

The voice for water consumers Llais defnyddwyr dŵr

> Review of household customer complaint handling by water companies in England and Wales

> > 1 April 2023 - 31 March 2024

CCV

Introduction	3
Key findings	4-5
Complaints that come through to CCW	6
Case studies	8-12
The Alternative Dispute Resolution process	13
Complaints from customers to water companies	14
Complaints by category	
Stage 2 complaints to water companies	17
Individual company performance	18-22
Appendix	24-25

Introduction

CCW is the independent voice for water consumers in England and Wales.

We help customers who have not been able to resolve a complaint against their water company. We also provide free advice and support. Every year, we help thousands of customers reach a satisfactory conclusion to their complaint, including securing financial redress or changes that lead to an improved service. All of CCW's work is informed by extensive research, which we use to champion the interests of consumers and influence water companies, governments and regulators.

This report looks at complaints made to companies and to CCW and focuses on the experiences of household customers (not businesses). It draws together the intelligence and insight CCW has gathered from the complaints made directly to water companies and those where customers have sought our help to get a resolution. We use this to establish where there might be specific issues at a company or industry level that are impacting customer service and need to be addressed. By identifying the reasons behind customers' dissatisfaction, we can then work with companies to tackle these problems.

The stages of complaints

There are three stages in the water industry complaint procedure. This report references all of them.

Many customers contact their water company to make an enquiry.

- If these initial queries are answered immediately, they are classed as contacts and not complaints. These contacts are not included in these numbers.
- A complaint is classed as the customer expressing dissatisfaction (rather than just asking a question). A Stage 1 complaint is where the customer has made a complaint and the company has issued its first official response.
- A Stage 2 complaint is one that has not been resolved by the company at the first attempt.
- If a complaint is still not resolved to a customer's satisfaction at Stage 2, they can bring the matter to CCW for us to review it. When we take on a complaint for a customer we use a number of different methods to resolve it, including negotiation, mediation and adjudication.

Key findings

Complaint volumes have gone up.

CCW finds it completely unacceptable that complaints that have had to be escalated to us have gone up by 29% in the last year that's even higher than the 10% rise in complaints that customers made directly to their water company.

Water companies must do more to sort out complaints at the first opportunity. Customers should not have to spend more time than necessary to resolve their complaint.

To address this, CCW is using our expertise to help companies to understand and resolve the root causes behind the escalation of complaints. We did two-day complaint assessments at five water companies in 2023-24, and we will have visited every water company in England and Wales by the end of March 2025.

In addition, Ofwat must properly hold water companies to account for poor customer service and include customer complaint volumes as part of the C-MeX financial mechanism.

Issues with water bills are still the main driver of complaints

Billing is still the biggest category of complaints and the volume of these has increased in total – both in complaints made directly to water companies and in what comes through to us.

Within complaints about bills, more people have complained this year about water meters, disputing their metered bill being the largest cause of complaint to CCW. CCW finds this worrying because, over the next few years, more and more homes will be fitted with water meters.

So companies need to get this process right for customers before it affects more people.

To address this, CCW will be working with the industry over the next year to establish what information customers need about water meters, and how that can be given to them in the way they find most useful.

People are expressing more worry about the environment

Given that trust in the water industry is at an all-time low¹, CCW was not surprised to see general complaints about environmental performance – mainly relating to storm overflows and sewage spills into rivers and the sea – which customers brought to us have increased by a huge 217%.

CCW's recent research² shows that the strength of people's feelings about water companies' responsibility for polluting the environment does not directly correlate to their water companies' actual performance in this area.

^{1.} Water Matters 2024 - CCW ² Environment Matters: The data from Water Matters 2024 - CCW ^{3.} CCW's response to Ofwat's 2025-30 draft price determination - CCW

The industry as a whole needs to improve on this matter; it's not any one company's issue. We have pointed out to the industry that until it improves not just performance, but people's perceptions of performance, trust will be hard to earn back.

CCW wants to see companies collecting and using data to produce – and share publicly – storm overflow delivery plans that clearly prioritise reducing harm and improving the environmental health of our rivers, lakes and seas.

So we are asking Ofwat to direct water companies to fix the most harmful storm overflows first, not just tackle the "easy" ones³.

Complaints that come through to CCW

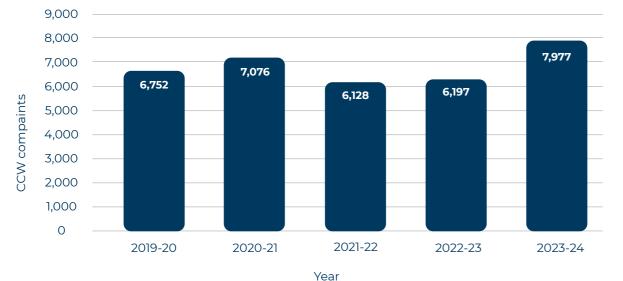
CCW is the water consumer watchdog. After a company has had two chances to resolve a customer's complaint, if they are not satisfied, they are entitled to bring it to us.

CCW can help people with most complaints that they bring to us. We're experts in customer service but there are some issues, like complaints about general water industry performance, that are for regulators like Ofwat or the Environment Agency to look at. When people bring these types of issues to us, we direct them to the right place, but we also keep a record of them to help build our evidence base. This in turn informs our research and makes sure we have a clear picture of people's views on the water industry, so we know where to challenge companies to do better.

Complaints coming through to CCW have increased by 29% since last year to 7,977. This is the highest total number since 2015-16. CCW finds this completely unacceptable. By the time CCW actively takes on a complaint it will have exhausted the company process.

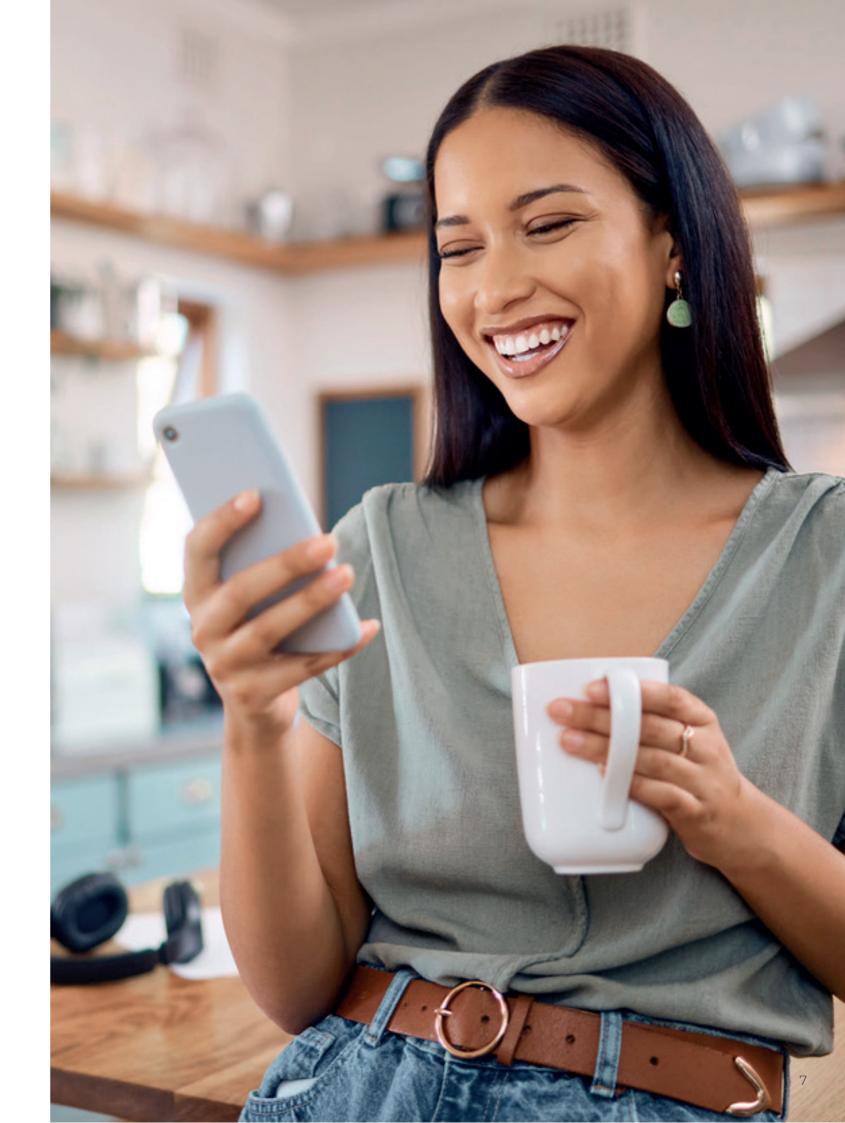
This means a customer has normally made an enquiry; complained once (Stage 1); not got a resolution; complained again (Stage 2) and still not got a resolution from their water company. Companies have up to 10 working days to respond to a complaint, but we can see from our records that the process before a customer comes through to us can take several months.

Companies can send a response within 10 days, but then follow-up work, such as visiting sites, investigating problems and finding solutions, can take far longer.











Case study 1 - billing issue

Adam's Direct Debit was reduced by his water company without any explanation. When he called the company to ask about this, it confusingly suggested that there might be a leak, so increased the Direct Debit. The customer asked the company to come out and check for the suspected leak by performing a couple of tests at the meter, which the company agreed to do, but later cancelled the appointment. The company asked Adam to arrange for a plumber to confirm there was no leak instead, saying it would refund the plumber's cost. Adam did this, but the refund was not issued. Multiple complaints were raised due to poor service and unresolved issues, leaving Adam frustrated and dissatisfied with the service.

After a lot of effort on Adam's part, the company gave him a leak allowance – this is a reduction to a water bill to cover the cost of any water lost through a leak - but gave no explanation of how this had been calculated. It also gave Adam a goodwill gesture of £40 for poor service, but many questions remained unanswered.

CCW raised a formal investigation with the water company, detailing the multiple service failures and the sheer effort the customer had needed to make in getting the company to understand the problems. We requested the company address the outstanding questions and review the promised refund and goodwill payments for poor customer service. Following the investigation, the water company acknowledged its failures and agreed that the number of Stage 1 and Stage 2 complaints the customer had to raise was unacceptable. It agreed to honour the promised refund for the plumber appointment (£250), increased the goodwill gesture to £140 and agreed to send a letter of apology to the customer for the service failings.

Adam accepted the improved resolution CCW had secured for him and was grateful for CCW's help. However, the fact that it took eight months, and CCW's intervention, to reach this conclusion is an example of poor service. This matter took far too long to resolve, and whilst the outcome acknowledges and apologises for that, it was an avoidable protraction.



Types of complaints that come through to CCW

All types of complaints to CCW have increased since last year. To try and stop complaints happening in the first place, in 2023 CCW introduced complaint assessments with water companies. To date, we have completed five assessments.

Complaint assessments are two-day deep dives carried out by a team of CCW consumer experts, including our Director of Consumer Relations. We sit with the water companies' complaints teams, randomly select cases from a list of the most recent complaints and go through them in detail – revealing and discussing what was done well and what could have been handled better. Some of these are one-off mistakes, but over the two days, some wider learning points usually emerge. Where we uncover good practice, we encourage companies to share it with others, so the industry as a whole can improve.

As well as discussing findings in detail while onsite, afterwards, CCW sends the companies a report about what was found and gives them a list of clear action points. Follow-up sessions then ensure CCW and the company track progress against the action points, to make sure improvements are being made.

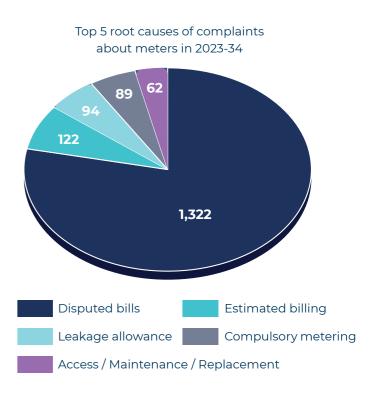
Water companies tell us they find these assessments really useful, and we have already seen them lead to change within companies and improvements to the way complaints are handled.

Complaints about bills

Complaints about bills increased by 31%. All companies in England and Wales, except South West Water and Southern Water, generated more billing complaints than they did last year.

Complaints about water meters

Complaints from customers to CCW about water meters have increased by 30%. These types of complaints include disputes about meter readings; how often meters are read; getting access to meters in order to read them; and whether they're working properly.



More and more households are being fitted with smart water meters - 13% of households now have one⁴. Smart meters allow customers to access meter readings far more frequently, usually via an app or the company's website.

In the past, CCW has seen complaints increase to companies and to CCW when metering programmes are rolled out, often around installation, reinstatement after work and first metered bills. Once meters are embedded, we do not see companies with more metered properties receive more billing complaints than those with fewer meters (appendix 9). This indicates customers' worries are not ongoing but driven by the initial meter installation. CCW finds an increase in complaints during the installation process and initial billing concerning. Most water companies are planning a big rollout of smart meters over the next few years. The current plans are for 48% of households to be fitted with a smart meter by 2030; 73% by 2040; and 76% by 2050⁵. We want companies to improve their communication and installation processes during the roll-out of meters, to reduce the number of complaints generated around this work.

CCW is supportive of smart meters in principle. They deliver many benefits – more real-time data should identify more leaks; customers and businesses can see clear information about their water consumption, which should help drive behavioural change to reduce usage; and smart meters will give water companies data to help them design innovative tariffs to encourage customers to use water wisely.

Water companies need to learn from early experiences of rolling out smart meters to make sure that installing and using them is as pain-free as possible for customers, and we are pleased companies are already sharing their experiences, good and bad, with each other.

This is especially important right now because, like the rest of the world, the UK is experiencing the effects of climate change, notably on our rainfall patterns and the number of extremely hot days. In addition, our population is growing. These factors are already putting a strain on our water supplies. Defra's Plan for Water⁶ sets out that by 2050, England has to cut its water usage to 110 litres per person, per day. Water companies in Wales have agreed to the same reductions. At the moment, the average daily use of water is 146 litres per person^{.7} That figure has stayed about the same for the last ten years – it even increased during the pandemic.

Complaints about sewerage services

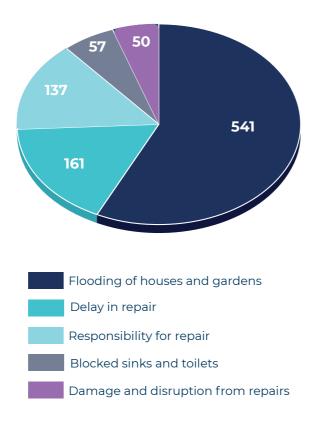
Complaints coming through to CCW about sewerage have increased this year by 62%.

The Environment Agency's annual Environmental Performance Assessment (EPA)

report of the environmental performance of England's nine water and sewerage companies showed that the total pollution incidents from sewerage and water supply assets increased to 2,174 – the second consecutive annual increase and highest number recorded since 2019.

Water companies say it has been a rainy year, which has caused increased storm overflow discharges, which are designed to prevent sinks and toilets getting blocked, and homes and gardens being flooded when sewers reach capacity. However, we continued to receive complaints from customers about these types of awful experiences.

Top 5 root causes of complaints to CCW about sewerage in 2023-34



CCW has also seen an increase in complaints about delays in clean-up services and repair of drains by water companies when somebody's property has been flooded, as well as in disputes over who pays for the costs of repair and cleaning up after a flooding incident.

CCW's research shows that, unsurprisingly, customers find incidents of sewer flooding highly disruptive and one of the most personally impacting events that they can suffer. CCW finds it unacceptable for rainy weather to cause this kind of horrible problem for thousands of people every year.

In our work with the water sector on updating the Guaranteed Standards Scheme (GSS), CCW is recommending that the current exceptional weather exemption from the sewer flooding standard should be removed. We are pleased that changes to GSS, including this recommendation, are being consulted on by the UK government.

The UK is experiencing increasingly extreme weather conditions resulting from climate change, and this will only continue. Water companies need to act quickly to improve the operation of their sewerage networks.

Complaints showing general concern about the environment

This year, CCW had a 217% increase in people complaining to us about environmental issues that are wider than specific problems affecting their actual property or water service. The majority of these complaints were about sewage being discharged into people's local rivers and the sea. In addition, we have seen reports that hundreds of customers are **boycotting** the sewerage part of their bills in protest over their water companies' environmental performance. Old, badly maintained pipes and other infrastructure is one of the root causes of sewer flooding⁸, and news stories that companies have historically paid dividends and bonuses instead of maintaining infrastructure makes bill rises to pay for the needed upgrading and improvements all the more unpalatable to people.

This comes as no surprise. CCW published **our latest Water Matters tracker report** in

May 2024. It showed customer trust in their water company at an all-time low. **We looked more closely into the data**, to understand the drivers behind this distrust, unpicking the elements customers were most dissatisfied with. We found that 40% of customers blamed their water company for putting 'too much pollution/sewage into the water'. That's as many as the next six reasons for dissatisfaction combined. And it's up from a quarter of people in the previous year's survey.

Over half of people also felt their water company was responsible for river pollution. But interestingly, these numbers did not at all reflect the actual performance of individual companies on spills from storm overflows. So a trust gap has opened up between perception and reality. Water bosses must explain and deliver their plans, then keep communicating about progress. If companies fail to do this, the strength of people's anger and frustration will grow while trust in the sector will continue to shrink.



^{5.} Appendix A: Smart metering in revised draft water resources management plans - GOV.UK (www.gov.uk)

^{6.} Plan for Water

^{7.} Discover Water Website

^{8.} Event Duration Monitoring - Storm Overflows - Annual Returns - data.gov.uk table 5 2022 EDM Storm Overflow Annual Return

Case study 2 -Environmental complaint

Bernadette had been refusing to pay her water company for wastewater services due to concerns about sewage dumping into the sea. Previous debt recovery actions were paused, but this hold had been removed and debt recovery action had started again.

The company told Bernadette that no rebates, refunds or compensation would be provided due to storm overflow releases, and it would pursue outstanding charges through its debt collection process for the unpaid part of the bill. The account was placed on hold for a few weeks to give the customer time to make the payment, but the company said it would not discuss the matter further and advised her to contact CCW for further support.

We explained to Bernadette that water companies are not obligated to suspend or delay debt recovery actions due to payment boycotts. We know that people feel strongly about this issue and feel that withholding payment is the only action they can take to express their frustration with storm overflows. However, we don't recommend it, as the debt recovery action can lead to credit ratings being affected and ultimately even County Court Judgements being issued against people.

Bernadette wanted CCW to get the company to stop or reinstate the hold on debt recovery action, but this isn't something we could do or something we support in this circumstance. Instead, we explained why we don't think withholding payment is the right way to protest and provided guidance on how to escalate her concerns through the appropriate regulatory bodies.

The Alternative Dispute Resolution process

On 1 December 2023, CCW took over the Alternative Dispute Resolution (ADR) process, making it quicker and easier for customers in England and Wales to resolve complaints.

Since we took over, CCW is sending fewer complaints through to adjudication (57 in the first four months of operation) than used to go to the previous ADR operator (153 in the four months before CCW took over). This is despite the overall increase in complaints coming through to CCW. The drop is because



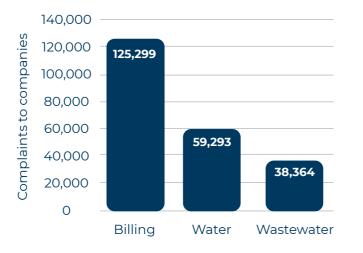
we are giving more help and guidance to solve customers' problems earlier on – at first contact with us, or customers are accessing our new mediation service. 41% of cases reaching our ADR stage are resolved through mediation or giving advice to customers.

Complaints from customers to water companies

The largest number of complaints from customers to water companies in 2023-24 were about billing issues, followed by complaints about water services, and then wastewater (sewerage) services. In 2023-24, the water companies received 222,956 complaints.



Total complaints to companies by category in 2023-24



Complaint by category

This is the second year that companies have reported total complaints by all contact methods – written, phone, email and social media.

So this is the first year that CCW has had the opportunity to properly compare how companies are performing year on year.

Explanatory note

The figures and text in the rest of this section, Complaints from customers to water companies, does not include Southern Water.

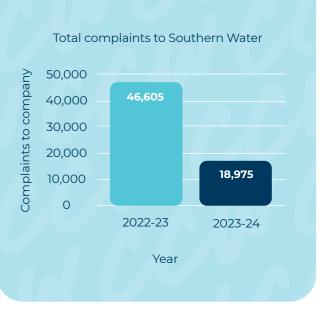
This is because of a system error identified in Southern Water's historic recording of its operational (water and wastewater) telephone complaints.

Contacts to the company were being incorrectly recorded as complaints and this means its figures for 2022-23 were wrong. CCW first notified Southern Water of this mis-recording in 2022, following an independent audit of all companies' complaint recording.

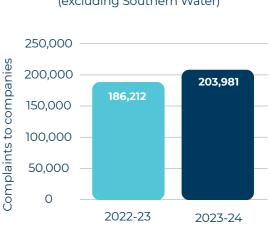
Southern Water's correction of this error has led to such a decrease in complaints that it affects the industry total. With Southern Water included, the industry has received fewer complaints. But with Southern Water excluded, the industry has received more complaints. In light of this, because Southern Water's improvement in operational telephone complaints is, in the main, due to a correction of an error, not a decrease in complaints received, CCW has made the decision to exclude its totals from all year-on-year comparisons 2022-23/2023-24 from this report so as not to skew the figures for the whole sector.

We note the company has seen a decrease in its billing telephone complaints and in its written complaint levels year on year; neither of which were affected by the error. 7% of households in England and Wales are served by Southern Water.

But 9% of the complaints in 2023-24 were to Southern Water.



Excluding Southern Water, the total number of complaints from customers to water companies has gone up by 10% this year.



Total complaints to companies (excluding Southern Water)



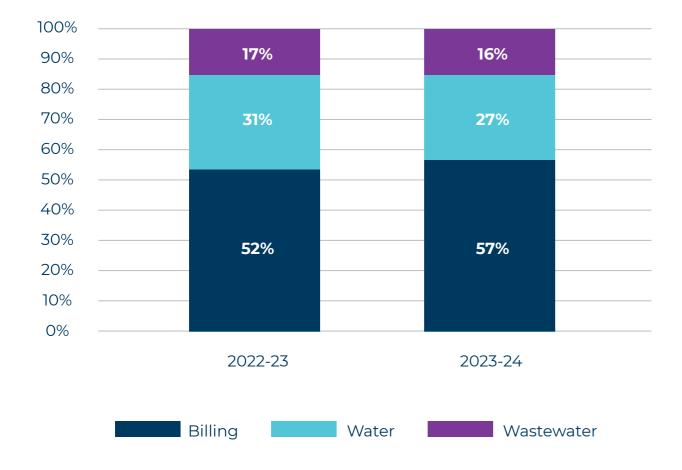
Complaints by category

Complaints about bills – queries about the amount, affordability, payments and how to pay – continue to make up the majority of complaints to water companies. 57% of all the complaints this year were about billing, compared to 52% last year.

Alongside the proportion increasing, the total number has too; there's been a 21% year-onyear increase in the number of complaints to companies about billing issues. Complaints about water services (leakage, low pressure, no water supply) have dropped by 5% this year, but they still make up the second largest group of complaints.

Complaints about wastewater (sewerage service) remain steady at 16% of total complaints.

Proportion of total compaints to companies by category (excluding Southern Water)

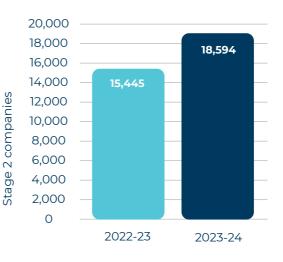


Stage 2 complaints to water companies

The data and text in this section, Stage 2 complaints to water companies, does include Southern Water. This is because the error only affected contacts recorded at Stage 1, so Stage 2 complaint numbers are unaffected.

The total number of Stage 2 complaints to all water companies in 2023-24 has gone up by 20% since last year. CCW is really disappointed that not only have total complaints risen, but that the number of Stage 2 complaints – where the water company didn't resolve the issue first time – has proportionally increased even more. Put simply, this means that compared to last year, water consumers have had more things to complain about and have felt less satisfied with the first answer, so needed to ask the company to review its position more times than last year.

Stage 2 complaints to companies



Year



Individual company performance

CCW examines the performance of individual water companies by comparing them with others that provide the same main services; i.e. we compare water and sewerage companies and water-only companies separately.

Our comparison takes into account two distinct metrics for performance - the total complaints received by companies from customers and our complaint-handling metric. The complainthandling metric provides a more holistic picture of how well companies are dealing with complaints. It uses a combination of the number of Stage 2 complaints a company receives - an indicator that complaints are not resolved to the customer's satisfaction by

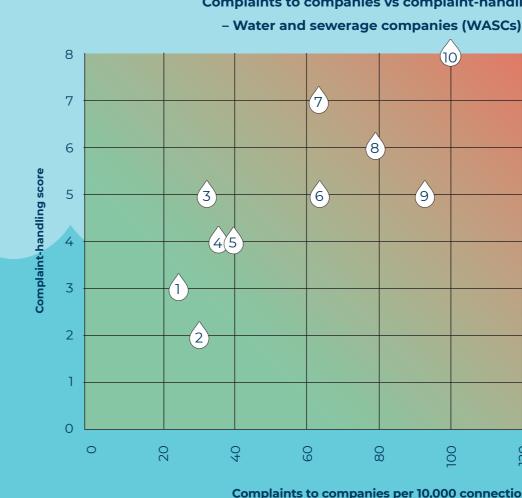
companies - and the number of complaints customers bring to CCW for resolution. Individual complaint-handling calculations for companies are shown in Appendix 1b.

This section provides additional commentary on the performance of companies that demonstrated better or worse than average performance in both metrics. It is possible for companies to have high levels of complaints, while also being good at handling them or a low level of complaints and be poor at handling them. Customers don't want to complain, so the ideal is for companies to not generate complaints, but if they do, they should handle them well.

Water and sewerage companies - overall complaint performance 2023-24

Company	Complaints to companies per 10,000 connections ⁹	Complaint handling	Good
			Better than
Anglian Water	34.4	Better than average	average
Dŵr Cymru Welsh Water	62.1	Poor	
Hafren Dyfrdwy	22.5	Better than average	Worse than average
Northumbrian Water	33.1	Better than average	average
Severn Trent Water	31.2	Worse than average	Poor
South West Water	79.0	Worse than average	
Southern Water	91.3	Worse than average	
Thames Water	139.0	Poor	
United Utilities	63.6	Worse than average	
Wessex Water	25.6	Good	
Yorkshire Water	97.6	Poor	

⁹. See Appendix 1a for details of how the complaints metric is calculated. A lower score shows better performance.



1. Hafren Dyfrdwy 2. Wessex Water 3. Severn Trent



Of the water and sewerage companies, Thames Water and Yorkshire Water had the largest number of complaints per household served that came through to CCW. This, combined with their high Stage 2 complaints, meant they were both poor performers in our complaint-handling metric, as well as being the companies that received the most complaints directly from their customers per 10,000 connections.

Wessex Water had the fewest number of complaints come to CCW, which, combined with its low Stage 2 complaints, gave it the best complaint-handling score. Hafren Dyfrdwy

Complaints to companies vs complaint-handling



/	\land		\mathbf{i}
	10	<u> </u>	
8			
1			
9			
	0 0		

Complaints to companies per 10,000 connections

- 7. Dŵr Cymru Welsh Water 8. South West Water 9. Southern Water
- 10. Yorkshire Water **11. Thames Water**

- received the fewest complaints per 10,000 connections directly from its customers, with Wessex Water a close second. Wessex Water is the only water and sewerage company to score well in both metrics.
- CCW is disappointed that Thames Water has moved into the worst performer spot, with customers making more complaints directly to the company - as well as to CCW - than any other supplier. Twenty-three Thames Water customers in every 10,000 have to make a Stage 2 complaint - that's four times higher than the overall industry rate.

CCW went to Thames Water in January 2024 to do a two-day complaint assessment with the company's Customer Team. We have since been working closely with them to identify the root causes of those complaints to support improvements in how they handle them. The causes of complaint and handling issues we saw were myriad and diverse, but CCW sees no excuse for Thames Water not to be able to address them. We have been pleased with Thames Water's improvement plan focusing on the issues, and its willingness to take on board our suggestions. We hope to see complaint numbers fall in 2024-25; early indications are promising.

We are disheartened to see Yorkshire Water's position. Despite a slight decrease

Affinity Wate

Bristol Water

SES Water

Cambridge Water

Portsmouth Water

South East Water

South Staffs Water

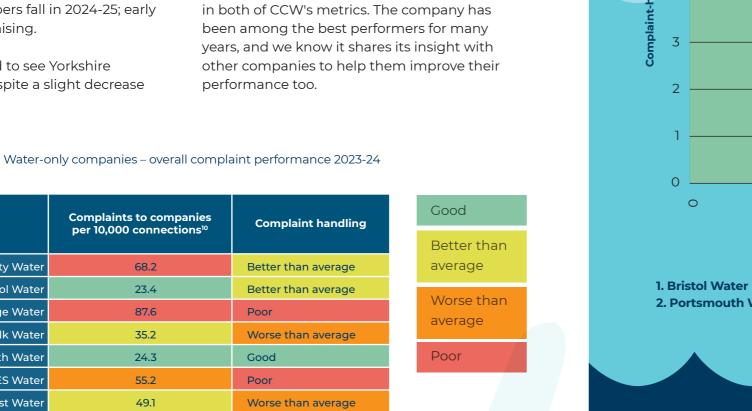
Essex & Suffolk Water

Company

in complaints made directly to the company - and some minor improvements on billing and sewerage - this performance is still unacceptable. Most concerningly, the company's ability to resolve complaints has declined – its Stage 2 complaints have increased by 20%, and complaints to CCW have increased by 90%. CCW has recently carried out a complaint assessment and we will be looking for the company to act on our findings.

Wessex Water was the only water and sewerage company to achieve a green rating

Worse than average



^{10.} See Appendix 1a for details of how the complaints metric is calculated. A lower score shows better performance.

68.2

23.4

87.6

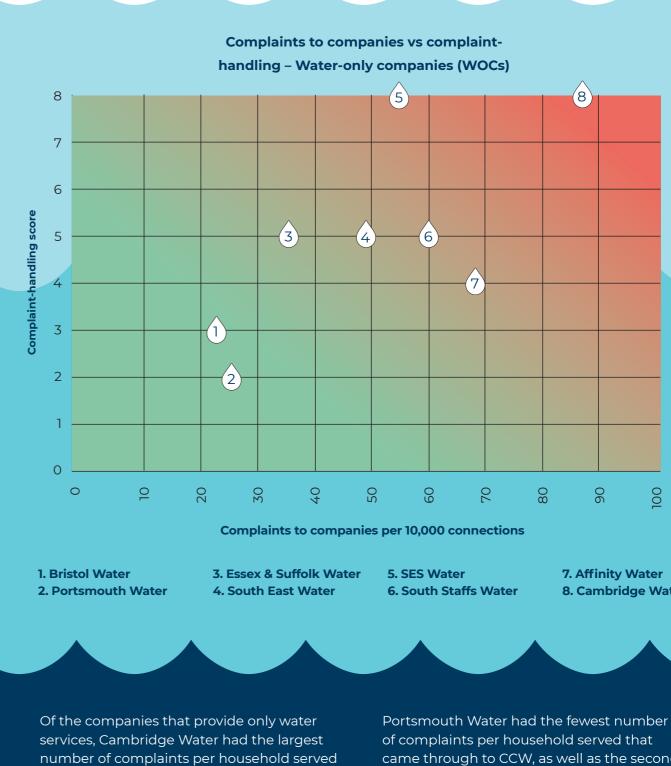
35.2

24.3

55.2

49.1

59.5



that came through to CCW – up 77% compared to last year. Complaints to the company have more than doubled in the last year. This was driven by huge increases in complaints about bills, and most of those related to metered bills. We are aware that system issues caused problems with meter readings, which had to be manually processed.

The company assures us it has addressed the issue, and we will see a drop in the number of complaints its customers make as a result.

8. Cambridge Water

came through to CCW, as well as the second lowest number made directly to it per 10,000 households served. Last year, Portsmouth had low levels of complaints directly from its customers, but an 'above average' complainthandling score.

It's great that the company has improved again this year to now be a good performer in both measures – the only water-only company to achieve this.

Customer experience and financial rewards for water companies

In April 2020, Ofwat introduced C-MeX – a financial and reputational incentive mechanism designed to provide customers in the water sector with excellent levels of service. Companies receive a score based on the satisfaction ratings given by customers in monthly surveys.

Each company can receive outperformance payments, or incur underperformance payments, based on how it scores compared to other companies.

When it comes to complaints, we'd rather customers didn't have to make them at all and we think companies should therefore be financially incentivised to reduce them. High volumes of complaints are evidence of a poor experience for many customers and can be an indicator of more fundamental problems.

We want to see an additional metric put into C-MeX that measures customer complaint volumes (per 10,000 connections).

That measure should make up 25% of the value of C-MeX. If Ofwat believes that **"providing an excellent customer experience for customers is fundamental for maintaining trust and confidence in the water sector,"** it must provide financial incentives for water companies to do that right from the start.



Appendix 1a: Our methodology

Normalising complaints

To allow us to compare companies of different sizes, our complaint metrics factor in the number of water and wastewater connections served by each company. The metric we use to do this is 'complaints per 10,000 connections'. For example:

Company A

Total complaints	600
Total connections	4,000,000
Total complaints per 10,000 connections	= 600/4,000,000 x 10,000 = 1.5

Volume of complaints

Table A1

We use total complaints (per 10,000 connections) to reflect the underpinning service.

This is assessed based on quartiles where quartile 1 is the best performing quartile. The colour coding is as follows:

QuartileTotal complaint rank1Better performance2Better than the median3Poorer than the median4Poorer performance

Complaint-handling score

The complaint-handling metric is a composite of the percentage of escalated Stage 2 complaints (compared to total complaints) received by companies and complaints made about companies to CCW per 10,000 connections. Both components are based on the quartile performance within WaSC and WOC bandings where Quartile 1 is the best performing quartile. Each quartile is then scored as follows.

Quartile 1: 1
Quartile 2: 2
Quartile 3: 3
Quartile 4: 4

Comparative Performance

Where we compare the performance of individual companies we do so within their respective segments as either Water and Sewerage Companies (WaSCs) or Water Only Companies (WOCs).

Our metrics

We assess company complaint performance based upon two metrics designed to reflect the underlying service provided to customers and the ability of companies to resolve customer complaints first time.



The respective scores for Stage 2 complaints and Complaints made about companies to CCW for each company are then added together to determine their respective complaint-handling score. Each company is then assigned an overall complaint-handling ranking in accordance with the following criteria:

Table A2

Total score	Complaint-handling rank
2	Good
3-4	Above average
5-6	Below average
7-8	Poor



The voice for water consumers Llais defnyddwyr dŵr



Contact us

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