

# RISK STATEMENT & ASSURANCE PLAN

*Statement of risks, strengths and weaknesses  
and draft assurance plans for 2015/16.*

*For consultation.*

*November 2015*



SEVERN

TRENT

# About this document

*Severn Trent Water is one of the largest of the ten regulated water and sewerage companies in England and Wales. We strive to provide high-quality services to more than 4.3 million households and businesses in the Midlands and mid-Wales. Our customers pay the lowest average bills in the UK.*

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By 2020, we want to be the most trusted water company: delivering an outstanding customer experience, the best value service and environmental leadership.

Every year we publish a wide range of information about our services and our performance. This information is used in a variety of ways; not least it may shape the choices our customers and stakeholders make. We therefore want to make sure that it can be relied on.

We are now reviewing our assurance processes to make sure that they remain appropriate for the current financial year (2015/16).

## Background

As we developed our [business plan for 2015-20](#), we recognised that the introduction of performance commitments with associated Outcome Delivery Incentives (ODIs) would create a new area of focus for our assurance plans.

There are 45 performance commitments in our plan. Of these performance commitments, 33 have financial rewards and penalties attached to them as ODIs – which may impact our customers' bills. We are one of just three companies able to apply some of these ODIs during the 2015-20 period (i.e. before our plan is fully delivered).

In recognition of this, we set out detailed proposals for assurance in our business plan with the aim of ensuring that our customers and stakeholders can trust the data and information that we provide on our performance. This document builds on those proposals.

It also considers how we can ensure our customers and stakeholders can have confidence in the information we publish more widely.

## Ofwat's company monitoring framework

Ofwat's company monitoring framework (published in June 2015) set out its expectations of how it will oversee the information that we, and the 17 other water companies, provide to our customers. Under this framework, Ofwat assessed Severn Trent and 14 other companies as requiring targeted assurance. This means we need to work with our customers and stakeholders to target issues, and then consult on our draft assurance plans to make sure they are sufficient to address these issues.

We are supportive of this approach – we cannot expect to build and maintain the trust of our customers and stakeholders if we do not first understand if they have any concerns, and then seek to address them.

### This document is in two parts.

The first is our statement of risks, strengths and weaknesses. It has been developed using feedback we have received from our customers and stakeholders about the information we provide. It also takes into account our own assessment of risks to our ability to provide information that they trust.

The second part of this document is our draft assurance plan for 2015/16. It sets out how we plan to respond to those risks. It is for consultation, so we would welcome your views on it. Further details of how to respond are on page 11.

Later this financial year we will publish a final assurance plan. And once this plan has been implemented, we will publish an annual performance report setting out our progress against our performance commitments.

# 1.1 Our statement of risks, strengths and weaknesses: summary

*In this section we summarise how we carried out our risk assessments, and the target areas we identified. Our draft assurance plan in section 2 sets out how we propose to respond to these risks.*

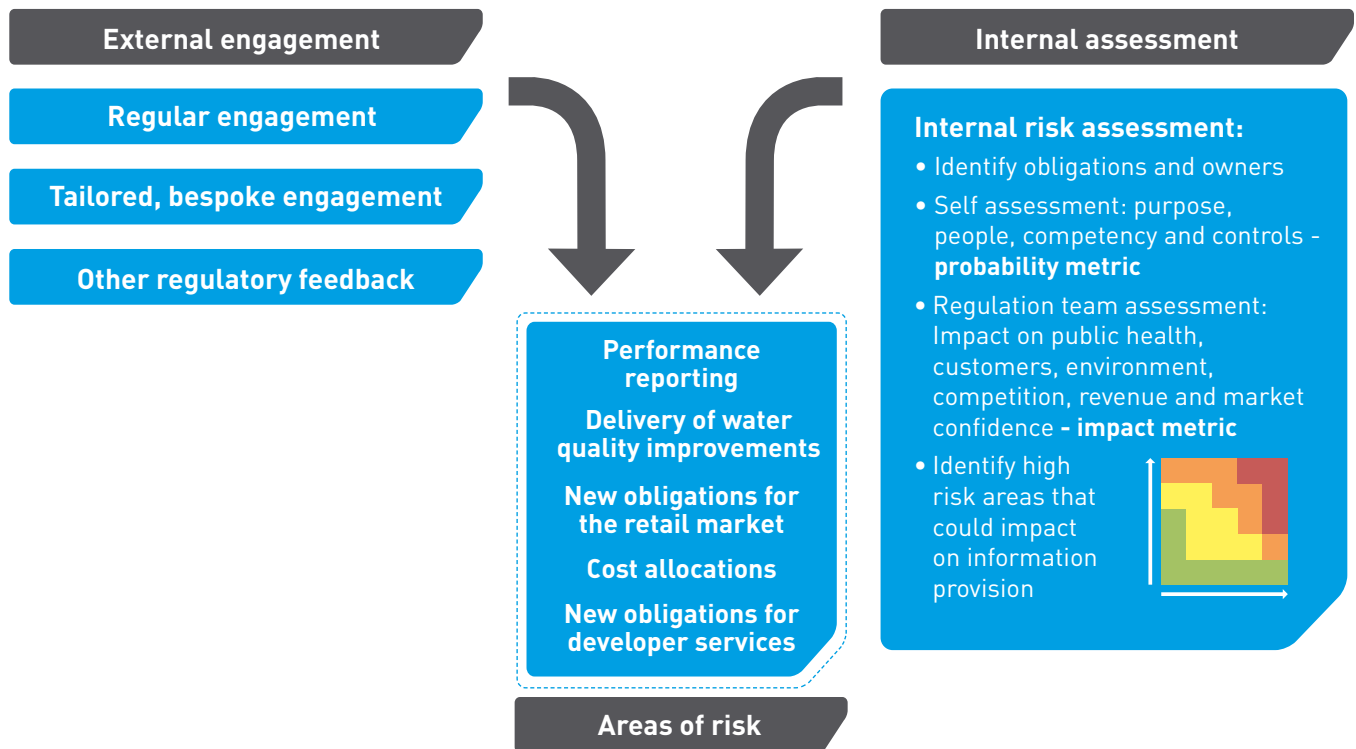
## Approach

Figure 1 below illustrates how we have developed this statement using two inputs: external engagement and an internal assessment. The following section (1.2) explains this approach and the outcome in more detail.

We have not limited these assessments to just our end of year performance reporting, but rather considered the information we provide to customers and stakeholders, and our regulatory and statutory obligations, more broadly.

This is a separate assessment to the risks inherent in our business activities and mitigation measures which we include in our [Annual Report and Accounts](#).

Figure 1: Approach to developing this risk statement



## Statement of risks

The risks we identify in this statement principally reflect:

- new reporting requirements and statutory obligations; and
- other changes in our external environment or our customers’ and stakeholders’ expectations.

They are:

*Performance reporting – performance commitments and ODIs.*

2015-20 marks a new era of performance reporting for us. The introduction of financial ODIs means that our performance has the potential to directly impact customers’ bills on an unprecedented scale. And every single one of our performance commitments, regardless of whether a financial incentive is attached, could impact our customers’ and stakeholders’ perceptions of us, and shape the choices they make. Given the importance that we, our customers and our stakeholders attach to performance commitments, we have developed a rigorous assurance plan. Rather than carrying out a risk assessment to target performance commitments for greater assurance at the end of the financial year, our draft assurance plan (section 2) provides for all performance commitments to undergo full external assurance at both the half and full year (in addition to our ongoing internal quality checks, controls and improvement plans). Our half year review allows us to identify performance commitments where further assurance ‘deep dives’ may be required in the run up to full-year reporting.

### *Delivery of drinking water quality improvements*

In our 2015 Annual Report and Accounts we set out that drinking water quality would be a key area of focus for performance improvements over the coming year. We recognise that this is an area that we need to provide stakeholders with confidence about the progress we are making.

### *New obligations for the retail market*

The Water Act 2014 introduces a new retail competition framework for non-household customers. As an incumbent in the market, we need to provide assurance that we will be ready for market opening on 1 April 2017.

### *Cost allocations (and segmental reporting)*

The introduction of retail competition will place further customer (retailer) scrutiny on how we allocate our costs between wholesale and retail activities. Whilst Ofwat did not raise any concerns with the allocations in our 2014/15 regulatory accounts submission, this is an area that we will continue to focus assurance activities on to provide market participants with confidence in our charges.

### *Developer services*

The Water Act 2014 introduced new obligations in relation to the services we offer to developers. We have also begun to voluntarily report our performance with other water companies, so that customers can compare the standard of service they receive from us in context with the rest of England and Wales. Given these new requirements, and in the light of forthcoming statutory changes, this will be an area of focus for our future assurance plans.



# 1.2 Our approach in more detail

*In this section we explain in more detail how we identified the target areas set out in section 1.1.*

**Our statement of risks, strengths and weaknesses has been developed using two assessments:**

- An external assessment. We asked our customers and stakeholders how they use the information we provide and the extent to which they trust it.
- An internal assessment. We carried out a self-assessment to identify risks to our ability to comply with our statutory and regulatory obligations. We considered if these risks would impact our ability to produce information that our customers and stakeholders can trust.

We describe each in turn. The second section of this document sets out the assurance plans we propose to put in place to mitigate these risks.

## **Engaging our customers and stakeholders**

We recognise that our customers and stakeholders may not trust the information we produce if we do not first understand and address any concerns they may have.

**We already have a number of established channels of engagement:**

- regular meetings with our regulators and statutory customer representative (CCWater);
- regular meetings and events with broader stakeholders (for example, partnership working on flooding issues);
- ongoing investor engagement, and annual announcements of interim and preliminary results; and
- on-going customer research, including instant feedback mechanisms and a quarterly survey.

This engagement helps to inform, and plays a part in, our assurance approach. For example, we may work with the Environment Agency to ensure consistency in our categorisation of pollution incidents or CCWater may challenge our customer focussed documents.

As we developed our business plan for 2015-20, we established an independently chaired, multi-stakeholder group – the Water Forum – to challenge how our customers' priorities were reflected in our plan. It includes representation from the Environment Agency, CCWater, Natural England, National Farmers Union (NFU), East Midlands Councils and the CBI. We engaged with around 17,000 customers and 160 stakeholder groups as part of this process.

The Water Forum now has a continuing role to challenge whether we are delivering our commitments to our customers, and how we communicate that performance. It was involved in the development of our assurance proposals in our business plan. It has also reviewed this document.

In addition, to develop this statement we carried out further research to ensure there are no underlying concerns that we are unaware of.

## **Specific engagement for this statement**

As we produce information that is used by a diverse range of stakeholders in a number of ways, we used a tailored approach to engagement that considered three broad groups. We considered two issues; which information stakeholders are interested in that we produce; and the extent to which they rely on its accuracy.

For each strand of engagement, we asked questions relating to four parameters: awareness, use, trust and accessibility.

### **Group 1: water expert stakeholders**

*Stakeholders with both a high level of interest in and reliance on the information we produce.*

We regularly meet with our regulators and have a common understanding of the information they need from us to effectively perform their statutory remits. We held two meetings of our Water Forum and also held separate meetings with CCWater, the Environment Agency, the NFU, and Natural Resources Wales to discuss if there were any specific issues they wished to be included in this statement.

These stakeholders did not identify any fundamental concerns with our current assurance processes and information provision. They did, however, emphasise the introduction of performance commitments and ODIs as an area of forthcoming risk for 2015/16.

### **We have also considered other feedback from our regulators.**

We engage with the Drinking Water Inspectorate (DWI) as part of the normal course of our business. The DWI has also given a detailed view of our performance in its 'Drinking Water 2014'<sup>1</sup> report. We have identified water quality as a continuing area of focus for improvement and recognise the need to provide assurance to our stakeholders of progress being made.

Ofwat's initial assessment<sup>2</sup> of our ability to deliver and report on performance (based on our 2015-20 business plan) placed us as one of 15 companies who were classified as requiring 'targeted' assurance. Two of the risks from Ofwat's assessment that were classified with an amber confidence rating remain relevant for this statement:

- **Cost allocations** - Ofwat were satisfied with the additional information on cost allocations we provided in response to a query on our business plan and no issues have been raised with our subsequent 2014/15 regulatory accounts submission. However, the pending introduction of greater competition and a forthcoming review of non-household default tariffs in 2016 could increase the impact of any issues (on competition or market and consumer confidence) in the future. We have therefore identified cost allocations as an area for further assurance.
- **Compliance with obligations** - we have one strategic case currently being investigated by Ofwat relating to the provision of sewerage services to 23 properties in Derbyshire. We continue to work with Ofwat to reach a satisfactory resolution.

<sup>1</sup> See: <http://www.dwi.gov.uk/about/annual-report/2014/central-eastern.pdf>

<sup>2</sup> [http://www.ofwat.gov.uk/regulating/compliance/pap\\_pos02150210comonassess.pdf](http://www.ofwat.gov.uk/regulating/compliance/pap_pos02150210comonassess.pdf)

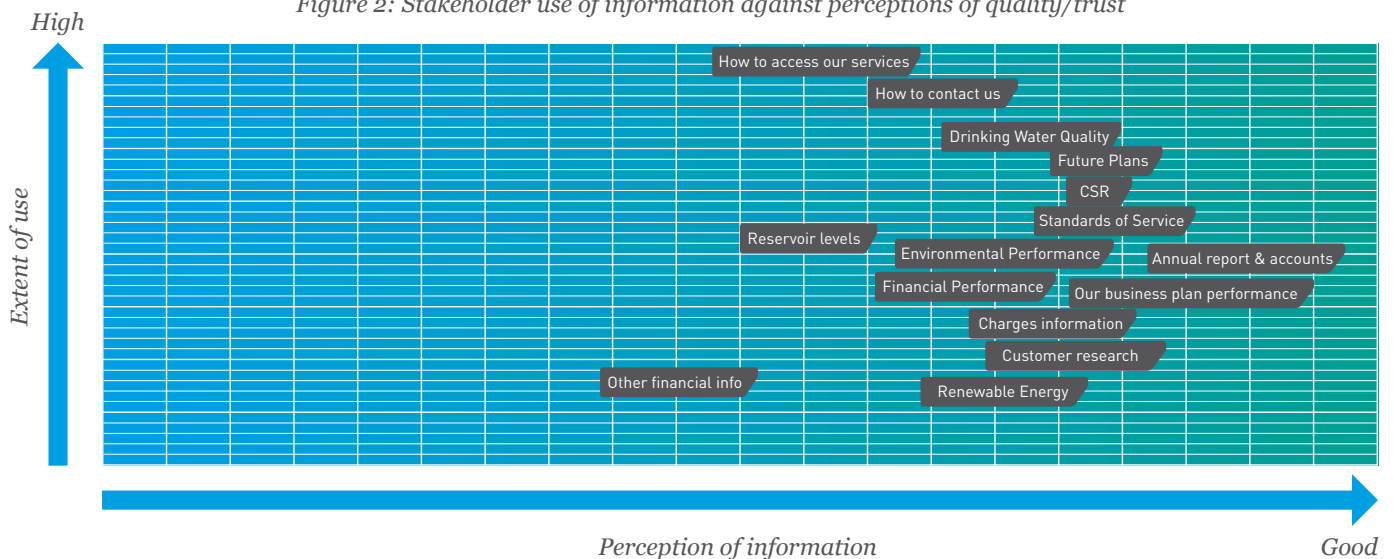
## Group 2: Stakeholders

*Stakeholders with an interest in, and/or some reliance on the information we produce.*

We recognise that a broader range of stakeholders may use the information we place in the public domain. We therefore invited stakeholder groups (including local authorities, environmental NGOs, business representatives and public health officials) to take part in an online survey.

Our stakeholder survey was designed to gauge which information stakeholders use (a proxy for materiality) and whether they had any concerns with it. 18 (out of c.400 invited) responded. They presented a mixed profile of the extent to which information we provide is used. No stakeholder raised significant concerns regarding the quality of that data (indicated by the blue area on the figure below).

Figure 2: Stakeholder use of information against perceptions of quality/trust



When asked if we could do anything differently regarding our information provision in future, c.60% responded no. Of the 40% that answered yes, they wished to see more accessible information better tailored for their needs. We will take this forward in our annual performance report.

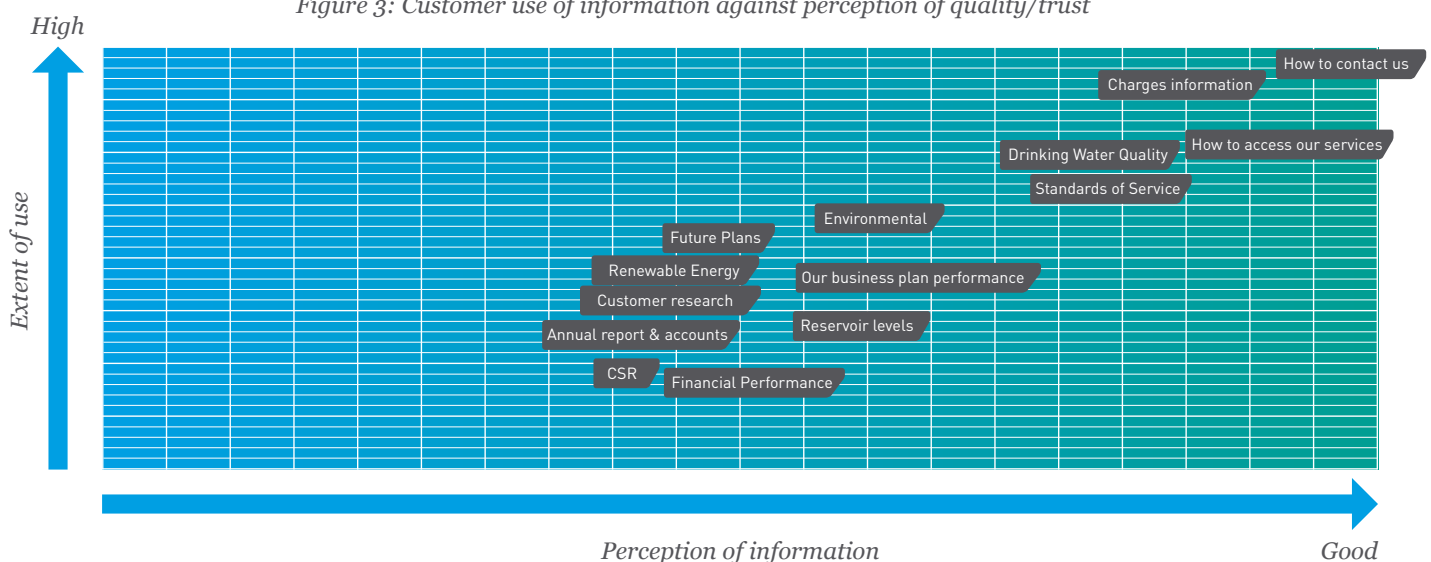
## Group 3: Customers

*Customers may not always have a strong interest in, but are reliant on the accuracy of information we produce.*

Our customers rely on us producing accurate information – particularly with the introduction of ODIs where the information we produce can have a direct impact on their bills. They may not, however, always be aware of it nor have a strong interest in it.

A sample of around 500 household customers responded to our online survey. As illustrated below, respondents did not raise any specific concerns with the quality of information we produce.

Figure 3: Customer use of information against perception of quality/trust



When asked, a quarter of respondents would like us to do things differently. As with stakeholders, their main request was for better tailored and more accessible information.

Whilst customers did not raise any specific concerns regarding Severn Trent, responses suggested an underlying distrust of information provided by large corporate companies – particularly whether information showed the full picture and was properly put into context. We will agree with the Water Forum as to whether further scrutiny and challenge can be applied to our communication of performance.

Our draft assurance plans (section 2.2) set out how we will mitigate the risks identified by our customers and stakeholders.

## Our internal assessment

This year we refreshed our framework to identify potential risks to complying with our statutory and regulatory obligations (relating to our regulated water business).

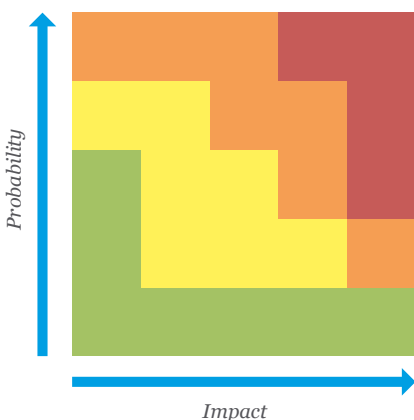
Our framework seeks to ensure there is clear ownership and accountability for each of our duties and obligations from director level, to accountable strategic leaders (senior management) and responsible managers. The framework includes existing obligations and new statutory obligations yet to be commenced.

Each year, strategic leaders accountable for the delivery of obligations are asked to perform a 'self assessment' against four key parameters – purpose, people, competency and controls. This assessment allows us to form a **probability metric** – to identify areas of compliance risk.

We use an **impact metric** based on the impact of a risk materialising to: public health and safety; the environment; customer service; competition; revenue and market confidence (e.g. reputational impact). This helps us to prioritise areas for improvement during the course of the year. Where risks are identified, our 'second line of defence' [explained in section 2] oversight teams work with the teams accountable for delivery to make process improvements. At the end of the financial year, strategic leaders carry out a further assessment. This process helps to inform our Board's annual risk and compliance statement. The process

is reviewed by our independent Internal Audit team and the outcome is cross-checked against the risks that are identified by our enterprise risk management (ERM) process which is reported in our Annual Report and Accounts.

Our aim is to target areas where we can make process improvements.



However, the framework can also help to indicate where there could be risks to the quality of information we provide to our customers and stakeholders.

This year, from our internal assessment we identified three priority risks relevant for this statement:

- **Performance reporting** – this risk has been highlighted as we are introducing new reporting processes (for our ODIs and performance commitments), and in recognition of the potential impact on customers, environment and market confidence of inaccurate data. We explain further below.
- **Emerging requirements for the non-household retail market and other competition provisions** – this risk reflects that new statutory and regulatory obligations are to be introduced that require new processes and systems to be developed. Its inclusion is principally on the basis of the potential impact on customers, the development of competition, and market confidence if we are not ready to meet those obligations when they are implemented in 2017.
- **New statutory provisions relating to new connections and new voluntary reporting requirements** – similarly, this risks reflects that new statutory and regulatory obligations are to be introduced that require new processes and systems to be developed, and in the light of the potential impact on customers, the development of competition and market confidence.

## Performance commitments and ODIs

We made 45 performance commitments in our business plan for 2015-20. Of these, 33 have financial rewards and penalties attached to them as ODIs.

We made a decision as we developed our business plan in 2013/14, in discussion with the Water Forum, that all performance commitments should be a priority area for a high degree of assurance. This was because:

- our performance commitments reflect the areas of service that our customers have told us are most important to them – we have an obligation to accurately report if we are meeting our commitments;
- our investors can make decisions as to whether to invest in our company based on the performance data we provide – we have a fiduciary duty to accurately report how we are performing; and
- we are just one of three companies that are able to apply some of the financial ODIs during the 2015-20 period (before our plan is fully delivered) – if we are to make decisions that impact our customers' bills, we must have confidence that it is on the basis of high quality information.

In recognition of these risks, rather than undertake a risk assessment to target specific performance commitments for greater assurance, we have instead commissioned third line assurance to be carried out during the first half of 2015/16 to review our methodologies, documented processes, and their application.

We have reported the outcome of this half-year assessment both internally to our Audit Committee and externally to the Water Forum. It will be used to target the further third line assurance – 'deep dives' – we employ during the second half of 2015/16 and at the financial year end.

Our draft assurance plan sets out how we propose this will be undertaken.

## 2.1 Draft assurance plan: our approach

*This section sets out our draft assurance plan for 2015/16. The first part provides an overview of our approach to assurance. The second focuses on the key areas identified in our statement as risks, as well as where we have established third-line assurance processes that we propose to continue in 2015/16.*

We welcome stakeholders' views as to whether our plan adequately addresses areas of risk identified by our own internal assessment and external stakeholder engagement. Details of how to respond are set out on page 11.

We have an established assurance and performance reporting framework. Our proposed assurance plan for this financial year, 2015/16, continues and evolves the processes we developed for the reporting of company KPIs in our Annual Report and Accounts and for regulatory submissions in previous years.

### Our framework is underpinned by four key principles:

- *Robust assurance* We operate a three-lines of defence model, targeted at areas of greatest risk.
- *Ownership and accountability* We have clear lines of ownership for both the delivery of performance, and the accuracy of the data provided.
- *Effective governance* Governance is provided by our Board, Audit Committee, Disclosure Committee and with additional challenge provided by the Water Forum.
- *Transparency and public accountability* We publicly report on our performance, and hold ourselves to account where we do not meet our commitments.

In this section we provide an overview of each principle.

### Robust assurance

We have an established approach to internal controls and related assurance. We operate the 'three lines of defence model' which distinguishes between first line processes and controls, second line oversight and third line independent assurance.

Table 1: Three lines of defence model

Line	Functions	Purpose	Typical Activities
1a	Business operations: Wholesale operations, Customer teams	Responsible for the delivery of service and performance	<ul style="list-style-type: none"> <li>• Provision of source information</li> </ul>
1b	Embedded first line: Wholesale planning and performance, Retail planning and performance	Responsible for the reporting of performance	<ul style="list-style-type: none"> <li>• Reporting of performance information</li> <li>• Defining and documenting methodologies and processes</li> <li>• Quality checks and reviews</li> </ul>
2	Oversight functions: Chief Engineers Office, Finance, Regulation, General Counsel	Define policy and provide assurance	<ul style="list-style-type: none"> <li>• Development of assurance framework</li> <li>• Quality checks and reviews of systems and controls</li> </ul>
3	Independent assurance: Internal Audit, external assurance providers	Provide independent challenge of levels of assurance provided by the first and second lines	<ul style="list-style-type: none"> <li>• Review methodologies and processes</li> <li>• Review application of methodologies and processes and ultimate integrity of the data</li> <li>• Review completeness and appropriateness of the assurance framework (Internal Audit)</li> </ul>

Assurance is a year round activity for us and first and second line activities are undertaken throughout the year. For areas identified as higher risk, or where we have specific reporting obligations (e.g. financial accounts), we employ external third line assurance at relevant points during the year, much of which is brought together and culminates in our year end financial and performance reporting.

Section 2.2 sets out where we propose to employ third line assurance this year (2015/16), and in the light of the risks identified in section 1.



## Ownership and accountability

Strong personal and collective ownership is critical for ensuring the accuracy of information we produce, driving improvements and holding ourselves to account. Regular internal performance reporting to our Executive Committee (weekly and monthly) and Board (at each meeting) and half-yearly performance reporting to the Water Forum reinforces this culture of ownership and accountability. Every year we refresh our compliance framework to ensure that individual accountabilities are assigned to our regulatory and statutory obligations. And we operate a rigorous process of sign-off for our performance data – sign-off by the data owner, the responsible senior manager and finally the accountable director in addition to our Board governance arrangements (see below).

Our three lines of defence assurance model ensures that there is clear separation of accountabilities between those responsible for delivery of a performance commitment or a regulatory/statutory obligation and those responsible for ensuring the integrity of that data. This delineation is mirrored in our governance arrangements.

## Effective governance

As a publicly listed company we have committed to comply with reporting requirements under the UK Corporate Governance Code, the Transparency Directive and UKLA Listings Rules. In addition, Ofwat's June 2014 'Commentary on company governance codes' assessed our governance code as fully meeting its principles.

Our assurance plans provide for governance of our performance commitments and other external reporting with a clear delineation of accountabilities.

- The Board's role is to meet its obligations to the company's stakeholders. It reviews performance in the light of the company's strategic objectives and business plan commitments – ensuring that any necessary corrective action is taken.
- The Board's Audit Committee assists the Board in discharging its responsibilities for the integrity of the company's financial statements, the assessment and effectiveness of internal controls and the effectiveness of internal and external auditors.
- The Board's Disclosure Committee oversees the company's reporting obligations under the Companies Act 2006, the UK Corporate Governance Code and the UKLA Listings, Disclosure and Transparency Rules.
- The Water Forum provides independent external challenge of both our performance against our commitments and the information we provide on it.

## Transparency and public accountability

Since 2008 we have had a Continuous Disclosure and Communications policy. This sets out our commitment to earn the trust of our customers and stakeholders by being open in our communications and performance reporting.

Our communications are based on transparency, integrity, accessibility and timeliness. Each year we publish Annual Report and Accounts for Severn Trent Plc and Severn Trent Water Ltd and have historically published an annual performance report against our regulatory KPIs for the latter.

This year we will continue to hold ourselves publically to account with the publication of a new annual performance report (which will incorporate Ofwat's reporting requirements).

# 2.2 Draft assurance plan: in detail

*Section 2.1 explains our overall approach to assurance. In this section we set out our proposed assurance plan for 2015/16.*

We have not detailed every assurance activity that we plan to carry out during the year, particularly using first and second line defence, but rather focus on the key areas of risk identified in section 1 as well as where we have established third-line assurance processes (for example, audit of statutory accounts) that we propose to continue.

Tables 2 and 3 overleaf set out our plan. Some of the activities are already underway but we welcome views as to whether such activities should be continued/will be sufficient in future years.

Table 2: Established assurance processes

Area	Reason for inclusion	Overview of activity
<b>Scheme of charges</b>	We have established processes to ensure that our scheme of charges and principal statement are consistent with charging principles and our revenue caps.	<ul style="list-style-type: none"> <li>• External third line assurance of tariffs model and application.</li> <li>• External third line assurance of data inputs and application of charging principles.</li> <li>• External third line review for 'margin squeeze' risks.</li> </ul>
<b>Statutory and regulatory accounts</b>	The continuation of established processes to audit our accounts in line with statutory and regulatory requirements.	<ul style="list-style-type: none"> <li>• External third line audit of accounts in line with agreed procedures.</li> </ul>
<b>Access prices</b>	This is an established process. Input data is updated each year to produce indicative access prices.	<ul style="list-style-type: none"> <li>• External third line review of inputs</li> </ul>

Table 3: Third line assurance processes for 2015/16 driven by our statement of risks, strengths and weaknesses

Area	Reason for inclusion	Overview of activity
<b>Performance commitments and ODIs</b>	In our own assessment, and in our stakeholders' view, all performance commitments are a priority area given the immaturity/complexity of some and the potential impact on customers, environment and market confidence. Assurance will be undertaken at both half and full year (to identify any issues well in advance of final end of year reporting). Further 'deep dives' may be applied to areas of greater risk identified at half-year review and during the year.	<ul style="list-style-type: none"> <li>• External third line review of methodology.</li> <li>• External third line face-to-face review of methodology application.</li> <li>• External review of reported performance figures.</li> <li>• Additional deep dives into key customer priorities and emerging areas of process risk from half-year review.</li> </ul>
<b>Annual performance report</b>	This report is the principal way that we will document our annual performance and hold ourselves publicly to account. The report will include inputs from other areas covered by this assurance plan (e.g. financial accounts) and require some forecasts of performance. It is important that we present information in a fair and balanced way that is accessible to our broad range of customers and stakeholders.	<ul style="list-style-type: none"> <li>• External third line assurance of data, performance forecasts (and methodologies) and the presentation of information.</li> <li>• Water Forum review of the presentation and dissemination of information.</li> </ul>
<b>Cost allocation and segmental reporting</b>	Although Ofwat were satisfied with the additional information on cost allocations we provided in response to a query on our business plan, and subsequent regulatory accounts submissions, the pending introduction of greater competition and a scheduled non-household default tariff review in 2016, heightens the impact of a material error.	<ul style="list-style-type: none"> <li>• External third line review of methodologies and application of regulatory accounting guidelines 2 and 5.</li> </ul>
<b>Preparations for non-household competition (Water Act 2014)</b>	Failure to demonstrate readiness and compliance with a level playing field could have a significant impact on customers, market confidence and competition. New reporting requirements (letters of assurance) will be required from companies in order to provide assurance to market stakeholders.	<ul style="list-style-type: none"> <li>• External third line assurance of programme plan, resources, and management of delivery risks.</li> </ul>
<b>Drinking water quality performance</b>	We recognised in our 2014/15 Annual Report and Accounts the need to place a greater focus in this area and provide stakeholder assurances that operational and performance improvements are being made.	<ul style="list-style-type: none"> <li>• Creation of 'cleanest water' improvement programme.</li> <li>• Internal Audit third line assurance of programme plan, resources, and management of delivery risks.</li> </ul>
<b>Voluntary reporting on new connections</b>	This is a new voluntary reporting requirement introduced in 2014/15. Given relative immaturity of reporting processes, and potential customer/market confidence impact third line assurance will be undertaken.	<ul style="list-style-type: none"> <li>• Second line review of reporting processes and methodology.</li> <li>• Internal Audit third line assurance of application and finals submission.</li> </ul>
<b>Strategic casework</b>	Ofwat currently has one strategic case open about Severn Trent regarding sewerage provision in Derbyshire. Its inclusion in this plan reflects our commitment to find a satisfactory resolution for all parties.	<ul style="list-style-type: none"> <li>• Escalated strategic leader (senior manager) to case manage reaching a resolution (second line). Regular reporting to executive on action being taken.</li> </ul>

# How to respond

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*We welcome customer and stakeholder comments on section 2 of this document – our draft assurance plans. In particular, we would welcome views on whether our proposed plan sufficiently addresses the areas of risk identified in section 1, if there are any gaps, or if our approach is disproportionate to the risks identified.*

We welcome your response by 29 January 2016.

We will publish our final assurance plans in February 2016.

Responses can be sent to: **[future.consultation@severntrent.co.uk](mailto:future.consultation@severntrent.co.uk)**

Or by post to:

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In some instances we may want to make the responses we receive publicly available. Please let us know if you would like your response to be kept confidential.

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