

The Strategic Panel's Response to CCW's Draft Strategy and Forward Work Programme 2026-27

The [Strategic Panel](#) (the Panel) is the most senior market governance group and is responsible for leading the evolution of the Business Retail Market (BRM) and shaping its strategic direction to bring about the best customer outcomes. As such we welcome the opportunity to respond to the consultation on [CCW's Draft Strategy and Forward Work Programme 2026-27](#).

This response focuses on the commitments in CCW's plan relevant to the BRM and business customers.

Our response (by commitment)

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

The Panel agrees with the sentiment as evidenced in our [response to Ofwat's Retail Exit Code \(REC\) review consultation](#). However, we believe it is important the revised REC protections from April 2027 are appropriate, responsive and aligned with the needs of a maturing BRM.

We encourage CCW's campaign to promote the longer term benefits to customers of a gradual easing of protections over time. We believe this - and the improved competitive service offerings it can enable from retailers - is key to reducing the number of 'disengaged' businesses in the market. Continued caps based on an average cost to serve risk excluding many of these customers – who often have higher-costs to serve - from improved competitive service offerings.

The Panel would welcome the opportunity to use their combined expertise to help shape this campaign.

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

We continue to support CCW having targets for resolving complaints; we would like CCW to publish their current and future progress against these targets. Subject to CCW making good progress against the existing target, we encourage CCW to explore whether there is room for the targets for 26/27 to be more ambitious as opposed to maintaining the targets from last year.

Reviewing TPI principles of behaviour

The Panel welcomes CCW's commitment to *Review the TPI (third-party intermediary) principles of behaviour in the business retail market to ensure that customers receive a fair, transparent and honest service from TPIs*. This relates to an action (C2) in our [Roadmap to the Flourishing Market](#) which is assigned to CCW:

***C2 TPI Principles** An accreditation for third party intermediaries (TPIs) is developed by CCW that provides confidence to customers that their TPI is operating in their best interests. This accreditation scheme might in future form part of the Customer Protection Code of Practice (CPCoP) but would not equate to a regulatory requirement on TPIs.*

We will continue to work closely with CCW on the delivery of this action due to its importance in relation to business customer confidence in TPIs.

Hold regular customer panels for all water companies

The Panel is supportive of this but would like CCW to ensure business customers and/or their representative bodies, e.g. Federation of Small business (FSB) or Major Energy Users Council (MEUC), are included. This is important because business customers still rely on the wholesale services provided

by water companies - and experience issues like supply interruptions - in the same way as household customers.

Publish a view on what innovative tariffs have worked best

The Panel believes it is important this covers business tariff trials as well as household trials.

The Panel is supportive of efforts to phase out falling block tariffs by April 2026, as announced in the Water White Paper to encourage more responsible water usage. The Panel has [voiced to Ofwat](#) the importance of ensuring future pricing structures remain fair and don't simply increase bills for large customers already doing everything they can to be more water efficient. We hope this research can give a view on how this could be achieved.

Commission research to see if NAV customers are more satisfied than customers of incumbents

The Panel is supportive of this research but would like more detail on what CCW plans to do with the outputs. Any conclusions need to reflect the significant difference in terms of the size and number of customers being served by NAVs compared to incumbent wholesalers. The Panel has previously voiced concerns about the way CCW research presented satisfaction among business customers in Wales vs England, despite the markets being very different (Wales: one main wholesaler and c170 >50Ml/year large business users vs England:17 wholesalers, 1.2 million customers).

If you have any questions or comments on our response, please email panel.secretariat@mosl.co.uk