Waterwise Response to Ofwat's consultation on minor revisions to water efficiency target methodology

March 2012

Waterwise is extremely supportive of Ofwat's plans to put in place a framework to incentivise and reward water companies for work to help develop robust evidence on the effectiveness of water efficiency measures. This framework would allow companies' contributions to a collaborative evidence base fund to count against a small proportion of their volumetric base targets.

Waterwise's response to Ofwat's consultation on minor revisions to water efficiency targets relates to three main areas:

- The introduction of a framework that would allow companies' contributions to a collaborative evidence base fund to count against a small proportion of their volumetric base targets
- Removal of the 30% cap currently imposed on the contribution of 'soft measures' to the volumetric element of water efficiency targets, where the soft measures proposed beyond the cap can be clearly shown to lead to water savings
- Unsolicited distribution of water efficiency products

The Collaborative Evidence Base Fund

We believe the fund provides a fantastic opportunity to improve the understanding of the impact of water efficiency interventions, fund new research to fill gaps in knowledge (including gaps identified by the Waterwise work) about specific aspects of water efficiency interventions and provide further funding to the Waterwise Evidence Base, at the discretion of water companies. The latter would help deliver more of the longlist of company priorities for Waterwise Evidence Base work, of which only a proportion is currently funded.

Throughout Phases 2 and 3 of the Evidence Base Programme, Waterwise has been talking to water companies to understand what gaps exist in the water efficiency evidence base. As a result of this and other work that Waterwise has engaged in, in addition to having expertise in carrying this type of project, we have a number of ideas for projects that would help to improve the evidence base.

There is a question as to how the fund, if it is established, should be owned and managed. Discussions have already taken place between water companies, Water UK, UKWIR and Waterwise, aimed at ensuring appropriate governance arrangements, which make best use of forums already in place. These are discussed below.

Proposed approach to governance

The current Waterwise Evidence Base Steering Group comprises all the parties with an interest in the outcome of work commissioned through Ofwat's proposed Central Research Fund, the maintenance of the WR25 database (currently managed by UKWIR), and the ongoing work in Phase III of the Waterwise Evidence Base. It includes the current funders of the Waterwise Evidence Base: Defra, the Environment Agency and Ofwat.

In summer 2010, when the proposed Fund was first being discussed, agreement was reached on a proposed structure to encompass all of the above, and strengthen the links between the three. Specifically, this was agreed with the water companies, Water UK, UKWIR, and the Chair of the current Waterwise Evidence Base Steering Group. It was then discussed with Waterwise Evidence base funders (Defra, the Environment Agency and Ofwat), who were content.

The details of this agreement are set out below. This was further discussed at the Waterwise Evidence Base Steering Group meering in February 2011, and agreed as a useful structure. **It should be stressed that these are not Waterwise proposals, but were proposed and signed off by the wide range of players listed above. They are detailed below to reflect these discussions:**

It is proposed that, instead of setting up an additional forum to oversee the Collaborative Evidence Base Fund, that the Terms of Reference be reviewed and the group renamed "Water Efficiency Evidence Base Steering Group", supported by a Waterwise Secretariat. The Terms of Reference would encompass the strategic direction of:

- *Phase III of the Waterwise Evidence Base work – although the group will be less involved in managing the detail of the work (this would be picked up by separate working level groups)*
- *The allocation of the Collaborative Evidence Base Fund to water efficiency research projects. It is important to note that there should be no presumption that projects would be led by Waterwise, although that there would be value in Waterwise's input to scoping projects and continuing as Secretariat for the Evidence Base Steering Group*
- *There should be a requirement that project data be made available for inclusion in the evidence base. Waterwise could also contribute by dissemination of the outputs from projects run through the Collaborative Evidence Base Fund*
- *Responsibility for the WR25 "UKWIR" Database. Waterwise would manage the contract (to be competitively tendered) for updating of the database. If/when the Water Efficiency Evidence Base Steering Group winds up then the ownership and future arrangements for maintenance of the database should be reviewed, with the default position being that IP ownership should pass to Water UK*
- *In practical terms, Waterwise would support the Collaborative Evidence Base Fund being held by Water UK, in a ring-fenced account*

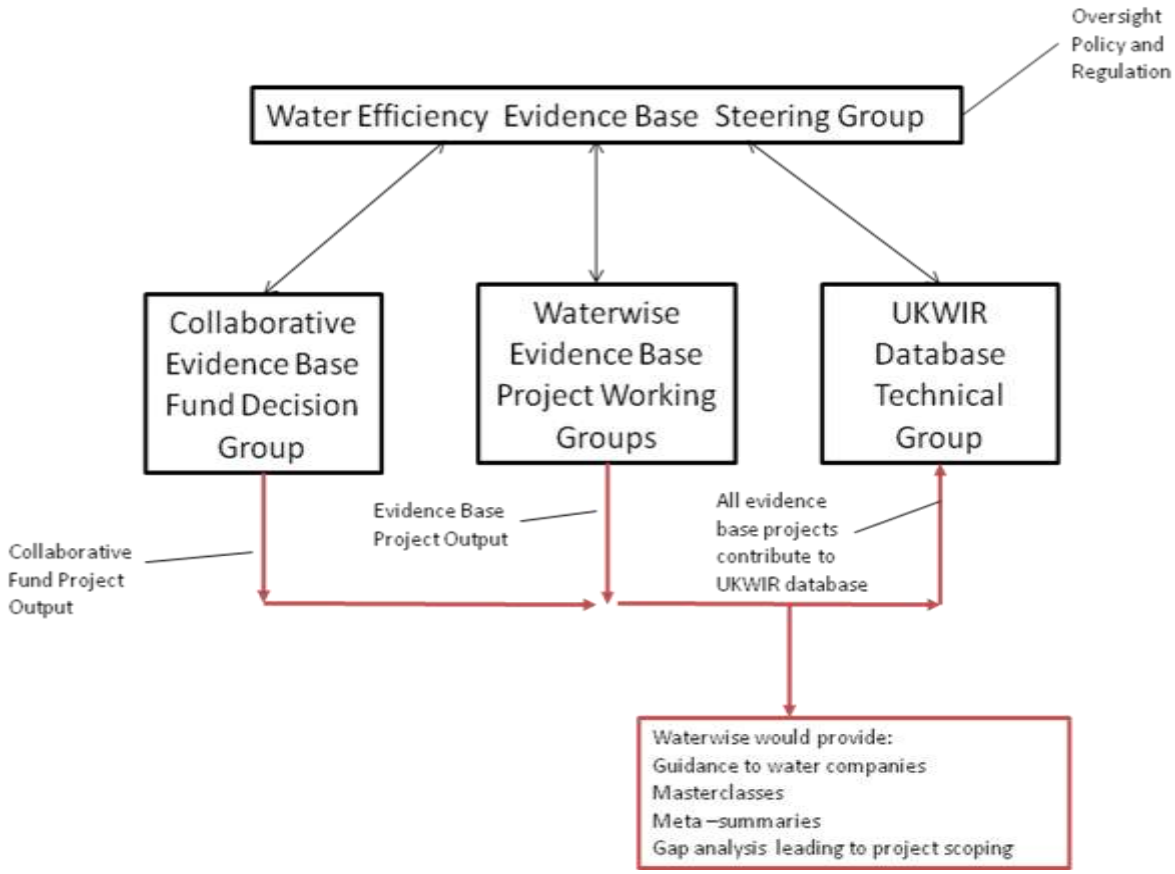

Figure 1 - Proposed evidence base governance structure

To facilitate the workings of the Steering Group, supporting groups could be established as illustrated in Figure 1 above:

- *A Collaborative Evidence Base Fund Project Board – to recommend allocation of funds to the Steering Group, scope projects, select suppliers to carry out the work and oversee delivery of projects. This should sit under the auspices of a Water UK task and finish group. Individual projects could have separate steering groups to supervise the work, as appropriate*
- *Evidence Base Project Working Groups and an Evidence Base Peer Review Group (now established) in order to provide more in-depth input from water companies, Ofwat, Defra and the Environment Agency on project methodologies and what projects aim to achieve*
- *A project group to maintain the UKWIR WR25c database, with maintenance of the UKWIR database transferred to Waterwise and run as a separate group, overseen by the Water Efficiency Evidence Base Steering Group. UKWIR has historically owned and "maintained" the Water Efficiency Database. There are three aspects to this issue:*
    - *Who should own the IP to the "UKWIR" database, and who should decide this*
    - *The need for somebody to actively chase companies to provide data and reports to populate the database*
    - *IT skills to maintain/update the web-based database*

Outputs

Waterwise agrees that the outputs from any projects carried out under the Collaborative Evidence Base Fund should be publicly available. This has been a fundamental characteristic of the work which has been carried out to date through Waterwise's Evidence Base programme and we believe that this should continue to ensure that barriers to accessing the outputs are reduced to a minimum.

We would support a review of the collaborative evidence base fund after the first year to determine not only its effectiveness in sponsoring water efficiency studies, the character of the studies funded, and the need for longer-term projects, but also the appropriateness of the governance arrangements.

Removal of the cap on soft measures

Waterwise is cautious about the removal of the 30% cap currently imposed on the contribution of 'soft measures' to the volumetric element of water efficiency targets.

We acknowledge the need not to restrict water company choices as to how to deliver water efficiency. However, whereas we have evidence from Waterwise's Evidence Base that can help us assess how much 'hard measures' could contribute to the targets, we have little to no idea how much softer measures may contribute to achieving the water efficiency targets. The mechanism through which the savings were quantified for softer measures - UKWIR's quantification of water savings from baseline water efficiency activities project - acknowledged that there was insufficient evidence available to have confidence in the savings that are currently attributed to softer measures. Therefore, allowing savings derived from softer measures potentially greater weight in achieving the water efficiency targets is not supported by the available evidence base.

Unsolicited distribution of water efficiency products

Waterwise is supportive of Ofwat's plans not to allow assumed savings from the unsolicited distribution of water efficiency products to count towards quantitative water efficiency targets. We think this is a move in the right direction as it is far preferable that customers be engaged prior to receiving products so that they can choose whether they would like to have a product and make use of it.

There is still a large amount of uncertainty concerning the proportion of different products which are installed after they have been distributed to customers, but this change is a step forward.

Conclusion

Waterwise is supportive of the proposed fund. We report here discussions on governance of the fund agreed by the companies and the key players in summer 2011. We are cautious about removal of the cap on soft measures.

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Ike Omambala, Waterwise Technical Research Manager

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