

## Wessex Water Services Ltd Response to Ofwat's PR19 Draft Determination – August 2019

**Representation reference:** Outcomes O9

**Representation title:** Lead communication pipes replaced

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### Summary of issue

In our PR19 business plan we set a long term ambition to have a lead-free supply network by 2040 in order to remove the public health risks posed by lead in drinking water. To support this we have included a performance commitment to remove 9,000 lead pipes by March 2025.

We have been exploring the range of possible options to achieve this commitment and are in the process of developing a challenge through our Marketplace (a key part of our open system approach, as set out in the business plan <https://marketplace.wessexwater.co.uk/>) to understand potential support and delivery mechanisms within the supply chain.

During this process we have become aware of commitments made by other water companies, most notably Thames Water and Welsh Water, who have similar drivers to remove the health risk posed by lead pipes.

Thames in particular have a commitment to replace and rehabilitate almost 54,000 pipes by March 2025.

Our current performance commitment requires replacement of lead pipes rather than rehabilitation. In order to maximise the opportunity for cross industry collaboration, and for us to share innovation on removing the lead health risk, we would like to amend our performance commitment to allow us to take advantage of any future innovations developed to reduce the health risk posed by lead pipes.

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### Change requested

We request Ofwat agreement to update the detailed definition of the performance commitment Q3 and Q4, by adding the following bullet point at the end of the section starting 'replacement of lead pipes covers all activities, including:'

- *Pipes whose long-term lead health risk is removed through the use of innovative technologies developed in the future and approved by the DWI.'*
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**Rationale (including any new evidence)**

With other water companies such as Thames having a sizeable lead pipe replacement and rehabilitation programme planned for AMP7 in addition to our own 9,000, we believe there is merit in collaborating to understand and support the development of potential technologies to achieve the targets.

We wish to be able to work with organisations who have developed technology that is able to safely remove the long term health risk posed by lead pipes with lower customer impact than currently available technologies. Any technologies implemented and utilised would be subject to DWI approval.

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**Why the change is in customers' interests**

Pipe rehabilitation still removes the health risk posed by lead which is the primary driver. However, it provides the opportunity to deliver the outcome in a less intrusive way than replacement, thereby reducing inconvenience to customers.

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**Links to relevant evidence already provided or elsewhere in the representation document**

Supporting document 3.1A Performance commitments. PC Q4