



Affordability and Acceptability Guidance queries and responses – 6th September 2023

We published our <u>Guidance for water companies: testing customers' views of the acceptability and affordability of PR24 business plans</u> and also <u>Guidance for water companies - Principles for setting out comparative company performance data</u> (the Guidance) for the PR24 price review in December 2022.

At the PR24 Collaborative customer research steering group, Ofwat and CCW stated that a queries process would be run specifically for questions regarding the Guidance. Where a query is raised, which may be relevant to other companies, Ofwat and CCW will publish it.

Note: there is a separate process - PR24 Final Methodology Questions - for queries and responses relating to the PR24 final methodology.

The following table shows a record of the queries and responses processed up to the 6 September 2023. We will update this document regularly.





Ofwat ref.	Торіс	Query	Response
1	Assurance	If an ICG agrees with a change to the guidance set out by the company, does this mean that the variation from the guidance would be accepted by CCW and Ofwat? How do companies know that they are making the right decisions?	ICGs can be asked to sense check decisions, but that doesn't guarantee that they will be accepted by Ofwat. Companies need to use discretion but need to be accountable for their decisions. Touch points have been built into the ongoing engagement plan to allow discussion on 'sticking' points and learn from others.
2	Affordability/Qual	Several questions on the theme of the approach to the proposed single water affordability scheme removed as no longer applicable	The approach to including social tariff schemes in bill profiles has been redrafted on P.15.
3	Qual	For face-to-face research, is it OK to email geographic areas to gain the sample?	Yes, but may need follow up recruitment (random, but within a defined area).
4	Quant	Can companies change the wording of the questions within the quantitative research, as long as the sentiment of the question remains the same?	There is no flexibility within the prescribed questions for change, but the prescribed content does allow for this.
5	Qual	How many enhancements can a WASC include?	A maximum of six (across both sets of services).
6	Quant	Re: clarification over data collection methods for the quantitative research phase. We fully support the requirement to contact a representative sample of our customer base, include	Cost-efficiency and reduction of carbon footprint are both objectives that we support and we see no reason why your proposal would be inconsistent with the guidance.
		those whom we do not hold emails addresses for. At the same time, we are looking to be as cost-efficient as possible, and reduce our carbon footprint, through minimising paper. We potentially have an opportunity to align the timings of our quantitative AAT with our yearly billing cycle and were wondering whether including the initial contact letter either as an 'on-sert' or 'in-sert' to the bill would meet the requirements of the AAT guidance.	The caveat to this is that if the yearly billing cycle is for unmetered customers only, provision must also be made to include metered customers for the initial contact letter as well.





7	Qual	I'm not clear from the guidance if for the Qualitative research we need to be providing indicative bill impacts to inform these discussions. I appreciate we need to provide a one-page summary of the proposed business plan and what we are intending to include in there but I'm just unclear on the level of detail. This will help me to think about the best time to run this activity based on when we have this information available.	The qualitative research needs to include indicative bill amounts for each version of the plan shown in order for people to consider affordability and the implications of different phasing options on bills.
8	Qual/Quant	Should customers who have taken part in other water company research be included in the customer lists for sampling?	Yes – samples should be as inclusive as possible.
9	Qual/Quant	Should customers who have opted out of marketing communications be excluded from customer lists?	Yes - if the wording of the 'opt out' question specifically mentions market research. If it is more general, and only refers to marketing communications or similar, this does not specially cover market research.
10	Qual/Quant	Should all customers be contacted or a sub-set of them?	Contact a random sample sufficient to achieve the research purpose. It would be disproportionate to contact the whole customer base at the start, unless there is good reason to think this would be necessary to achieve the required sample size (i.e. the customer base is very small).
11	Assurance	Are companies expected to test materials and cognitive load working with their ICGs?	Yes – to make sure the information makes sense in terms of cognitive load.
12	Qual	What about the amount of information that could be shown, in terms of whole range of things to show people?	The Guidance is to focus on the 6 common PCs (6 for WaSCs, 3 for WoCs) plus up to 6 enhancements where customers have choices about phasing of the delivery of services and bill impacts over the longer term. The aim of this to limit the amount of information people see to a set of core services which are known to reflect customer priorities, plus things that customers can influence in the research. Performance data for the 6 PCs is





			published on CCW's website. The Guidance is that the performance data shown to research participants would reflect recent service performance.
13	Qual	There are some survey style questions at end of the qualitative research. Should these be asked for each plan or do they cover everything?	They should be asked for each version of the business plan that has been shown to them.
14	Quant	 Re: recruitment of the sample Do we need to draw a random sample of customers from our systems pulling out the various data fields needed for each customer. For any customers that we have an email address for in the sample, we will email them about the survey. Any that don't have an email will be sent a letter. So the engagement type (email or letter) naturally falls out of the data set that's been randomly chosen? It's far more cost effective to recruit from customer lists by engaging with the customer using an email rather than a letter we could, for example, select our random sample from those where we have email addresses or we could set a minimum quota to achieve for letters but both would mean the sample is skewed to those who have an email account. 	The approach should support a random sample, so the mode of contact therefore falls out of the randomly selected sample.
15	General/Qual/ Quant	 We are proposing to conduct a 'light' version of AAT test in February to provide early engagement on the proposed plan. This will be in line with the guidance document as far as possible, but may use different sampling methods and reduced sample sizes to allow for a quicker turnaround of results. Companies would not have sufficient time to conduct Affordability and Acceptability testing (AAT) twice in 	 It is important that your proposed approach is developed according to your independent assurance arrangements (e.g. working with your ICG) so that scrutiny and challenge (were necessary) can be provided. The Guidance requires that at least one full round of testing is conducted, and your wider approach would meet this.





16 Quai	2. 3. 4. 5.	line with the guidance proposed. The feedback from this test would be used to inform the next iteration of the plan which would be tested in full in line with the guidance in the summer. We expect this version of the plan to be more stable for full testing. We are aware that this approach is different from a number of other companies and so would like to understand Ofwat/ CCW views on the proposed approach. In the quantitative survey, would we ask the question set prescribed for the least cost/ must do plan and then repeat this for the proposed plan? And would there be a one-pager for both the least cost/ must do plan and the proposed plan or just the proposed plan? In terms of phasing options, are we expected to omit any that are not judged feasible due to statutory compliance and/or financing constraints? E.g. a flat bill profile for the next AMP? Would we look to replace infeasible profile options with an alternative or simply remove the option? Based on latest agency feedback it is possible that overall research costs may substantially exceed comparable PR19 research. Given the extensive nature of the testing, are there any cost saving approaches or measures you have discussed with other companies rawing in carrying out the research? conducting quantitative research between a WaSC a WoC(s)	4. 5. Yo Gu	approach, Ofwat/CCW suggest that you work with your independent assurance party to develop your approach to testing. The Guidance for the quantitative survey is that only the company's proposed plan is tested, supported by (ideally) a one page summary for easy reference, with the option to add 'information' screens to expand on specific services in the high level summary. If there are different bill profiles, reflecting realistic choices which can be delivered for customers, then these should be tested. If there is little flexibility about bill profiles, it may not be worth testing them as customers have little influence/they cannot be delivered. The decision around this should be discussed with the ICG or equivalent. We regard the approach as comprehensive, rather than extensive. We have discussed with a company sending out survey invitations with other correspondence to save costs. The Guidance has been developed to allow for scaling for smaller companies, and to recognise some of the challenges around sampling and recruitment. Where companies share ways of managing costs we are happy to share with these with the industry, as they arise. ur questions highlight an inconsistency in the iidance between the section on research
				nducted by 'WoCs' and that headed 'Joint
		lease provide clarification on which future bill profile should present to customers in quant research for a C		ocurement Option' below it. In answer to your estions:





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	 The guidance on P9 states: For water only companies we expect them, as a minimum, to: Conduct research with customers in all areas except those where the wastewater provider supplies less than 10% of the WoCs' overall household customer base Test the affordability of the combined bill impact of proposed water and wastewater provider plan Test the acceptability of the WoCs proposed business plan (ie covering water services only) This suggests to us that in all cases the future bill amount (the chart at question 5 in the quantitative questionnaire) must be for the total water + sewerage bill 2025-30. However, in the quantitative questionnaire appendix [Appendix F), the guidance states (in the introduction to OF). 	2.	For affordability, the whole bill should be tested. The questionnaire appendix refers to ' [water/water and sewerage/sewerage]' because there are some circumstances, referred to elsewhere in the Guidance such as separate billing, where single service affordability testing is appropriate Affordability testing for the water only future bills and wastewater only future bills can be tested, but only as additional questions at the end of the questionnaire. Where research is jointly commissioned it makes sense for the combined business plans to be tested first and then the individual plans separately. The ordering is Q1 to Q8b based on joint bills and plans, then 7a -8b for an individual plan and 7a-8b again for the other individual plan (the order of the plans, ideally, to be rotated). Affordability of separate bills, if conducted, should be asked at the end of the survey.
	business plan (ie covering water services only)		-
	This suggests to us that in all cases the future hill	3	
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			order of the plans, ideally, to be rotated).
			should be asked at the end of the survey.
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	introduction to Q5):		e rationale throughout is that the customer
	"The next set of questions are about proposed changes to your [water/water and		spective takes precedence over the company spective. We will issue an amendment to the
	sewerage/sewerage] bill for the years 2025-2030.		dance to rectify this. In the Guidance the
	The chart below shows these changes. It also shows	-	lacement paragraphs will be:
	how inflation may impact on your bill, based on the		······································
	Bank of England's inflation forecasts."		nis approach would need to ask about the
			ordability of the whole bill impact and the
	This suggests that you can ask about the water only		ceptability of the combined plan before testing the
	or sewerage only future bill, rather than the total		ceptability of the water and wastewater plans
	water and sewerage future bill. Please can you clarify?		lividually. Consideration should be given as to ether the water and wastewater plans, when
	olamy:		own individually (after the combined plan), should
			and the combined plan, should





2. Is it acceptable to extend the quantitative questionnaire so it covers a) the water only future bill & plan, b) the sewerage only future bill & plan, and c) the total combined future bill?	be rotated across the sample. Affordability testing can, optionally, be conducted on individual service bill impacts, but only as an addition at the end of the research.
 The guidance on P11 states: Companies that share customers are welcome to explore the potential for a joint procurement exercise, where the plan for water services and proposed costs, and the plan for wastewater services and proposed costs are shown to participants, along with an overall plan This approach would need to ask about the affordability and acceptability of the water and wastewater plans individually, before considering the whole. The order in which each is presented may also need to change across the sample. Please can you confirm if this applies to the quantitative questionnaire? At the moment it is not explicit in the questionnaire outline in the appendix if this is possible? 	For this approach to work, the timings in terms of when business plan information is available for testing need to align. Consideration should be given to how the findings will be reported in respect to views on the whole plan, and views on individual water and wastewater plans, so that sensitive business plan information is not made available to other water and wastewater companies. The same principles apply if companies conduct joint qualitative research i.e. views on affordability and acceptability of whole plans, followed by views on water and wastewater acceptability (and, as above, optionally on affordability). The research and reporting process must ensure that business plan information is not visible/shared across different water and wastewater companies."
3. If it is acceptable to extend the quantitative questionnaire as per point 2 above, what should the order of questioning be?We would envisage that the questionnaire would need to be in the following order, but we note that	
this would change the context for 'total bill affordability' as respondents will have already seen the constituent parts of the total bill and the summary of the plans, before answering this	





		question. Please can you confirm if this order would be acceptable within the guidance? Also please confirm if there is any requirement to ask total combined plan acceptability questions in the event that we ask both component parts individually?	
17	Qual	Where can companies find information on company targets?	Company targets for 2020-25 can be found in Ofwat's 'Water company performance report: 2021- 22' (previously known as the Service Delivery Report) which covers 12 of the common Performance Commitments. Report and data available at: <u>Water Company Performance Report</u> 2021-22 - Ofwat Targets for the additional PCs can be gathered from company APRs. We are currently exploring if these can be collated centrally for companies to use.
18	Qual	Should water quality contacts be based on per 10,000 or per 1,000?	Drinking water quality contacts should be based on per 1,000.
19	Qual	Should WASCs show all companies comparative information for water measures?	Yes - this will ensure consistency across all of the companies testing these areas.
20	Qual	Should companies be using supply interruptions for 3-6 hours, or anything over 3 hours?	The PC measure for water supply interruptions is any interruption that is longer than 3 hours. The Guidance has been amended accordingly.
21	Quant	Should the NHH survey include a question on the financial situation, or is this just for the HH survey?	The survey questionnaire (Appendix F of the Guidance) has financial situation questions (Q1, Q2 and Q3) which should be asked of household and non-household customers. In regard to including these questions in the NHH customer survey, we have identified an error which only directs Q1 and Q2 to HH customers. This has now been amended in the Guidance (Appendix F) to the following:





			 Q1. Thinking about your [HH: household's/NHH: organisation's] finances over the last year, how often, if at all, [HH: have you/NHH: has your organisation] struggled to pay at least one of [HH: your household bills/NHH: its bills]? Q2. Overall, how well would you say [HH: you are/NHH: your organisation is] managing financially now? The first response code will need to be changed to reflect response options for HH and NHH customer respectively: [HH: Living comfortably/NHH: Doing well]
22	Qual/Quant	What is the expectation for sending out invites to take part in the research in other languages?	Companies need to demonstrate how this has been considered. Their own customer intelligence and evidence may suggest some areas where it could be appropriate to send out translated invites, although the approach should be proportionate. Another option could be to add a sentence to the invites, offering the survey in other languages if people request it.
23	Qual	The guidance says that phasing for up to six enhancements should be tested. This may not cover all of the options for longer term phasing. Can a handful of indicative enhancements be used to guide the recommendations?	We can see the sentiment behind this suggestion, for example, in principle do people want to pay for enhancements or defer given current cost of living. However this approach may mean that people do not have sight of service choices that would be important to them, and that they may wish to prioritise. We suggest that a prioritisation across different service enhancements is established to understand how different principles would apply to them.





24	Qual	 We are hoping you will be able to clarify a point on leakage which we've found a difference between the main doc guidance and the guidance on presenting comparison data. For the Leakage measure the main guidance states to show the measure as Per Property but the guidance with graph options shows it in Mega Litres. We'd be grateful if you could confirm which we should use please. 	Stimulus should show leakage at per property per day. The text in the Guidance which refers to showing leakage per property for comparative data overrides the text in the Guidance for principles for setting out comparative company performance data. CCW/Ofwat discussed how leakage performance data should be shown at length and concluded that a per property measure is more relatable for customers than mega litres a day.
25	Assurance	 Would it be appropriate and / or possible to share with yourselves [Ofwat and CCW] for a review of the information we've used [in running a pilot]? For the official test, we will be getting the process externally assured – but an early sight would be useful for any red flags or issues you might see? It might also help, as there might be things you spot that could be useful to share with other companies. 	At this stage, it would not be appropriate for Ofwat or CCW to undertake a review. Instead, your independent assurance arrangements (e.g. ICG) should be engaged to provide feedback, if not already. But if there are specific areas, such as a technical issue relating to the Guidance which requires clarification, or if there are areas of testing which raise issues about successfully conducting the research, then these should be raised with Ofwat and CCW.
26	Qual	On page 39 which includes definitions to used in the Acceptability testing – it talks about supply interruptions. However, in the table it says it's for between 3 and 6 hours – where as I think the measure we're meant to use is greater than 3 hours and can go a lot higher than 6 hours?	Companies should use anything over 3 hours as per the performance commitment (PC) measure. The PC measure for water supply interruptions is any interruption that is longer for 3 hours. The Guidance has been amended accordingly.
27	Qual	I am working through the AAT guidance again and looking at the minimum sample sizes on page 17 for a WaSc. Am I right to be reading it like this:	Table 1 in Version 1.1 of the Guidance has been amended to clarify the sample sizes and sample range.





		 Option 1 – We include 8 future customers and those with vulnerabilities (8+8) within the main deliberative discussions, which will then include 64 people (the upper number in the table) plus 24 NHH customers through depths and workshops? So this gives a sample of 88 in total? Option 2 – We include the lower number in the table (48 HHs) in my deliberative discussions plus separate fieldwork for my 8 future customers and those with vulnerabilities (8+8), plus my 24 NHH customers giving me a sample of 96 in total? I'm confused by how you get to a minimum of 98 customers in total. 	
28	Qual	On page 9 of the guidance there is suggested text for the statutory programmes on WINEP/ WRMP, DWMP and Storm Overflows. There is also information companies have to insert on the bill impact of these. Can I check if the bill impacts included here should be displayed with or without inflation?	Yes, this should include inflation.
29	Qual	The guidance has the elements for the prescribed pre- task – list of content A-I. Is that list also a prescribed order that we have to show the content in or can we change the order of content so long as all that content is in the pre task?	Companies may set the pre-task content out in a different order to the Guidance. People must be given access to this information in advance of discussions/depths, either in paper, online or other format if applicable. It is possible that the format may in any case, allow people to go through the order of the information as suits them. However, where companies set it out in a different order to the Guidance, it is good practice to discuss the rationale for this with the ICG or equivalent, so that the rationale for this is understood.
30	Qual	We are currently out in our region doing public consultation and have held a stakeholder event. We're	If the information that your research agency is working with across each company, and that





		also about to publish the materials from that public consultation on our website. This includes indicative bills albeit linked to our initial draft plan. With that in mind our own lawyer is more relaxed about the joint research as anyonecould get hold of information simply by going onto our website. We're minded therefore to ask the research agency to relax a little which will make the research easier to navigate for all parties.	research participants will see in the qual and/or quant is already in the public domain in its entirety, then there is no need to prevent this company data being visible between companies for this research. CCW/Ofwat are not in a position to say what the legal risk would be if this is relaxed but would advise that where the information is not in the public domain, steps should be taken so this is not visible between companies
31	Qual	I notice that you have updated the description of the supply interruptions PC on P.39, P.52 and P.69. However, I notice that it is still described as "unplanned" water supply interruptions, whereas the common industry measure on supply interruptions makes no distinction between planned and unplanned supply interruptions. I just wanted to check that we should use the common industry measure prescribed by Ofwat here. It might be something to update in the next version.	The measure covers both planned and unplanned interruptions i.e. it is the common industry measure. Version 1.1of the Guidance has been amended to refer to Water supply interruptions >3 hours.
Update a	dded 27.04.23 beld		
32	Qual	 How much of a deviation the companies can make [from the Guidance] and, if they were to make these changes, would the feedback from CCW/Ofwat be negative? Possible changes from the Guidance based on cognitive testing are [specific examples]: Re-ordering 'D. A high-level explanation of what the water company does' to come before 'C. An explanation of the role of research with customers in PR24' – this change was made in order to keep all the slides about what Welsh Water do running consecutively rather than jumping to the role of research and then back to what Welsh Water do 	CCW/Ofwat cannot sign-off proposed changes from the Guidance following cognitive testing. It's for the ICG (or equivalent) to consider proposed changes as they should be involved in this process from end to end, and would be able to come to a view on what is justifiable (after pilot/testing) that doesn't bias the research either way. Regarding the final point about the order of the pre- task materials - Yes the order of the pre-task can be changed, where testing supports this and following dicussion with the ICG about this so they understand the





			rationale. We confirmed this verbally at the Steering Group meeting with companies on 13th March.
33	Qual/Quant	Who is judging the quality of research for company social tariff schemes if it is outside of the business plan?	CCW confirms that The Defra guidance states: Undertakers must "consult organisations that represent customers on proposals for a company social tariff and have regard to their views. This must include the Consumer Council for Water (CCWater)". There is no expectation for companies to consult with their ICG or equivalent on this, but they can do so if they wish
34	Qual/Quant	Which social tariffs will be included in the bill profile? (e.g. WaterSure)	The intention is that customers see a bill profile which is closest to what they will be paying – so if it is possible for this to reflect WaterSure then it should do.
35	Qual/Quant	Will Ofwat/CCW provide comparative performance and target data for the key performance commitments where it is required?	The minutes of the last meeting signpost companies to where this can found; Ofwat and CCW are now in the process of providing this centrally. UPDATE: this was circulated to companies on 24 04 23
36	Qual	How do companies show the bill impact of big investments to customers if the investments don't fall under any performance commitment (e.g. future water supplies)?	Substantial investments like this fall into WRMPs, which would be covered by one of the non- prescribed additional components allowed for in the Guidance i.e. enhancements.
37	Qual	In the stimulus materials, it would be important to show the work of water companies like social tariffs to consumers to explain more about what we do. How can water companies do this?	Companies can reference that they offer help to low income households in Section D of the pre-task. However, it is important that water companies show a balanced view and do not only show positive information about what they do/their performance. Companies should work with ICGs to ensure that he information provided is balanced.





38	Qual	Re the section on prescribed content for phasing of enhancements - there are different timescales and scale of delivery – how should these be shown?	Customers will see up to three versions of company business plan – a must do (as close as feasible to statutory requirements) plan, a company proposed plan which may include enhancement options, and an optional third version. Each plan will have different levels of service and phasing options for people to consider – so they will see up to three service levels.
39	Qual	I wanted to pick up on something that was said at today's meeting. It was mentioned that CCW were considering providing the comparative performance information for all companies to you. Please can you clarify a) when that decision will be made and b) if it is decided you will provide the information, when will it be provided to companies?	We're currently working thorough our options for this, it is something that we want to be able to share with companies. We don't have timescales as yet, but appreciate that it's needed soon. UPDATE: this was circulated to companies on 24 04 23
40	Qual	 Best value/least cost versus discretionary/statutory investment We wanted to clarify what is expected by the least cost plan definition. The guidance document states the following: We are conscious that regulatory terminology can be complex for research participants, so we suggest that companies use phraseology such as: Least cost or 'must-do' plan: "this plan allows us to carry out the work that we're required to do by law." Proposed plan: "this is the company's proposed plan and may include extra work over and above what we are required to do by law to provide extra benefits to customers, the environment and local communities". 	The least-cost or must do plan is intended to reflect only what companies must do to meet statutory requirements. However, we recognise that the dividing line between statutory and discretionary is not always clear, and in those instances – i.e. where it is not feasible to tease these apart – we allow for some flexibility. In the case of government/regulators heavily supporting investment above what is technically the statutory/must do level, this can be included in the statutory/must do plan. If this introduces flexibility in the way the service can be delivered this should be a transparent option for customers. The detail of this should be discussed with the ICG or equivalent.





Prescribed focus on the least cost 'must do' business plan, i.e. a business plan based on statutory elements to meet statutory requirements, where it is possible to isolate these from discretionary elements and enhancements	
And finally	
We understand that the distinction between statutory (least cost) and discretionary elements (proposed plan) can be unclear and it may be difficult for companies to produce a least cost plan with associated estimated bill impacts. We are not expecting companies to interpret 'least cost' too literally and expect them to apply some proportionality and reason in defining their least cost plan.	
We wanted to confirm that Ofwat and CCW are not expecting the least cost plan to solely include the statutory investment (which is what the example of how it could be described to customers implies with the reference to 'required to do by law' and indeed the second text inclusion), but that we are also able to include non-statutory elements. For example, leakage reduction beyond a de minimis level, lead pipe replacement or smart metering which are being heavily supported by various government departments and regulators. The second text inclusion above, by stating we should not interpret least cost too literally, suggests to us our least cost plan can include these elements, but that the proposed plan/best value may go further in some areas.	





		Are you able to confirm that our understanding is correct please and that least cost is not solely statutory investment?	
41	Qual	Joint testing with XX Water in the XX and XX areas: As I think you may be aware we are doing joint testing with XX Water in the XX and XX areas. We note the requirement to have a plan on a page, but feel that this is going to be very tricky to do across the two companies and may be unclear to customers which elements are the responsibility of each company.	Yes this is acceptable. Companies should however keep in mind that the plan (ideally) on a page is intended to be used as a quick reference/summary guide by customers, with the deliberative/depth interviews building on this as relevant.
		Is it acceptable in this instance to have the water and wastewater elements each on a page?	
42	Qual	Targets for performance commitments We have been looking at the performance commitments we must share and how to include whether companies have met their targets. For a number of PCs there are either differing targets across companies, or more commonly, some companies with no target as they are not common PCs yet. Are you happy for the graphs to just show the target for XX Water and whether we are meeting them?	Targets for other companies must be shown where they are available. If they are not available a footnote should be added to explain this. We are still looking into the feasibility of collating targets centrally, and will keep companies updated. UPDATE: this was circulated on 24 April 23.
43	Qual	Data inconsistencies We note the requirement to use the data from Discover Water for the PCs. However, we have done some comparisons against the most recent APR (so 2021-22) from an industry data share on these metrics, and in a fair number of the PCs, there are differences in the data. They are reasonably minor and wouldn't make a	Companies should use the most accurate data – CCW and Ofwat are currently in the process of collating this and plan to ask companies to validate the data against their ARPs. UPDATE: this was circulated on 23 04 23.





		material difference on a graph, but we wanted to confirm you are happy for us to use the Discover Water data?	
44	Qual/Quant	We have not yet completed cognitive testing, but are planning to do this very soon. I was wondering what should happen in the event customers don't understand wording or question text prescribed by Ofwat/ CCW in the guidance? This question is for both the qual and quant stages of the research. Are we required to stick with the Ofwat/ CCW and guidance wording, or should we be tweaking descriptions/ text to remedy comments made by customers in the pilot/ cognitive interviews?	Companies should discuss potential changes as highlighted by cognitive testing/pilots with their ICG. Any changes should make the materials more 'meaningful' for customers to engage with, and not introduce bias into what customers are shown.
45	Quant	In the quant survey, Q7a,b,[c,d] on page 85 states that we should show these questions in blocks of 3 business plan components. This works well for the 6PC areas, but is this required for the 'up to 6 enhancement areas'? We currently have four enhancement areas for testing and are therefore wondering if we can display these in groups of 2 or one block of 4?	Either a block of 2 or a block of 4 would be acceptable - companies can choose.
46	Qual	 The guidance sets out the first question in the post task as follows: Q1: Your current water and sewerage services bill is [organisation to write in]. How easy or difficult is it for you [NHH: your company/organisation] to afford to pay your current water and sewerage bill: We think this might be a little confusing for participants. The first sentence reads as a statement but there is an action for the participant (ie: to write in their current bill amount) that they might miss. 	As this is prescribed text, we do not propose changing the guidance unless a substantive or material change is needed. If your pilot shows that NHHs are finding this instruction confusing, please discuss this with your ICG or equivalent, in order to reach a way forward as informed by the pilot





		 Would it be possible to separate this into two questions as below: NHH customers only: Question 1: Please write in your organisation's current water and sewerage services bill (including site area (surface water) drainage where relevant) for the most recent 12 months,: £ NHH customers only: Question 2: How easy or difficult is it for your organisation to afford to pay your current water and sewerage bill? Please answer one only: Very easy Fairly easy Reither easy nor difficult Fairly difficult Very difficult Don't know 	
47	Quant	 These are questions on the quantitative survey below, if you could please advise: Can I confirm that we shouldn't be showing the 'engaging business plan one-pager' in the quant survey? In reference to the section of the guidance copied below, could I confirm if this is intending for us to show comparative data on all water companies for the 6 PC's, or just our company specific service levels? 	-Yes, I can confirm that you shouldn't be showing the 'engaging business plan on-pager' in the quant survey; the stimulus material should be restricted to that described on page 86 of the guidance -Yes, I can confirm that comparative data should be shown for all water companies for the 6 PCs.
48	Qual	When we show the indicative bill impacts for future AMPs beyond 2030, do you have any preference on whether we show the end of AMP bill amount (eg the	We are looking for the best estimate of the bill to be shown for each year up to 2030; after 2030, we suggest that different presentations can be tested with customers alongside the wording of caveats





		average annual bill for 2034/35) or the average bill across the whole AMP (eg from 2030/31 to 2034/35)?	which should be included to explain the uncertainty around longer term estimated bills. The basis of the longer term bill estimates should be clear – i.e. clear labels, which would for example, say if it is an estimated average bill over a 5 year period, or if it is an estimated price point at the start or end of a five year period.
49	Qual	Display of comparative PC data The screenshot below shows the common PC data we need to display, and we believe it is compliant with the guidance. However, our CCG have concerns that whilst it is based on the same data, it is confusing for customers to have both displays. As a way to make it more understandable to customers, they would like to request that the table (P9 of the document on presenting comparative data) on the right hand side could be adjusted to display the companies in order of performance. Their concern is that for some customers, understanding the meaning of the percentages and then mentally adjusting them to get an idea of best to worst is a lot to take in. We propose to test both the prescribed way of displaying and the slightly amended approach above in our cognitive testing of the material. If the research demonstrates that customers find the revised approach easier to understand we would like to change to this display style for the main qualitative research. Are you happy to support this (as if you would like us to follow the exact guidance regardless of the outcome of the cog testing, testing the two versions is less valuable)?	We agree that it is appropriate to cognitively test two versions of the presentation of comparative company data – one which has companies ordered alphabetically, and one which shows them in order of performance. The presentation of each should otherwise follow the guidance i.e. use the same colouring etc. The results of the cog testing should be shared in full with the ICG or equivalent. If the cog testing supports ordering by performance for better comprehension, then with ICG agreement on the approach to this aspect, Ofwat/CCW would accept this. UPDATE Supplementary response: 14/04/23 - Regarding the use of the table (see P9 of the document on presenting comparative data) and graph – we would like both of these to be shown, with the potential to reorder the table by performance if cognitive testing and the ICG support this. It would be for the facilitators to explain that the same information is shown in both of them, but ordered in a different way. This means there is no advantage nor disadvantage to any water company through the way the data is presented, but people





			can refer to either or both as they need to, in order to help understand how their company is performing.
50	Quant	Our expert researchers on the CCG raised a concern that whilst the selection method appears to be trying to create a random probability sample approach, there is no mention of a requirement for reminders which is typical of this method, and instead appeared to be essentially setting a target of a minimum number people reached which may or may not be full representative. We would like to clarify two things:	We've considered whether reminders should be flagged as a requirement with all companies in order to support a randomn probability sample. However, as this was not explicitly stated in the Guidance, and will affect survey costings and companies/agencies may not have considered this in their procurement, we think it is difficult to prescribe this/make a requirement at this stage.
		 Whether there is an expectation to have reminders within the guidance? If one CCG requires a reminder, should the same method be applied across other companies in jointly commissioned projects even where the other CCG has not requested it? 	We would however like all companies to discuss whether or not to issue reminders with their ICGs/suppliers to explore the best way forward. If costs/timings are going to make this difficult to implement at this stage, then as it was not clear in the Guidance, we will support the ICG's recommendation for whether reminders are issued, or whether additional sample is used. The approach used, i.e. reminders or additional sample, should be explained clearly in any summary/presentation/report of findings.
51	Qual	Just wanted to feedback from our initial cog tests this week (so far only 2 so by no means a full sample, but the same themes are coming through as our CCG suspected from both) with regards to the information provided.	Firstly, we are assuming that this relates to cognitive testing in relation to the qualitative research materials. Having discussed this, we feel that the Guidance stands – our rationale is explained below.
		Customers are struggling with the amount of info relating to the PC information provided, and it is likely [research agency] will be recommending to us if the remaining sessions follow the same theme, that we only have the graph rather than the table as well. Obviously we will discuss this with our CCG and see if they are	The concern we have is that if the Guidance is relaxed around this, we will move back towards a situation where companies devise their own way of approaching the content – which we want to avoid as this leads to different influences feeding in to how





		happy with this recommendation as well before implementing. However, the cog tests so far have shown there are further challenges with the quantum of information they are provided with. We are of course happy to discuss this all with our CCG and see which recommendations they support us implementing if that is your preferred course of action.	 people respond (similar to PR19). This risks moving away from the consistency and comparability which is one of the objectives of the common approach to this research. We agree there is a lot of information in the pre-task, but the deliberation allows for this to be revisited and the facilitators to build on what people have read, allowing for people to have not fully absorbed or understood all of the information. Regarding the use of the table and graph – we would like both of these to be shown, with the potential to reorder the table by performance if cognitive testing and the ICG support this. It would be for the facilitators to explain that the same information is shown in both of them, but ordered in a different way. This means there is no advantage nor disadvantage to any water company through the way the data is presented, but people can refer to either or both as they need to, in order to help understand how their company is performing.
52	Qual	The prescribed questions for the pre-task use the following wording (page 41): [snip of qual household pre-task, part I] My interpretation of the word current is that we would be referring to what customers are paying right now – which I appreciate will differ depending on metered status, payment frequency and so on. At the same time I had understood that in the bill bar chart we wanted the 22/23 bill to be the starting point? I think the text "current" might be confusing particularly for	By 'current bill' we're referring to whatever the customer has received most recently. Although the Guidance refers to the 22-23 bill in relation to Q5 of Appendix F, this would become the 23-24 bill for the current year (for unmeasured customers), or whichever year the two most recent half yearly metered bills fall in to, which would depend on their billing cycle. Piloting of materials should identify what is most helpful for respondents for clarity – either specifying





		an unmetered customer who relatively recently received their 23/24 bill and might remember that communication, rather than recall the 22/23 bill they were paying last year.	their current or most recent bill, and/or the financial year of the bill.
Updated	added 23.05.23 be	low	
53	Quant	 Follow up question to response on 'current bill' (52 in the queries log) Can you clarify what you require for Question 4 in the Quant please? Q4. Your current water and sewerage services bill is x. [NHH: omit this line] How easy or difficult is it for you [NHH: your company/organisation] to afford to pay your current water and sewerage bill: Having different start points for different customers would make a significant difference to what the inflationary impact looks like (see two illustrative examples below) and so give different customers different reads on the impact of inflation. Please can you clarify guidance on how the bill profile chart should be displayed for the Quant at Q5? 	 We've given this further consideration, and propose the following: Q4 is amended to read: How easy or difficult is it for you [NHH: your company/organisation] to afford to pay your current water and sewerage bill: This drops the reference to the bill amount for HHs, and does not reference a financial year. The thinking behind this is that: The aim of Q4 is to identify affordability of the current bill It is not necessary to specify the financial year of the current bill, as it is whatever year is current for each customer Bill-payers do not need to have a bill amount in front of them to know how affordable they are finding current payment Finally, the proposed approach keeps this as a very simple question Q5 will then show bills starting with the financial year 22-23 for everyone; using the same base year mitigates the impression of the effects of inflation on different bill years.





			This response was circulated to water companies on 12/05/23 within the slides for the collaborative steering group meeting on 16/05/23 where it was presented to attendees.
54	Qual/Quant	We're just about ready to reach out to our customers for the A&AT recruitment and would appreciate your steer. I'd like to check with you that we can use the same list for our A&AT recruitment or should we be excluding any who had registered for Your Water Your Say?	 Q8 of the Q & A log says: Should customers who have taken part in other water company research be included in the customer lists for sampling? Yes – samples should be as inclusive as possible; customers from the YWYS sample frame can be included in the A & AT sample frame Additional response: Companies may wish to ask survey respondents if they have taken part in water company research in the last 6 months. We would expect numbers to be very small, but this would make it possible to see if there is any correlation with strength of views and recent research participation. This response was circulated to water companies on 12/05/23 within the slides for the collaborative steering group meeting on 16/05/23 where it was presented to attendees.
55	Qual/Quant	Timing of clarifications - what happens if a company has already conducted research and a subsequent clarification may have changed their approach?	This question was raised between Ofwat and CCW as one of our reflections on the clarification process. The starting point is that companies should follow the Guidance that is current at the time of their research.





			If a subsequent response to a clarification question would have changed how an aspect of the research was approached, and this may have had a material impact, this should be discussed with the ICG or equivalent, and set out in the business plan submission. This response was circulated to water companies on 12/05/23 within the slides for the collaborative steering group meeting on 16/05/23 where it was presented to attendees.
56	Quant	Some companies are now developing their surveys for A & A T. In terms of showing their proposed business plan, while the Guidance sets out points about the provision of contextual information, this is not generally covered by prescribed text. It would help with consistency if some prescribed text could be provided for this. Will Ofwat/CCW provide further text for this?	Companies should note that we do not expect to see prescribed text changed in the survey, as this is key to ensuring consistency. The contextual information should support the prescribed text, and not expand its coverage beyond what is necessary for meaningful understanding. To help develop contextual information, companies should refer to text which is already in the Guidance for the qualitative research, and use this where it reads directly across to the presentation of the survey. However, if cognitive testing shows that in a survey context, an alternative wording which conveys the same meaning and content would materially better support meaningful understanding, companies should discuss this with their ICG to reach a view on the final wording. When interpreting the findings of cognitive testing, companies and ICGs should bear in mind that people do interpret things differently – 100% consistency in understanding is rare - and balance





			this against any perceived need to change something.
			Sources of text/contextual information already in the Guidance are:
			P40 text sets out the six common PCs and text to describe them – companies should use this as the starting point for the PCs in the survey. Ofwat/CCW would prefer that companies use this text as set out – but accept that companies will need to test this cognitively to ensure there is sufficient understanding in a survey context, where people do not have moderator support. Note that 'pop up' information boxes can be used to support understanding of these PC descriptions in the survey.
			P39 sets out prescribed text for the qualitative research to explain about target setting for the qualitative research; companies should use this as the starting point for contextual information for the survey.
			P10 contains suggested text to explain some of the obligations that companies have – this can be drawn on if needed.
			All of this should be tested and discussed with the ICG or equivalent, and the testing process and discussions documented for transparency.
	added 18/07/23 be		
57	Quant	Response sent by CCW/Ofwat on 20/06/23 following queries from several companies raised at the Steering	Please note, this guidance has been superseded by the revised guidance issued on 29/06/23 (see





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Group meeting on 12/06/23 about the presentation of comparative company performance data and targets and complexity.	row 73.) It was good to see you all last week at the Steering Group Meeting. As you'll be aware, part of that discussion centred around how comparative information should be shown to respondents within the quantitative element of the affordability and acceptability research. We have spoken to a small number of companies who are starting to develop their surveys and have indicated that there is the potential for cognitive overload with how the comparative information is currently set out in the guidance. Some companies have also shared results of cognitive testing on this point with us, and we thank you for that.
	One of the key aims of the affordability and acceptability guidance is to ensure that it is not only comparative, but that the research delivers meaningful results. To achieve this, research materials must be easy for respondents to understand and engage with.
	We have reflected on the feedback we have had from companies on how the current guidance could evolve to ensure that the information shown relating to comparative performance of the common PCs could be made more straightforward to respondents, with the aim of limiting the cognitive load.
	The current guidance sets out that comparative company performance should be shown in a bar chart, with an additional table outlining how companies are performing against their targets. We consider that the bar chart may be omitted, on





	condition that performance is explained by required text to say how well the company is performing against others. The wording is not prescribed, though the inclusion of explanatory text to this effect is prescribed where the bar chart is omitted. This could be in the form of a text box outlining that 'water company performs x out of y companies for this metric'. This could lead to a show card that looks similar to the below:
	We hope that this is a pragmatic way forward for the quantitative testing, but would, as always, welcome any questions on this approach. Additionally, we'd like to take this opportunity to remind companies about the importance of ensuring that communications with respondents about the performance of the company and future plans must be balanced and unbiased, with no leading information. For example, if companies have used the wording "better than target" or "met their target" for PCs where targets have been exceeded, then we expect the opposite wording, i.e. "worse than target" or "not met their target", to be used for PCs where they have not. Language should be neutral and balanced and our Ofwat colleagues have indicated that they will carefully scrutinise this aspect of the research when it is assessed as part of QAA.





58	Quant	In the quantitative questionnaire the guidance shows that anyone not wishing to declare their exact age (in S1) should be routed out. Presumably, this is because we are screening out under 18s and without knowing their age this is not possible, and because not knowing customers' age could have a negative impact on the analysis. Would it be permissible, however, to ask them a follow up question to see if they are happy to provide their age in one of the broader age bands that are using for coding the answers to S1 before we screen them out? In the latter scenario we can also show younger age bands and screen out under 18s without drawing instant attention to the fact that we screen out those aged under 18. We feel there is a risk of losing potentially valid interviews if we strictly screen out everyone who does not wish to provide their exact age.	We are happy for a follow up question to be added after S1, to reduce/avoid people being screened out if their initial response on age is 'Prefer not to say'. The follow-up question must ensure that ages can be coded into the age bands specified in the Guidance, which are below: 18-24 1 25-34 2 35-44 3 45-54 4 55-64 5 65-74 6 75+ 7
59	Quant	We would like to seek clarification on whether we can exclude water only/ waste only customers from the quantitative acceptability and affordability research, when providing customer sample lists to the research agency. We note that the guidance states that 'for household customers, companies should use their domestic customer database as the household sampling frame. Survey exclusions should be kept to a minimum. We recommend that only customers who have explicitly opted out of market research be excluded from the	We agree that the 10% rule would apply here and so water only/waste only customers can be excluded from the sample list. Additionally, void accounts and/or deceased/inactive accounts can be excluded from the sample too.





		 sample. Customers who have opted out of marketing or completed one of the company's other surveys recently are in scope'. XX Water has very small population sizes for these customer groups (around 3%). Looking at the guidance (page 10) this falls under the 10% customer base referred to. The numbers from natural fallout would therefore likely be very small. Additionally, the screening question S4 is leading to some of these customers to be screened out i.e. water is provided by XX Water, waste services is not, respondents click 'no' and then they are screened out. The research agency has advised that from both a Data Protection legislation and MRS Code of Conduct, we should exclude from the sample. This is because knowingly emailing someone an invitation to a survey they are not eligible for, would not be in accordance with either. We would also seek to exclude void accounts and/ or deceased/ inactive accounts from the sample as they 	
60	Quant	are not active. We and our clients have some concerns on survey length, with a large amount of detailed information to	Response below included for completeness – it is superceded by the revised Guidance issued on
		read. Even assuming 2 screens for each PC and one screen for each of 6 other components, this is 18 screens of information to describe the plan. This excludes an overall summary page which is recommended in the Q&A (and which would seem essential to sum up everything before asking Q8), and also the bill profile chart(s). For some customers, we expect overall this will be a 20-25 minute-plus survey,	29/06/23. See row 73 for this. We understand that there may be a lot of information for customers to work though, but have set the parameters for all companies to test to ensure consistency and cannot agree to changes to this before the materials have been cognitively tested. At this stage we are not minded to change the presentation unless there is good evidence to





		longer than we would normally advocate, meaning drop-	suggest that the version in the current guidance
		outs and fatigue. (Where we are conducting jointly	does not work.
		commissioned research it will be even longer). We want	
		to check that we are understanding the guidance	We propose:
		correctly on displaying the components of the plan for	
		the Quant, i.e. is this level of detail required, or had a	The material is drafted to the follow
		more abbreviated way of displaying the components and	Guidance. This means that everyone must see
		comparative information been intended?	comparative company performance and companies
			should be ordered alphabetically, rather than in
			performance order. The proposed 'hover' approach
			would mean that not everyone would see
			comparative company performance and this would
			not be acceptable to CCW/Ofwat because it
			introduces inconsistency in how people can evaluate
			company proposals. An acceptable alternative
			would be to combine the chart and table into a
			single screen.
			The meterial is then as writh (a), to stad/ailstad
			The material is then cognitively tested/piloted
			to understand cognitive demand, comprehension
			and survey length.
			• We would be happy to receive the outputs of
			the cognitive testing/piloting in order to consider if
			any material changes are needed,
61	Quant	Thanks for sharing this revised guidance (20/06/23). I	Email sent to all companies on 29/06/23 clarified the
		have a question about what we do when there is no	presentation of company target data, which was to
		target for a measure. For example in the data set CCW	include a simple statement to say whether the
		shared earlier this year for a couple of measures some	company was meeting or not meeting its target,
		companies have no target for 21/22 and therefore can't	where one was set.
		perform better or worse. In our qualitative comparative	
		graphs we used a neutral colour for these companies	
		rather than green (better than target) or red (worse than	
		target), but this revised guidance makes it slightly	
	1	······································	





		trickier. I'm asking from both a presentational point of view, but also think of XX Water and how you expect us to present the fact we don't have a target.	
62	Quant	 We have a few early concerns (re revised guidance of 20/06/23) that we would like to share: Showing performance only in this way can introduce bias as some companies do not have targets for a measure, or for some measures the performance targets are different between companies. This could result in a high performing company with a tight target that narrowly misses it looking like a poor performer, with the opposite applying to easier targets. There is no prescribed design guidance and that could lead to Ofwat determining that companies' design is introducing bias. The wording is not prescribed, and that companies' choice of wording could be determined by Ofwat to be introducing bias. 	We are aware that a few companies that do not have targets for external sewer flooding and water quality contacts and in these instances we propose that comparative information is shown for these metrics following the guidance we have published: Comparable-information-Acceptability-and- affordability-of-PR24-business-plans (3).pdf. We envisage this as following the guidance from page 4 onwards for bar charts (omitting the information relating to targets for all companies). In these instances, the bar chart would replace the ranking we set out in the previous email. Email sent to all companies on 29/06/23 clarified the presentation of company target data, which was to include a simple statement to say whether the company was meeting or not meeting its target, where one was set.
63	Quant	 We have some more queries regarding the revised guidance of 20/06/23. Please can you confirm how the deviation from target percentages should be calculated. Should the ranking statement be based on companies' deviation from their target or on their actual comparative performance? For example, XX Water would be ranked 2nd in industry for leakage performance but 16th based on deviation from target. I have attached a screen shot of how the deviation from 	Where you have said that XX Water performs 19 out of 19 companies this should relate to the comparative performance (so where is XX Water relative to other companies on actual performance) rather than where it performs in relation to the targets. This would mean that XX Water performs 2nd out of 19 companies, and the table would show the percentage deviations from each company's own target as shown in the screenshot





		 target would look like for leakage and we don't think that this is a true of fair representation of XX Water performance. Could you also clarify how companies with no target should be accounted for and whether they should be included in the table or not. 	On the point about calculating the deviations from targets, the calculation to use is: % change = 100*(P-T)/T Where P = Performance and T = Target
64	Quant	 We think that stating: XX Water performs 2nd out of 19 companies, and; The table showing percentage deviations from each company's own target is very confusing as there is no connection between the performance statement and the information shown in the table. If this is to be the case, please can you provide prescribed words to describe what is being shown in the table as well as prescribed words for the performance statement. 	The response below included for completeness, it was superceded by the email sent on 29/06/23. The ranking in the table showing target information would be based on the deviation from the target, but we'd swapped a few emails yesterday to outline that the text above the table should show where XX Water are in comparison to others, which will hopefully give a more rounded view of performance. You'd suggested that the wording around this could be confusing for people and so we would suggest that the text explains that: "Water company performs x/y companies overall on this metric" whereas the table is labelled as company performance against targets. We do not intend to set prescribed wording for company performance, but hope that the broad guidance given in the previous email is of use. The expectation is that companies work with both research agencies and their ICGs to agree balanced narrative to the stimulus materials
65	Quant	In addition to the exclusions to the sample previously discussed, we will be following the advice of our priority services team and excluding customers with dementia (just under 4.5k customers). This is a limited group of customers, and forms only 1.5% of overall priority	We don't foresee any issues with this approach.





		services customers, so we are confident that this group as a whole will be represented in the survey.	
66	Quant	 Following the revised guidance of 20/06/23: We are in the middle of our cognitive testing, so we will use the remaining sessions to test the survey with the revised guidance on performance data. I am still worried that there is a lot of information to customers to wade through, such that when they finally reach the acceptability question they will just say "don't know". But let's see what the testing says. We are thinking of adding in a question to the survey, so that for customers that tick "don't know" we ask them why they selected that, and offer them some options on the basis of what customers say in the cognitive testing. I just have one thing to check for clarification, and one comment. 	Response below included for completeness. It has been superceded by the email issued on 29/06/23. Your understanding of what the stimulus material should look like is correct. Can I just double check what you mean by the tables are ranked differently though please? And on the point of potential confusion. We would suggest that that the text explains that: "Water company performs x/y companies overall on this metric" whereas the table is labelled as company performance against targets. If anything does come out of the cog testing on this point though, we'd be interested to hear about it if you're willing to share.
		 Clarification: The comparative bar chart is to be excluded (except for companies where there was no target). And as I understand it, the revised table showing performance against target by company, ranked, is to replace the previous table which showed the same thing, but ranked differently. The wording in your email doesn't make that 100% clear. Is that correct? Comment: There is a potential confusion here for customers. Ranking of companies according to absolute level of performance (as per the proposed wording) is not the same as ranking according to divergence between performance and target (as per the revised table). This is because for quite a few measures companies have different targets. This could lead to a situation where customers read text that says "[Company x] performs third out of 10 companies on this 	We've had to move away from the alphabetical ordering in order for this to easily work for people. The issue of how companies are performing in absolute terms should be captured in the text about how well the company performs against others ("Water company performs x/y companies overall on this metric")





		measure", but then in the table they are ranked 8th. I'm not sure about the best way of dealing with this problem but thought I should raised it in case it had been missed. The revised framing of the table only works if the companies are ranked according from best to worse vs target. Companies may appear low down on this table, even if they are actually performing better than some other companies in absolute terms.	
67	Quant	The research agencies we are working with feel like the cognitive overload will still be present with the amended approach (20/06/23) as it still takes a lot of explaining/understanding to unwind performance, targets, the variation from targets and the comparability to other water companies. Both agencies are worried that we might lose participation/engagement before we get to the most important part of the survey – plan acceptability. Given this was the least interesting part of the study to customers in qual testing, they feel like it could be simplified further. They suggest the following: - Header - Description of measure - Explanation of higher number is better/worse for the measure - The 2021/22 target was XX - Current performance - Ahead/met/behind target - < <company>> are currently ranked 11th out of 17 water companies for this measure I'd welcome your thoughts on this, I appreciate you are going to have many suggestions/variations on this.</company>	We emailed all companies on 29th June with a revised approach to showing company performance and target data. This will help to reduce the level of cognitive demand which you highlight as a concern. In response to your specific question, we did not include the additional headings in the revised approach, preferring to minimise the information shown. However if cognitive testing finds that an additional line or two of neutral information would be helpful to people taking the survey, this is something to share with and discuss with your ICG or equivalent to agree a way forward on.





68	Quant	There is a bit of confusion around the new comparative data guidance for external sewer flooding and water quality contacts. I have heard from another company that these PCs should be displayed in bar chart form, rather than the new table format outlined in Liz's email, due to some companies not having targets for these PCs.	Response below included for completeness. It has been superceded by the email with revised guidance issued on 29/06/23. If you have targets for these metrics, please follow the guidance that Liz Cotton sent earlier this week (20/06/23).
		Please could you clarify if this is the case and if the guidance is that every company should do this or just those who don't have a target for these PCs?	We've been working with the companies who don't have targets to find a workaround and will communicate this to all companies shortly.
69	Quant	We are planning on going live with our Quant at the end of this week and these changes (to company performance/target data figures) have come in the nick of time to make changes to our survey stimulus. Please can you confirm whether there are any further	Response below included for completeness. The first part has been superceded by the email with revised guidance issued on 29/06/23. The reference to Query 55 is separate to this and is still valid.
		changes expected, and if so, whether we will be negatively assessed for not including any such changes should they arrive after we have locked down the stimulus and started the survey. Changes to the Guidance which they may not have been able to	We do have an outstanding query from one of the other companies about their water quality contacts figure, and I'm waiting to hear back from them on this.
		respond to, and which may have a material effect on their research,	With this being a fast moving exercise for companies, it is likely that the Q & A will refine some aspects or the process as it goes along, and some companies will not be party to responses at the time they test.
			Query 55 in the Q & A log anticipates this: Timing of clarifications - what happens if a company has already conducted research and a subsequent clarification may have changed their approach?





			This question was raised between Ofwat and CCW as one of our reflections on the clarification process. The starting point is that companies should follow the Guidance that is current at the time of their research. If a subsequent response to a clarification question would have changed how an aspect of the research was approached, and this may have had a material impact, this should be discussed with the ICG or equivalent, and set out in the business plan submission. This response was circulated to water companies on 12/05/23 within the slides for the collaborative steering group meeting on 16/05/23 where it was presented to attendees. In other words, consideration would be given to whether/how changes in the Guidance or in this case data might have affected findings. I should add that we are just about to issue a change to the Guidance regarding the presentation of company performance data. This will go very shortly, and you may wish to wait for this, if you are in a position to do so. This email sets out how companies which have already started their research or finalised their research materials will be considered in terms of subsequent changes to the Guidance which they may not have been able to respond to, and which may have a material effect on their research,
70	Quant	The comparative data issued by CCW doesn't show our WQ target (along with some other companies). Our target is 1.4 and I'm not sure why it isn't included in the	CCW/Ofwat initial response 26/06/23: When we compiled the targets we drew them from Ofwat/CCW sources – and this was one we didn't have.





		data? We would like to include this in our quant materials, rather than not showing a target at all. I'm conscious that the guidance says we must use the comparative information only so would welcome your steer here please? Would it be possible to include the XX Water target and reissue the data? Apologies if you have already had similar queries on this from the other companies.	Please could you advise where the target originates from – is it an internal company target or does it come from elsewhere? Superceded by the revised approach to presenting company performance/target data which was sent to companies on 29/06/23.
71	Quant	 I've been reflecting further on the revised presentation of comparative performance (CCW/Ofwat email of 20/6/23 refers) and just wanted to clarify: When you say "Water company performs x out of x water companies on this measure" – are you intending that companies are ranked based on the 21/22 performance data or the performance vs target? For measures where we don't have a common target we get very different optics depending on which you pick – for example on external sewer flooding XXX Water performs 2nd (out of 11) when ranking on performance and 9th (out of 9) on performance vs target (because 2 companies don't have a target). Presenting performance vs target in the table ignores the fact that XXX Water has by far the lowest target in the sector (which is also part of the rationale for our 2030 target). It might confuse participants that the number of comparator companies varies depending on the measure, how many have targets, and whether companies like XX and XX have one or two data points. 	We are about to issue a change to the Guidance regarding the presentation of company performance data, which should help address this issue. See all company email 29 06 23 line 73.





		I appreciate there isn't a perfect answer, but I just wanted to check that it's intentional that the text and the table present something (perhaps too subtly for those doing the survey) different.	
72	Quant	With the new guidance (20/06/23) on the comparative data tables, we see XX Water ranked at the top of the table on pollution incidents. However, this is misleading as it isn't comparable due to the small size of its sewerage system. In the Ofwat water company performance report (page 23), another company is shown as the top performer. We could remove it from the table ranking and list it at	Thank you for this. Just to let you know that we are about to issue a change to the Guidance regarding the presentation of company performance data, which should help address this issue,
		the bottom in grey with a caveat? I am conscious the way we display this should be comparable across companies, so any advice is appreciated.	
73	Quant	We are carrying out cognitive testing on the latest guidance around the presentation of comparative information, in the new tabular format.	CCW/Ofwat response having considered representations and information from different companies – revised guidance sent 29/06/23: We emailed companies on 20th June to suggest an
		Our findings so far are that customers have struggled to interpret the deviation from target percentages, finding it difficult to determine what these represent. The fact that the ranking statement is based on actual performance has exasperated the problem, as they cannot understand why the position in the ranking statement	alternative approach to showing company performance data. This alternative approach was a response to company feedback about concerns on cognitive load, and to simplify what people were seeing to help with this.
		and in the table below are different, not realising that the two things are comparing performance on two different aspects. We have had customers comment that they assume that this is a mistake in the survey which undermines their trust in the data that is shared throughout. Our ICG has also challenged the new	Since then, we have had feedback from companies about the suggested format, with at least one company having cognitively tested this, and this has highlighted three substantive issues which affect comprehension:





	-	
	tabular format, and strongly feel that using it in its	• The use of deviations from the target (included to
	current form is not in the best interests of the research.	show how far above or below target each company
		is)
	We have developed an alternative presentation of	• The mismatch between the ranking of companies
	comparative performance which we are also testing with customers, and the results so far are looking promising.	 in performance order, and deviations from target Not all companies have targets for the common
	We will conclude our testing today.	PCs that are being used in the A&A testing
	we will conclude our testing today.	r CS that are being used in the AdA testing
		To address this we are now proposing a further
		simplified version of the presentation (revised
		approach attached). Rather than showing targets
		for each company, it will show the companies
		ranked in order of the performance, showing the
		performance being achieved by each company
		alongside each bar (e.g. for leakage this would be
		XX litres per property per day). Alongside the chart,
		a simple statement would say whether the company
		is meeting or is not meeting its target. There would
		also be a statement to say that the company is X out
		of X companies based on its performance.
		We appreciate it is not ideal to propose another
		approach at this stage and are sensitive to the
		situation where some companies have already
		started testing, or have finalised their research
		materials. However, as more companies cognitively
		test the materials and find comprehension issues,
		this would lead to each company adapting their own
		version in discussion with their ICG, and likely lead
		to multiple versions. The approach we now propose
		aims to manage this scenario. We add that we will
		not consider revising it again - it is inevitable that
		further cognitive testing, by its nature, will identify
		some issues with this. However the new proposal is





			a big simplification from what was initially proposed in terms of complexity and will reduce cognitive load. Where a water company has already started their survey and it is now too late to adopt this revised approach, they will not be penalised for having followed an earlier version of the Guidance. If it is felt that subsequent changes may have made a material difference to the research output, this should be discussed with the ICG and the case for this set out in their business plan submission,
74	Quant	I was wondering if I could quickly ask some direct advice on sampling for Affordability testing. For the main sample we think we'll need 36,000 customers contacted through email and letters. (as well as some face to face work). We're trying to follow the guidance with the way the same is drawn, and pulled an original file of 45,000 and a boost of 15,000. This was done completely at random using a random function applied to all our customer data. Our data includes all the information on IMD, PSR status, counties etc. We have also run analysis on the full set of our customers with IMD, PSR etc. to apply to weightings. The agency are asking whether we can a) Use the same files (much higher than we need) to then strip out some of the higher quintiles, so the sample then matches the IMD proportions per county that we need. b) Or, do we need to ensure the sample drawn is just in those proportions.	Yes, approach a) is acceptable, as long as the 'stripping out' you refer to is consistent with the aims of the sampling methodology, i.e. is done randomly, as appropriate, and within strata, as appropriate.





		I'm hoping that a) will be OK – to keep it a little easier for our data team, but I just wanted to double check.	
Update a	added 01.09.23 belo	W	
75	Quant	 We would really value your feedback on the bulleted points below on whether it's a red line on the guidance, or whether there is flexibility assuming both our ICG and qual findings/quant Cogs fully support a departure from the guidance: [bullets removed here except where specific to the response given] We would also like to flag a key point as a WOC, in terms of where the "clean water only" bill profile affordability question goes. The guidance is clearbut in our Cogs testing customers supported this chart being shown straight after the combined bill profile chart in terms of flow and understanding the split between water and sewerage charges. There is also the point that if we show the combined bill (which will show a notable increase) and then go straight into acceptability testing of our water only plans, it may skew negatively the acceptability response if they have only been shown the combined bill impact at that point. Whilst I can also see the reason for asking this question at the end from an overall comparability perspective across the companies, we wanted to understand if this is a red line. 	Our prevailing view is that for consistency, companies should follow the Guidance. On that basis, we can't agree to ad hoc changes. The route remains open for companies to consult their ICGs, which we note you are doing. We also note that the Guidance allows for companies to add a question (or questions if time allows) at the end of the survey which could accommodate your third bullet.
		Question about wider acceptability testing studies	Regarding wider acceptability studies – this seems like a decision for the company, in that if the value of
		 We are about to start a second wave of our acceptability testing of our WRMP24 final plans in both our supply regions. The AAT guidance was not available 	this is in being able to make comparisons, this may override the adoption of an approach closer to what is in the Guidance. However it might be worth





last summer when we undertook wave 1, but we were looking for guidance on whether we would be expected to adopt the principles from the guidance in wave 2? We are concerned if we start altering questions used for wave 2 vs how we asked in wave 1 and stimulus materials then we won't be able to track comparability between the 2 waves. Any chance we could have a call to discuss this in more detail or if you can give me some guidance, that would be very useful.	considering whether the original design would have been different now and any implications of this in terms of the findings and interpretations.
Speeders feedback	Thank you for providing further feedback on speeders.
 We support the proposed approach, but would raise the following points for consideration: Have you considered how the methodology for identifying a speeder will work in terms of the fieldwork methodology? For example, the completion time of a NHH phone survey is often notable more than a HH online survey. Given this, assume the guidance will make clear that it will be the difference from the median time for any given methodology used to collect the feedback? We don't want to lose high-quality HH survey responses as they fall below the median time set, which has been skewed up by NHH completion times. If speeders are removed, are Ofwat/CCW expecting the customer removed to be replaced by a similar segment – e.g. a HH customers with a IMD decile of 2 is 	We agree that the cut-off point should be different for different audiences (HHs and NHHs) and also if different modes are used (telephone vs online). It would be derived from the median for the particular combination of audience and mode. Yes, companies should replace a respondent who has been excluded, with a respondent from the same IMD segment. The achieved sample should be in line with the sampling objectives. Particularly important in this respect is a clear focus on ensuring sufficient representation of respondents from deprived areas.
removed, should they be replaced by a customer from the same decile? Assume this would be up to companies to manage to ensure a representative split across the whole HH and NHH sample is achieved, but	Data cleansing of speeders is likely to be just one of the data Q/C processes which agencies run. We would expect the agency to conduct the full range of data Q/C processes they would usually apply to a
wanted to check?Is the median the only guide that will be given for removing speeders. Agencies often use a number of	data set like this, so respondents may be removed for other reasons as well as speeding. It would be good practice to be transparent about the data Q/C





		checks when determining if the responses should be removed, some of which are qualitative. For example, a response may just fall inside the median time set, but their responses in the open ends suggest they have not taken the survey seriously. Just confirming that agencies should apply common sense where it is obvious a response should be removed, as it does not meet quality standards expected to inform company plans?	criteria used, and the number of respondents removed from the data set for each criteria. We would not expect the overall number of exclusions to be high,
76	Quant	 On the proposed treatment of speeders: My overall observation would be to question the materiality of this issue, the need and appropriateness of a blanket approach, and wonder if this should be left to companies and their agencies to address in their quality checks and account for in reports. Further detailed feedback follows below: On the subject of Ofwat and CCW's proposal of mandating the removal of all interviews of duration a third lower than the median; we fear there may be unintended consequences. 1. We will not be possible to know how many interviews end up getting removed until after fieldwork has finished and the time to get more has passed (because we won't know the median duration until that point). So we may have to get more interviews before the final fieldwork date (but without knowing in advance how many more will be required), which will have a cost associated with it. The alternative to that is to obtain the specified number of interviews knowing that an undefined amount 	 We expect that any research agency, when commissioned to deliver a particular sample size, will review the sample it has achieved at the end of the fieldwork phase and as part of the data Q/C process will remove questionable responses. This means that the research agency may aim to achieve more than the specified sample size, to allow for data Q/C at the end of the process, and should be experienced at handling the uncertainty around this. We would not expect there to be a lot of exclusions for the A & A survey and there should be a good feel for how the survey completion time is developing – and likely proportions that may need to be excluded – as the fieldwork progresses. This can be used to inform whether more sample will be needed to compensate towards the end of the fieldwork phase. This seems to be part of usual project management practices CCW/Ofwat want to maximise comparability – if every company uses a different cut-off point to exclude speeders, this could influence findings in ways which are not visible to us. So we want





will be removed from the end data (so a shortfall in	companies and their agencies to use the same
delivery basically).	approach, so it is a level playing field.
2. Without any analysis into spread of durations, this	3. We would expect research agencies to run the full
seems like a very specific, and arbitrary, target/line. A	range of data Q/C on the final data set and remove
really tight spread of durations would mean almost no	questionable responses, as they would for other
losses, a really wide and uniform spread could mean	research. It should be standard practice to be
lots lost. We would always look at the data, and make a	transparent about the data Q/C process and the
decision in the round, on a project by project basis.	criteria used for this, and to note the number of
3. Duration based removal is only one part of the suite	responses which were excluded for each of the
of measures that an organisation like ours would employ	criteria.
for removal of suspect data (including response	4. It makes sense to base the median on the type of
analysis). Does singling this one element suggest that	audience (NHH, HH) and the way in which data is
other measures do not need to be applied or are of	being collected, so the cut-off point will reflect
lesser importance (or are CCW and Ofwat intending to	whichever combination of audience and mode is
fully define the data cleaning task)?	being used.
4. There are methodological differences in the various	5. As noted at points and 1 and 3, we see this as a
audiences and how we are collecting data from them	fairly standard part of the data Q/C process which
that influences duration. For example, if we group CATI	research agencies should be experienced at
(which always has a duration far longer than online, due	handling, and explaining their approach.
to participant/interviewer interaction) in with online then	nanaling, and explaining their approach.
the median rises vs an online only survey – which will	
cause more online interviews to be dropped than if we	
had treated each method separately. CATI is only	
making up a very small number of interviews so that	
specifically may not be a big problem. However, NHH	
(which again often has a significantly shorter duration	
than HH) could be a big problem that is worsened by the	
relative sample sizes – we don't want 2000 HH at 20	
mins going up against 200 NHH at 10 mins, and losing	
all 200 NHH for being >1/3 slower than the average of	
19 mins (for (extreme) example)). Is this rule going to be	
tailored and specific enough that it takes these factors	
into account (as we always would when cleaning data)?	





		5. Previous repeated rule changes for the displaying of comparative data was problematic. The late entry of this requirement appears to have the potential to turn into a scenario like that. Water companies and agencies starting to getting into the meat of the data cleaning will find that these (and I'm sure other) issues will appear, and they will start realising that otherwise perfectly reasonable looking data needs to be excluded. The next step will be agencies/companies asking about different specific scenarios.	
77	Quant	Our research agency has highlighted a few concerns on the approach of a blanket removal of respondents who complete the survey in under a third of the median completion time: 1. It will not be possible to know how many interviews end up getting removed until after fieldwork has finished and the time to get more has passed (because we won't know the median duration until that point). So we may have to get more interviews before the final fieldwork date (but without knowing in advance how many more will be required), which will have a cost and time impact associated with it. 2. Without any analysis into spread of durations, this seems like a very specific target/line. A really tight spread of durations would mean almost no losses, a really wide and uniform spread could mean lots lost. Research agencies would always look at the data, and make a decision in the round, on a project by project basis. 3. Duration based removal is only one part of the suite of measures that a research agency would employ for removal of suspect data (including response analysis).	 We expect that any research agency, when commissioned to deliver a particular sample size, will review the sample it has achieved at the end of the fieldwork phase and as part of the data Q/C process will remove questionable responses. This means that the research agency may aim to achieve more than the specified sample size, to allow for data Q/C at the end of the process, and should be experienced at handling the uncertainty around this. We would not expect there to be a lot of exclusions for the A & A survey and there should be a good feel for how the survey completion time is developing – and likely proportions that may need to be excluded – as the fieldwork progresses. This can be used to inform whether more sample will be needed to compensate towards the end of the fieldwork phase. This seems to be part of usual project management practices CCW/Ofwat want to maximise comparability – if every company uses a different cut-off point to exclude speeders, this could influence findings in ways which are not visible to us. So we want companies and their agencies to use the same approach, so it is a level playing field.





		Should others be applied or is Ofwat intending to fully	3. We would expect research agencies to run the full
		define the data cleaning task? 4. There are methodological differences in the various	range of data Q/C on the final data set and remove questionable responses, as they would for other
		audiences and how we are collecting data from them,	research. It should be standard practice to be
		that influences duration. For example, if we group CATI	transparent about the data Q/C process and the
		(which always has a duration far longer than online, due	criteria used for this, and to note the number of
		to participant/interviewer interaction) in with online then	responses which were excluded for each of the
		the median rises vs an online only survey – which will	criteria.
		cause more online interviews to be dropped than if we	4. It makes sense to base the median on the type of
		had treated each method separately. NHH (which again often has a shorter duration than HH) could also be a	audience (NHH, HH) and the way in which data is being collected, so the cut-off point will reflect
		problem. Is this rule going to be tailored and specific	whichever combination of audience and mode is
		enough that it takes these factors into account (as	being used.
		usually would be when cleaning data)?	5. As noted at points and 1 and 3, we see this as a
		5. There is a concern that a late entry of this	fairly standard part of the data Q/C process which
		requirement could result in further questions and	research agencies should be experienced at
		uncertainty once we begin data cleaning and different	handling, and explaining their approach.
		scenarios arise.	
78	Quant	In previous XXX Water surveys we have always used a	Yes, there is flex around the wording to
		slightly adapted version of the HH inflation explanation	accommodate wording for HHs and NHHs.
		copy to move away from mentioning households. Given	We have providually revised the wording for
		we are asking NHH customers to focus their responses in the context of their organisation, it does then seem	We have previously revised the wording for questions 1 and 2 of the Guidance (link below) as
		confusing to then suddenly talk about "household	follows:
		inflation" and "your household income". The guidance	'Appendix F: Survey guestionnaire' - wording
		states this wording is prescribed and no mention of	clarified for NHH and HH customers in Q1 and Q2.
		being able to use a NHH version, but I just wanted to	First response code for Q2 amended to reflect
		confirm if the expectation is that we should use this	NHH/HH option – see P.83.
		exact wording for both HH and NHH survey versions, or	Guidance-Acceptability-and-affordability-of-PR24-
		if there is some flex on this? If none, I will feed this back	business-plans (3).pdf
		as a point of note for the next round of AAT we	
		discussed at the last meeting for a potential review.	However your current question refers to the text on
			P14. Where this is being used in a NHH context, we have no objection to replacing the phrase





			'household income' with something more fitting for NHHs, such as 'business income'.
79	Quant	Our CCG have strongly recommended that we produce optional voice overs and animations of the showcards which will read out the information on them and also present the relevant information at the same time so that participants can follow along. We're planning on doing this as simple animations within PowerPoint and we will not be changing the mandated content in any way. The voice over will read only the information on the showcards for: • The comparative performance showcard (3x PC's) • The target performance showcards (3x PC's) • The service enhancements in our plan (3x) I just wanted to run it past you to see if you see any issues with the idea.	We have no objection in principle to a voice over to read out the mandated content for the showcards, or to an animation to support this, provided that each is in the spirit of the Guidance and does not influence how people may respond to the content.
80	Quant	Can you can help please with a reply to one of our online community members who has tried to undertake the AAT quant survey. We have only had one comment like this to date, but would appreciate it if you could quickly check my response below and advise if it needs editing – specifically the section in yellow as I am unsure why this decision was taken so have put my best guess to start with as I can't find the reasoning anywhere in the guidance. We obviously followed the guidance for the question in the survey, which is to screen out if people say "prefer not to say" (ref screen shot below). Thanks for trying to take part in this study. As mentioned above, we have to follow the regulator's guidance on the survey questions and the decision is that if you choose not to give your age then, unfortunately, you won't be able to take part. The main reason for this decision is to ensure that the results of the survey can be evaluated	Thank you for contacting us about this. Yes, you're correct, it is so we can analyse views by age group. We wanted to avoid having a chunk of people who did not provide that information as age is an important break for the analysis of this data set. The analysis will be done in age bands, and there is the option to use this to specify an age group if this is helpful – query 58 of the A & A queries log refers.





	by different generations of customers. I will be sure to feed back your point about this for consideration for future surveys of this type.	