

## **MOSL's response to CCW's Draft Strategy / Forward Work Programme 2026-27**

As the market operator of the business retail market (the BRM) in England, MOSL welcomes the opportunity to respond to CCW's [Draft Strategy and Forward Work Programme 2026-27](#). Given our role, our response is focused on CCW's commitments (listed in bold) that we understand as either directly or indirectly impacting or benefiting business customers or the BRM.

In the final Strategy, we encourage CCW to clearly set out whether each commitment relates to household customers, business customers, or both.

### **Resolving 80%/95% complaints in 20/40 working days respectively**

MOSL continues to support the proposed targets to resolve complaints.

We also encourage CCW to publish its performance against its resolution targets. This will provide transparency – which CCW advocates across water companies – that complaints are being resolved within the committed timescales.

### **CCW will carry out at least two complaints assessments with water retailers**

We welcome CCW's proposal to carry out at least two complaints assessments with water retailers. This reflects MOSL's feedback on [CCW's 2025–26 Forward Plan](#), where we encouraged CCW to undertake further analysis to better understand gaps in the complaints process for business customers. These findings should be shared to drive improvements and to better understand key issues impacting business customers.

In addition to retailer and wholesaler complaint assessments, MOSL encourages CCW to commission an independent review of its own complaints-handling process, particularly for business customers. This could support further clarity on escalation routes, identify CCW process gaps and provide assurance that business customer complaints are being adequately addressed and resolved.

When reporting business customer complaints (and wider measures of awareness and satisfaction), we encourage CCW to recognise the significant differences in the sizes of the English (1.2m customers) and Welsh (170 large business customers) business water markets. Recognising this disparity is important to enable fairer comparisons and provide a more accurate picture of the unique issues influencing customer satisfaction.

More broadly, we welcome greater granularity in CCW's reporting on complaint areas. While billing and charges are frequently cited as the main source of business customer complaints, the underlying causes remain unclear. This is despite market data showing more frequent meter reads, which should improve billing accuracy. We would be happy to work with CCW to identify the root causes and address them through appropriate market mechanisms or improvement programmes.

### **Challenge wholesaler policies on compensation for business customers for loss of earnings for fairness and consistency**

MOSL welcomes a review of compensation policies to ensure business customers are treated fairly and consistently. Retailer perspectives should also be considered, given their role as the primary point of contact for business customers and their responsibility for managing service issues as they arise.

### **Commission research to see whether customers of NAVs are more satisfied with their water service than the customers of incumbent providers**

While MOSL supports this proposal in principle, we would like to understand the key driver for this research and how findings will be used to help drive improvements for business customers. We would also like clarity on whether this proposal relates to both household and business customers.

Additionally, any assessment should be cautious about drawing simplistic comparisons between customer satisfaction for NAVs and wholesalers, given the significant differences in their size, operations and customer numbers.

### **Publish our view on what innovative tariffs have worked best**

MOSL has heard from CCW that this objective does not apply to business customers. However, we strongly encourage CCW to extend this objective to consider tariffs for business customers that could reduce water demand, particularly considering the water scarcity challenges the UK is facing. This would also align with the water reform White Paper's call to phase out falling block tariffs by March 2030 and drive water reuse for larger business customers. Onsite water saving solutions could be made more effective if complemented by innovations in tariffs.

### **Campaign for relevant and appropriate price and non-price protections for disengaged businesses**

While MOSL supports the use of relevant and appropriate price and non-price protections for business customers, we believe these protections should be loosened over time where this enables more effective competition and improved customer outcomes. As evidenced in [MOSL's response](#) to Ofwat's Retail Exit Code (REC26) consultation, we encourage Ofwat to adopt a clear framework for benchmarking engagement metrics. We also encourage the regulator to look to other industries, like the energy market,

where engagement trials have been undertaken to encourage disengaged energy consumers to act, often by switching tariffs or suppliers to access better deals.

Ofwat's 2024-25 [State of the Market](#) report and survey indicates that market awareness is growing but switching rates remain low. We believe this indicates that customers may be aware of the market yet choose not to participate when meaningful savings are unavailable through switching services due to constraints imposed by the current REC. In this context, price protections may be contributing to lower levels of engagement by limiting retailers' ability to discount, innovate and differentiate their offerings.

When undertaking the campaign, CCW should draw from this evidence base, noting the range of stakeholder responses to the State of the Market that highlight how price protections may be contributing to customer disengagement.

### **Share learnings with the industry – at least quarterly – on how the rollout of smart meters is working for customers**

MOSL has heard from CCW that this objective does not apply to business customers, due to work already being undertaken by the Retailer Wholesaler Group (RWG). If business customers are not included as part of this objective, it should be made clear in the Forward Plan. We also encourage CCW to ensure any learnings from the pieces of work are shared.

As the custodian of central market data, we are keen to work with CCW to support industry-wide learning on how the smart meter read rollout is working. MOSL's [metering dashboard](#) and [smart meter rollout maps](#) provide visibility of how smart meters are being rolled out and used across the market, offering valuable insights for the industry.

The Smart Meter Read Hub – which will be delivered by the end of 2026 – will provide a central hub for smart meter reads for business customers. It will give retailers improved, standardised access to smart meter reads submitted by wholesalers. This will enable them to bill customers more accurately and work with them to identify areas to reduce demand.

### **CCW will begin a multi-year longitudinal study to measure/explore consumer engagement with water use post smart metering**

MOSL has heard from CCW that this objective does not apply to business customers. If business customers are not included as part of this objective, it should be made clear in the Forward Programme. As noted above, any crossover benefits and learnings from this research and ongoing work on smart metering rollout in the business market should be shared.

## **Hold regular customer panels accountability sessions for all water companies in England and Wales**

MOSL has heard from CCW that this objective does not apply to business customers. If business customers are not included as part of this objective, it should be made clear in the Forward Programme.

We believe there is an opportunity for business customers to sit on customer panels, like the Federation of Small Businesses and Manufacturers' Enterprise UK Council. This would enable an additional mechanism for CCW to hear business customer complaints and real-time customer feedback.

### **General comments**

We welcome further insights into issues impacting business customers – building on evidence provided in the recent [Business retail market update 2024-25](#). We are concerned by one of the headline messages from the survey, which indicates that only 15% of business customers are satisfied with the water industry. We are keen to work with CCW to ensure that future survey questions and methodologies clearly distinguish business customers' satisfaction with the market from their views on the wider water industry, and that the information is presented clearly and accurately.

If you have any questions or comments on our response, please email [comms@mosl.co.uk](mailto:comms@mosl.co.uk).