



To whom it may concern

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9 January 2019

Dear Sir

**Letter of Assurance from Portsmouth Water Board re 2019/20 Wholesale Charges**

This letter is addressed to the customers of Portsmouth Water and other interested parties, including Non-Household Retailers.

It confirms that the Board of Portsmouth Water believe that the wholesale tariffs and the Wholesale Charges Scheme which will be published by 11 January 2019 comply with its regulatory requirements.

The Board have been actively involved throughout the progress of this Charges Scheme. There was detailed discussion on the subject at the September and December Board meetings and a specific meeting of the Chairman of the Audit Committee, management and external advisers of the Company on 8 January 2019.

The Board therefore believes it is in a position to confirm the following:-

- a) the Company complies with its legal obligations relating to the Wholesale Charges it has published;

*Specifically the Board confirms that the charges are compliant with the wholesale revenue cap determined by Ofwat at PR14 and that the costs associated with Open Water are appropriately recovered from our non-household customer base only.*

*Further, the charges recognise any adjustments required from the Wholesale Revenue Forecasting Incentive Mechanism (WRFIM).*

*We have engaged Frontier Economics to review this submission and they have provided external assurance that the proposal is compliant. The Board believe Frontier Economics are well placed to give this assurance given their knowledge and experience of the water industry.*

- b) the Board has assessed the effects of the new charges on water supply and sewerage licensees (as a whole or in groups) who are retailing wholesale services and on customers

occupying Eligible Premises (as a whole or in groups) and approves the impact assessments and handling strategies developed in instances where bill increases for licensees (as a whole or in groups) who are retailing wholesale services and on customers occupying Eligible Premises (as a whole or in groups) exceed 5%;

*The Board can confirm that no non-household wholesale tariff will increase by more than 3.5%.*

*Further we have looked at the change in total bills for all non-household customers and conclude that there is no increase greater than 3.34% as a result of the proposed price changes. 18 illustrative customers have been reviewed, including the average in a class and an upper and lower customer in the class as required by Ofwat guidelines.*

*For non-household customers the total bill increases ranges from 2.70% to 3.34% depending on the method of charge and usage. Thus we do not need to establish either an impact assessment or a handling strategy for any class of customer.*

- c) the Company has appropriate systems and processes in place (including up-to-date models and data) to make sure that the information published about its Wholesale Charges is accurate;

*The Board acknowledge the importance of having appropriate systems and processes in place to determine the tariffs and denominators underpinning the proposed wholesale charges in particular.*

*We have developed an in-house tariff model and purchased a bespoke model from Frontier Economics to ensure our tariffs are compliant. Both are completed by management and audited by Frontier Economics on an annual basis; they confirm both models are fit for purpose.*

*Further we have an agreed process to determine the denominators which underpin the tariffs calculations. We engage our technical auditors, Atkins, to audit the denominators. They have confirmed that the historic data on which we have established our 2019/20 denominators is well founded. The Board believe Atkins are well placed to give this assurance given their knowledge of the Company systems as part of its annual audits.*

- d) the Company has consulted with relevant stakeholders in a timely and effective manner on its Wholesale Charges;

*The Company confirms that it has consulted with CCWater in particular in a timely and effective manner. We received a letter of support for our proposed charges from CCWater on 7 January 2019.*

- e) where Final Wholesale Charges are significantly different from the indicative Wholesale Charges published for the same period, the Board has considered the reasons why those changes occurred and has issued a statement explaining why those changes were not anticipated and/or mitigated.

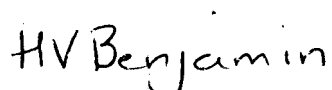
*We have compared our final wholesale charges with those we published on 30 September 2018. There are minimal changes reflecting between the two publications. In addition to minor changes in assumptions on numbers and usage, the final tariffs have been adjusted slightly to give a more equal distribution of the price increase amongst the different customer types.*

*The Board therefore conclude that the wholesale charges have not changed materially since the indicative charges were published on 30 September 2018.*

**Conclusion**

The Board of Portsmouth Water believe that the tariffs and associated wholesale Charges Scheme, to be published 11 January 2019, complies with the Company's legal and regulatory requirements.

This statement will be published on our website on 11 January 2019 and sent to Ofwat together with information on significant changes to tariffs and average household bill information.



**Heather Benjamin**  
**Non-Executive Director**  
**and chair of the Audit Committee**



**Helen Orton**  
**Finance and Regulation Director**