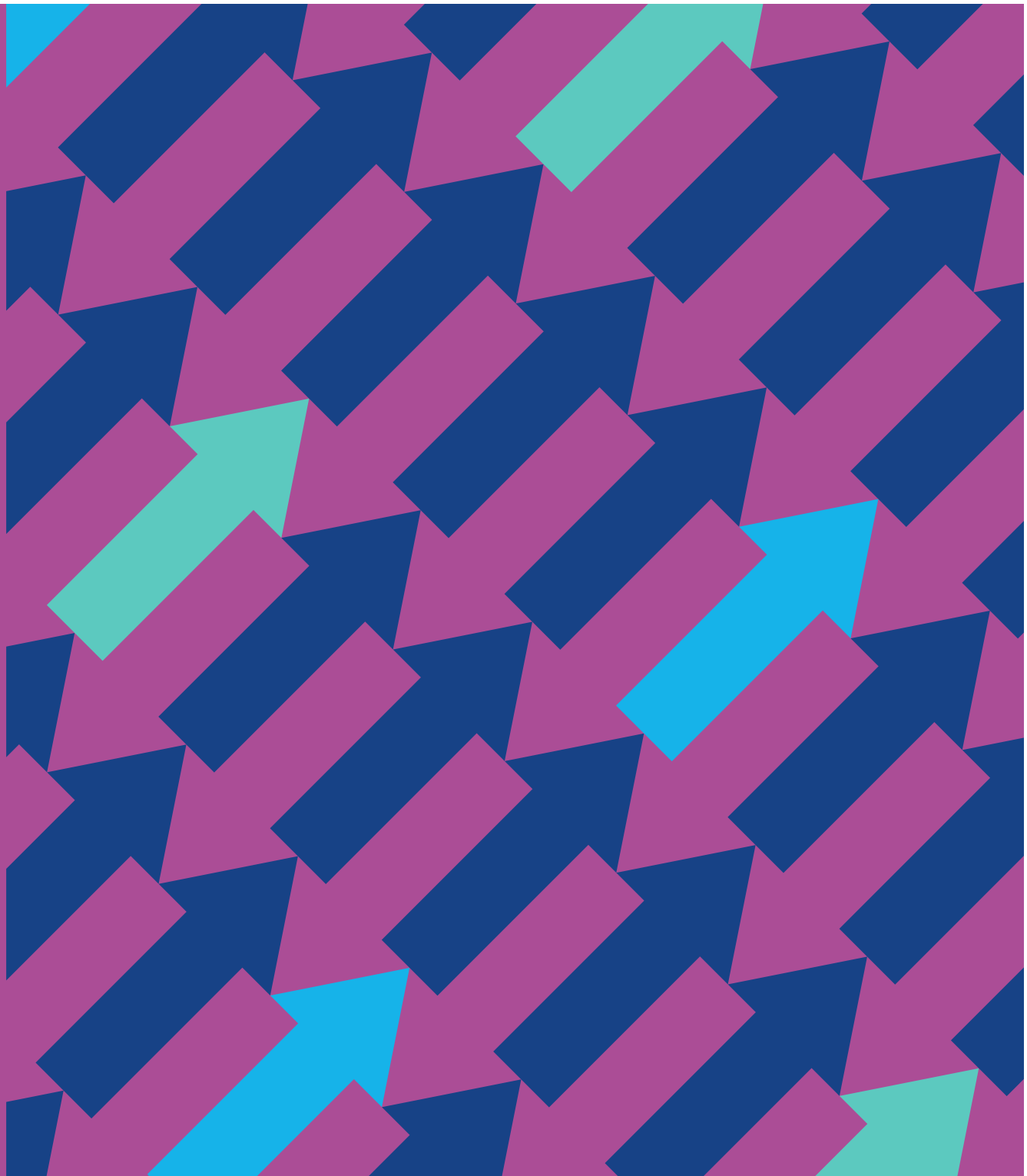


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# Return to Sewer Allowances

Customer Guidance

**RWG**



## Guide Summary

Water companies acknowledge that not all the water used at a property will go down their sewers and therefore the return to sewer percent is not 100%.

Introduction

Assessment of Allowance

Types of Allowance

Responsibilities

Most sewerage wholesalers apply a default Return to Sewer (RTS) figure of between 90-95% to their metered sewerage volume charges. This has the effect of automatically applying an allowance of between 5 to 10% in recognition that not all water used by measured customers' returns to sewer. This document provides the customer with the relevant responsibilities and processes for applying for a return to sewer allowance.



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## 1.0 Introduction

Where you have a water meter, your sewerage volume charges are normally based on the assumption that not all water consumed is returned to the sewer.

Most sewerage wholesalers apply a default Return to Sewer (RTS) figure of between 90- 95% to their metered sewerage volume charges. This has the effect of automatically applying an allowance of between 5 to 10% in recognition that not all water used by measured customers' returns to sewer.

It should be noted that some wholesaler's do not apply a default RTS figure so any non-return to sewer allowances will need to be claimed, via your retailer. For more details of your wholesaler's default allowance please see Appendix 4.

An RTS allowance may be applied in the following ways:

- against the volume of sewage returned to sewer
- included in the wholesaler's tariff
- accounted for on the trade effluent bill, where the customer pay's trade effluent charges.

Where a customer believes that the volume of water not returned to sewer exceeds the wholesaler's default allowance, they can apply for an additional Return to Sewer (RTS) allowance. Evidence must be provided to substantiate any claims (this is covered in more detail later on in the guide).

Once the RTS allowance is approved, the wholesaler will inform the retailer to adjust the customers' sewerage volume charges to reflect the correct discharge to sewer.

The RTS allowance should be reviewed periodically or where there is a significant change in circumstances e.g. the customer changes their process, or their water demand changes significantly.

## 2.0 Types of Allowance

There are a number of reasons why water does not return to the sewer. These include:

- Evaporation (e.g. boiler, cooling towers, heated swimming pools, launderette);
- Irrigation (e.g. garden centre/golf club/football club);
- Removed off site (e.g. swimming pool bathers' costumes & towels; tropical fish shop; disposal off-site due to interceptor or tank cleaning);
- Added to a product (e.g. cement works, bakery, food & drink manufacture, Livestock farms).

## 3.0 Assessment of Allowance

The allowance is normally quantified by the installation of private sub meters to enable charges to be based on accurately measured data e.g. sub metering the supply to a large irrigation tank used for ground watering.

If direct measurement is not practical, then allowances may be calculated using other supporting data such as production figures; water content in product; employee numbers/staff headcount; manufacturers' specifications or using standard industry guidelines. Appendix 1 details the water consumption recognised by the National Farmers Union (NFU) and Department for Environment, Food & Rural Affairs (DEFRA) for common types of livestock, so allowances can be calculated for small holdings and farms on shared supplies.

The allowance will be applied until there is either a significant change in circumstances on site or the wholesaler undertakes a periodic review of the RTS allowance. Wholesalers will provide advanced notice of such reviews.

## 4.0 Responsibilities

### 4.1 Your Responsibility (Customer)

**4.1.1** If you believe the volume of water not returned to sewer exceeds the wholesaler's default allowance, you should contact your retailer who will apply for the appropriate allowance on your behalf.

**4.1.2** You should provide information to your retailer on where and how water is lost e.g. evaporation, tankered off site, used in product, used for irrigation, as and when requested.

**4.1.3** It would be helpful to understand your site layout and site processes so that you can demonstrate how and where water is used and whether or not it returns to sewer. It would be beneficial if you could supply a simple water balance for your site like the example provided in Appendix 2.

**4.1.4** You may be asked to provide a site drainage plan, if requested by the wholesaler, to assist in the assessment of your application.

**4.1.5** You may want to consider how the RTS allowance can be accurately assessed, for example by installing sub-meters. If this is not practical, then you could provide other supporting information such as water in product data; records of off-site disposal; manufacturer specifications for evaporative losses; employee numbers etc.

**4.1.6** If a private sub-meter is required, please ensure it meets the requirements of Measuring Instruments Regulations 2016. The wholesaler can provide guidance on where the meter should be installed and what information will be required for the meter to be registered in the billing system. The cost of the meter installation and future maintenance of the meter will be your responsibility.

**4.1.7** It would help if you could provide regular meter readings to your retailer for the allowance to be accurately applied to your charges.

**4.1.8** You should inform your retailer of any significant change in your business activities which may affect the amount of water returning to the sewer and provide any supporting evidence that may be required.

**4.1.9** Please inform your retailer immediately if your private sub meter stops recording or becomes damaged or is replaced.

### 4.2 Your Retailer's Responsibility

**4.2.1** The retailer should: provide you with information, support and advice on your wholesaler's default RTS allowance, how your site is charged and any RTS allowances you currently receive.

**4.2.2** Advise you whether any additional RTS allowance maybe due for your type of business, based on their knowledge and your SIC (Standard Industrial Classification) code.

**4.2.3** Prepare and submit an allowance application form to the wholesaler on your behalf. A copy of the form can be accessed via the link shown in Appendix 3.

**4.2.4** Assist you to collate information required by the wholesaler in order to validate your allowance.

**4.2.5** Advise you of the wholesaler's decision with regards to the RTS allowance.

**4.2.6** Advise you when to read and submit private sub meter readings, if required, so that an accurate RTS allowance can be made.

**4.2.7** Upload the main meter readings and any private sub meter readings so they are visible to the Wholesaler and use these readings to issue you with accurate invoices.

**4.2.8** Inform you if your sub meter readings are not being received in line with the reading schedule or if the sub meter doesn't appear to be recording correctly.

**4.2.9** Support you in providing information where the wholesaler carries out a periodic review of your allowance.

**4.2.10** If you are switching retailers, your new retailer has visibility of any RTS allowances applied to you and should review your allowance as part of an onboarding process to ensure you are being charged accurately and receiving the appropriate allowance for your business.

**4.2.11** Collaborate with you and your wholesaler to provide the information required for an allowance to be reviewed.

### **4.3 Your Wholesaler's Responsibility (waste water company who owns the sewers)**

**4.3.1** Your wholesaler should: publish their RTS allowance policy on their website and provide details of their default RTS allowance in their Wholesale Tariff Document.

**4.3.2** Process and assess any additional RTS allowance in line with their policy.

**4.3.3** Arrange a visit to your site if required, to verify the most effective way of assessing the allowance.

**4.3.4** Communicate their decision to the retailer within 20 working days. If this timescale needs to be extended, the wholesaler will notify the retailer and explain why this is required.

**4.3.5** Confirm the date from which the allowance will be applied, in line with their policy and apply this accordingly.

**4.3.6** If a private sub meter is required, the wholesaler will advise where the meter needs to be located.

**4.3.7** Advise what information it requires from the submeter e.g. meter make, model, serial number, number of digits, date of installation, initial reading, location and X&Y co-ordinates.

**4.3.8** May work with the retailer to undertake a periodic review of the RTS allowance granted to ensure that it is still being applied correctly.

Please Note: If a wholesaler is unable to complete its review of the RTS allowance and has made reasonable efforts to engage with the retailer and you, the customer (e.g. cannot arrange to access the customers site), then the wholesaler may revert the RTS to its default until such times as it receives the information it requires.

## Appendices

### Appendix 1 – Details of the typical water consumption for common livestock from the National Union of Farmers (NFU)

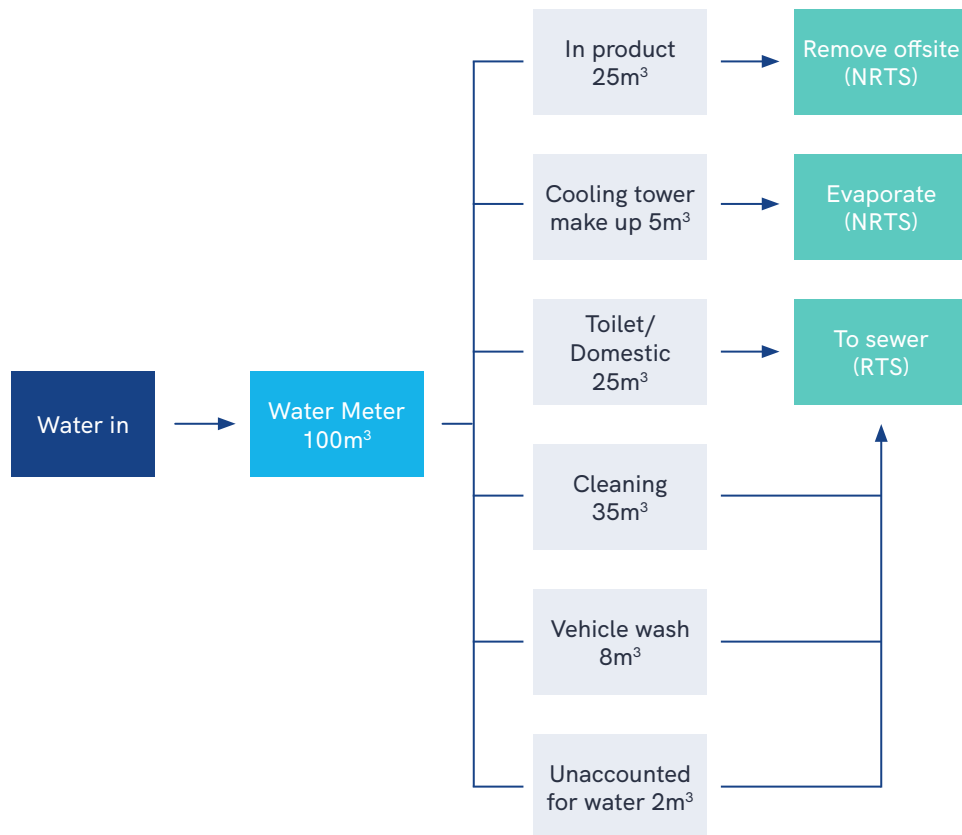
Please note these are typical figures which are recognised by the NFU and DEFRA\*. The exact consumption would depend on whether the livestock is fed dry feed (pellets), or wet feed (silage, grass etc). If fed dry feed, please use the higher figures as livestock would have to drink more. Water consumption will also depend on the temperature, the warmer/hotter it is the more livestock will drink. To keep RTS allowances simple and representative it is suggested an annual average % allowance is calculated and applied as an RTS (i.e. the allowance is applied to all consumption throughout the year).

Livestock Type	Litres per day per animal
Dairy Cow	104 - 122 (lactating)
	20 - 59 (dry period)
Beef cow	25 - 45
Calf	5 - 25
Sheep	3.3 - 7.3
Pig	6 - 10 (dry sow)
	15 - 30 (farrowing sow (i.e. weaning piglets))
	3 - 6 (grower/ finisher)
Poultry	0.09 (pullet)
	0.20 (broiler/caged hen)
	0.22 (non-caged layer)

\* these figures were detailed in an ADAS report commissioned by DEFRA entitled "Sustainable Water for Livestock"

## Appendix 2 – Simple Water Balance

A simple water balance is provided below. Some of the figures can be calculated, such as the toilet/ domestic and in product, whereas it may be worth sub-metering others e.g. cooling tower make up, or the vehicle wash. Alternatively, it could be possible to assess the vehicle wash by calculation if there is a record of the number of washes etc.



Please see the example above. The wholesalers water meter records 100m<sup>3</sup> per annum, however not all of the water consumed returns to sewer, so a return to sewer allowance is due as follows:

RTS	Volume
Toilet/Domestic	25m <sup>3</sup>
Cleaning	35m <sup>3</sup>
Vehicle Wash	8m <sup>3</sup>
Unaccounted for water	2m <sup>3</sup>
<b>TOTAL</b>	<b>70m<sup>3</sup></b>

Therefore, the RTS is  $70/100 * 100 = 70\%$  i.e. 70% of the water returns to sewer and 30% does not.

**For further information on preparing a water balance please paste the following into your web browser:**

[www.wrap.org.uk>content>water-balance-template](http://www.wrap.org.uk/content/water-balance-template)

**If you would like to target water efficiency to reduce your consumption and generation of wastewater to save money a great starting point is WRAP's Tracking Water Use to Cut Cost which is a free publication and full of practical advice:**

[http://www.wrap.org.uk/sites/files/wrap/WRAP\\_Tracking\\_Water\\_Use\\_to\\_Cut\\_Costs.pdf](http://www.wrap.org.uk/sites/files/wrap/WRAP_Tracking_Water_Use_to_Cut_Costs.pdf)



### **Appendix 3 – A copy of the allowance form a retailer must complete and forward to the wholesaler**

To see a copy of the allowance form a Retailer must complete please click on the link below or type the link into your internet browser.

<https://mosl.co.uk/market-codes>

### **Appendix 4 – Summary of Wholesalers Alignment with the Voluntary Good Practise Guide for RTS Allowances**

Please see the following pages.

The tables detail the Wholesalers policies. If you are unsure about who your Waste Water Wholesaler is you can find out by entering your postcode on the following website [www.water.org.uk/advice-for-customers/find-your-supplier/](http://www.water.org.uk/advice-for-customers/find-your-supplier/)

Company	Default RTS % (please comment if allowance is applied to volume or tariff?)	Back dated to	Borehole	Grey water	Rainwater harvesting	Preferred RTS measurement	When is the allowance reviewed?
RTS Good Practice	Wholesalers must apply their standard RTS allowance which may be reflected as a percentage of the bill or built into their tariffs, where it is the latter this should be clearly stated. The most appropriate approach is a direct method as a percentage and this should be 95% of the volume of water supplied.	Most recent date or 1st April of the tariff year in which the Form was received by the Wholesaler, or the date the customer moved in - whichever is the most recent.	Private meter installed on borehole supply which returns to sewer. The Wholesaler may bill a Retailer for the volume of borehole water returning to sewer, in addition to any potable water returning to sewer.	If the grey water is sourced from an alternative source (i.e. is not sourced from a potable supply) a private meter may be required on the grey water supply which returns to sewer. The Wholesaler may bill a Retailer for the volume of grey water returning to sewer, in addition to any potable water returning to sewer.	Private water meter installed on rainwater harvesting supply which returns to sewer. The Wholesaler may bill a Retailer for the volume of harvested rainwater returning to sewer, in addition to any potable water returning to sewer. A Wholesaler should consider if an allowance is required against surface water charges where it raises a charge for rain water harvesting.	All parties should take a pragmatic view. Installation of a private water meter may be appropriate if only one or two meters are required and the RTS allowance is significant. If the RTS allowance is reasonably minor or difficult to meter then a calculated or estimated volume is appropriate.	The Retailer will review if an RTS allowance is due as part of their on boarding process, or upon a change of occupier/ occupancy. Note a wholesaler can instigate a review of any RTS allowance agreed if it suspect something may have changed or as part of a periodic review as per Process H Part B of the Operational terms.
Anglian Water	95%	Applied going forwards (next billing period) once evidence has been received and validated. E.g. sub meter installed and meter reads taken.	AWS requires where practical all significant NRTS are metered (this would include boreholes, water in product, water disposed of off site, evaporation etc.). This would work in both ways to prove a non RTS or additional RTS due to own supply.	Ask for meter and charge for the additional volume RTS.	Ask for meter and charge for the additional volume RTS.	Sub meters or physical evidence such as tanker receipts.	We would reset/ remove the allowance at a change of occupancy or when the allowance expires. We tend to suggest a maximum review period of 2 years but review annually as BAU.
Northumbrian Water	95% (note we charge 100% volume but at 95% of the tariff i.e. there is a 5% non return to sewer allowance built into the tariff).	Most recent date 1st April of the tariff year the form was received in or date the customer moved in - whichever is the most recent.	NWL requires where practical all significant NRTS are metered (this would include boreholes, water in product, water disposed of off site, evaporation etc.)	We would ask they are metered and charge them an additional volumetric sewerage charge for the quantity of 'non potable' water returned to sewer.	Depends if it the surface water is discharged as trade effluent. If it is we would adjust the site 'connected surface area' to excluded the area which is drained, measured and charged for as trade effluent.	We use both. It depends on the how variable the sites water consumption as well as the variability of the NRTS. We would like to use both moving forward.	We would reset/ remove the allowance at a change of occupancy or when the allowance expires. We tend to suggest a maximum review period of 5 years.
Severn Trent Water	95%	Most recent date 1st April of the tariff year the form was received in or date the customer moved in - whichever is the most recent.	Meter on Borehole required.	Request for private sub meter be installed if grey water is NRTS.	Request for a private sub meter be installed and charge for the additional volume RTS. Reduction in SWD possible if overflow isn't connected to STW main.	Whilst a sub meter which measures the return to sewer, or losses, is preferable Severn Trent will accept other data which can be corroborated to calculate the volume returning to sewer, or not returning to sewer as the case may be.	We would typically review the RTS allowance on a change of occupancy (retailer lead).
South West Water	95%	Most recent date 1st April of the tariff year the form was received in or date the customer moved in - whichever is the most recent.	Require the alternative supply to be installed in such a way so that the water which is used and discharged can be measured by means of a meter installed on the alternative supply system, sub-meter. Billing specification meter on the borehole supply, linked to Sew SPID as PRIVATEWATER.	Measured by means of a meter installed on the alternative supply system, sub-meter. Meter on Grey water plumbing prior to reuse. Usage is deducted from main meter. 100% RTS charged. Linked to Sew SPID as PRIVATEWATER.	Sewerage charges are payable on the water discharged. Meter on pipework from tank to toilets etc. 100% RTS charged. Linked to Sew SPID as PRIVATEWATER.	Usage not returning to sewer should be measured. Metered evidence based calculation considered at SWW discretion. Anything non-standard (not metered) can be discussed and would be at SWW discretion if given.	We would typically review the RTS allowance on a change of occupancy (retailer lead).
Southern Water	95%	Previous actual last read.	Meter on borehole supply preferred.	No adjustment.	No adjustment.	Will allow subs but often use calculations to work out percentage.	Change of occupancy but reserves the right to periodically review.

Inline with GPG

Better than current GPG

Does not currently meet good

**Gray Water** - Typically, its not applicable to raise any additional charges in respect of grey water, as it returns to sewer anyway (e.g. bath water used to flush toilets), it's just slightly stronger than it would have been if it had not been re-used- but its still 'domestic sewerage'.

**Rain Water incentives** - Northumbrian Water - offers reduced charges in relation to surface water drainage for attenuation, and other sustainable urban drainage schemes. These are applied to the surface area banding charge, rather than non-return to sewer.

Reviewed by Trevor Hobb on 27/4/21.

Company	Default RTS % (please comment if allowance is applied to volume or tariff?)	Back dated to	Borehole	Grey water	Rainwater harvesting	Preferred RTS measurement	When is the allowance reviewed?
Thames Water	95%	Claims may be back dated up to 16 month from the date of application.	Meter on borehole supply preferred.	No adjustment.	No adjustment (Dealt under H01 - Surface water abatement).	Sub meter & calculation used to grant the abatement.	We would typically review the RTS allowance on a change of occupancy (retailer lead).
United Utilities	95%	1st of April of the current financial year.	Meter on borehole supply preferred.	Ask for meter and charge for the additional volume RTS.	Private meter installation preferred. Allowance against surface water charges applied where applicable.	Sub meter or calculation used some standard allowances applied.	Change of occupancy but reserve the right to periodically review.
Wessex Water	95%	1st of April of the current financial year.	Meter on borehole supply preferred.	No adjustment.	No adjustment.	Range of analysis including sub metering, water balance, standard allowances.	We would typically review RTS allowances as part of a periodic review.
Yorkshire Water	95%	1st of April of the current financial year.	Meter on borehole preferred.	Meter on grey water supply preferred.	Meter on rain water harvesting system preferred.	Standard allowances for cattle, swimming pool evaporation, bathers allowances and for domestic use based on number of residents or employees. We may request a meter to be fitted where possible.	We would typically review RTS allowances as part of a periodic review.
Dŵr Cymru Welsh Water <sup>1</sup>	95%	1st of April of that year.	Meter on borehole supply preferred.	No adjustment.	No adjustment.	% Reduction is the norm but depending on the circumstances we may install a sub meter.	Change of occupancy but reserve the right to periodically review.

Inline with GPG

Better than current GPG

Does not currently meet good

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Reviewed by Trevor Hobb on 27/4/21.

<sup>1</sup> Please note that Sewerage services in Dŵr Cymru's statutory area are not in the Retail market.