

**Yorkshire Forum for Water Customers
Minutes of Meeting
16 October 2025
Microsoft Teams Meeting**

Attendees:

Chris Griffin	Independent Member
Dave Merrett	Independent Member
Fiona Morris	Environment Agency
James Copeland	National Farmers Union
Kursh Siddique	Independent Member
Steve Grebby	Consumer Council for Water

Apologies:

Guests:

Kirstin Hutchinson	Yorkshire Water
Donna Hildreth	Yorkshire Water
Josh Clayton	Yorkshire Water
Tim Myatt	Yorkshire Water
Rachel Barnard	Yorkshire Water

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1. Minutes

- a) The minutes from September's meeting will be circulated to Forum members for feedback and approval outside of the meeting.

Action 1: Members to provide any feedback on September's minutes by 31st October.

2. Actions

- a) Open and in-progress actions were reviewed.
- b) Actions from November 2024:
 - i. *The Company to finalise decisions about the future of the Forum. In progress.* Following the Cunliffe review, a pause will be taken to clarify expectations before reviewing and updating the Forum's operations for AMP9.
- c) Actions from June:
 - i. *Further detailed reporting on complaints to be brought to July's meeting. Complete.*
- d) Actions from July:
 - i. *The Company provide an update in September or October on the regulatory landscape. Complete.*
 - ii. *The Company to provide an update on pollution challenges at the next environment subgroup meeting following the Interim Report publication from the Environment Agency and the Pollution Reduction Plan. Remains open due to delay in publication.*
 - iii. *The Company to share the recent Ofwat sewer flooding response submission with the Forum for review, focusing on response times and planned improvements, and present this information at August's meeting. Covered at the October Environment subgroup. Complete.*
 - iv. *Update on LORI AMP7 final position to be brought to the environment subgroup. Covered at October's Environmental subgroup meeting. Complete.*
- e) No meeting in August.
- f) Actions from September:
 - i. *The Company to meet with the chair before October's meeting to discuss building a sustainable future for the Forum. Complete.*
 - ii. *Members to provide feedback or suggestions on the future of the Forum to the chair before October's meeting. Complete.*

- iii. The Company to share the Pollution Incident Reduction Plan (PIRP) with members at a future meeting. **Open.** On November's agenda.
- iv. The Company to provide a breakdown of C-MeX negative drivers at the next Affordability & Vulnerability subgroup. **Open.** On November's A&V agenda.
- v. Add Cunliffe C-MeX reform review to the next A&V subgroup agenda.

Complete.

g) New actions from October:

- i. **Action 1:** *Members to provide any feedback on September's minutes by 31st October.*
- ii. **Action 2:** *The Company to issue a poll to determine preferences for future meetings.*
- iii. **Action 3:** *The Company to offer guidance on how the Forum can most effectively advocate for increasing the Company's ambition regarding the ISF/ESF response time target.*
- iv. **Action 4:** *The Company to clarify its ISF/ESF commitments in 2020 and address the apparent non-delivery.*
- v. **Action 5:** *The Company to share the Complaints slide deck.*
- vi. **Action 6:** *The Company to return to the Forum with further details on regulatory changes when they are known.*

3. Update from the private members session

- a) The Chair raised the need to review the meeting schedule and location for 2026 meetings.

Action 2: The Company to issue a poll to determine preferences for future meetings.

4. Update from the Environment Subgroup

- a) The subgroup Chair provided an update on the recent meeting.
- b) The subgroup Chair reported that the Company presented an update on environmental and pollution performance. The Water Industry National Environment Programme (WINEP) delivery programme remains on schedule for AMP8, with necessary frameworks and financial approvals established. Building on lessons from AMP7, the Company has incorporated a six-month float into each scheme to facilitate compliance demonstration. While several schemes have now fallen below this float, remedial actions are being implemented to realign the programme. Early discussions with the Environment Agency (EA) regarding potential extensions are also underway.
- c) Internal reprogramming is under consideration to prevent the concentration of schemes in the final year, and opportunities to advance certain schemes are being reviewed. With respect to the transition from AMP7 to AMP8, the Company provided additional information about the challenging delivery timelines for “no deterioration” schemes, noting that substantial investments will be required. Strategies such as fast-tracking and streamlining of processes have been adopted to meet deadlines, and options including early commissioning and mothballing of completed schemes are being evaluated to mitigate end-loaded delivery. This approach is informed by experience gained during AMP7.
- d) In year one of AMP8 (including year six of AMP7), 81 schemes are scheduled for delivery, with five complex Pudsey schemes deferred to 2028. As a result, a penalty will be incurred in the year one EPA.

Length of River Improved (LORI)

- e) The subgroup chair relayed the Company’s update, noting that 18 projects were unfinished by the end of March; however, 6 of these have now been completed. The main reasons for the delays included supply chain issues due to high industry demand for equipment, shortages of control panels, and

chemical dosing problems that required switching from ferric to polyaluminium chloride.

- f) The subgroup requested ongoing updates on LORI performance at future meetings.

Sewer flooding response times and customer service

- g) The Chair shared the update on the Company's new approach which has the aim of achieving agreed response times for both internal and external sewer flooding (ISF/ESF). Additional resource has been dedicated to ISF resolution, including some more experienced technicians, with a view to achieving the 4-hour response by the start of the next financial year. The Company plans to introduce improvements to the ESF response time after the ISF improvements have been established, an approach challenged by subgroup members since ESF experiences can be just as disruptive to customers as ISF.
- h) The subgroup Chair asked that a follow-up on ISF and ESF response times be brought back before the subgroup in Autumn 2026.
- i) Forum members noted that a promise had previously been made in 2020 to improve response times for ISF including hiring 300 engineers and deploying vans across the area, and that this commitment was not met.
- j) Members debated whether this was a new promise or a reiteration of a previous promise; the slow pace of delivery compared to other companies; scepticism about whether the new targets will be met; and a need for flexibility based on severity and impact rather than a fixed target.

Action 3: The forum requested a pathway to effectively challenge the Company's ambition concerning the ISF/ESF response time target.

Action 4: The Company to clarify its ISF/ESF commitments in 2020 and address the apparent non-delivery.

- k) A member noted that improving the response times for ISF and ESF would be expected to substantially improve overall customer satisfaction scores.

Carbon emissions and Net Zero transition

- l) The subgroup chair communicated the updates from the Company on how Net Zero is being integrated into business strategy and aligning with Ofwat's Climate Change principles.
 - i. AMP7 achieved a 10.5% reduction in operational emissions (against a target of 12%) and a 27.4% reduction in capital emissions (against a target of 23%). The

Company attributed the shortfall to an increase in asset base and population growth.

- ii. The subgroup Chair reported that while the Company aimed to save 770k tonnes of embedded emissions during AMP7, just over 500k tonnes was achieved—equivalent to a year’s operational emissions—but gains were offset by emissions from capital projects and population growth.
 - iii. The subgroup heard that AMP8 targets are based on fixed 2022 emission factors, as stipulated by Ofwat, with significant upward pressure from new capital projects. The Company is investing over £100 million in energy efficiency, renewables, fleet transition, chemical optimisation, and process emission reduction.
 - iv. The Company’s net zero transition plan aims for a 46% reduction in operational emissions by 2030 and 80% across all scopes by 2050, with a focus on absolute reductions rather than offsets, as favoured by customers.
- m) The subgroup Chair concluded the summary of the subgroup meeting by recommending it undertakes a review of lessons learned from the year’s extreme weather and drought events.

5. Business Update

- a) The Company provided an update on Water Resources noting that reservoir levels are now at 53% and have risen for the past 5 consecutive weeks. They still remain 18% lower than this time in 2024. Customer communications regarding water conservation are ongoing, however activities such as car washing and garden watering are less common during this season. A member noted that 2024 had been a particularly wet year, however the Company responded that it was still low compared to the last 10 years. Temporary Usage Bans (TUBs) are to remain in place for the foreseeable future.
- b) The Competition and Markets Authority (CMA) has issued its provisional determination. Although the Company is not participating in this process, the provisional outcomes have been published.
- c) Ofwat has released their draft determination for the “blind year” reconciliation. After the APR is published, Ofwat reviews the Company’s data to confirm accuracy and agreement on rewards, penalties, and any necessary adjustments. The “blind year” primarily addresses differences between forecasts from the price review and actual outcomes, serving as a final tidy-up. There are no major or unexpected issues, except for one development related to river improvements.

- d) The Annual Performance Report (APR) noted a shortfall of 114 kilometres in the LORI Performance Commitment (PC). Despite this, all planned improvements will proceed. Instead of imposing the immediate £6 million penalty for missing the target in AMP7, the regulator proposes deferring payment and requiring delivery through a new Price Control Deliverable (PCD). The Company is reviewing the implications of the PCD and will provide further information in the next meeting's business update.
- e) A member noted that Ofwat's actions highlight the need to review the approach to LORI projects. In AMP7, many last-minute, high-cost projects were justified by comparing costs to potential penalties. They said the Company should prioritise timely planning, value for money, and environmental outcomes rather than just avoiding penalties. They noted that efficiency and providing reassurance in achieving environmental goals is essential.

6. Complaints Update

- a) The Company shared update complaints performance including key themes around the cause of complaints and the C-MeX recovery plan.
- b) The Company highlighted that, when compared to Financial Year (FY) 25, Stage 1 complaints in FY26 are down. Stage 1 reflects the first step in a formal complaint, in line with Consumer Council for Water (CCW) guidance. NFA complaints (No Further Action), represent customer dissatisfaction that is resolved without requiring escalation to the formal complaints process.
- c) The Company explained that a systems issue in June had caused a spike in Stage 2 complaints (Stage 1 complaints were not being made visible) but that this is now resolved. A member asked why this had not been identified sooner, and the Company responded that because Stage 2 complaints are measured as a proportion of Stage 1, they initially attributed it to a decrease in Stage 1 complaints.
- d) The Company stated that the investigation found customers were generally satisfied with the time required to complete the work but expressed dissatisfaction with the communication regarding the work.
- e) The Company voiced the opinion that there is room for improvement in the way it uses technology to help keep customers updated. The Company stated that using new technologies for customer updates is challenging, so it has formed a team focused on keeping customers informed.
- f) The Company observed a shift in the nature of complaints, with customers now submitting concerns on topics such as traffic lights, road closures, and delayed works that were previously less commonly raised.

- g) A member inquired whether the increase in complaints was related to customers' greater awareness of the process and motivation to participate. The Company observed more visits to its complaints page and an uptick in clicks to CCW's website. It also identified several Facebook groups that share generic complaint templates for water company customers. Additionally, factors such as rising bills, pollution incidents, and a hosepipe ban contributed to greater customer scrutiny.
- h) The Chair asked if the IT issue, which resulted in a delay in addressing complaints, had affected overall customer perceptions of their experience. The Company replied that they had seen a dip in satisfaction scores during that month, which had since recovered. C-MeX was not impacted but this is thought to be due to the very small sample size.
- i) The Company stated that it has established several additional roles dedicated to managing Internal Sewer Flooding (ISF) and Reduced Toilet Use (RTU) throughout the process. This decision was based on research indicating that these issues significantly affect customers.
- j) To lower NFA complaints, the Company will use a "second voice" model in which customers wanting to complain are transferred to a more experienced agent for resolution before a complaint is made.
- k) A member suggested social media replies are often too brief and could be improved. The Company responded that it is continuing to strengthen its social media team to provide better engagement online.
- l) The Chair asked if introducing a "second voice" was genuinely benefiting customers or an attempt to reduce the incidence of escalated complaints. The Company responded that it aims to train all agents to the "second voice" standard, eventually eliminating this step and making interactions easier for customers.
- m) The Chair raised concerns about how complaints are categorised, particularly when a customer has a poor experience with the first agent. The Chair suggested that such cases should be treated as complaints, regardless of whether the issue is with the customer experience or initial issue of the call.
- n) The Chair also questioned whether the Company would transparently report cases that require escalation to a "second voice" and whether these would be tracked separately for analysis.
- o) The Chair asked how the Company would handle situations where a customer declines to speak to a second agent. The Company confirmed that such cases would still be escalated and treated as complaints, following the same process as telephone complaints, with a 24-hour period to attempt resolution before moving to the next stage.

- p) The Company observed that most complaints are not about the conduct of the initial agent, but rather about the information provided or the outcome. The 24-hour window is used to review the case, set expectations, and attempt to resolve the issue before it progresses further.
- q) The Company noted that some customers prefer to hear information from a second person for reassurance, especially in light of recent declines in customer trust. However, the Chair highlighted that for many customers—particularly those with limited time—having to contact the Company multiple times or speak to multiple agents can be burdensome and may be perceived as poor service. The Company acknowledged the challenge.
- r) The Company shared plans to introduce new communication channels over the next 12 months, including a WhatsApp channel and online problem reporting. The Company is also exploring video technology to allow customers to send videos of their issues, potentially reducing the need for phone calls. This is expected to be piloted before the end of the year.
- s) A member asked about the removal of case management. The Company explained that while it has always handled case management, higher-level cases were outsourced. This outsourcing was discontinued in favour of planned digital solutions, however these have been delayed by technical difficulties.
- t) A member recounted a bottled water supply issue, highlighting communication as the main challenge, especially how information was shared during an incident. Staff changes caused some confusion, though the escalation process worked well with a callback in 24 hours. The member felt the tone of the response aimed to prevent a formal complaint and suggested improvements to tone and terminology.
- u) They also recommended that future improvements should include GPS tagging, as used by power companies in video reporting, and adopting technology from GP surgeries where customers send videos or photos for more accurate assessments.
- v) The Company reported a rise in Clean Water complaints since April and with the introduction of TUBs, including over 200 TUBs-specific complaints and more than 1000 related written correspondences. Additionally, customers frequently reference the hosepipe ban when raising concerns about other issues, notably bursts and leaks. These factors have contributed to a rise in Stage 1 complaint volumes.
- w) A member asked about tracking complaints from vulnerable customers. The Company responded that CCW rated its responses to these complaints

positively, with fewer Priority Services Register (PSR) customers filing complaints even as PSR enrolment has increased.

Action 5: The Company to share the Complaints slide deck.

7. Regulatory Change

- a) The Company provided an overview of the impact of the Cunliffe Review. In July, the report of the Independent Water Commission was published containing 88 recommendations. It highlighted
 - i. The introduction of a single regulator covering the functions of Ofwat and Drinking Water Inspectorate (DWI).
 - ii. Greater catchment planning with companies working with local stakeholders to plan in 5 and 25 year periods.
 - iii. Replacing regulator-imposed "top down" targets with locally-driven goals that address specific community needs.
 - iv. Significant changes to strategic planning processes, noting some uncertainties remain.
 - v. Regulators moving closer to companies, in terms of governance and financial management, to better understand asset management and investment needs as well as the needs of the customer and the environment at a local level.
 - vi. Stronger government vision, proactive policy-making, and better alignment of customer and environmental interests.
- b) The government will review the recommendations and issue a White Paper outlining selected policies for consultation. A transition plan will also be developed to guide the sector from its current state to the desired future state.
- c) To change the regulatory framework, a fundamental review of the written legislation is expected taking up to a year. Changing to a single regulator is expected to take 2-3 years.
- d) The Chair asked about the government's commitment to regulatory change amid shifting priorities. The Company replied that the new Secretary of State has retained the three-stage strategy, but no specific commitments on timing or other details have been made.
- e) The Company noted that Defra has set up transition groups for regulators and companies to interpret and implement the Cunliffe Review's outcomes. Defra is also conducting individual discussions to assess practical application of recommendations but faces resource constraints. Ofwat has created a

transition forum for CEOs, and the new Secretary of State has invited CEOs to meet with her soon. The Company is engaging with key parties while it waits for these governmental decisions to be finalised.

- f) The Company believes appointing a new Chair and CEO for the regulator right away is crucial, allowing the regulator to start planning and making changes as soon as possible. Waiting until after the legislation is passed would significantly affect PR29 planning, especially since it's uncertain what responsibilities current regulators might have in PR planning by then.
- g) The Company stated that existing regulators continue to play a significant role in ensuring accountability during the delivery of AMP8. However, it emphasised that efforts and resources should not be spent on activities that will not transition to the new regulatory framework.
- h) The Company recommends that a bridging period be introduced between AMPs 8 and 9, raising concerns about whether it is reasonable to expect companies, regulators, and other stakeholders to implement 88 recommendations, establish a new regulatory body, fulfil the current business plan, and develop a new business plan—all within a five-year timeframe.
- i) The Company expressed its preference for promptly establishing an Implementation Council comprising current and prospective regulators, companies, relevant stakeholders and partners to guide the proposed changes in accordance with the government's long-term vision.
- j) It restated the importance of catchment partnerships, for example with local and national rivers' trusts.
- k) Members discussed challenges between local and regional planning as well as planning in a volatile political landscape.

Action 6: The Company to return to the Forum with further details on regulatory changes when they are known.

8. EPA report publication update

- i) The member for the EA suggested that the Environmental Performance Assessment should be discussed at the next meeting with the Company's Head of River Health also in attendance.

9. AOB

- a) No other business was raised.

Actions tracker –

October 2025

Ref.	Action	Status
1	Members to provide any feedback on September's minutes by 31 st October.	Open
2	The Company to issue a poll to determine preferences for future meetings.	Open
3	The Company to offer guidance on how the Forum can most effectively advocate for increasing the Company's ambition regarding the ISF/ESF response time target.	Open
4	The Company to clarify its ISF/ESF commitments in 2020 and address the apparent non-delivery.	Open
5	The Company to share the Complaint slide deck.	Open
6	The Company to return to the Forum with further details on regulatory changes when they are known.	Open

September 2025

Ref.	Action	Status
1	The Company to meet with the chair before October's meeting to discuss building a sustainable future for the Forum.	Open
2	Members to provide feedback or suggestions on the future of the Forum to the chair before October's meeting.	Open
3	The Company to share the Pollution Incident Reduction Plan (PIRP) with members at a future meeting.	Open
4	The Company to provide a breakdown of C-MeX negative drivers at the next Affordability & Vulnerability subgroup.	Open
5	Add Cunliffe C-MeX reform review to the next A&V subgroup agenda.	Open

August 2025

No meeting in August.

July 2025

Ref.	Action	Status
1	The Company provide an update in September or October on the regulatory landscape.	In progress

2	Dan Chubb to provide a summary on the consultation about in-period adjustments.	Complete
3	The Company to provide an update on pollution challenges at the next environment subgroup meeting following the Interim Report publication from the Environment Agency and the Pollution Reduction Plan.	Open
4	The Company to share the recent Ofwat sewer flooding response submission with the Forum for review, focusing on response times and planned improvements, and present this information at August's meeting.	Open
5	The Company to share details of the proportion of customers who find their bill unacceptable or responded neutrally to the Bill Affordability question.	Complete
6	The Company to provide further details on the differences between metered and non-metered customers in terms of their media perceptions.	Complete
7	Update on LORI AMP7 final position to be brought to the environment subgroup.	Open

June 2025

Ref.	Action	Status
1	The Company to respond on whether mains replacement plans have changed following issues in York (bursts in cast iron pipes within clay soil) and to explain why the Company had not previously addressed these issues, given that the risk was known.	Complete
2	The Company to provide any publicity plan for communication of the reasons for the bursts in York.	Complete
3	The Company to provide health and safety information about asbestos cement pipes, particularly relating to any issues involved in their replacement.	Open
4	Further detailed reporting on complaints to be brought to July's meeting.	Open

May 2025

All actions completed.

April 2025

Ref.	Action	Status
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1	The Company to clarify whether the proforma response to the Cunliffe enquiry can be shared with members as well as the written report.	Complete
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March 2025

All actions completed.

February 2025

All actions completed.

January 2025

All actions completed.

December 2024

All actions completed.

November 2024

Ref.	Action	Status
5	The Company to finalise decisions about the future of the Forum.	In progress