in summer and freeze/thaw events in winter can clearly be seen.

We remain focussed on improving performance in this area and have a number of initiatives in place to achieve this. Performance improvement initiatives are primarily delivered via a monthly Low Pressure Programme Board, but also through separate targeted activities to resolve or improve pressure issues. We have also identified capital schemes for future delivery that will remove time by resolving local pressure issues.

The methodology for AMP8 differs slightly from AMP7, however the fundamentals of the measure are the same, therefore our improvement activities remain broadly unchanged.

We do however acknowledge that the Performance Commitment targets in AMP8 are stretching compared to AMP7 and offer little in the way of headroom for a worsening of performance, or seasonal events such as a particularly hot dry summer.

To give ourselves the best chance of achieving the AMP8 targets we need to look beyond capital investment schemes and focus on other areas that we know in the past have improve performance. This includes speed of response to incidents, rezoning of customers during an incident to ensure they have adequate pressure (not just water restored), ensuring g planned work has mitigations to prevent low pressure, and identifying and responding quickly to PRV control issues.

We also have a challenge around visibility of logger availability and developing a methodology for capturing and reporting instances of logger unavailability and applying the appropriate uplift. This is being actively worked on.

3E.7-8, 11-12 Customers in vulnerable circumstances

We are committed to delivering an exceptional experience to all our customers, ensuring our services are available and inclusive to all. We offer a range of services, both for financial support (such as those receiving our Low-Income Fixed Tariff) and for those registered on our Priority Service Register designed for those customers that may require extra help with communication, access, physical or other needs.

We ask our customers to tell us about their experiences with us and to score us from 0 (very dissatisfied) to 10 (very satisfied). We also ask our customers to tell us how easy we are to do business with, again scoring us using the same scale where 0 is not easy and 10 very easy.

The survey results provide the responses to the following questions:

- How satisfied are you with the service you receive from us?
- How easy are we to do business with?

Responses received

We survey customers through a variety of contact channels following an interaction with us. We aim to reach as many customers as we can to ensure the survey results provide a realistic reflection of all types of vulnerability experienced and a robust sample size for reporting.

Contact Channels

The PR19 final determination guidance sets out that surveys should be conducted through SMS, web, email, and end of call surveys.

'End of call' surveys are conducted through SMS or email sent at the end of the call. We believe it inappropriate for surveys to be conducted person-to-person during the telephone call as this may be open to bias, with customers uneasy to provide open

and honest feedback. It is also not in line with market research code of conduct best practice.

Proactive Survey

In addition, we also proactively contact customers via SMS who have not had contact with us for over 12 months, but who are on the PSR register or flagged as financially vulnerable.

As specified within the PR19 guidance, the commitment requires that the survey is conducted following an interaction. The proactive surveys results are therefore reported separately on our website alongside the survey results. As with our value for money metric, while all survey responses prove useful to understanding customer views, media cover and overall perceptions of water companies appear to heavily influence customer scores where an interaction has not actually taken place in the year.

Wording of questions

In line with our branding and tone of voice, the words 'we' and 'us' are used in place of 'Affinity Water' in the survey questions.

Customers surveyed

We can confirm that only contacts relating to billing and financial queries have been included in the 'receiving financial help' surveys. Further we can confirm that interactions relating to operational and metering queries have been excluded as specified in the 'specific' exclusions within the guidance. We assume 'metering' to include meter reading queries.

For customers receiving non-financial help, surveys have been conducted solely with customers on the PSR register who we have interacted with us. This survey covers all activity types. We regard all contact with a PSR customer as a 'PSR interaction', vulnerability is not restricted to a narrow contact definition or only when PSR is directly referenced. PSR and vulnerability is broad reaching. It is essential we understand how we treat these customers in all services they receive, and how we can make their journey as smooth as possible.

24-25 Full Year Actual Results:

Financially vulnerable CSAT:	**89%** score 7-10
Financially vulnerable Make it Easy:	**88%** score 7-10
Non-financially vulnerable (PSR) CSAT:	**86%** score 7-10
Non-financially vulnerable (PSR) customers Make it Easy:	**84%** score 7-10

While many customers on the Priority Service Register commend our representatives for their politeness, professionalism, and efficiency, we recognise the need to address concerns such as high water bills, communication issues and metering installation.

For customers receiving financial support, we are dedicated to offering more affordable pricing and flexible payment options. We strive to enhance our services to

better meet the diverse needs of all our customers, especially those with special circumstances or limited means.

In line with the requirements of the FD, the results have updated for 2024-25 and published on our website:

https://www.affinitywater.co.uk/docs/performance/Additional-Services.pdf

3E.9 BSI Accreditation

This BSI Kitemark has been tailored specifically to demonstrate best practice for Water Provision. This includes alignment with Ofwat requirements including the Paying fair guidelines.

This international standard specifies requirements and guidelines for organisations on how to design and deliver fair, flexible and inclusive services that will increase positive outcomes for consumers in vulnerable situations and minimise the risk of consumer harm. It covers organisation culture and strategy, inclusive design and responding to consumer vulnerability.

In January 2024 we transitioned from BSI standard 18477 to the new ISO standard 22458 – Consumer Vulnerability - Requirements and guidelines for the design and delivery of inclusive service.

We had our ongoing surveillance assessment with BSI in March 25 and were once again confirmed as meeting the requirements with continued certification recommended.

The BSI auditor noted evidence of several improvements including the Vulnerability Strategy, removal of call handling time targets and bill redesign. Also observed were good approaches which included our Smart Metering programme and our annual refresher training for colleagues on vulnerability.

3E.10 IT Resilience

The IT resilience metric monitors priority 1 & 2 incidents to ensure services are restored in a timely manner ensuring unplanned interruptions to services are kept to a minimum and therefore disruption to our customers.

For 2024-25, we are reporting an impact score of 1258, against a target of less than 1,200 in the year. This is the first time we have not achieved the target in the reporting period (2020-2025).

The reported impact score is a total score derived from the availability/ outages of all our key systems though out the year. A summary of availability for these systems for 2024-25 is shown below:

	Yearly (Apr24-Mar25)		
	Total Downtime (Minutes)	Total available uptime Since April 2024 (Minutes)	% Uptime for Period
Totals	3215	34,689,600	99.991%

We acknowledge that our total minutes of downtime has increased over the reporting period, and service improvement plans have been implemented to drive improved resilience across the services which caused the most disruption.

We continue to

- Adopt "Cloud 1st Ethos" with any new technologies, we leverage SaaS (software as a service) offerings where possible.
- Progress our IT Resilience Programme - looks to continually improve upon our strong foundational platform, by enabling regular hardware refreshes, regular patch management and application product upgrades to ensure we maintain vendor support.
- Focus on risk mitigation, identifying potential vulnerabilities and the measures to mitigate them, though implementing security controls and backup systems to establish continuity plans to address threats effectively.
- Focus heavily on security controls and measure to ensure we invest in tooling that proactively advises of potential cyber vulnerabilities allowing us to take swift remediation when necessary.
- Standard mandatory training across the organisation to improve technology awareness i.e., security best practises.

We continue to make improvements to our ServiceNow system (IT service management system) and the way we work. Where issues are identified, experts are assigned to each action, to track from route cause to resolution. We look to group recurring incidents, enabling identification of potential trends in cause(s) and impacts on lost time. This enables comprehensive post incident reviews which ultimately feed into future improvements.

Reporting and assurance

As required in the FD, we confirm that as part of our external assurance process IT resilience was audited by our external assurers.

A summary overview of the above can also be viewed in our APR Assurance report.

Reporting and assurance:

Assurance Summary for APR Commentary 3A.10 IT resilience

Table and Line Ref.	Subject	Assurance summary		
		Methodology	Data	Findings
PR19AFW_R-N6	IT Resilience	Green	Green	We consider the Company's methodology for reporting is robust, with checks and controls built into the processes. We did not identify any issues with the Company's reporting when sampling.

Methodology

We consider the Company's handling of its reporting, investigation and resolution of its IT issues is robust. The Company demonstrated to us that their systems record information needed to deal with an IT incident, including how they review incident afterwards. The Company continues to investigate repeat incidents, spotting recurring patterns and how they can work with their service provides to prevent reoccurrences. We also found the Company's process for record keeping to be robust.

Data

This is not a complex reporting process. When performing data check, we did not find any issues. The Company was able to demonstrate that its data and data controls were robust.

Whilst the Company did not achieve its performance target for 2024/25, its record keeping, controls and report of its data demonstrated that its data is robust.

3E.13 Value for Money Survey

Our value for money survey seeks to understand householders' overall satisfaction with the 'value for money' of our service.

As part of our Customer Perception Survey, customers are asked to rate the value for money of the services they receive from us. Customers score from 0 to 10, where 0 is 'very poor value for money' and 10 is 'excellent value for money'. The surveys are conducted each quarter by an external market research company.

Throughout the period this has been a particularly difficult target to achieve, given the backdrop of customers facing rising costs of living and other post pandemic financial pressures. Customers have cited increasing household bills and being unable to compare price across sectors as reasons for lower scores.

While all survey responses prove useful to understanding customer views, the perception of value for money is reported against those customers that say they are confident they know their bill size. It is of note that where customers do not have an understanding of how much they pay for water service, their score of 'value for

money' was lower than those who do. Media cover and perceptions of the overall cost of utilities appears to heavily influence this viewpoint rather than a knowledge of the actual cost of the water service.

Although this performance commitment does not extend into AMP8, we remain dedicated to providing exceptional value for money to our customers. We are currently reviewing our tracking surveys, which gather customer feedback and ratings on the value for money we offer, to better understand their perspectives and improve our services.

3E.14 WINEP delivery

We have completed all WINEP Actions (individual lines) within our Environment Agency (EA) AMP7 WINEP Tracker with evidence submitted to the EA within the agreed regulatory deadlines.

The actions delivered in AMP7 include a combination of the following:

- Sustainability changes
    - This includes reductions, no deterioration licence changes and/or cessations of abstractions at multiple groundwater sources in chalk stream catchments to supporting addressing of flow RNAGs (reasons for not achieving good status) in line with the Water Framework Directive (WFD) Drivers.
    - This overlaps with the Abstraction Reduction performance commitment.
- River restoration schemes
    - Completed river restoration and habitat enhancement schemes on chalk streams to address flow and ecological RNAGs in line with WFD Drivers.
    - These Actions overlap with the River Restoration performance commitment (3A.9 PR19AFW_W-B3 Cumulative number of project units delivered since 1 April 2020) for which we have outperformed the 36 Unit target for AMP7 delivering 42 river restoration project units.
    - The river restoration projects have delivered significant benefits to a number of chalk streams across our supply area which are already demonstrating improvements in Riverfly scores in some areas.
- Drinking Water Protected Area (DrWPA) and WFD groundwater quality (WFDGW_ND) schemes
    - Completed catchment management schemes to mitigate the impacts of agricultural pollution on surface, groundwater and risks to public water supply
    - These schemes have successfully delivered significant benefits to water quality, including reductions in 'at risk' pesticide concentrations across all catchments, and improvements in soil health and the way land is managed with high-risk catchments.
- Biodiversity schemes

    - These include successful delivery of our Invasive Non-native Species scheme (INNS Out) which has funded community groups to manage INNS across our supply area. This scheme was shortlisted for a Utility Week industry award.
- Water Resources Investigations
    - Completed the AMP7 programme of investigations (26 Action IDs) in line with line 5A.30 Total Number of WINEP Investigations cumulative for AMP.
    - This is the equivalent to 95 individual WINEP ID rows across our AMP7 WINEP tracker

120 of these WINEP ID rows were due for completion within year 5 of AMP7. 62 of these WINEP ID rows have already been signed off as complete by the EA. There have been some delays to the review and sign off from the EA. The EA had between the 15 April and 15 May to review and sign off the relevant Actions. We were advised they could not complete this within the formal timescales and as such 58 Actions (all water resources investigations) have been marked as 'Pending' on our WINEP tracker. We have been given assurances these will be signed off and can be considered as complete with final review and sign off in due course. We have received confirmation in writing from our EA Account Manager to this effect, confirming we have delivered 100% WINEP for AMP7.

Table 3F - Underlying calculations for common performance commitments - water and retail

3F.8 Unplanned outage reduction in company level PWPC Ml/d

Our 2024-25 peak week capacity was 1,192.34, reduction of 0.26 ml/d compared to 2023-24 (17.57), which we attribute to resolution of a number of issues at Iver, Debden Road and Drellingore and more planned work.

Also see 3A.6, 3I.1, 6A.28

Table 3H - Summary information on outcome delivery incentive payments

We have made no adjustments to table 3H and confirm the PCC figures reported are without any adjustment for Covid.

Table 3I - Supplementary outcomes information

3I.1 Planned outage and reduction in PWPC

The yearly reduction in PWPC is 44.09Ml/d (3.70%). This is attributed to planned work, planned maintenance activities and capital works. When compared to 2023-24 this is a decrease of 10.73Ml/d.

Also see 3A.6,3F.8, 6A.28

3I.2 Risk of severe restrictions in drought

Please refer to commentary given under 3E.1.

For columns 4 to 9 of line 3I.2, we have made the following assumptions:

- Col's. 4-8 (from "deployable output" to "total population supplied") are reported as in-year figures rather than averages.
- Col. 9 Customers at risk is reported as the 25-year average, consistent with the percentage of customers at risk reported in Table 3E.
- Elements 4 to 8 (from "deployable output" to "total population supplied") are reported as in-year figures rather than averages.

Section 4: (Additional regulatory information – service level)

Table 4A - Bulk supply information for the 12 months ended 31 March 2024

4A.1 to 4A.26 Bulk supply exports

The total number of bulk exports is 77. This is an increase of 37 from 2023-24, all of which are new exports to NAV. (New Appointment and Variations) sites.

Exports to NAVs: we have indicated the number of individual metered connections to our network i.e. the number of individual bulk exports.

NAV sites have been grouped as there are not sufficient lines within the Excel data table to report sites individually.

Bulk Export grouping	NAV Sites	Export Ml
ADVANCED WATER INFRASTRUCTURE LTD	2-NAV-00000-Newhall Milestone Rd	0.02
ADVANCED WATER INFRASTRUCTURE LTD	5-NAV-01746-Audley End Road	0.03

ICOSA WATER SERVICES LTD	1-NAV-00343-Wilton Park	36.15
ICOSA WATER SERVICES LTD	2-NAV-01452-Friends School Mt	0.14
ICOSA WATER SERVICES LTD	2-NAV-01802-Foxgrove Path	0
ICOSA WATER SERVICES LTD	3-NAV-01224-High St, Codicote	1.8
ICOSA WATER SERVICES LTD	3-NAV-01271-Oakley House	8.37
ICOSA WATER SERVICES LTD	4-NAV-01514-Fifth Way	0.11
ICOSA WATER SERVICES LTD	4-NAV-01580-Harrow Civic Centre	0.19
ICOSA WATER SERVICES LTD	4-NAV-01637-Alperton Bus Garage	0.09
ICOSA WATER SERVICES LTD	5-NAV-00728-Shire Hill Farm	0.03
ICOSA WATER SERVICES LTD	5-NAV-00976-West of London Road	0.01
ICOSA WATER SERVICES LTD	5-NAV-01511-Duck Street	1.41
ICOSA WATER SERVICES LTD	5-NAV-01548-Moor Fields	0.87
ICOSA WATER SERVICES LTD	6-NAV-00000-Gascoyne WGC	0
ICOSA WATER SERVICES LTD	6-NAV-01303-Egley Road	1.44
ICOSA WATER SERVICES LTD	7-NAV-00518-AreodromeRdHawkinge	1.24
INDEPENDENT WATER NETWORKS LTD	1-NAV-00000-Inkerman House	0.04
INDEPENDENT WATER NETWORKS LTD	1-NAV-00310-Kings Langley	5.83
INDEPENDENT WATER NETWORKS LTD	2-NAV-01062-Bullins Green Lane	0.96
INDEPENDENT WATER NETWORKS LTD	3-NAV-00000-Lytton Way	0.02
INDEPENDENT WATER NETWORKS LTD	3-NAV-00107-Bidwell	201.15
INDEPENDENT WATER NETWORKS LTD	3-NAV-00107-Bidwell Bedford Rd	0.04
INDEPENDENT WATER NETWORKS LTD	3-NAV-00107-Bidwell Parcel B	29.6
INDEPENDENT WATER NETWORKS LTD	3-NAV-00394-Barnfield Avenue	12.12
INDEPENDENT WATER NETWORKS LTD	3-NAV-00668-Gresley Way	8.06
INDEPENDENT WATER NETWORKS LTD	3-NAV-00668-Gresley Way (2)	0.12
INDEPENDENT WATER NETWORKS LTD	3-NAV-00873-Heath Lane	7.06
INDEPENDENT WATER NETWORKS LTD	3-NAV-00931-Newmarket Road	3.16
INDEPENDENT WATER NETWORKS LTD	3-NAV-01036-North Rd Stevenage	9.25
INDEPENDENT WATER NETWORKS LTD	3-NAV-01075-Northaw Road	1.25
INDEPENDENT WATER NETWORKS LTD	4-NAV-00167-Nestles Avenue	8.82
INDEPENDENT WATER NETWORKS LTD	4-NAV-00167-Nestles Avenue (2)	59.74
INDEPENDENT WATER NETWORKS LTD	4-NAV-00964-Woodside Park	2.06
INDEPENDENT WATER NETWORKS LTD	4-NAV-01121-BT Telephone Ex	2.62
INDEPENDENT WATER NETWORKS LTD	4-NAV-01192-Beaufort Park	1.1
INDEPENDENT WATER NETWORKS LTD	4-NAV-01313-Victoria Quarter	0.32
INDEPENDENT WATER NETWORKS LTD	5-NAV-00082-Silver Leys	126.5
INDEPENDENT WATER NETWORKS LTD	5-NAV-00267-West Road	15.42
INDEPENDENT WATER NETWORKS LTD	5-NAV-00334-Hadham Road	11.99
INDEPENDENT WATER NETWORKS LTD	5-NAV-00963-Ashdon Road	0.47
INDEPENDENT WATER NETWORKS LTD	5-NAV-01050-Henham Road	17.43
INDEPENDENT WATER NETWORKS LTD	5-NAV-01076-Station Rd Felstead	0.44
INDEPENDENT WATER NETWORKS LTD	5-NAV-01163-Hall Road Elsenham	0.32
INDEPENDENT WATER NETWORKS LTD	5-NAV-01223-Clifford Smith Dr	0.4
INDEPENDENT WATER NETWORKS LTD	5-NAV-01242-Stansted Rd ParcelB	3.67
INDEPENDENT WATER NETWORKS LTD	5-NAV-01510-Stocks Lane	0.2

INDEPENDENT WATER NETWORKS LTD	5-NAV-01513-High Road Thornwood	0.04
INDEPENDENT WATER NETWORKS LTD	6-NAV-00000-Brooklands College	0.01
INDEPENDENT WATER NETWORKS LTD	6-NAV-00305-London Road	15.77
INDEPENDENT WATER NETWORKS LTD	6-NAV-00468-Canalside	11.81
INDEPENDENT WATER NETWORKS LTD	6-NAV-00686-Palm Hills	4.22
INDEPENDENT WATER NETWORKS LTD	6-NAV-00699-Manor Farm	7.29
INDEPENDENT WATER NETWORKS LTD	6-NAV-00745-Garlicks Arch	0.44
INDEPENDENT WATER NETWORKS LTD	6-NAV-01277-Heatherwood Hosp	1.29
INDEPENDENT WATER NETWORKS LTD	6-NAV-01347-Brox Road Ottershaw	0.46
INDEPENDENT WATER NETWORKS LTD	7-NAV-00060-Martello Lakes	34.76
INDEPENDENT WATER NETWORKS LTD	7-NAV-00212-Archers Court	2.07
INDEPENDENT WATER NETWORKS LTD	7-NAV-00212-Archers Court (2nd)	13.07
INDEPENDENT WATER NETWORKS LTD	7-NAV-00253-Folkstone Seafront	1.16
INDEPENDENT WATER NETWORKS LTD	7-NAV-00991-Archers Ct (A256)	1.63
INDEPENDENT WATER NETWORKS LTD	7-NAV-01268-Whitfield	2.63
INDEPENDENT WATER NETWORKS LTD	8-NAV-00171-Oakwood Park	34.47
INDEPENDENT WATER NETWORKS LTD	8-NAV-00241-Turpins Ride	4.98
INDEPENDENT WATER NETWORKS LTD	8-NAV-00261-Weeley Road	7.87
INDEPENDENT WATER NETWORKS LTD	8-NAV-00666-Long Road	3.2
INDEPENDENT WATER NETWORKS LTD	8-NAV-00730-Low Road	3.54
INDEPENDENT WATER NETWORKS LTD	8-NAV-00730-Low Road (2)	3.79
INDEPENDENT WATER NETWORKS LTD	8-NAV-00863-Lady Nelson Gardens	3.3
INDEPENDENT WATER NETWORKS LTD	8-NAV-00895-Sladburys Lane	7.61
INDEPENDENT WATER NETWORKS LTD	8-NAV-00901-Brook Park West	3.82
INDEPENDENT WATER NETWORKS LTD	8-NAV-01169-Chicken Farm	0.8
INDEPENDENT WATER NETWORKS LTD	8-NAV-01457-Richard Avenue	0.22
LEEP NETWORKS WATER LTD	1-NAV-00620-Spencers Park	1.9
LEEP NETWORKS WATER LTD	4-NAV-01460-Clayton Road	0.44
LEEP NETWORKS WATER LTD	6-NAV-01298-Chilsey Green Farm	5.69
LEEP NETWORKS WATER LTD	7-NAV-00948-Rhodes Park	14.69

Table 4Q - Developer services - New connections, properties and mains

4Q.1-12 New connections and properties

The total number of new connections has decreased in 2024-25 compared to 2023-24, as NAV sites continue to grow within our supply area. Although we delivered 1,050 fewer connections than last year, NAV connections increased significantly, from 784 in 2023-24 to 3,408 in 2024-25. This rise in NAV presence has been observed across the industry, and we forecast this trend to continue throughout AMP8.

Self-Lay new connections have seen a slight increase, from 1,409 in 2023-24 to 1,424 in 2024-25. We believe the slower rate of growth is also linked to the expansion of NAVs,

as NAV companies frequently partner with Self-Lay Providers to deliver new infrastructure and connections on their sites.

These new connections and property volumes align to the trends we are seeing when it comes to delivery of new mains lengths.

4Q.13 Length of new mains - Requisitions

We are reporting 11km this year, compared to 14km in 2024, 15km in 2023 and 16km in 2022.

There was again a decline in length of mains laid this year due to the continued slow moving housing market and the increasing effect of SLP's and NAV's.

4Q.14 Length of new mains - SLP's

We are reporting 15km this year, compared to 16km in 2024, 31km in 2023 and 27km in 2022.

This year's installed meterage is in line with last year, reflecting the continued slow moving housing market and the increasing effect of NAV's.

Table 4R - Connected properties, customers, and population

4R.1-9 customer numbers average in the year

The overall number of Business customers has fallen from 2023-24 as we are still identifying properties which are no longer classified as non-household due to redevelopment, change of use, or have been disconnected from the network as the supply is no longer required.

Both the billed measured and unmeasured customers have decreased since 2023-24 with voids increasing over the same period, this is likely to be because of the ongoing economic issues that are affecting the country as many high street shops and other businesses have closed their doors over the past 12 months.

Over the last year we have seen an increase in retailers disconnecting customers temporarily for lack of payment, this has risen from 411 in April 2024 to 510 in March 2025, this is likely due to the increased costs for running businesses meaning that they are not able to pay their bills.

4R.17 Total new residential properties connected in year

During of February and March 2025 c, 20,000 AMI meters were installed as part of the PCD accelerated funding for smart metering. These meters have been identified and included under the "AMI Meter (capable)" designation in 4R.17 and 4R.19, pending full implementation of networks, and reporting tools to validate active AMI meters.

4R.18 Total number of new business properties connections

The number of billed new connections in 2024-25 has decreased slightly from 186 to 177. We are still seeing a large number of new connections (205) showing as void in CMOS which is a concern although we are billing the retailers on any recorded consumption on their meters.

When meters are installed, we aim to use AMR (or AMI moving into AMP8), but this is not always possible. This may be due to installation issues, or the type of meter installed for the customer.

As of 31st March 2025, we have not installed any AMI meters for business customers.

4R.19 Residential properties billed at year end

See 4R.17

4R.20 Residential properties billed at year end

30,141 properties have been identified as being uneconomical to bill and excluded from void calculations. These are properties that are listed as being billed as a measured property and have an occupancy status of empty/no named customer listed as the bill payer in our billing system. Where meter reads show that the consumption going through the meter is equal to or less than 5m3. The annual average equivalent used in annual average voids calculations (4R.1) is 28,718. There are no "other" unbilled properties recorded.

4R.23 - Business properties billed at year end

The number of billed properties at year end has reduced by 687 from 2024-24, this reflects the ongoing issues around ongoing increased costs that businesses require to keep operating.

For measured properties we have increased the coverage of AMR meters by 3% to 26% from 2023-24

As of 31st March 2025, we had not installed any AMI meters for business customers.

As per the guidance for these lines we have excluded 94 billed Cattle Trough supplies from our figures.

4R.24 Business properties unbilled at year end

We have 510 business properties which have been temporarily disconnected from supply due to lack of payments to their relevant retailers, so we have excluded these from the overall property connections list. This has increased from 411 in 2023-24, but as with the reduction in billed properties this could be due to the increased costs for running businesses meaning they are not able to pay their bills so have been disconnected for lack of payment.

We are reporting them as 'Unbilled – Other' as these would fall under properties that are unbilled due to dispute in the guidance.

4R.25 - Business void properties at year end

The total number of voids have increased by 269 from 2023-24, this reflects the ongoing issues around ongoing increased costs that businesses require to keep operating.

4R.26 - Total connected business properties at year end

The total number of Business Properties in CMOS has decreased from 2024-2025 by 302. Properties are being removed from CMOS to redevelopment, change of use to residential, or have been disconnected from the network as the supply is no longer required.

4R.28 – Resident population

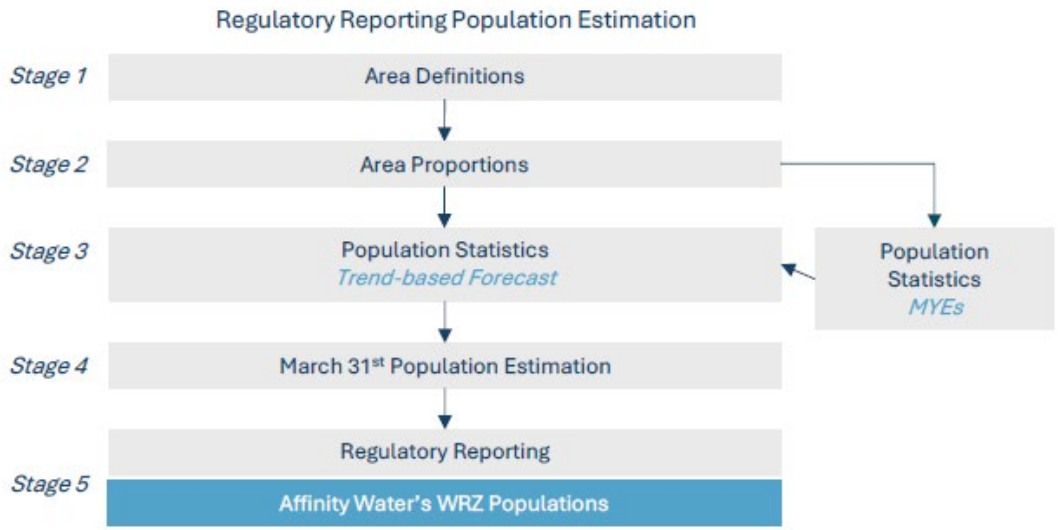
We have seen an increase in resident population from 3960.288 to 4042.305. This is a 2% increase on last years reported figure.

This year we have purchased population data from Edge Analytics and CACI to validate our estimates. The two estimates were within 0.09% of each other which gives us good confidence over the figure being reported. The population statistics used in the population estimation process have been drawn from the following sources:

• 2022 and 2023 mid-year population estimates (MYE) published by the ONS for local authority districts.

• The ONS' 2018-based sub-national population projection (SNPP) for local authority districts, together with accompanying assumptions on fertility, mortality and migration.

Using these data inputs, a 5-stage process has been used to derive the Regulatory Reporting population estimates for Affinity Water's WRZ geographies.



As per previous years, an adjustment is made to account for the Hidden and Transient population within our water balance. This adjustment includes an estimate for:

1. Short term residents - Anyone living in England and Wales who was born outside the UK and who intended to stay for a period of between 3 and 12 months, for any reason
2. Second address within the Affinity Water operating area - An address at which a person stays for more than 30 days per year that is not a person's place of usual residence
3. Irregular migrants - The term 'irregular migrants' typically refers to the stock of migrants in a country who are not entitled to reside there, either because they have never had a legal residence permit or because they have overstayed their time-limited permit

An adjustment is made for fringe supplies sitting outside the Affinity Water boundary but supplied by Affinity Water, for properties sitting inside the Affinity Water boundary but supplied by neighboring water companies and for NAV properties.

4R.29 – Non-resident population

This line is not applicable to Affinity water.

4R.30 - Household population

This figure is as 4R.28 but with communal and non-household population removed from the total count.

4R.31, 4R.32 – Household measured and unmeasured population

In order to split out this population between measured and unmeasured properties the following steps are then taken:

1. Property numbers are provided by the water balance team.
2. The AR24 occupancy rates are multiplied by the number of measured and unmeasured properties accordingly at a resource zone level.
3. This is then reconciled against the total household population generated and additional population redistributed. This means that the ratio of measured to unmeasured population numbers are maintained but the numbers are adjusted proportionally.

Table 4Z – Household bill reduction schemes, debt and Guaranteed Standards Scheme (GSS) payments

4Z.A1.27 Other bill reduction schemes

Cost of Living Payment

We continued to support nearly 60,000 households during 2024-25 with our one off £50 payment to support with cost-of-living and we have increased the number of referral partners that we work with on this scheme.

We will continue to support households in this way during 2025-26 and will use various data sources to target support in the most effective way. As part of our support during annual billing 31,000 households have already received this support.

4Z.B1-2 Debt metrics

We have c.1.4m connected customers of which c.100k (7%) are supplied water only, and the remaining c.1.3m (93%) are supplied water & sewerage. We have c.39k closed accounts with an outstanding balance, of which c.2k were supplied water only (5%), the remaining c.37k (95%) were supplied both water and sewerage.

4Z.B3-8 Household customers in arrears

We currently have c.111,000 active accounts in arrears, this is (8%) of the overall active account base. The total arrears outstanding is c.£54m (water), therefore the average arrears per account is c.£486 (water).

Of those that are active and in arrears, approximately 6% are an arrangement (Tallyman or CCP), with total arrears due of c.£1.9m (3.6% of total arrears).

When it comes to final accounts, there are c.31k accounts in arrears, this is 80% of total final accounts. The total arrear for final accounts is c.£10.2m, thus c.£329 on average per final account. 2% of these accounts are on an arrangement with an arrears of c.£0.2m.

67% of active accounts arrears value is connected to non-payers, the arrears total in this pot is c.£36.4m. Whilst 75% for final accounts are non-payers, the arrears total in this pot being c.£7.7m.

4Z.B9-10 Temporary payment suspension

For the 2024-25 reporting period, we have been tracking both payment breaks and breathing space on a weekly basis. This has enabled us to provide the number and value of the arrears which was not available for 2023-24 period.

4Z.B11-13 Household debt collection through third party agents where water company remains creditor

We have reported both debts collection by external agents active and final accounts, for volumes and £ values. This data represents the total volume and value of customers placed to external agents during the year 2024-25. The data will include non-unique customer accounts, i.e. where an account has been placed with external agents more than once in the year. We believe that the intention of this data point may be to record unique customer accounts placed with external agents, therefore for clarity the figures will contain some double counting in the numbers we have reported.

A sample check of 100 customer accounts where we know they have been to at least 1 external agency in 2024-25 has identified that 43% have in fact been to 2 or more external agencies in 2024-25.

We are unable to provide data relating to the volume of customers registered on our Priority Services Register "PSR" who are being collected by external agents. This is due to the data not being captured historically. A sample check of 100 customers who are currently managed by external agents confirms that 16% are registered on the PSR.

4Z.B14-16 Household debt sold to external agencies

In the 2024-25 reporting period, there were two debt sales completed. Debt Sales are only performed with final account debt, once the account has passed through our

normal internal collection process, and then two Debt Collection Agencies and returned as unable to collect. Accounts are reviewed prior to being passed for Debt Sale. Examples of accounts that are removed are customers that have made recent payments, or where we have a date of birth indicating that the customer is over 70 years of age, deceased, insolvent, or a commercial bill payer (landlord).

The criteria does not include customers on our Priority Services, however, for the purpose of this annual return, these have been identified.

Accounts that go through to Debt Sale have a "DZ" class added with a class reference denoting which Debt Sale this represents. For the 2024-25 period, the DZ class reference was either "Debt Sale 10" or "Debt Sale 11". The DZ class and class reference is added by IT as a bulk program. This class cannot be added or removed by a user.

The sold accounts are written off and a "block" is added to the account on our billing system so that no further financial updates can be made to the account. This prevents users opening or make any adjustments to the accounts. The class also provides a "pop- up" message to users stating that the account is subject to Debt Sale.

We have redacted the figures reported in these lines in our publicly available versions of the APR for commercially sensitive reasons. They have however been provided to Ofwat for regulatory purposes.

4Z.B17-18 Payment matching activities

Payment Matching scheme and Crisis Fund (including Economic Abuse) are recent additions to our debt support schemes. Payment Matching started in December 2024, and Crisis Fund started late 2023.

Payment Matching

Criteria for the payment matching:

- Ability to make payments that cover current water usage and contribution towards the arrears
- Have a significant water debt of at least £1,000- and one-year's arrears
- Provide a detailed income and expenditure
- Have an active Water account and be responsible for the water bill
- Commit to maintaining regular payments towards the current water bill and arrears over a 2-year period.

At the end of the first year, we will match the arrears paid, therefore reducing the overall debt. At the end of the second year, we will match the arrears leaving only current charges for the customer to pay, going forward.

If the customer misses any payments, the scheme is withdrawn, and they are unable to re-apply.

Crisis Fund

This is used when a customer has experienced exceptional circumstances such as terminal illness, a serious/debilitating illness or abuse which has caused the water bill to remain unpaid.

Criteria for Crisis Fund:

- Evidence of the crisis
- Significant water debt arrears with at least £500
- Ability to pay current usage
- Arrears of one year or older
- Made a payment towards the water bill in the last 12 months
- Application form is completed

Although data has been captured for the reporting period of 2024-25, we plan to further enhance how this data is captured and reported.

4Z.B19-24 Unpaid household bills referred to courts

We have reported zero claims in the high court, zero high court judgements and zero high court judgement enforcements, as we do not issue claims for debts in the high court. We request that the high court issues a writ of control for some judgements issued and obtained in the County Court. However, no claims are issued or obtained in the high court and, therefore, no judgements are enforced.

Section C Payments to household customers made in accordance with the Guaranteed Standards Scheme (GSS)

The figures entered are a reasonable reflection of the GSS and similar compensation payments made to residential customers in the year. Insurance claim payments are not included.

GSS payments are processed through an automated system, the 'Business Rules Engine' (BRE). The BRE ensures the correct payment value goes to the customer and the correct recording of the GSS event type is noted e.g. missed appointment, supply interruption, etc.

Prior to 2023-24 GSS numbers and values had not been reported in the APR since 2011-12. Our systems for the recording of payments did however remain in place over the intervening period, we have identified a need to improve this automation tool, colleague training and the assurance testing which is conducted on

payments. Activities have already progressed such as refresher training to embed the processes and application, and the way in which these payments are made.

There still remain some errors whereby ex-gratia payments have been coded as GSS and vice-versa. While the specific definition under each GSS criteria is not always carefully observed, this does not appear to impact the customer receiving the correct payment value but makes allocation between individual service standards difficult and internal root cause review difficult. These processing errors appear in the main to be missed appointment or complaints not responded to within 10 days.

The values in the table for GSS payments have been split to differentiate where we have voluntarily enhanced the amount paid. These increases are in line with uplifts requested by Ofwat in their publication 'Guaranteed Standards Scheme: Recommended changes to the UK Government'. Any additional enhancements to payments outside of these changes are made as an ex-gratia payment.

4Z.C4-14 Payments to household customers made in accordance with the Guaranteed Standards Scheme (GSS)

4Z.C8

We pay GSS against failure to restore after 12, not 24 hours. We voluntarily accepted the change in payment regime in accordance with those laid out the November 2018 document, 'Guaranteed Standards Scheme: Recommended changes to the UK Government' Our systems were adjusted to reflect this change. We have therefore noted all the payments made after 12 hours in column 1, as the guidance states the number of payments made, not the number that should have been made. Only 7 properties however actually experienced an interruption greater than 24 hours.

All customers that received payments under this category were paid following 12-hour interruptions. We have manually adjusted these payment rates and report the uplifted value in Column 3&4 'amounts higher than the statutory GSS'.

4Z.C9

Multiple payments were made to three customers whose interruption exceeded 24 hours after the initial interruption. These additional payments were made after 12 hours, not 24 hours (in line with the recommendations). We have therefore attempted to split the payments into the 24-hour durations and allocated the additional payment values into columns 3&4 "Total number of times and value of amounts higher than the statutory GSS". As each payment is paid separately in the system, they are noted as separate payments.

Two interruptions were the result of stop taps being left off following works. The customers were on holiday at the time and therefore the water remained off until they returned, at which point they made contact with us. As we turned the water off and should have been aware, payment was made from the interruption onset. The third

interruption was caused by contractors turning off the master stop tap to the lead rail they were working on; this took significant time to identify.

4Z.C12

We have made a significant number of payments for failing to respond to complaints within 10 working days. We are aware this is falling below the standard expected from our customers and are working to improve our internal processes to improve our service to our customers.

4Z.C15-24 Number and value of payments made to household customers for events that are currently not part of the GSS

4Z.C15

We are unable to provide a breakdown of the reasons for non GSS payments and therefore report the number and value under one line noted ex-gratia.

All non GSS payments are coded as ex-gratia within our billing system and there is no coding to provide sub-categories for these payments. Reasons are recorded within our billing system on individual customer records but cannot be retrieved except on a manual individual basis.

The reasons for these payments will include good-will, reimbursement of a customer's costs for something that may have been our responsibility, and compensation for events that are similar to a GSS failure but do not meet the specific criteria of GSS. We have identified that some billing adjustments also appear to be made on the ex-gratia coding, where identified these have been removed them from the numbers.

Section 5- (Additional regulatory information – water resources)

Table 5A - Water resources asset and volumes data for the 12 months ended 31st March 2024

Line 5A.5 – Water from artificial recharge

We do not have this type of source so therefore this line is reported as 0.

Line 5A.6 – Water from aquifer storage and recovery

We do not have this type of source so therefore this line is reported as 0.

Line 5A.7 – Water from saline abstractions

We do not have this type of source so therefore this line is reported as 0.

Line 5A.8 – Water from water reuse

We do not have this type of source so therefore this line is reported as 0.

5A.10 Number of pumped storage reservoirs

Although Ardleigh abstraction volumes are excluded in line 5A.2 (due to Anglian Water providing abstraction volumes for the whole site), Ardleigh is still declared as a source in this line as Ardleigh reservoir is operated by the Ardleigh Reservoir Committee which is owned jointly by Affinity Water and Anglian Water.

5A.11 Number of river abstractions

Due to Walton raw water settling reservoirs being categorised as a balancing reservoir (as it has less than 15 days storage) the source is categorised as a river abstraction rather than pumped storage. This is because balancing reservoirs sit in Network plus – raw water storage and impounding reservoirs and pumped storage reservoirs make up the raw water reservoirs which sit in Water resources – Raw water abstraction.

5A.12 Number of groundwater works, excluding managed aquifer recharge (MAR) water supply schemes

The number of groundwater works has decreased by 3 from the prior year, with the exclusion of Chalfont St Giles, Mud Lane, Periwinkle Lane and Waterhall which were all out of service during 2024-25. Marlowes has been included as this site is now back in service.

Changes from PR24 2024-25 forecast

Chalfont St Giles, Mud Lane and Waterhall were not accounted for in PR24 2024-25 forecast but are due to return to supply. Periwinkle Lane source is off earlier than forecast (2024-25 instead of 2025-26) as part of sustainability reductions.

Although Runley Wood (Chalk) source has been decommissioned and Runley Wood (Greensands) source commissioned earlier than anticipated from PR24 (2024-25 instead of 2025-26) this doesn't impact on forecast figures as this is one site with two separate sources each requiring different treatment. As the Chalk source didn't cease abstraction until the beginning of February 2025 and the Greensands source didn't go into supply until the end of March 2025 there was no overlap where both

sources were running into supply at the same time. We therefore have still reported this as one groundwater works.

5A.13 Number of artificial recharge (AR) water supply schemes

We do not have any sources that fall into this category.

5A.14 Number of aquifer storage and recovery (ASR) water supply schemes

We do not have any sources that fall into this category.

5A.15 Number of saline abstraction schemes

We do not have any sources that fall into this category.

5A.16 Number of reuse schemes

We do not have any sources that fall into this category.

5A.17 Total number of sources

This is a calculated line which equals the sum of lines 5A.9 to 5A.16. The total number of sources has decreased by 3 in line with the changes documented in line 5A.12.

Changes from PR24 2024-25 forecast

Changes from PR24 forecast are documented in line 5A.12.

5A.20 Total number of intake and source pumping stations

The number of intake and source pumping stations has decreased by 3 from the APR24 submission with the exclusion of Chalfont St Giles, Mud Lane, Periwinkle Lane and Waterhall which were all out of service during 2024-25. Marlowes has been included as this site is now back in service.

Changes from PR24 2024-25 forecast

Chalfont St Giles, Mud Lane and Waterhall were not accounted for in PR24 2024-25 forecast but will be brought back into service. Periwinkle was accounted for in 2025-26 instead of 2024-25.

5A.21 Total installed power capacity of intake and source pumping stations

In addition to the changes listed in 5A.20 there are some changes that impact capacity only. Iver standby pumps have been installed and are available for use.

Some additional kW fluctuations are due to operational changes such as pump replacements, individual pumps brought back into or taken out of service or any APH changes (where pump function is split across more than one price control).

Changes from PR24 2024-25 forecast

In addition to the changes listed in 5A.20 an additional pump at Hunton Bridge is now expected in 2025-26 due to delays with the iron removal plant.

5A.22 Total length of raw water abstraction mains and other conveyors

The 0.96km length reported in this line is the balancing main from Heron Lake to Queensmead (length 0.96km).

5A.23 Average pumping head – raw water abstraction

Trend Analysis

In the South East region we have seen an increase of 13%, after a deep analysis we have attributed this to our St Margarets borehole site where we have confirmed an error in the previous years' reporting.

APH – raw water abstraction	AWC	AWSE	AWE	Weighted Average
2022-23	16.48	27.04	23.34	17.23
2023-24	17.09	24.11	23.42	17.63
2024-25	17.20	27.21	22.77	17.87

Data Accuracy

The percentage of total lift at site/pump group level is derived from telemetry output and has been calculated using verified annual abstraction volumes (wherever in context with abstraction source pumps).

In Brett (East) region we have not reported any pumped storage volumes from Ardleigh Reservoir. As agreed previously with Ofwat, volumes will be reported by the Ardleigh Reservoir Committee (ARC) as the licence holder, rather than by Affinity

Water and Anglian Water. However, this does not impact on the pumps associated with Ardleigh Reservoir and their head calculation remains part of the APH model for 'treated water distribution'.

Estimations were made on missing or insufficient data available. The estimation method for pressure data for the price control included using previous years' static head or accepting models from previous years, where there was no evidence of radical interventions at sites/pump sets. One exception was at Amersham, where up to date static data using local monitoring was used. Of the estimated calculation, 100% used engineering calculations to obtain a figure.

The total number of estimated raw water abstraction pumps was 5 out of 117 (4%). However, calculated into volumetric flow lifted [m.Ml] this becomes 29% estimated. This is largely due to our largest abstraction site, Iver being classified as estimated data. The use of static engineering figures is used to calculate the lift on this site as it is pumped from a large shaft fed from the Thames via a wedge block transfer tunnel. We are very confident with this data due to accurate designs and plans of the site that that do not vary year-on-year, however, to align with our methodology and transparency this will stay classed as estimated. For context estimated data falls to 5% without this site.

Significant changes from previous year

Change from previous year (m.Ml > 100, change >50% or <-50%)

Pump Group	Flow [Ml/d]	Lift [m]	Flow Lifted [m.Ml]	% Change	Commentary
Wall Hall	3.91	18.52	751.57	51%	Increased output after long term repairs fixed
St Margarets	1.70	51.30	296.57	236%	Corrected lift from previous year
Marlowes	2.31	4.79	170.75	9019%	Site brought back into supply this year
Springwell	-5.06	0.03	-108.23	-67%	Site OOS for 4 months for repairs
Runley Wood (Chalk)	-0.91	-12.03	-115.72	-33%	site taken OOS from Jan
Runley Wood (Chalk)	-0.91	-12.03	-115.72	-33%	site taken OOS from Jan
Thundridge	0.02	-14.99	-150.44	-26%	BH1 OOS and BH3 reduced license
Eastbury 3	-3.80	0.12	-162.64	-94%	OOS
Chalfont	-1.58	-20.26	-206.84	-57%	Site OOS all year
Bushey Hall HP	-2.44	-3.95	-295.92	-41%	Small variance for large volume
Berrygrove HP	-5.43	-9.39	-691.84	-67%	Pump OOS

Pump Set	Region	Pump description	Raw Water Abstraction	Raw Water Transport	Treatment	Distribution	Accuracy	Comment
Amersham (Borehole)	Central	Abstraction & Treatment	0%	-1%	1%	0%	Actual	Allocation changed
Netherwild	Central	Abstraction & Transport	14%	-14%	0%	0%	Actual	allocation changed
Cow Lane Borehole	South East	Abstraction to Distribution	0%	0%	0%	0%	Actual	Name change - updated accuracy
Denge Non-RO Wells	South East	Abstraction & Treatment	0%	0%	0%	0%	Actual	Name change - updated accuracy

Denge RO Wells	South East	Abstraction & Treatment	0%	0%	0%	0%	Actual	Name change - updated accuracy
Dover Priory	South East	Abstraction-Treatment-Distribution	0%	0%	0%	0%	Actual	Name change - updated accuracy
Rakeshole North	South East	Abstraction to Distribution	0%	0%	0%	0%	Actual	Name change - updated accuracy
Ottinge Booster	South East	Abstraction-Treatment-Distribution	0%	0%	0%	100%	Actual	New addition
Chartridge Borehole	Central	Abstraction-Treatment-Distribution	0%	0%	0%	0%	Actual	Updated accuracy
Chesham	Central	Abstraction-Treatment-Distribution	0%	0%	0%	0%	Actual	Updated accuracy
Clandon	Central	Abstraction-Treatment-Distribution	0%	0%	0%	0%	Actual	Updated accuracy
Oughton Head	Central	Abstraction-Treatment-Distribution	0%	0%	0%	0%	Actual	Updated accuracy
Periwinkle Lane	Central	Abstraction & Treatment	0%	0%	0%	0%	Actual	Updated accuracy
Runley Wood (Greensands)	Central	Abstraction & Treatment	0%	0%	0%	0%	Actual	Updated accuracy

5A.24 Energy consumption - water resources (MWh)

See Energy commentary under 6B.23

5A.29 Water resources capacity

We measure water resources capacity in terms of water resources yield, which captures the annual average volume of water available from the environment and constrained by water resources control assets (network and treatment constraints).

The Deployable Output (DO) values used to calculate the Water Resources Capacity are based on WRMP14 and WRMP19 values (based on a 1 in 200-year drought). Where network and treatment constraints have been identified, the average DO values have been uplifted using expert judgement to account for the sources' full capability under drought conditions. The cumulative climate change impact is then applied.

Water Resources Capacity and the resulting potential DO uplifts constitute a theoretical scenario only. Affinity Water has an agreed programme of licence capping and sustainability reductions in order to leave more water in the local environment. Therefore, we need to take a cautious approach to any increases in abstraction due to the removal of the network and treatment constraints in catchments that are deemed environmentally sensitive.

The observed changes to Water Resources Capacity on an annual basis reflect the WRMP14 (for the years 2018-2020) and WRMP19 (from 2020 onwards) climate change figures (which are cumulative) and sustainability reductions which have resulted in a reduction or cessation of a source (when there is an impact on 1:200 DO). Note that the AMP7 sustainability reductions and licence capping planned for 31st March 2025

are not considered in the reported figure. The DO for Grafham (50 Ml/d) was removed from 2022-23 following review of the methodology. It was confirmed that it is already accounted for as an import value. As a result, the Water Resources Capacity volume has reduced since reporting started in 2018.

The difference between the 2023-24 and 2024-25 figure is 3.09 Ml/d. This is the climate change impact figure applied (1.17 Ml/d lost DO between years), in addition to a reduction in the water which was available at Periwinkle Lane through the financial year 2024-25 (1.92 Ml/d), as the licence was surrendered part way through the year on 11 November, hence there was no abstraction available after this date. The data that inputs into the calculation of Water Resources Capacity is accurate and reliable. The climate change figures and 1:200 DO values are taken from WRMP14 and WRMP19 respectively.

We do not include Grafham in our calculation as this volume is accounted for already as a treated water import.

5A.30 – Total number of completed investigations (WINEP/NEP), cumulative for AMP

All 26 WINEP Investigations relevant to 5A.30 have been delivered with required reports and supporting evidence submitted in accordance with our EA WINEP Tracker and associated Measures Specification Forms. A number of these investigations are still awaiting formal sign off from the Environment Agency, with was due by the 15th May. We have been liaising with the relevant EA Driver leads; we have written confirmation that the outstanding investigations will be signed off.

Further information on WINEP investigations can be found under line 3E.14.

Section 6 - (Additional regulatory information – water network plus)

Table 6A - Raw water transport, raw water storage and water treatment data for the 12 months ended 31st March 2024

6A.3 - Total number of raw water transport stations

The number of raw water transport stations has decreased by 2 from the APR24 submission due to the exclusion of Chalfont St Giles and Mud Lane which were both out of service during 2024-25.

Changes from PR24 2024-25 forecast

Chalfont St Giles and Mud Lane were not accounted for in PR24 2024-25 forecast. Both are to be brought back into service.

6A.4 - Total installed power capacity of raw water transport pumping stations

In addition to the changes listed in 6A.3 there are some changes that impact capacity only. Iver standby pumps have been installed and are now available for use. Some additional kW fluctuations are due to operational changes such as pump replacements, individual pumps brought back into or taken out of service or any APH changes (where pump function is split across more than one price control).

Changes from PR24 2024-25 forecast

As per the changes detailed in line 6A.3. Iver standby pumps were accounted for in PR24 224-25 forecast.

6A.5 Total length of raw water transport mains and other conveyors

We are reporting 199.06km, a slight decrease on the 203.45km reported last year. This is primarily due to a reduction in length of raw water blending mains.

6A.6 Average pumping head – Raw Water Transport

Trend Analysis

In the South East region we have seen an increase of 107%, this is due to a classification peer review. We have amended the Denge Dungeness pumps to water transport where previously classed as treatment. These pumps feed water to Dungeness Power plant for non-potable water use.

APH – raw water transport	AWC	AWSE	AWE	Weighted Average
2022-23	19.86	0.39	57.44	20.28
2023-24	19.55	0.30	53.53	20.42
2024-25	18.65	0.62	54.70	20.05

Methodology

The percentage of raw water transport loss at site/pumping group level (where water abstraction site and water treatment works were not located at the same site) was

calculated from telemetry output, pipework information from Infoworks, GIS and hydraulic models.

The total number of estimated raw water transport pumps was 1 out of 28 (4%). Calculated into volumetric flow lifted [m.Ml] estimated data is 0.5%.

Significant changes from previous year

Change from previous year (m.Ml > 100 or <-100, change >50% or <-50%):

Pump Group	Flow [Ml/d]	Lift [m]	Flow Lifted [m.Ml]	% Change	Commentary
Wall Hall	3.91	18.52	751.57	51%	Increased output after long term repairs fixed
St Margarets	1.70	51.30	296.57	236%	Corrected lift from previous year
Marlowes	2.31	4.79	170.75	9019%	Site brought back into supply this year
Springwell	-5.06	0.03	-108.23	-67%	Site OOS for 4 months for repairs
Runley Wood (Chalk)	-0.91	-12.03	-115.72	-33%	site taken OOS from Jan
Runley Wood (Chalk)	-0.91	-12.03	-115.72	-33%	site taken OOS from Jan
Thundridge	0.02	-14.99	-150.44	-26%	BH1 OOS and BH3 reduced license
Eastbury 3	-3.80	0.12	-162.64	-94%	OOS
Chalfont	-1.58	-20.26	-206.84	-57%	Site OOS all year
Bushey Hall HP	-2.44	-3.95	-295.92	-41%	Small variance for large volume
Berrygrove HP	-5.43	-9.39	-691.84	-67%	Pump OOS

Pump Set	Region	Pump description	Raw Water Abstraction	Raw Water Transport	Treatment	Distribution	Accuracy	Comment
Denge Dungeness	South East	Raw Water Transport Only	0%	100%	0%	-100%	Actual	Classification change

6A.7 Energy consumption – raw water transport (MWh)

See 6B.23 for commentary

6A.12 Total length of raw and pre-treated (non-potable) water transport mains for supplying customers

We are reporting 32.70km, which is a small decrease from 34.96km reported last year. The 2.26km difference is due to the removal of raw water blending mains between Periwinkle Lane and Beech Road (1.52km) and reduction in length of the process water mains supplying Dungeness Power Station (0.74km).

6A.16 - W3 works

Number of works (nr)

The number of Surface water works categorised as W3 has increased by one from the APR24 submission. This is due to the inclusion of our new Sundon conditioning plant.

Water treated (Ml/d)

Sundon volume is counted twice, once for the import as SW5 and again for its retreatment as SW3

6A.17 - W4 works

Number of works (nr)

The number of Groundwater works has decreased by two from the APR24 submission. Hart Lane has been reclassified from GW4 to GW5 following the addition of UV. Periwinkle Lane is no longer counted as a GW4 site as it was non-operational in 2024-25 (the abstraction licence was revoked in December 2024, and it is being decommissioned as part of the sustainability reductions programme).

Changes from PR24 2024-25 forecast

Periwinkle Lane was originally forecast to be removed from GW4 as part of sustainability reductions in 2025-26. This was brought forward and implemented in 2024-25.

Runley Wood Chalks source (GW4) was scheduled to be decommissioned and the Greensands source (GW2) commissioned in 2025-26. This site comprises two distinct sources, each requiring different treatment processes. As the chalk source didn't cease abstraction until the beginning of February 2025 and the greensands source didn't go into supply until the end of March 2025, we have retained the classification as GW4. This remains consistent with the PR24 forecast for 2025-26. Similarly, the Hunton Bridge iron removal plant has been delayed to 2025-26. This does not affect the treatment type which remains as GW4 (as all additional treatment will be at a lower level than the UV already installed on site).

Water treated (Ml/d)

This has not significantly changed since the APR24 submission.

6A.18 - W5 works

Number of works (nr)

The number of Groundwater works has increased by one from the APR24 submission as Hart Lane has been reclassified from GW4 to GW5 following the installation of UV treatment.

Water treated (Ml/d)

Sundon volume is counted twice, once for the import as SW5 and then its retreatment as SW3.

6A.20 WTWs in size band 1

Chartridge and Clandon have not been used since 2019-20 and 2020-21 respectively. Despite zero flow, in prior years they been included in the Banding number. However, this year they have been removed.

6A.22 WTWs in size band 3

Chesham and Periwinkle have not been used since 2020-21 and 2023-24 respectively. Treatment is no longer available, and these sites have therefore been removed from the count.

6A.24 WTWs in size band 5

Blackford has not been used since 2021-22. Despite zero flow, in prior years it has been included in the Banding number. However, this year it has been removed.

6A.26 WTWs in size band 7

Due to the changes at Sundon the increase in peak week production capacity has moved Sundon to a Band 7 Treatment works.

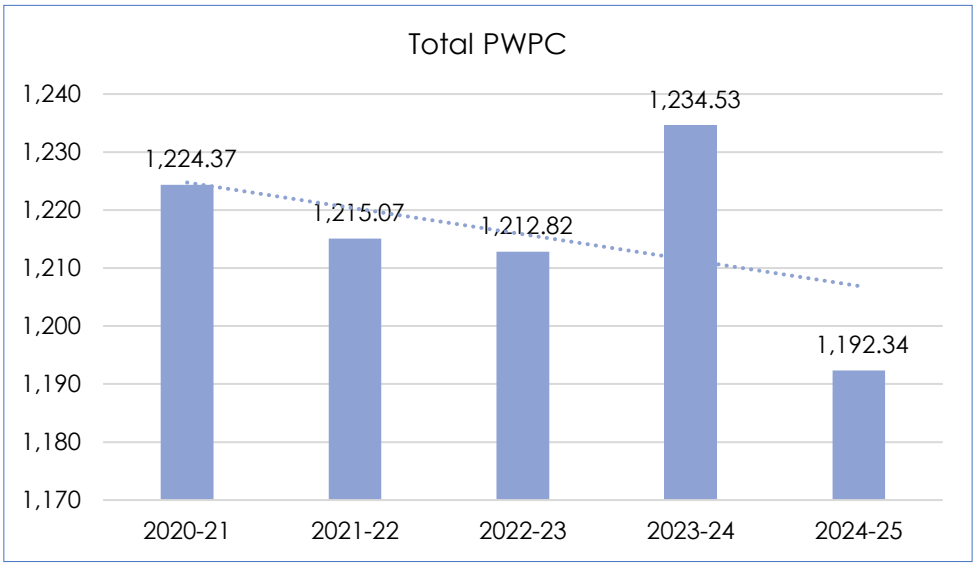
6A.28 Peak week production capacity (PWPC)

Our Unplanned outage peak week production capacity for the 2024-25 reporting period is: 1,192.34. This is a reduction of 42.19 Ml/d when compared to the previous year PWPC of 1,234.53.

During our review, we observed that our largest site, Iver, experienced a notable reduction in PWPC from 225.58 to 213.90, primarily due to an extended period of

significant planned work. While we acknowledge this reduction, we remain confident in the site's ability to exceed this figure should operational demand require it. Additionally, following recommendations related to capital works, we have excluded the Kingsdown and Blackford sites from this year's submission. These sites previously contributed a combined PWPC of 22.39.

We have conducted an evaluation of PWPC through analysis of actual site performance data over a comprehensive five-year period from 1 April 2019 and concluded on 31 March 2024. This period witnessed periods of unprecedented hot, dry conditions, wetter winter and spring, with 2023-24 being benign with no significant hot or cold trends.



Our analysis shows a downward trend in PWPC, which we attribute to several factors:

1. Long-term outages during this period that reduced our capacity.
2. Sustainability reductions that have a positive effect on the environment (especially chalk streams) and the contribution of operational changes to this trend.

   From 1 April 2025 licenses will be revoked at Periwinkle Lane and Runleywood (Chalk) sites and these will be removed from the unplanned outage and PWPC calculations. (There are also further reductions effecting eleven other sites).
3. Improvements in our capability to acquire and analyse data over time, allowing us to more accurately assess our PWPC.

While telemetry data plays a key role in our evaluation process, we recognise its limitations particularly its susceptibility to weather conditions. Many of our sites go directly into supply and we have historically used periods of high demand as a surrogate for testing. Providing real-world data on how our sites perform under stress, which could potentially be more informative than traditional capacity tests. It also demonstrates adaptability and learning opportunities from challenging circumstances.

Please see 3A.6 for more further information regarding PWPC and capacity testing.

6A.29 PWPC having enhancement expenditure for grey solution improvements to address raw water quality deterioration

The PWPC for the following treatment works are included in table 4L for enhancement expenditure

Treatment works	Programme		PWPC (Ml/d) 2024-25
Iver	Crypto	-	213.90
Egham	Crypto	-	137.40
Holywell*	Treatment Investment	Accelerated funding project	17.52
North Stortford*	Treatment investment	Accelerated funding project	6.73
Kingsdown*	Nitrate treatment	Accelerated funding project	0.00
Broome*	Nitrate treatment	Accelerated funding project	2.27
Oughton Head**	Treatment investment	-	0.00
Total			377.82

* Kingsdown was out of service in 2023-24 & 2024-25 due to turbidity issues and high nitrate levels.

** Oughton Head has no PWPC as the treatment works is currently not in service. We are carrying out works to bring the site back into use.

6A.30 PWPC having enhancement expenditure for green solution improvements to address raw water quality deterioration

We do not have any sites to report under green solutions.

6A.32 Number of treatment works requiring remedial action because of raw water deterioration

There are 27 treatment works that require remedial action because of raw water deterioration. These are for:

- Cryptosporidium at 2 sites, Nitrate at 3 Sites, individual notices for PFAS at our five tier 3 and high tier 2 treatment works.
- Appendix A within our AMP8 PFAS Strategy notice (DWI Ref AFW-2023-00013), lists 20 treatment works that are classified as (low) tier 2 sites with respect to PFAS concentrations. Three of these treatment works, Iver, Egham and Stansted, are already listed above because they are subject to notices for other water quality parameters.

	Site	Reason	DWI Reference
1	Iver	Cryptosporidium (& Amp8 PFAS)	AFW-2020-00005 (AFW-2023-00013)
2	Egham	Cryptosporidium (& Amp8 PFAS)	AFW-2020-00006 (AFW-2023-00013)
3	Broome	Nitrate	AFW-2023-00001
4	Kingsdown	Nitrate	AFW-2023-00002
5	Stansted	Nitrate (& Amp8 PFAS)	AFW-2023-00004 (AFW-2023-00013)
6	Holywell	PFAS	AFW-2023-00003
7	Bowring	PFAS	AFW-2023-00008
8	Wheathampstead	PFAS	AFW-2023-00009
9	Blackford	PFAS	AFW-2023-00010
10	Ardleigh	PFAS	AFW-2023-00011
11	Clay lane 27	AMP8 PFAS	AFW-2023-00013
12	Clay lane 36	AMP8 PFAS	AFW-2023-00013
13	North Mymms	AMP8 PFAS	AFW-2023-00013
14	Crescent road	AMP8 PFAS	AFW-2023-00013
15	Mill End	AMP8 PFAS	AFW-2023-00013
16	Batchworth	AMP8 PFAS	AFW-2023-00013
17	Northmoor	AMP8 PFAS	AFW-2023-00013
18	Roydon	AMP8 PFAS	AFW-2023-00013
19	East Hyde	AMP8 PFAS	AFW-2023-00013
20	Dover Priory	AMP8 PFAS	AFW-2023-00013
21	Broomin Green	AMP8 PFAS	AFW-2023-00013
22	Chertsey	AMP8 PFAS	AFW-2023-00013
23	Walton	AMP8 PFAS	AFW-2023-00013
24	Holmstone	AMP8 PFAS	AFW-2023-00013
25	Hunton Bridge	AMP8 PFAS	AFW-2023-00013
26	Marlowes	AMP8 PFAS	AFW-2023-00013
27	Watton Road	AMP8 PFAS	AFW-2023-00013

The number of treatment works that require remedial action has increased since 2024, when there were eleven, due to the inclusion of sites that are medium risk for PFAS within the appendix of our PFAS strategy.

In May 2024, we were released from our undertaking for microbiological parameters at Windmill Hill (DWI Ref AFW-2021-00004) after we submitted a report to DWI

confirming we had completed all steps in the notice and our microbiological monitoring had demonstrated the effectiveness of the high intensity UV irradiation.

6A.33 Zonal population receiving water treated with orthophosphate

The population receiving orthophosphate dosed water is 3073.484 which is a slight increase from 2024. This is as a result of a population increase across our supply area. The number of orthophosphate dosing plants has remained the same and these plants are supplying the same water supply zones as in 2024.

6A.34 Average pumping head – water treatment

Trend Analysis

There has been a marginal reduction in water treatment APH this year. This aligns with the sustainability reduction trial we have been trialling in Q4 to reduce our dependency on chalk stream abstraction. This supply has been replaced by imported water from Anglian Water which largely gravitates into our system having been pumped to our storage from Grafham Water Treatment Works.

APH – water treatment	AWC	AWSE	AWE	Weighted Average
2022-23	11.66	9.93	0.00	11.16
2023-24	10.98	8.77	0.00	10.32
2024-25	10.66	8.48	0.00	9.90

Methodology

The percentage allocation of treatment head loss at site/pumping group level has been calculated by static height differences or by deducting the 'Pressure available before treatment' from the 'Head available before distribution' values. This data has been verified as part of the review of the APH calculation.

Using as much verified total lift and flow data as possible for abstraction or raw water transport price control areas, data also indirectly helps to validate the treatment losses for each site/pump sets.

Of the Estimated calculation, 100% used Engineering calculations to obtain a figure.

The total number of estimated water treatment pumps was 9 out of 98 (9%). However, calculated into volumetric flow lifted [m.Ml] this becomes 48% estimated. This is largely due to our largest treatment site, Iver being classified as estimated data. The use of static engineering figures is used to calculate the lift on this site as it is pumped from a large shaft fed from the Thames via a wedge block transfer tunnel. We are very

confident with this data due to accurate designs and plans of the site that that do not vary year-on-year, however, to align with our methodology and transparency this will stay classed as estimated. For context estimated data falls to 20% without this site.

Significant changes from previous year

Change from previous year (m.Ml > 100 or <-100, change >50% or <-50%):

Pump Group	Flow [Ml/d]	Lift [m]	Flow Lifted [m.Ml]	% Change	Commentary
St Margarets	1.70	51.30	296.57	236%	Corrected lift from previous year
Marlowes	2.31	4.79	170.75	9019%	Site brought back into supply this year
Runley Wood (Chalk)	-0.91	-12.03	-115.72	-33%	site taken OOS from Jan
Runley Wood (Chalk)	-0.91	-12.03	-115.72	-33%	site taken OOS from Jan
Thundridge	0.02	-14.99	-150.44	-26%	BH1 OOS and BH3 reduced license
Clay Lane	0.14	-6.08	-714.54	-26%	Static suction head amended 5m

6A.35 Energy consumption - water treatment (MWh)

See Energy commentary under 6B.23.

Table 6B - Treated water distribution - assets and operations for the 12 months ended 31st March 2024

6B.1 Total installed power capacity of potable water pumping stations

The total installed power capacity has decreased overall from the APR24 submission. Alongside the changes documented in line 6B.16, Denge boosters have been downsized, Oxhey Woods now includes additional pumps, and Periwinkle Lane has new booster pumps to replace the existing high lifts. Some additional kW fluctuations are due to operational changes such as pump replacements, individual pumps being brought back into service or taken out of service or any APH changes (where pump function is split across more than one price control).

6B.2 - Total volumetric capacity of service reservoirs

The volumetric capacity has decreased by 16.5Ml from APR24. Sundon reservoir has been removed as it has now been converted into a treatment tank following the commissioning of the conditioning plant on site. The new 20Ml reservoir at Preston has now been included.

Changes from PR24 2024-25 forecast

The new 20Ml reservoir at Chaul End is now expected to be completed in August 2025 and will therefore be included in 2025-26 instead.

6B.4 Water delivered (non-potable)

The total non-potable water delivered has decreased from last year from 1.10 Ml/d to 0.80 Ml/d. This is generated by a small number of supplies (5 in total) so volumes can fluctuate from year to year.

6B.5 Water delivered (potable)

This has decreased by 13.4 Ml/d from 2023-24.

6B.6 Water delivered (billed measured residential properties)

This has increased by 11.3 Ml/d from 2023-24 as customers continue to switch from unmeasured to measured as part of our metering programme.

6B.7 Water delivered (billed measured businesses)

This has decreased by 3.4 Ml/d from 2023-24.

6B.16 Total number of potable water pumping stations that pump into and within the treated water distribution system

The number of potable pumping stations has increased by 1 from the APR24 submission with the addition of Marlowes and Harefield and the exclusion of Waterhall.

Changes from PR24 2024-25 forecast

Please see the changes detailed in lines 6B.17 to 6B.20.

6B.17 Number of potable water pumping stations delivering treated groundwater into the treated water distribution system

The number of potable pumping stations remains unchanged from the APR24 submission. However, two changes have occurred, Marlowes was back in service and Waterhall was out of service for the reporting period.

Changes from PR24 2024-25 forecast

Waterhall was not accounted for in our PR24 submission but will all be brought back into service.

6B.19 - Number of potable water pumping stations that re-pump water already within the treated water distribution system

The number of potable pumping stations has increased by 1 from the APR24 submission with the addition of Harefield pumping station.

Changes from PR24 2024-25 forecast

Midway North pumping station has not been implemented in 2025-26 due to delays with land acquisition.

6B.21 - Total number of service reservoirs

Although the total number of service reservoirs remains unchanged from last year Sundon reservoir has been removed, and Preston reservoir has been added reflecting the volumetric capacity reported in line 6B.2.

Changes from PR24 2024-25 forecast

Changes from the PR24 forecast are documented in line 6B.2.

6B.23 Energy consumption – treated water distribution (MWh)

In 2024-25, total energy consumption increased by 1.2% compared to the previous year. Variance by price control area is summarised below:

- Raw Water Abstraction: +4.2%
- Raw Water Transport: +1.2%
- Water Treatment: –1.4%
- Treated Water Distribution: +0.8%

Overall, there has been a general decline in system efficiency during the year, largely driven by our abstraction sustainability programme. In Q4, we implemented abstraction cessations and reductions at several sites to reduce reliance on chalk

stream sources. The resulting supply shortfall was mitigated by increasing output from more sustainable abstraction sites and by importing additional water from Anglian Water via our new conditioning plant at Sundon. While this has increased our operating energy intensity, we continue to pursue optimisation through our energy efficiency and carbon reduction programmes in preparation for AMP8.

6B.24 Average pumping head – treated water distribution.

APH – distribution	AWC	AWSE	AWE	Weighted Average
2022-23	84.69	77.22	29.20	82.34
2023-24	82.79	75.37	28.53	79.74
2024-25	81.63	74.62	28.96	78.07

We apply a percentage allocation where a pump set is associated with both 'treatment' and 'distribution', maintaining the split from previous years for the majority of cases.

The total number of estimated treated water distribution pumps was 30 out of 270 (11%). Calculated into volumetric flow lifted [m.Ml], estimated data is 0.2%.

Water is exported to South East Water from our Egham Water Treatment Works – this has been excluded from our APH calculations.

To minimise assumptions made in reporting average pumping head, we have linked 'head available before distribution' to specific telemetry measurement points where recorded pressure could best represent the remaining head before distribution. Where this was not possible, we have used previous year estimations.

Significant changes from previous year

Change from previous year (m.Ml > 100 or <-100, change >50% or <-50%):

Pump Group	Flow [Ml/d]	Lift [m]	Flow Lifted [m.Ml]	% Change	Commentary
Hadham Mill (Rye Hill)	6.62	8.81	519.53	60%	Increased avg flow this year to support Roydon and Redricks outages
Blackford (Harefield)	39.06	3.30	311.95	21762616%	Pumps brought back in to service this year
St Margarets	1.70	51.30	296.57	236%	Corrected lift from previous year
Springwell (Heronsgate)	3.27	0.42	274.59	63%	Increased transfer support from Iver to Heronsgate
Marlowes	2.31	4.79	170.75	9019%	Site brought back into supply this year
Friars Wash (Chaul End)	-0.42	-11.62	-102.66	-79%	Low booster flow this year due to low demand balance from Misbourne. Flow has just been lifted from BH pumps
Anthony's	-0.05	-66.75	-1249.27	-84%	Suction pressure meter correction

Pump Set	Region	Pump description	Raw Water Abstraction	Raw Water Transport	Treatment	Distribution	Accuracy	Comment
Chaul End	Central	Distribution Only	0%	0%	0%	100%	Actual	New addition
Mill Green	Central	Distribution Only	0%	0%	0%	100%	Actual	New addition
St Margarets Booster	Central	Distribution Only	0%	0%	0%	100%	Actual	New addition
Ardleigh (Dedham)	East	Distribution Only	0%	0%	0%	100%	Actual	New addition
Ardleigh (Elmstead)	East	Distribution Only	0%	0%	0%	100%	Actual	New addition
Blackford (Harefield)	Central	Distribution Only	0%	0%	0%	100%	Actual	Updated accuracy
Blackford (HL)	Central	Distribution Only	0%	0%	0%	0%	Actual	Updated accuracy
Perivale	Central	Distribution Only	0%	0%	0%	0%	Actual	Updated accuracy
Rowley Lane	Central	Distribution Only	0%	0%	0%	0%	Actual	Updated accuracy

6B.27 - Total number of treated water distribution exports

This continues to increase due to the creation of NAV sites/

6B.28 - Volume of treated water distribution exports

This line remains steady as whilst NAV exports have increased, other exports have decreased.

6B.29 – Peak 7 day rolling average distribution input

Our Company peak 7 day rolling average typically occurs in June or early July prior to summer school holidays. Although hotter temperatures can be seen at the end of July or August, a significant amount of our population leaves the area for summer holidays. In APR25, our company peak week was 23-29 June (which was prior to schools breaking up for summer holidays).

6B.31 Measured household consumption (excluding supply pipe leakage)

This has increased by 23.0 Ml/d from 2023-24 as customers switch from unmeasured to measured consumption through our metering programme. The amount of externally measured supply pipe losses being deducted has also reduced as we updated the underlying supply pipe losses at a per property level in 2024-25.

6B.32 Unmeasured household consumption (excluding supply pipe leakage)

This has reduced by 10.6 Ml/d from 2023-24 as customers switch from unmeasured to measured under our metering programme.

6B.33 Measured non-household consumption (excluding supply pipe leakage)

This has decreased by 2.7 Ml/d from 2023-24

6B.34 Unmeasured non-household consumption (excluding supply pipe leakage)

This has decreased by 1.3 Ml/d from 2023-24 as our updated unmeasured non-household figure has been refreshed for 2024-25 which showed properties were using less water per property than the previous study.

6B.35 Total annual leakage

This has decreased by 5.4 Ml/d from 2023-24.

Please see 3A.3 for leakage commentary.

6B.36 Distribution system operational use

This has decreased by 0.3 Ml/d from 2023-24

6B.37 Water taken unbilled

This has increased by 3.0 Ml/d from 2023-24.

6B.38 Distribution input

This has increased by 5.8 Ml/d from 2023-24.

6B.39 Distribution input (pre-MLE)

This has increased by 3.3 Ml/d from 2023-24.

As part of our new Sundon commissioning plant a new meter was installed upstream of the reservoir. For this year's reporting we have used that new meter which replaces a calculation using 3 downstream meters that were previously used to calculate this import. The new single meter has a small take off meter after the meter (Streatley), which feeds back into the Anglian area which is deducted from the meter volume. This has caused a small increase in DI of approximately 1.5Ml/d. We believe this to be an improvement in reporting accuracy.

6B.58 Leakage upstream of DMA

This has decreased by 0.9 Ml/d from 2023-24. This follows an increase in the number of DMAs we report on which has resulted in a reduction in leakage in areas outside continual monitoring. This volume is now captured within the distribution main losses. We have also carried out an annual update of our BABE assessment within which we have overwritten the standard leakage values on one of services reservoirs as our Customer Delivery team made us aware of a leak that was significantly greater than the allowance made in the BABE assessment.

6B.59 Distribution main losses

This has increased by 20.5 Ml/d from 2023-24 as our supply pipe losses calculation has decreased in 2024-25, so more water is now attributed to distribution mains losses.

6B.60 Customer supply pipe losses – measured households excluding void properties

This has decreased by 11.7 Ml/d from 2023-24 as we have updated the underlying supply pipe losses at a per property level in 2024-25.

6B.61 Customer supply pipe losses – unmeasured households excluding void properties

This has decreased by 11.0 Ml/d from 2023-24 as we have updated the underlying supply pipe losses at a per property level in 2024-25.

6B.62 Customer supply pipe losses – measured non-households excluding void properties

This has decreased by 0.7 Ml/d from 2023-24 as we have updated the underlying supply pipe losses at a per property level in 2024-25.

6B.63 Customer supply pipe losses – unmeasured non-households excluding void properties

This has decreased by 0.2 Ml/d from 2023-24 as we have updated the underlying supply pipe losses at a per property level in 2024-25.

6B.64 Customer supply pipe losses – void measured households

This has decreased by 0.8 Ml/d from 2023-24 as we have updated the underlying supply pipe losses at a per property level in 2024-25.

6B.65 Customer supply pipe losses – void unmeasured households

This has decreased by 0.4 Ml/d from 2023-24 as we have updated the underlying supply pipe losses at a per property level in 2024-25.

6B.66 Customer supply pipe losses – void measured non households

This has decreased by 0.2 Ml/d from 2023-24 as we have updated the underlying supply pipe losses at a per property level in 2024-25.

6B.67 Customer supply pipe losses – void measured non-households

This has decreased marginally from 2023-24 as we have updated the underlying supply pipe losses at a per property level in 2024-25.

Table 6C - Water network+ - Mains, communication pipes and other data for the 12 months ended 31st March 2024

6C.1 Total length of potable mains as at 31 March

This year we are reporting 17,041.6km of mains. This is a net increase of 52.5km over last year. The average annual increase of the previous 3 years is 43.2km (50.5km over the last 5 years).

6C.2 Total length of potable mains relined

No mains have been relined this year.

6C.3 Total length of potable mains renewed

The 3.5km reported in this line comprises 1.8km of distribution and trunk main renewals completed as part of below ground asset delivery works, and 1.7km of mains diversion (developer services and HS2).

6C.4 Total length of new potable mains

This year we are reporting 26.3km laid by Developer Services (DS) and Others (inc. M&R, Leakage and Production), and 21.0km of new mains installed across network reinforcements and sustainability reduction works.

6C.5 Total length of potable water mains (≤320mm)

This year we are reporting 15,725.7km of mains. This is a net increase of 42.1km over last year. The average annual increase of the previous 3 years is 36.8km (41.9km over the last 5 years).

6C.6 Total length of potable water mains (>320mm and ≤ 450mm)

This year we are reporting 628.9km of mains. This is a net increase of 2.6km over last year. The average annual increase in net mains length over the last 3 years has been 3.5km.

6C.7 Total length of potable water mains (>450mm and ≤610mm)

This year we are reporting 504.5km of mains. This is a net increase of 7.7km over last year. The average annual increase in net mains length over the last 3 years has been 2.7km. This year's higher mains length includes the final commissioning of 6.5km of Harefield to Oxhey Woods trunk main which was laid between 2021-2024.

6C.8 Total length of potable water mains (> 610mm)

This year we are reporting 182.4km of mains. This is a net increase of 0.1km over last year. The average annual increase in net mains length over the last 3 years has been 0.1km.

6C.9 Total length of potable mains laid or structurally refurbished pre-1880

This year we are reporting 76.5km of mains. This is the same mains length as last year. The average annual decrease in mains length over the last 3 years has been 0.1km.

6C.10 Total length of potable mains laid or structurally refurbished between 1881 and 1900

This year we are reporting 202.5km of mains. This is a decline of 0.2km since last year. The average annual decrease in mains length over the last 3 years has been 0.2km.

6C.11 Total length of potable mains laid or structurally refurbished between 1901 and 1920

This year we are reporting 606.3km of mains. This is a decline of 2.1km since last year. The average annual decrease in mains length over the last 3 years has been 1.6km.

6C.12 Total length of potable mains laid or structurally refurbished between 1921 and 1940

This year we are reporting 2,515.2km of mains. This is a decline of 2.6km since last year. The average annual decrease in mains length over the last 3 years has been 1.9km.

6C.13 Total length of potable mains laid or structurally refurbished between 1941 and 1960

This year we are reporting 3,846.1km of mains. This is a decline of 6.0km since last year. The average annual decrease in mains length over the last 3 years has been 8.1km.

6C.14 Total length of potable mains laid or structurally refurbished between 1961 and 1980

This year we are reporting 3,707.5km of mains. This is a decline of 6.1km since last year. The average annual decrease in mains length over the last 3 years has been 5.1km.

6C.15 Total length of potable mains laid or structurally refurbished between 1981 and 2000

This year we are reporting 2,748.6km of mains. This is an increase of 0.2km since last year. The average annual decrease in mains length over the last 3 years has been 2.1km.

This legacy line has increased this year rather than declining due to moving a 1.5km main laid in 1988 between Periwinkle Lane and Beech Road, from raw to potable.

6C.16 Total length of potable mains laid or structurally refurbished between 2001 and 2020

This year we are reporting 3,097.0km of mains. This is an increase of 2.3km since last year. The average annual decrease in mains length over the last 3 years has been 0.8km.

This legacy line has increased this year rather than declining due to the late recording in 2024-25 of a number of mains laid by Developer Services between 2009 and 2021.

6C.17 Total length of potable mains laid or structurally refurbished post during and after 2021

This year we are reporting 241.9km of mains, an increase of 67.2km over last year. The average annual increase in mains length over the last 3 years has been 61.6km.

6C.18-20 Communication pipes – numbers by pipe material

The figures given in these lines are calculated from a base-line estimate produced in 2012-13 and adjusted each year to take account of new communication pipes and replacements.

6C.18 Number of lead communication pipes

The number of lead communication pipes continues to be calculated from a 2012-13 baseline estimate, declining annually the number of lead communication pipes being removed from service.

This year, a further 995 lead communication pipes have been removed to leave an estimated 310,145 in service. The number of lead communication pipes replaced this year is in line with the annual 3-year average of 1,027.

6C.19 Number of galvanised iron communication pipes

The number of galvanised iron communication pipes continues to be calculated from a 2012-13 baseline estimate, declining annually the number of galvanised iron communication pipes being removed from service.

This year, a further 162 galvanised iron communication pipes have been removed to leave an estimated 245,812 in service. The number of galvanised iron communication pipes replaced this year is just below the annual 3-year average of 183.

6C.20 Number of other communication pipes

The number of 'Other' (material) communication pipes continues to be calculated from a 2012-13 baseline estimate, inclining annually the number of new non-lead and non-galvanised iron communication pipes being installed into service.

This year, a further 5,797 'Other' material communication pipes have been installed to make an estimated 537,356 in service. This number of 'Other' communication pipes installed is lower than the annual 3-year average of 7,758 principally due to reduced Developer Services activity.

6C.21 Number of lead communication pipes replaced for water quality

We did not carry out any work associated with our AMP7 lead communication and supply pipe replacement project in north Clacton and the surrounding area during the year.

We have continued to identify lead communication pipe replacements from our works management system (Maximo) where the customer has replaced their lead supply pipe and has requested that we replace our lead communication pipe. Many of these customer contacts were initiated as a result of 'flow/pressure' issues but were then processed under Regulation 30(1), where if the customer replaces their lead supply pipe, we are obliged to replace the communications pipe if it is lead. Consequently, we have included 277 of these communication pipe replacements in this line.

The last element to this line is lead communication pipes replaced after detecting elevated concentrations of lead in samples taken from properties. During 2024-25 we continued to replace lead communication pipes when sample results were above 5 µg/l but for the purposes of this line we have only included those communication pipes replaced when sample results were above 10 µg/l, as required by the line definition. We replaced 23 lead communication pipes following results above 10 µg/l. This gives a total of 300 lead communication pipes replaced for water quality reasons. In addition, we also replaced 34 lead communication pipes where a sample result was between 5 µg/l and 10 µg/l, in line with our strategy.

6C.22 Company Area

Company area remains unchanged at 4,515km2. The RAG guidance continues to confirm that no adjustment should be made for areas supplied by NAVs.

6C.23 Compliance Risk Index

See 3A.1 for commentary.

6C.24 Event Risk Index (ERI)

Our ERI score for 2024 was 0 and was substantially below the industry average. We had 19 events which were reported to DWI, many of which impacted a single property and attracted a very low ERI score.

6C.25 Properties below reference level at end of year

See commentary under 3A.12 Properties at risk of receiving low pressure (per 10,000 connections).

Prior years' numbers for properties 'on the register' are:

Year	Nr of properties 'on register'
2019-20	5,382
2020-21	30,311
2021-22	24,167
2022-23	23,680
2023-24	21,903
2024-25	18,870

The significant increase in 2020-21 resulted from the abnormal demand for water seen in the lockdown summer of 2020.

Table 6D - Demand management – metering and leakage activities

In line with the guidance for 10F, we have included the meters reported under the accelerated funding project in the appropriate lines within this table. All AMI meters installed in the year were in association with the project.

6D.6 New optant meters installed for existing customers

The number of optant meter installations increased this year, reaching 3,962 compared to 3,607 in the previous year. This uplift was primarily driven by a marked increase in customer demand, particularly from April 2024 onwards, when requests for meter installations rose significantly. In response to this surge, we proactively expanded delivery capacity to meet the heightened demand, enabling us to maintain service levels and meet customer expectations. This upward trend highlights both operational agility and growing customer engagement with metering options.

This consistent year-on-year growth in customer-led installations reflects increased public awareness and participation in metering, supporting broader water efficiency goals.

No optant meters were installed via 'Pathfinder', the accelerated programme, during AMP7.

6D.7 New selective meters installed for existing customers

Selective metering installations totalled 10,695 this year, marking a decline compared to prior years. This reduction was largely the result of significant resourcing challenges in the first quarter, following the withdrawal of a key contractor from the programme. This unexpected departure placed the delivery burden solely on our smallest

contractor, thereby constraining our capacity. Furthermore, the remaining work predominantly comprised reworks and joint supply installations—activities that are inherently more complex and operationally demanding. These combined factors impacted our ability to sustain the higher volumes achieved in previous periods.

Of the total installations reported, 937 were completed on joint or common supplies. The cost associated with installing meters on joint supplies does not differ from those on individual connections.

Throughout AMP7, Affinity Water delivered 174,035 selective metering installations. While this falls short of the target, it reflects a significant delivery effort in the face of contractor instability and a progressively more complex work bank. The programme continued to progress through a combination of strategic planning, agile resource reallocation, and a commitment to continuous process improvement.

During AMP7, a total of 188 AMI meters were installed via Pathfinder, the accelerated programme. In total, the number of selective meters installed was 10,883.

6D.8 New business meters installed for existing customers

The total number of new Business meters installed has increased from 72 in 2023-24 to 74 in 2024-25.

This is 23% higher than the 60 meters forecast for 2024-25 in the PR24 submission

63 of these were customers switching from unmeasured to a measured supply, with the remaining having an additional meter installed.

When meters are installed, they should be AMR, but sometimes this is not always possible due to installation issues, or the type of meter installed for the customer

As of 31 March 2025, we had not installed any AMI meters for business customers.

6D.9 Residential meters renewed

Meter replacement activity remained steady throughout AMP7, with a total of 12,826 meters replaced in 2024-25 through both proactive and reactive approaches. This included upgrading basic meters to AMR technology, as well as replacing existing AMR meters that had reached end-of-life or were no longer performing optimally. Although slightly lower than the 13,711 replacements completed in 2023-24, this year's delivery remains aligned with Affinity Water's long-term strategies for asset health, smart metering rollout, and demand management.

Over the full AMP7 period, a total of 61,868 meters were renewed, demonstrating consistent year-on-year delivery. While there was a modest reduction in the core replacement volumes this year, the combined efforts of business-as-usual activity and

the Pathfinder programme reflect sustained investment in the modernisation of our metering infrastructure.

The Pathfinder programme contributed significantly in 2024-25, delivering an additional 20,183 renewed meter installations. These meters formed part of a focused initiative to accelerate the deployment of smart meters in high-priority areas, enabling better leakage detection, enhanced billing accuracy, and long-term water efficiency benefits.

6D.10 Number of business meters renewed

The overall number of meters renewed has decreased by from 1793 in 2023-24 to 1665 in 2024-25. Meters are replaced on failure or at the request of retailers via customers.

This is 7% higher than the 1550 meters forecast for 2024-25 in the PR24 submission

Where possible we aim to install AMR meters (AMI moving into AMP8), however, this is not always possible due to installation issues, or the type of meter requested by the customer.

As of 31 March 2025, we had not installed any AMI meters for business customers.

6D.11 - Replacement of basic meters with smart meters for residential customers

The reporting process for this metric mirrors that of 6D.9, which tracks residential meters renewed, but focuses specifically on basic meters upgraded to AMR or AMI technology.

In 2024-25, a total of 10,364 basic meters were replaced with AMR-enabled meters, representing approximately 81% of all meter renewals completed during the year. It remains our policy that all meter replacements should be upgraded to AMR technology wherever feasible to enhance operational efficiency and data accuracy.

The Pathfinder programme contributed an additional 8,681 meters renewed from basic to AMI during 2024-25, supporting the accelerated rollout of advanced metering infrastructure.

6D.12 - Replacement of AMR meter with AMI meters for residential customers

All meters reported under this line were replaced under the ‘pathfinder’ accelerated metering project.

6D.13 - Replacement of basic meters with smart meters for business customers

84.7% of all the meters installed were the replacement of basic meters to AMRs in 2024-25 which is a slight increase in percentage terms from 2023-24 (82.6%). When meters are replaced, they should be installed as AMR meters, but sometimes this is not possible due to installation issues.

As of 31 March 2025, we had not installed any AMI meters for business customers

6D.14 - Replacement of AMR meter with AMI meters for business customers

As of 31 March 2025, we had not installed any AMI meters for business customers.

6D.15 to 20 Metering – supply-demand balance benefit

We calculate the benefit of metering activity to the supply-demand balance by extracting residential customer and business consumption data from Temetra (a meter management system) and processing this information through predictive models using the methodology outlined in individual line numbers below.

6D.15 New residential meters installed for existing customers – supply-demand balance benefit

We derive a benefit figure for new residential meter installations using the average water savings of selective and optant customers who had a meter installed in the reporting year 2024-25.

The sample size of customers who have switched to a metered tariff between 2017 and March 2025 is 134,031. We extrapolate the savings observed for this cohort of customers for the number of new meter installations (6D.6 & 6D.7 for selective and optants).

We assess the benefit associated with new residential meter installation using our suite of PCC models. These models remove the effects on consumption of Covid-19 and seasonality, so benefits can be compared on a month-by-month basis in a fair and reliable way. We calculate savings for new meter installations by comparing the median consumption per property prior to the installation with the median consumption after.

Joint supplies are not included in this methodology. The calculations assume one meter to one property, making it difficult to analyse savings when one meter covers multiple properties. We plan to develop a methodology to best estimate their benefits of joint supplies in the future.

6D.16 New business meters installed for existing customers – supply-demand balance benefit

We derive the benefit of new business meters installations on the supply – demand balance by counting the number of new business meters installed during the 2024-25 reporting year, as in line 6D.8.

The benefits from new business meter installations have been calculated by evaluating water savings across the full sample of installations made in 2024-25, supplemented with the inclusion of installations in the period Apr-20 to Mar-23 to increase the sample size. The savings for the report year 2024-25 is produced by applying the savings observed in the sample to the number of new meter installations made in the report year.

We used the same methodology to calculate unmeasured use in line 6D.15, but with non-household consumption analysed. To calculate the consumption of newly metered businesses, the unmeasured use of these customers is compared to the metered use, whilst also using our suite of PCC models to account of variances for weather, seasonality and the effects of Covid-19.

Due to the small volume of new business meter installed in a year, it may mean that the benefits may change from positive to negative year on year.

6D.17 Replacement of basic meter with smart meters for residential customers – supply-demand balance benefit

The meter read data for these customers was extracted from Temetra, and the meter reads pre-renewal were compared to meter reads post-renewal. This figure was then adjusted for seasonality and weather changes, as well as being passed through the Covid-19 impact model, to account for changes in customer behaviour due to lockdowns or easing of restrictions.

The savings calculated under this line are all for the basic meters replaced with an AMR meter. We have not installed any 'smart' (i.e. AMI) meters in 2024-25 outside of the accelerated funding project.

The figure for savings can change year-on-year, going from negative to positive. One reason for this is due to not getting the granular detail of why the meter was exchanged. It could be due to the meter not recording consumption, giving incorrect readings or other unknown considerations. All factors that could lead to a different Ml/d saving.

6D.18 Replacement of AMR meter with AMI meter for residential customers– supply-demand balance benefit

All AMI meters installed in the 2024-25 report year are reported in table 10F. No AMI meters were installed outside of the accelerated infrastructure delivery project.

6D.19 Replacement of basic meter with smart meters for business customers – supply-demand balance benefit

The process for this is the same as that for 6D.17 residential customers.

6D.20 Replacement of AMR meter with AMI meter for business customers – supply-demand balance benefit

All AMI meters installed in the 2024-25 report year are reported in table 10F. No AMI meters were installed outside of the accelerated infrastructure delivery project.

6D.21 Residential properties - meter penetration

No identification or designation of the accelerated smart meter installs is applicable for 6D.21, but the inclusion of AMI meters in the figures is noted here.

6D.22 Total leakage activity

As reported in APR24, we have aligned our methodology for reporting total leakage activity costs with the PR24 Business Plan table guidance for line CW19.1. The reported figure includes all Capex and Opex expenditure related to the 'PALM' categories including indirect costs, mains renewal costs and the mend costs. The total spends on leakage activities in 2024-25 was £45.601m. We have assigned 69% of these costs to maintaining leakage based on our assessment of breakout. The remaining 31% of the costs have been assigned to reducing leakage.

6D.23 Leakage improvements delivering benefits in 2020-25

We have delivered 5.4Ml/d of leakage reduction since 2023-24.

6D.24 - Per capita consumption (measured)

This has increased by 0.6 litres from 2023-24.

6D.25 - Per capita consumption (unmeasured)

This has increased by 3.0 litres from 2023-24.

Table 6F - WRMP annual reporting on delivery - non-leakage activities

Internal interconnectors delivering benefits in 2020-2025

AFF-CTR-WRZ4-4001: Egham to Iver

AFF-CTR-WRZ4-4001: Egham to Iver (Midway North Booster) is captured under this category. This is for the installation of a new booster pump to enable an additional 17Ml/d to be transferred from our Wey community to Pinn community.

Capex The reported Capex for all years of AMP 7 (2020-21 to 2024-25) are based on actual spend. Capex for 2024-25 aligns to that reported in Table 4L. Capex for beyond 2024-25 remains unchanged from APR24.

Opex for "After 2024-25" has not changed from APR24

Benefit – The scheme will enable us to transfer 17Ml/d at average and up to 30Ml/d at peak. For the purpose of reporting in the table, the annual average capacity has been input.

Interconnector – There is existing pipe infrastructure, but this scheme is to install a booster pump so that we can increase the capacity that can be transferred. Therefore, there is no new pipe or storage capacity. The pumping capacity to be installed is based on the assessment carried out by Stantec.

Variance from WRMP

Previously the delivery date was set for 2023-24, but due to land purchase constraints the option was delayed until delivery in 2025-26. The Capex, Opex and Benefits have been revised to evidence this change in delivery date.

Supply-side improvements delivering benefits in 2020-2025

AFF-RTR-WRZ7-0639: Deal Continuation After 2020

This is the continuation of an existing bulk transfer agreement. The transfer agreement only entitles us to utilise it under emergency conditions and therefore is not forecasted within our Opex budget to be utilised. Therefore, no Opex has been included. There is no new infrastructure required so there are no Capex costs associated with the scheme. The benefits have been included for all years at 0.07Ml/d as per the terms of the agreement.

Supply-side improvements delivering benefits starting from 2026

Sundon Conditioning Plant

Sundon conditioning plant (Sundon Reservoir) is the work required to upgrade the existing conditioning plant at Sundon, the upgraded plant is scheduled to become operational in September 2025/26. The delivery of this project will remove water quality constraints that currently prevent the full utilisation of our bulk import from Anglian Water into WRZ3 enabling us to increase our utilisation of the Anglian Water Grafham bulk supply up to its full 91Ml/d capacity (pre climate change impact), which is currently capped at 50Ml/d.

Capex The reported Capex for all AMP 7 years (2020-21 to 2024-25) are based on actual spend as reported in Table 4L. Future Capex cost remains unchanged from APR24. Capex for 2024-25 includes £582,621 Opex costs which have been converted to Capex. These costs were included as Opex in previous APRs as it relates to conditioning costs of Chemicals and Energy. This has been converted to Capex due to delayed delivery date of the project.

Opex for 2024-25 has been set to zero. While the scheme is functional from January 2025, the scheme is not in operation until after the Sustainability Reductions linked to Affinity Water's WINEP are introduced in AMP 8. The Opex for "After 2024-25" has increased due to the option being run for close to a year to simulate function once sustainability reductions begin in 2025-26. This has given a more accurate Opex figure for "After 2024-25".

Benefit The design maximum flow for the conditioning plant will be 109ML/d which is our maximum entitlement for the Grafham import via Sundon. The annual average entitlement is 91Ml/d. Within the WRMP we capped current utilization to 50Ml/d therefore the benefit has assumed to be 41Ml/d to enable us to use the full annual average license. For 2024-25, a value of 33.90 Ml/d has been included to demonstrate the ramping up of the scheme prior to commissioning in September 2024-25.

This scheme is not an internal interconnector, so the final set of columns have not been completed.

Variance from WRMP

Previously, the delivery date for Sundon Conditioning plant was 2023-24, however this has been changed to 2024-25, to align with the updated delivery date. The Capex forecast has changed to evidence the Capex expenditure in 2024-25 related to delayed delivery date. Opex and Benefits have remained the same.

In APR23, the Opex in the first year of operation was higher due to the chemical cost required to begin the operation of the option. This cost has been moved from Opex into Capex for APR24.

In APR25, the delivery date of the scheme has been updated to 2025-26 to reflect that the scheme is commissioned and functional but will not be operated until after the sustainability reductions (1st April 2025), linked to Affinity Water's WINEP commitment date.

Alignment to Table 4L

The Capex figures listed in Table 4L include Overhead and IT Share of the Sundon Conditioning Plant and Egham to Iver.

Demand side improvement delivering benefits in 2020-2025 (excl. leakage and metering).

The supply-demand balance benefit (demand saving) is assumed to be a reduction in consumption and is recorded as a positive figure. Benefits relating to leakage reduction and benefits from metering are excluded from this line.

The benefits of these activities to the supply-demand balance have been calculated using customer data, extracted from our Temetra system, and processed through predictive models.

The Ml/d benefits accruing from this activity are not something that can be measured directly; rather the volumes stated are outputs from these predictive models.

The 'benefits' should be seen as benefits to the natural environment and as arresting growth in distribution input that will occur through growth in population; they do not translate to a tangible reduction in the year-on-year distribution input figure.

Programme overview

Our Demand Management programme is split into the five following workstreams (pillars):

Pillar 1 – Water Efficiency & Water Saving Devices
Pillar 2 – Smarter Targeted Metering
Pillar 3 – Our Customers' Journey
Pillar 4 – Campaign in Partnership & Community Incentive/Campaigns
Pillar 5 – A National Voice

Demand saving benefits to date

Year	Ml/d	Ml/d cumulative
2020-21	0.56	0.56
2021-22	21.16	21.72
2022-23	25.63	47.35
2023-24	40.28	87.63

2024-25	26.12	113.75

Demand saving benefits 2024-25

All the benefits associated with the projects below were determined through our suite of PCC models using actual meter reads. These models remove the effects on consumption of Covid-19 and seasonality, so benefits can be compared on a month-by-month basis in a fair and reliable way.

Pillar	Project	Benefit (Ml/d)
Pillar 1	Home Visits	3.28
Pillar 2	Flow regulators	0.27
Pillar 3	Trigger Based Comms	N/A
Pillar 4	Behaviour Change	22.57
Pillar 5	A National Voice	N/A
Total		26.12

Home Visits (Previously Home Water Efficiency Checks)

We completed 17,318 home visits in 2024-25, with technicians installing devices and offering water saving tips and advice to the customer. Visits are completed across all Water Resource Zones and all customer types. This project is carried out in partnership with a delivery provider, Groundworks.

Savings are calculated for customers receiving a Home Visit by comparing the property's actual consumption with their predicted expected consumption if they were not to receive a visit, any positive difference or reduction in consumption is then attributed to the home visit. The average litre saving per property per day is found for each property, then summed and converted to obtain the mega litres per day figure (Ml/d).

In conjunction with the home visits, we have also initiated a service whereby if an internal plumbing loss is identified, a referral is put forward for a plumber to attend and fix the leak

The associated saving for Home Visits in 2024-25 was 3.09 Ml/d.

Leak Visits

This new service has been set up to help customers with internal plumbing losses but who have not yet had a Home Visit. Customers are able to scan a QR code on the website, taking them to a form to complete and submit a video of the leak. A plumbing manager reviews these videos and determines if they are repairable (under certain terms and conditions). A plumber is then sent out to help repair the leak. During September 2024 when this was set up and 31 March 2025, we completed 366 leak visits and averaged 508 litres per day savings.

The associated Ml/d saving for Leak Visits in the reporting year 2024-2025 is 0.19 Ml/d

Campaign in Partnership & Community Incentive/Campaigns: Save Our Streams (SOS) Benefits Modelling

The continuation of our SOS behaviour change campaign was vital to encouraging customers to take an action to help reduce their household water consumption. This was done by reaching out to customers through many types of media such as social media, on demand and communications.

We calculate savings for the SOS campaign by comparing at property level, the median consumption prior to the campaign and the median consumption after the campaign, producing water savings for customers both in average litres per property per day and mega litres per day, looking at two key aspects for the campaign.

- Behaviour changes through registrations: We estimate consumption savings from registrations of customers who signed up to the campaign - educated and motivated actions to reduce water use.
- Behaviour changes from campaign awareness: We estimate consumption savings for customers who have not signed up to the SOS campaign, their behaviour has been influenced at scale through advertising/PR/social and e-CRM campaigns.

The benefits modelling calculates the savings for the following cohort of customers:

- Customers who have signed up to the campaign during 2022-23.
- Customers who have signed up in previous years if they have had a subsisting reduction in consumption in 2022-23.
- All other customers impacted by the campaign e.g., via media channels (behavioural element) but have not signed up.

Further consideration when calculating savings for customer cohort M3 involves identifying these customers in the data by excluding known customers who have signed up to the campaign and customers who may be on other demand management campaigns. Survey data was used to understand the reach of the campaign amongst customers who have not signed up but have seen something about the SOS campaign and are taking action to save water as a result of interacting with the campaign through advertising and media.

The associated Ml/d saving for this project in 2024-25 is 22.57 Ml/d.

Flow Regulators

We installed 2,380 flow regulators in 2024-25. These are devices installed at the boundary stop tap to regulate and help manage consumption. During the year we focused on delivering these devices to high consumption households to see what savings could be made. This project is carried out in partnership with a delivery provider, Cenergist.

The savings were calculated by obtaining meter reads either side of the installation, as well as a read on the date of installation, to see the reduction. After excluding properties that did not have readings, date ranges that were not suitable and any outliers, the data produced an average saving of 113.69 litres per property.

Extrapolated to the installation figure gives an associated saving for Flow Regulators in 2024-25 of 0.27 Ml/d.

Variance to 4L

Within 6F demand management is included under Capex as this is how it is funded, however for statutory purposes a proportion of the spend has to be treated as Opex in 4L. For consistency we have continued to report it as Capex in 6F.

Section 9: Innovation Competition

Table 9A – Innovation Competition

Research and Development Activities

The development and application of new techniques and technology is an important part of our companies' activities. We are a contributing member of UK Water Industry Research ('UKWIR') and participate widely in, and benefit from, its research programme. The UKWIR programme focuses on the most significant challenges for the UK and Irish water industry, with the most significant for us being drinking water quality, water resources, catchment management, climate change, water mains and services, demand management, leakage and smart metering.

We are also a participating member of other water industry research and innovation groups. These include the Technology Approval Group, the Water Treatment Technical Working Group, the Sensor for Water Interest Group, the Instrument User Group, the Water Regulations Advisory Scheme, Spring and Cranfield Water Network. Throughout the year, we have carried out a number of research and development projects in association with these groups and individually. Most notably, research into the effectiveness treatment technologies in treating for PFAS, a group of "man-made" chemicals widely used within industrial processes.

Innovation Fund

In 2020 Ofwat, established an Innovation Fund (for the period 2020-30) to grow the water sector's capacity to innovate. The fund runs a series of competitions to award funding to innovation projects that deliver benefits to customers, society and the environment. The fund seeks to address the huge challenges the sector faces such as climate change, population growth and building public trust.

During 2024-25, we contributed £1.004 million to Ofwat's Innovation in Water Challenge, an industry-wide initiative to drive transformational change and better

meet the evolving needs of customers, society, and the environment. In 2024-25, we progressed nine projects supported by the fund, either as the leading organisation or a partner.

Through rigorous competition Affinity Water won three projects and are the lead water company assigned to these projects

- Water Neutrality at NAV (New Appointment and Variations) sites
- Smarter Tanks
- Project Seagrass

Water Neutrality at NAV sites (Project Zero)

We are leading the "Water Neutrality at NAV Sites" project, which continues to extend the water industry understanding of ways to reduce net water demand. With the project well over halfway complete, we are learning which water saving devices are most effective in the journey towards 'water usage neutrality', while simultaneously understanding which customer behaviours contribute to this target and how these can best be influenced.

Our first trial was at the IWNL NAV Site, Bidwell West in Houghton where we delivered a behaviour change campaign to 908 properties). We also saved water by retrofitting and fixing leaks in local businesses. This "offsetting" and played a key role in the project. For example, fixing an overflowing toilet helped a local school save over 7,000 litres a day.

The results were significant, with Bidwell West not only becoming water neutral, but water positive, the first of its kind.

We're continuing to work with house builders, NAVs, local authorities, technology manufacturers and suppliers, behavioural change specialists, and neighbouring water companies. We are exploring water neutrality through water re-use systems and water saving devices. We are also sharing what we have learned so others can do the same, in the UK and beyond.

More information can be found at

Project Zero - Ofwat Innovation Fund

Our water neutrality project - Affinity Water

Smarter Tanks

This project was completed in 2022

As we face increasing risk of drought due to climate change, technology to anticipate extreme weather patterns and prevent water shortages due to droughts will become more and more important.

The 'Smarter tanks' project explored how to best monitor drinking water and rainwater storage tanks using real-time control solutions, to see if more water could be stored when needed most, which could contribute to a more resilient water network and reduced disruption to customers. The project encountered a significant challenge with the start of the Covid-19 pandemic, which meant the project was completed on a much smaller scale than anticipated.

The initial success of the small-scale project provided learnings for a much larger endeavour called Safe Smart Systems (led by Anglian Water) which is now underway. This will explore automation from source to tap within the whole water network, rather than just with retrofitting existing assets.

More information can be found at Smarter Tanks to Build a Resilient Network - Ofwat Innovation Fund

Project Seagrass

The Seagrass Seeds of Recovery project aimed to provide a blueprint for restoring seagrass in the UK, creating opportunities to improve biodiversity and reduce carbon and nitrogen.

Seagrass meadows enhance the stability of the coastal zone, locking carbon into the seabed, improving water quality, and creating a habitat for small animals. This enhances the resilience of coastal ecosystems. The project aimed provide a road map to unlock the 'blue carbon' potential (carbon captured by marine ecosystems) of seagrass restoration for the water industry and beyond.

More information of the project can be found at: Seagrass Seeds of Recovery - Ofwat Innovation Fund

The project output report can be found at:
Developing_UK_Seagrass_Carbon_Code_2023

Additional projects

We are also active partners in eight further projects across a range of subjects, all of which have made notable progress in the year. Alongside "Safe, Smart Systems", the launch of project "Designer Liner 2" seeks to extend the work completed in Phase 1 of the project, defining the most effective pipelining solutions. "Managing Background Leakage" has used case studies in both Welsh Water and Affinity Water to further understanding of this important aspect of leakage. "Mainstreaming Nature Based Solutions" has moved through the legal arrangement phase into detailed Scope definition and the "No-Dig Technology" project will identify the most effective approach of avoiding costly excavations whilst repairing mains. Moreover, "In-Situ GAC Renewal" will identify ways of avoiding the costly and time consuming need to take GAC off-site to renew.

Our final two partnerships in conjunction with most of the other water companies, are customer focused "Stream", which seeks to fulfil the upcoming Regulatory requirement for open data and data sharing (https://www.streamwaterdata.co.uk/), whilst "Support For All" is exploring better ways of supporting our vulnerable customers through making the Priority Services Register provision more effective and efficient.

For further information regarding all these projects can be found at www.waterinnovation.challenges.org

Section 10 – (Additional regulatory information - accelerated programme additional impacts reporting, performance reporting and scheme delivery)

Table 10F - Accelerated infrastructure delivery projects data capture additional items

10F.1 Total length of new potable mains

No lengths of qualifying main have been installed in the year.

10F.2 Number of lead communication pipes replaced for water quality

No lead communication pipes have been replaced for water quality reasons under the accelerated funding programme.

10F.7 - New selective meters installed for existing customers

We installed 188 AMI meters for existing customers through the Smart Metering 'Pathfinder Trial', under the Accelerated Funding Delivery Project. The target for Pathfinder Trial was 4,000 new installations and 16,000 replacements/upgrades for residential customers.

We faced significant delays in our tender process and that had a knock-on effect on our delivery timeframe, as we moved from our initial plan of installations over 6–9 month period, to just under 2 months.

As a result of the PR24 Final Determination, the trial meters were appended to the AMP8 Year 1 Price Control Deliverable, which offers some flexibility around the new install/replacement split. Due to the much-reduced installation period, we focussed

on completing the total target, i.e. 20,000 AMI meters, rather than the split of new/ replacements. We are planning to increase the number of new installs in AMP8 Year 1 to allow us to catch up on Pathfinder Trial's under-delivery.

10F.8 - New business meters installed for existing customers

The Smart Metering Accelerated Funding Project included 20,000 AMI Residential meters and no Business meters.

As a result, no new business meters for existing customers were installed.

10F.9 - Residential meters renewed

We proactively replaced 20,138 residential meters with AMI meters. The split of Basic and AMR meters replaced is noted in 10F.11 and 10F.12.

The target was 16,000 replacements of both Basic and AMR meters with AMI meters but as outlined in 10F.7, that was subsequently increased to accommodate delays in the tender process and very constrained delivery timeframe. The meters selected for replacement were in an area of high leakage and PCC, which should result in increased demand benefits going forward.

10F.10 - Business meters renewed

No business meters were renewed.

10F.11 - Replacement of basic meters with smart meters for residential customers

We proactively replaced 8,681 residential Basic meters with AMI meters.

The target was 16,000 for replacements of both Basic and AMR meters with AMI meters but as mentioned in 10F.7, that was subsequently increased to accommodate delays in the tender process and very constrained delivery timeframe. The meters selected for replacement were in an area of high leakage and PCC, which should result in increased demand benefits.

10F.12 - Replacement of AMR meters with AMI meters for residential customers

We proactively replaced 11,502 residential AMR meters with AMI meters.

The target was 16,000 for replacements of both Basic and AMR meters with AMI meters but as outlined in 10F.7, that was subsequently increased to accommodate delays in the tender process and very constrained delivery timeframe. The meters selected for

replacement were in an area of high leakage and PCC, which should result in increased demand benefits.

10F.21- Per Capita Consumption reduction

We have reported 0 PCC and leakage performance improvements/ benefits in annual average terms delivered through the accelerated programme as meters were only installed in Feb and March 2025. While all meters are capable and the majority (c.80%) automatically connected to the network, we do not yet have an appropriate Meter Data Management System to collate and analyse the data or produce reports. While data is accessible it requires manual processing of data stored.

10F.22- Leakage improvements delivering benefits in 2020-25

See 10F.21

Table 10G - Additional reporting to account for impacts of transition expenditure

No metering activity took place under transitional expenditure

Table 10H - Accelerated schemes data capture reconciliation model input for the 12 months ended 31 March 2025

10H.89-96 Smart metering

We have installed 20,371 AMI meters, capable of recording and transmitting data at least once every 24 hours to measure supplies of water to premises.

More than 80% of these meters are enabled and already connected to the network and have been transmitting data since installation.

As outlined in 10F.7, we have not met the mix of meters set in the AMP8 PCD. We plan to rectify this in year 1. (2025-26).

See table 10F for further details.

10H.89 PR19 delivery AMR meters – unmeasured properties

Component 1

Within the Accelerated infrastructure delivery project - appendix 2: Price control deliverable, the in-year and forecasted targets were set on the basis of the sum of 6D.6, 6D.7 and 6D.8 ('AMR meter' column).

Component 1	2020-21	2021-22	2022-23	2023-24	2024-25	Amp total
6D.6 New optant meters installed for existing customers	2,346	4,503	4,341	3,607	3,961	18,758
6D.7 New selective meters installed for existing customers	25,648	50,374	46,065	41,253	10,688	174,028
6D.8 New business meters installed for existing customers	19	51	66	71	72	279
Total	28,013	54,928	50,472	44,931	14,721	193,065
Target	*28,013*	*54,928*	*28,916*	*42,049*	42,000	195,906

10H.90 PR19 delivery basic to AMR meter upgrades

Component 2

At the time of providing numbers for the accelerating funding, the APR did not collect the now reported 6D.11 & 6D.13 Replacement of basic meters with smart meters for residential/ Business customers. Component 2 was therefore set on the basis of the sum of 6D.9 and 6D.10 (AMR Column)

We accept these may have included AMR for AMR replacements and have therefore calculated component 2 as the sum of 6D.9-6D.10 for years 1-2 as these had already occurred and the proceeding years as the sum of lines 6D.11& 6D.13 replacement of basic meters with smart meters.

Component 2	2020-21	2021-22	2022-23	2023-24	2024-25	Amp total
6D.9 Residential meters renewed	11,492	11,585	-	-	-	23,077
6D.10 Business meters renewed	522	935	-	-	-	1,457
6D.11 Replacement of basic meters with smart meters for residential customers	-	-	9,720	10,822	10,364	30,906
6D.13 Replacement of basic meters with smart meters for business customers	-	-	944	1,481	1,418	3,843
total	12,014	12,520	10,664	12,303	11,782	59,283
Target	*12,015*	*12,520*	*8,683*	*11,000*	11,000	55,218

On the basis of how the targets were set we would have installed an additional 8,520 meters to those reported in Table 10H.

10H.91 and 10H.92 Acceleration new AMI smart meters installed and Acceleration AMI for basic replacements

Component 3 & 4

Combined we have installed 20,371 meters in the year. The proportion of new and replacement meters will be met as we progress with our PCD into Year 1 of AMP8.

10H.93 Baseline basic meters

Component 5

The figure reported is a calculation from '2019-20 start position' as noted in *Accelerated infrastructure delivery project, Appendix 2: price control* deliverables *(Ofwat, June 2023),* minus 10H.90 for each year to 2024-25.

Component 5	Start position 2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
10H.90 basic to AMR meter upgrades	-	12,014	12,520	10,664	12,303	11,782
Baseline basic meters (10H.93)	640,504	628,490	615,970	605,306	593,003	581,221
Target (<)	*640,504*	*628,489*	*615,969*	*607,286*	*596,286*	*585,286*

10H.94 Baseline AMR meters

Component 6

The figure reported is a calculation from '2019-20 start position' noted in *Appendix 2: price control deliverables* plus the sum of 10H.89 and 10H.90 each year to date.

Component 6	Start position 2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
10H.89 PR19 delivery AMR meters – unmeasured properties		12,014	12,520	10,664	12,303	11,782
10H.90 PR19 delivery basic to AMR meter upgrades		28,013	54,928	50,472	44,931	14,721
Baseline AMR meters (10H.94)	302,539	342,566	410,014	471,150	528,384	554,887
Target (>)	*302,539*	*342,567*	*410,015*	*447,614*	*500,663*	*553,663*

10H.95 and 10H.96 Leakage and PCC savings

Component 7 & 8

We are reporting zero savings in the reporting year.

See10F.21 for explanation.

10H.97 – Broome (NO3) Scheme 8

The new treatment process will secure a reliable 2.3Mld annual average deployable output and 4.5Mld peak week output from the Broome site to WRZ7 Dour water resource zone.
A deadline extension has been agreed with DWI from 31st March 2025 to 31st March 2026 for the Requirement: *'Completion of the detailed design of the nitrate treatment plant and award of the full contract for construction of the chosen solution'*.
As such the scheme to accelerate; 63% complete by 31st March 2024 and 80% complete by 31st March 2025. This accelerated scheme will enable the DWI Requirement to: *'Complete the construction, installation, and commissioning of the nitrate treatment plant'* by the deadline of 31st March 2029 to be achieved.

10H.98 – Kingsdown (NO3) Scheme 9

The new treatment process will secure a reliable 3.17Mld annual average deployable output and 3.7Mld peak week output from the Kingsdown site to WRZ7 Dour water resource zone.

DWI deadline of 31st March 2025 for the Requirement: *'Completion of the detailed design of the nitrate treatment plant and award of the full contract for construction of the chosen solution'* has been achieved.

As such the scheme to accelerate; 63% complete by 31st March 2024 and 98% complete by 31st March 2025. This accelerated scheme will enable the DWI Requirement to: *'Complete the construction, installation, and commissioning of the nitrate treatment plant'* by the deadline of 31st March 2027 to be achieved.

10H.99-100 scheme 17 – Holywell (PFOS)

We have replaced GAC media in 4 filters in the year. 3 filters were replaced in 2023-24, totaling 7 filters against a DWI target of 6 for the last 2 years of the AMP.

DWI notice ref: AFW-2023-00003:

'Complete GAC media replacement and reinstatement of 6 filters (cumulative

total from (b) 2). Date: 31 March 2025'.

We have 5 more filters to replace in the year 2025-26, (totaling 12) to fully meet the DWI notice which requires us to have replaced the media in all 12 filters by the end of 2025-26.

10H. 101-105 scheme 18 Stortford Resilience

We have fully commissioned the pipeline at Stansted Pumping Station completing the permanent blending pipework connection. The pumps have been upgraded at

Rochford and Forest Hall booster pumping stations. The infrastructure is substantially complete enabling blending and resilience. The planned completion in March 25 was delayed due to structural failure on an adjacent property during works at Stansted Pumping Station. The DWI have been informed of the delay and the revised completion date. The final automation of the control philosophy and blending at Stansted WTW is programmed for completion by 26th June 25.

Section 11 - (Additional regulatory information - Operational greenhouse gas emissions reporting)

Table 11A - Greenhouse gas emissions reporting for the 12 months ended 31 March 2024

Carbon Accounting Workbook (CAW).

The CAW uses a range of emission factors collectively agreed by water companies and the latest emission factors published by government for 2024.

Our scope 1 emissions are 5% more than in 2023-24, resulting mainly from increased use of generators to provide power to our operations. Our direct fuel includes diesel for onsite generators and plant (of which there was a 49% increase in volume purchased compared to 2023-24) and branded fuel replacements for gas oil used for heating, which are assessed as 'white diesel' based on advice from suppliers.

Our scope 2 location-based emissions have increased by 1.8%, which is in line with an increase of 1.7% in electricity purchased. The energy intensity of our operations increased this year, averaging 635kWh per Ml of water into supply compared to 629kWh per Ml of water into supply in 2023-24. Our market-based scope 2 emissions are calculated using supplier specific emissions factors. From October 2023 we have been using our supplier's residual tariff, as significant increases in the cost for 'green tariffs' in the UK mean we do not consider this offers customers good value for money. We are therefore reporting more scope 2 market-based emissions than in 2022-23 and 2023-24.

Our scope 3 emissions have increased by 15% from 2023-24, primarily due to an increase in emissions from chemical usage. Similarly to 2023-24, our emission factors associated with chemicals have been agreed by the 'chemical UK water industry: Chemicals and greenhouse gas emissions Task and Finish Group'. Our chemical usage has increased due to additional treatment required because of a change of supply strategy to accommodate 35Ml/d loss of licensed abstraction, and due to an increase in the purchase of granular activated carbon.

Lines 11A.33 to 36 present information around the various greenhouse gas (GHG) types for scope 3 emissions. For purchased electricity and chemicals GHG information is available only as a CO2e figure and therefore cannot be split into the various GHG

types. The numbers presented in 11A.33 to 36 are those scope three emissions where information is available to split emissions into GHG types.

In 2023-24 we received our first ISO14064-1 verification, covering our 2022-23 'operational' emissions. In 2024-25 we extended the scope of our ISO 14064-1 verification to cover our full carbon footprint for 2023-24.

During 2024-25, we implemented energy efficiency schemes largely through our successful pump replacement programme. These projects have saved 1.4GWh this year. We have also generated 1.9GWh through our solar installations.

In 2024-25 we continued our Electric fleet vehicle programme, with 25 electric vehicles in use by the end of 2024-2025. Our aim is to have transitioned 90% of our fleet to electric vehicles by the end of 2029-2030. From 1 January 2025 we committed to not ordering any new petrol or diesel operational vehicles unless the transition of certain vehicles is not supported by the technology. We also completed installation of charging infrastructure at several sites.

Capital Projects

In line with Ofwat's reporting requirements we have calculated the cradle-to-build emissions for our capital programme, building on the work undertaken in the previous year. For 2024-25 we estimated that the emissions associated with the delivery of our capital programme were 9,478 tCO_2e. This represents a reduction from the 2023-24 estimate of 13,301 tCO_2e, primarily due to the completion of most construction works in Year 4, with less construction activity undertaken in Year 5. In 2024-25 we estimated the emissions associated with 225 projects.

For 2024-25 we have modelled the emissions associated with 90% of Affinity Water capital expenditure on construction activities. This includes below ground assets (infrastructure), above ground assets (non-infrastructure), metering and minor reactive works.

Method Used

To estimate our capital project emissions, we use a bespoke tool created for Affinity Water. The tool comprises over 400 carbon models. These models utilise data from a range of sources including the Inventory of Carbon and Energy (ICE), CESSM workbook, Defra emission factors and directly from product manufacturers. The tool allows for a cradle-to-built asset assessment accounting for emissions arising from raw material extraction, manufacturing, transport to site and construction activities. Due to limitations in the current modelling capabilities, emissions associated with 10% of our Capex portfolio – including projects related to river restoration, Land, leakage, and Operational Technology- have not been estimated.

Two methodologies were applied in this year's assessment:

1. Scheme-based assessment- Emissions calculated using detailed activity data for individual projects.

2. Programme intensity based: Emissions extrapolated using intensity factors based on capital spend.

Our focus has been on capturing activity data for scheme-based assessment and extrapolating to increase coverage with programme intensity factors. We have applied the scheme-based approach to 60% of capital spend on construction activity and a programme intensity-based approach to a further 30%, covering a combined 90% of construction related Capex.

Confidence Assessment

We consider that it is not appropriate to apply a formal confidence grade framework to assess the uncertainty of the data sources used in our capital project emissions assessment.

Two different approaches were used to estimate the total embedded emission of capital project: scheme-based assessment and programme intensity assessment. The distribution of these assessment is shown in Figure 1.

Scheme-based assessment relies on project specific data. The primary sources of uncertainty in this approach stems from:

1. Potential errors in the carbon models used,
2. Human errors during data entry or use of the carbon estimation tool.

We have aimed to mitigate these sources of uncertainty using the following measures, respectively:

1. Testing of carbon models to ensure correct results when used in the tool,
2. Regular reviews internally to assure that errors when using the carbon estimation tool is minimised.

Programme intensity assessment assumes similar characteristics across projects within each programme and applies intensity factor accordingly. This method introduces a higher level of uncertainty due to its broader assumptions and lack of project-level granularity. However, it was limited to 30% of our Capex portfolio on construction activity to minimise its impact on the overall estimate. This approach was limited to 30% of our Capex portfolio spend on construction activities.

Approximately 10% of the construction related expenditure was excluded from both assessment approaches due to data limitation and the likelihood of generating inaccurate estimates using either method.

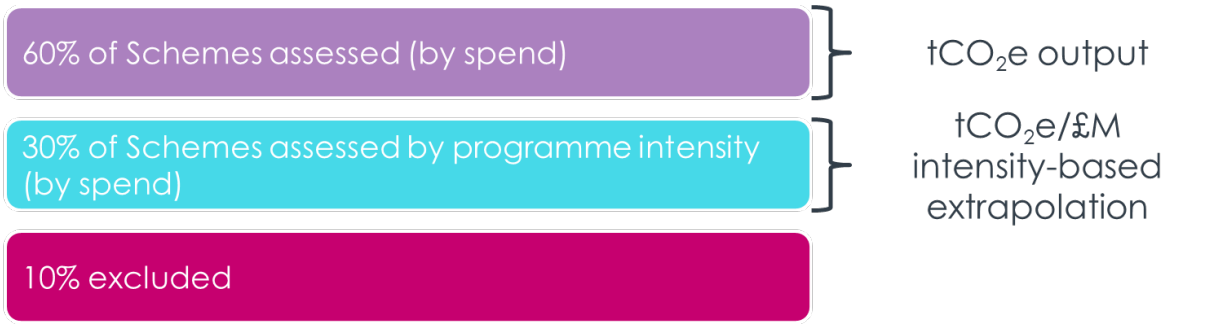


Figure 1- Distribution of approaches to assess the capital projects in the Capex portfolio.

Based on the Traffic light system criteria we consider that for 2024-25 we meet the requirement for 'Green' status with responses on each of the criteria as follows:

Provision of embedded emissions data as it relates to capital projects (cradle-to-build). We anticipate good practice in this area being for companies to provide cradle-to-gate as well as cradle-to-build based data.

We have provided embedded emissions data as it related to capital projects on a cradle-to-build basis as this most closely aligns to the PAS2080 standard. We may consider cradle-to-gate in the future if the cost to develop these models offers good value for money.

Clear evidence of external verification and certification by an appropriately qualified party as it relates to the use of standards and frameworks, and quality of data.

Our full 2023-24 greenhouse gas (GHG) footprint has been independently verified by NQA in accordance with ISO 14064-1. For 2024-25, our operational GHG emissions have been verified to ISO 14064-1, with full footprint verification scheduled for completion in September 2025.

Engagement with one or more recognised standard, framework, or approach for managing and reporting on embedded emissions.

We utilise ISO14064-1 as the standard to which we report our emissions (see above point). For embedded emissions we are continuing to embed PAS 2080 across our asset management life cycle processes.

Provision of insights into embedded emissions as they relate to construction and maintenance activities.

Through the development and update of our scope 3 inventory we understand which activities and which suppliers are likely to form our carbon 'hotspots'. For 2024-25 we have used this analysis to inform where we target our supplier engagement.

Complete and detailed SWOT analysis referring to embedded emissions.

Our combined operational and embedded emissions SWOT is included further below.

Provision of embedded emissions data as it relates to purchased goods and services (in addition to chemicals).

We have provided emissions associated with purchased goods and services which is part of our full scope 3 inventory. Purchased good services emissions are predominantly assessed using spend based data.

Evidence of both internal and external stakeholder engagement and education on its GHG emissions management and reporting approach.

During 2024-25 a range of engagement activities were undertaken with both internal and external stakeholders regarding climate change and carbon:

- Building on last year's approach, a portion of the company-wide bonus for 2024-25 was linked to operational GHG performance. The target and supporting actions were communicated through our company-wide all leaders briefing, encouraging colleagues to actively contribute to carbon reduction.
- Our Carbon Programme Board, chaired by the director of Asset Strategy and Capital Delivery, meets monthly to review carbon performance. The board membership includes heads of departments and delivery leads with the greatest influence over our carbon footprint.
- We maintained dedicated internal webpages focused on climate change and carbon, supplemented by periodic news articles shared across the business or within relevant directorates.
- We continued to advance the implementation of PAS 2080 through a dedicated working group. Outcomes were communicated via updated process documents, new guidance materials, lunch and learn events, and ad hoc training sessions.
- New internal training was launched for all asset planners and project managers. This focus on PAS 2080 implementation and practical strategies for carbon reduction in the built environment.
- We have more recently engaged our key supply chain partners involved in construction activities around supplier specific carbon reporting, the use of our carbon estimation tool and highlighting carbon related requirements for AMP8. This is done through a questionnaire created by the Managing Supply Chain Emissions working group. This engagement is expected to increase into AMP8.

Traffic Light System

In accordance with the RAG guidance note 11.6 our external technical auditors AtkinsRealis have commented their view of the level of confidence in our self-assessment.

"Affinity Water has adhered to Ofwat's reporting standards for the traffic light system concerning embedded GHG emissions. The company has submitted a robust self-assessment, demonstrated in the comprehensive commentary, indicating its

qualification for the "Green" category. After reviewing the details, including the data and methodology in the company's responses, we can confirm that they comply with the reporting requirements for the "Green" categorisation."

Purchased Goods and Services

2024-25 is the third year where Affinity Water has calculated emissions from purchased goods and services as part of its full scope 3 inventory. Emissions from purchased goods and services were calculated predominantly using purchase ledger data in combination with commodity specific emissions factors from the Comprehensive Environmental Data Archive (CEDA). CEDA has been updated this year where a new base year has been updated to 2022 from 2018. The impact of this is that the emissions factors have changed, in line with national economic and emission data. The exception to this is the calculation of emissions from the purchase of chemicals and imported water where primary activity data (volumes of chemicals purchased and imported) were used with appropriate emission factors. The EcoInvent database was used to calculate chemical emissions, these factors are different from those in the CAW and therefore our reported emissions are different to those reported in APR Table 11A.

Our purchased goods and services are showing a 3% decrease when compared with last year, from 50,546.4 tCO_2e to 48,948 tCO_2e. In comparison between years, there has been a 12% increase in emissions resulting from chemical purchase however there has been an 8% and 5% decrease in emissions from spend data and purchased water respectively.

Strengths, Weakness, Opportunities and Threats (SWOT)

Strength	Opportunities
• 2023-24 full footprint emissions were verified to ISO 14064-1 standard by NQA • GHG accounting of Scope 1 and 2 operational emissions is well understood and incorporated into business reporting. • The data we use to estimate scope 1 and 2 emissions is primary, measured activity data offering the best source of information. • Our Carbon Programme Board meets regularly to review our progress and oversee the delivery of our Net Zero Strategy. • Our senior managers and Board members are leading the business to reduce emissions. • We continue to use and support the update of the UKWIR Carbon Accounting Methodology through the Carbon Accounting Workbook (CAW) for operational emissions. This is an industry standard approach which is updated annually and is reflective of carbon reporting and emissions guidance from government and other relevant bodies. This industry wide tool offers greater consistency in reporting for the water sector. • We have continued to estimate our full Scope 3 inventory, improving the accuracy of reporting and our 2023-24 footprint has now been verified to ISO 14064-1 standard by NQA. • For operational emissions we have this year brought forward our ISO 14064-1 verification to enable this to be part of APR assurance • Our framework contracts contain a commitment for our supply chain to regularly update us on the carbon impacts throughout our capital projects.	• Nature based solutions have the potential to offer multiple benefits, with carbon reduction or sequestration as co-benefit (but there is no standard approach to calculating their carbon footprint: see 'Weaknesses'). • We are developing carbon literacy within the business to support carbon reduction across all our operations and are reviewing opportunities for carbon literacy accreditations. • Our solar programme continues, generating 1.9GWh in 2024-2025. Feasibility studies are being completed to review further opportunities for energy production. • There are opportunities to continue and expand upon our energy efficiency projects, which has overachieved the 5-year targets. • In 2024-25 we continued our journey to transition to an EV fleet, with 60 due to be delivered by the beginning of 2025/26 • Our asset-based carbon estimation tool and applying a financial value to carbon in decision making provides an opportunity to reduce whole life carbon impacts our capital delivery programme and provides a tool to monitor emissions reduction. • Greater supplier engagement is unlocking opportunities to reduce whole life carbon. • Moving to a multi capitals approach can help ensure a holistic approach is taken to asset management. • Reporting aligned to the GHG Protocol rather than 'operational' and 'embedded' could help streamline reporting and enable better comparison across sectors and countries.

• We have continually developed our carbon estimation tool with the latest models. We have also developed our employees use of the tool through dedicated trainings. This enables us to estimate, benchmark and reduce the emissions associated with our capital projects. • A working group, continue to embed the principles of PAS 2080 across our Asset planning and Capital Delivery directorate. • We have set internal targets, aligned with PAS2080, to drive the reduction in emissions associated with our capital projects. • Our investors are supportive of, and have set targets for, our emissions reductions.	
Weaknesses	**Threats**
• Some areas of operational emissions continue to remain less well understood both globally and specifically within the UK Water sector. This includes the emissions associated with water treatments (process emissions) and the emissions associated with production of chemicals which are purchased. • There is no standard approach to calculating the carbon footprint of Nature based solutions or environmental work such as river restoration. • There is currently limited guidance on how to account robustly for insetting activities which have a role to play in managing residual emissions. • We have been unable to source emission factors for a small amount (~1% by weight) of the chemicals we purchase and have therefore been unable to report the emissions associated with these. • Much of our scope 3 inventory is estimated using spend based	• Increasing energy costs and the cost of renewable energy is currently making reduction in scope 2 emissions more challenging. • Changes in regulatory requirements for AMP 8 onwards, such as sustainability reductions, are having a significant upward pressure on our operational emissions (e.g. as a result from having to move water a greater distance and increase levels of treatment). • The impact of climate change through the summer heatwave could significantly impact the amount of energy our business requires to meet water demand. • As maturity in accounting and reporting of emissions increases, it is likely to mean some emissions are currently under or over-estimated. Changes will require careful explanation and management as knowledge improves over time. • Management of scope 3 emissions is much more complex than for scope 1

approach, although this is sufficient to identify hotspots: future inventories should continue to include improvements to data collection. • Reporting capital project emissions requires the use of intensity metrics as not all projects can be estimated by our carbon estimation tool.	and 2 emissions. Collaboration with and maturity within our value chain is required to secure data and reduce emissions. • Regulatory drivers are increasing energy and chemical consumption during AMP8 making it increasing challenging to reduce emissions. Effectively and consistently valuing of carbon across water companies and regulators is required to support decision making. The ODI rate set out in the final determination is low which does not drive emission reducing activities when considering a cost benefit analysis. • Limited understanding of strategic whole life carbon consequences of decisions in the short-term may result in locking in of carbon consequences in future years.