



South Staffs Water Water Resources Management Plan 2019 Annual Review 2023/24

Securing your water future

Contents

Contents	1
1. Executive summary	3
1.1 Purpose	3
1.2 Overview	3
2. Introduction	5
2.1 Water resource zones, level of service and performance commitments	5
2.2 Overview of 2023/24 supply-demand balance	6
2.3 Company-specific actions	7
2.4 Dry year annual average	
3. Supply	
3.1 Impacts of weather events on supply	11
3.2 Outage	
3.3 Water Quality	14
3.4 Water Industry National Environment Programme (WINEP)	15
3.5 Deployable output (DO)	
3.6 Water available for use	
3.7 Bulk supply agreements	
3.8 Exported potable water	
3.9 New appointments and variations (NAVS)	17
3.10 Climate change impact on supply	
3.11 Distribution system operational use (DSOU)	
3.12 Drought Plan	19
4. Demand	21
4.1 Impact of weather events on demand	21

	4.2 Demand Profile	21
	4.3 Demand forecast, including population and property forecasting	24
	4.4 Metering	24
	4.5 Leakage management and reductions	26
	4.6 Consistency in reporting methodology	27
	4.7 Water efficiency	27
5	. Headroom and options	31
	5.1 Target headroom forecast	31
	5.2 Selected options	31
	5.3 Supply-demand balance	31
6	Forward look	32
	6.1 Preparing for AMP8	33

1. Executive summary

1.1 Purpose

This document sets out South Staffs Water's water resources management plan (WRMP) annual review for the period of 1 April 2023 to 31 March 2024. While South Staffordshire Water PLC incorporates the Cambridge Water supply area, this document applies only to the South Staffs Water region. We have produced a separate review for the Cambridge Water region.

The purpose of the annual review is to identify any material changes to the WRMP and to report on progress made during the previous 12 months. There have been no significant changes to report since we published our latest WRMP in December 2019 (WRMP19).

1.2 Overview

In line with our current 25-year plan, between 2020 and 2045 we will continue to ensure that all our customers have a secure supply of high-quality water that is provided in an environmentally sustainable way.

In addition, we have delivered our performance commitments in the following areas.



Leakage

We have out turned 2023/24 with a leakage level of 64.07 million litres a day (MI/d) (Post MLE). This compares to a WRMP19 2023/24 forecast position of 56.91 MI/d. At PR19, the final determination awarded by Ofwat impacted on our target trajectory, and therefore this differs to

our performance commitment level of 61.2 MI/d that we agreed with Ofwat.



Metering

We have installed 6,195 new meters including optants, new connections and replacements.

The volume of water that each of our household customers uses – the 'per capita consumption' (PCC) – as a reported weighted average was 136.9 litres/head/day (I/h/d). This is lower than in 2022/23, when this

figure was 142.89 l/h/d. For comparison, the dry year annual average WRMP19 forecast average PCC for the South Staffs region was 128.5 l/h/d.



Temporary or non-essential use bans

We have maintained our current levels of service. There have been no temporary or non-essential use bans during the annual review period of 2023/24. Whilst it was an average year, we proactively managed our surface water and continued with our customer campaigns for water efficiency to maintain supplies and our levels of service.



Water efficiency

We have focused on identifying best practice across the industry and innovative ideas for reducing water usage. We have been successful in securing our bid for the Ofwat Innovation Fund for a project that will identify the link between water and faith, providing vital information that will enable us to tailor our advice, support and offerings across our diverse community.

We have continued our in-education activities in schools, local community groups and other educational settings.

We have distributed over 20,000 water efficiency devices, an estimated saving of circa 0.13 MI/d of water across the South Staffs region.

We have provided advice and support to encourage developers to build water efficient homes in our region.

2. Introduction

We have carried out this review in accordance with the EA's latest guidance, which advises that we should:

- report on the progress against our WRMP;
- highlight any changes made to our WRMP;
- describe progress with key components of our WRMP;
- explain any changes to planned deliverables;
- describe any changes due to exceptional events;
- report on the actions the Defra, Ofwat and EA, asked us to work on after we published our final WRMP; and
- report an overall summary of the supply-demand situation.

Our WRMP19 covers the 25-year period from 1 April 2020 to 31 March 2045.

This is the fourth review of WRMP19, and we have applied the 2024 (APR24) data for the period of 1 April 2023 to 31 March 2024 to inform this document. This data has been through our quality assurance process.

The WRMP annual review data return will be submitted alongside this document.

This review is a statutory requirement of the Water Industry Act 1991 (as amended by the Water Act 2003), which states that:

"Before each anniversary of the date when its plan was last published, the water undertaker shall –

- (a) Review its plan; and
- (b) Send a statement of the conclusions of its review to the Secretary of State."

2.1 Water resource zones, level of service and performance commitments

ltem	Description	Company comment on review
Water resource zones	Any changes to boundaries or number of zones?	There have been no changes to the South Staffs region water resources zone boundary, which remains a single water resource zone for the region.

Item	Description	Company comment on review
Planned levels of service	Any changes to the level of service?	There is no change to our customer level of service stated in WRMP19.
		We consulted extensively with our customers as we prepared our business plan for 2020 to 2025, and they did not support a change to our levels of service, which are:
		 temporary use bans – not more than one in every 40 years; non-essential use bans – not more than once every 80 years; and emergency drought orders – not more than once in 200 years.
Performance commitments (PCs)	Progress on PCs that affect WRMP19	 The 2020 to 2025 (AMP7) PCs relevant to WRMP19 are: leakage; PCC; unplanned outage; and our environmental programme (WINEP) obligations. We describe each of these topics in the chapters below on supply and demand. Other PCs such as drought resilience also indirectly relate to WRMPs.

2.2 Overview of 2023/24 supply-demand balance

In our 2021/22 annual review, our reported SDB was -14.97 MI/d. For 2022/23, this deficit reduced to -12.34 MI/d, and for 2023/24 it is -13.23 MI/d.

We have continued to reduce our PCC this year, with a reduction in 6 l/h/d taking our reported total household PCC to 136.8 l/h/d. DI has also reduced but remains higher in comparison to our WRMP19 forecast, currently reporting 320.95 MI/d compared to our WRMP19 forecast of 295.72 MI/d.

During 2023/24 there were no weather-related headlines nor any demand pressures from hot/dry summer or freeze thaw. The SST demand profile as above reflects the following characteristics per year.

Figure 1 Distribution Input (DI) 2019/20 to 2023/24



We can see that there was an increase in demand in 2020 when we were at peak restrictions due to Covid-19, which continued to impact us through 2021 as lockdown behaviour changes persisted.

Although 2022 was a hot summer we saw a steady DI throughout the period, supporting our not needing to restrict customers' use as we did not reach the drought trigger in our drought plan for temporary use bans.

In 2023 we saw a peak in DI during a temporary hot spell, whereafter we then returned to usual.

It should be noted that headroom is 8.26 MI/d in our WRMP19 data tables for 2023/24. As headroom deals with uncertainty, some of these elements are no longer required when addressing the supply demand balance as the uncertainty has now passed. Examples include climate change impact on supply and demand, as well as risk of gradual groundwater pollution. We have removed these elements from the target headroom in our accompanying data tables so they reflect the WRMP19 position.

2.3 Company-specific actions

On 20 October 2023, we received a joint regulator letter from the EA, Ofwat and Defra raising concerns around a number of areas in our WRMP19 Annual Review for 2022/23. These are detailed, with summary updates, below. We have included more information on our programmes in these key areas in the specific sections later in the document.

2.3.1 SDB

You have a significant SDB deficit of -12.34 MI/d against a forecast surplus of 12.8 MI/d, and this is the third consecutive year that you have reported a deficit.

Our continued negative SDB continues to be driven by a sustained increase in household PCC following Covid-19 as well as higher outage. We have continued to drive reductions in PCC, with an additional 6 I/p/d reduction in 2023/24 and an associated 5 MI/d reduction in DI, but it still remains higher than pre-Covid due to permanent changes to behaviour.

Outage is a primary focus for us and we detail our improvement plans below.

2.3.2 Leakage

You reported leakage of 65.3 MI/d against a target of 60.32 MI/d. This is the second consecutive year that you have missed your leakage target. You are also not on track to meet your WRMP24 leakage baseline forecast of 59.20 MI/d at the start of the planning period.

The leakage values in our WRMP are not aligned to the latest leakage methodology. Due to changes to the methodology, and refinement of data following this, we have since back cast our leakage position and it is this value that we are targeted to deliver through our Ofwat Performance Commitment (PC). As such, these will not align throughout the AMP with our WRMP19.

We have updated our WRMP24 at revised draft stage to align with this current leakage target position as per the PC, and therefore our business plan at PR24 and WRMP24 are now totally aligned.

We have missed our Ofwat leakage PC target in 2023/24 and we provide more detail on this, the reasons for it and our improvement activity in section 4.6 below.

2.3.3 Metering

Your meter penetration is 3.45% below your WRMP19 target and is below forecast for the third consecutive year. In addition, the action plan you provided within your annual review to address your metering shortfall does not differ significantly to that proposed from last year's annual review. You have also confirmed that you will be unable to deliver your accelerated NHH metering and parts of your HH metering plan, both of which were granted funding for via the Accelerated Infrastructure Delivery Project process to accelerate the installation of smart meters.

Our metering forecasts in WRMP19 were based on customer optants. We have seen a significant reduction in the number of customers requesting a meeting since Covid, and upon undertaking some customer research to understand this. Customers cite the cost of living crisis as the main reason, with the uncertainty of bill profiles and the potential

increase of costs concerning customers, particularly those in larger and multi-generation family homes.

We have undertaken activity to increase the promotion of metering, the benefits and the support packages we can offer, increasing our presence in the community and undertaking campaigns such as Rita the Meter but these have not led to increased optants as hoped. Our focus now is on preparing for our universal metering programme which will start at the beginning of AMP8, where we can catch up the numbers we expected to see in AMP7.

We detail our metering approach in section 4.5 below.

2.3.4 PCC

Your reported PCC of 142.89 l/h/d is significantly higher than your planned dry year annual average figure of 129 l/h/d. PCC is 13.89 l/h/d above forecast, and over forecast for the third consecutive year.

Our analysis has shown, through travel data, that there is a proportion of our customers that now remain in the South Staffs area to work from home where previously they would have commuted out of the area to work. This new baseline position means we are continuing to see levels higher than our forecast at WRMP19.

However, we have increased our water efficiency budget year on year since Covid and we have seen an additional reduction of 6 l/p/d in 2023/24, reducing PCC to 136.86 l/p/d compared to our WRMP19 forecast of 128.5 l/p/d. We continue the focus in this area through year 5 and detail our plans for this in section 4.8 below.

2.3.5 Outage

Your reported outage is more than twice your outage allowance at 18.2 Ml/d.

As previously reported, our outage allowance at WRMP19 equates to circa 2% of available DO, which is lower than average levels and has been reviewed for WRMP24. In our revised draft WRMP, we have updated the outage allowance to be more representative of our available DO, asset base and performance, with efficiencies applied to represent our continued focus to reduce outage.

Outage has increased in 2023/24 and the majority of this is due to planned outage. A proportion of this is planned outage that was deferred from the previous year when we were operating in drought conditions, as our drought plan highlights that we will halt planned outage to ensure water resource availability when the appropriate measures are met. Our outage improvement activities are outlined in section 3.2 below.

2.3.6 DI

Your reported distribution input is 27.54 MI/d above forecast, with only a minimal decrease since 2021/22. This is the third consecutive year that your distribution input has exceeded forecast.

Our increase in DI is driven by the continued increase in household consumption post Covid, as outlined above. However, our efforts in this area have led to a reduction in DI of 5 MI/d in 2023/24. DI is now 320.95 MI/d compared to our WRMP19 forecast of 295.72 MI/d. Our plans for reducing leakage and PCC, as well as our new initiatives to reduce non-household water consumption are outlines in sections 4.6 and 4.8 below.

2.4 Dry year annual average

The DYAA Peaking factor applied to Household consumption in the South Staffs WRMP19 was 4.1% and we have used this uplift in the table.

For the supply components, the dry year uplifted table deployable output is stated as the WRMP19 final plan DYAA. Raw water losses, treatment works losses and operational use is as per the WRMP19 tables without uplift, as operational use would be minimised in a dry year and this element is the most variable in normal years, the WRMP19 figure is based on relatively consistent treatment works losses. For the outage component, we have excluded planned and reduced outturn unplanned by 20% as enhanced activity to reduce outages would be in place for a dry year.

3. Supply

3.1 Impacts of weather events on supply

Total annual rainfall for the 2023/24 year at our Seedy Mill rain gauge was 1020.9 mm. This is 148% of the long-term average between 1981 and 2010. We monitor the rain gauge at Seedy Mill because of its proximity to our primary reservoir (Blithfield), which is where our drought triggers refer to. In addition, we refer to other sources of weather and hydrological information such as those found in the EA water situation reports.

The graph below shows the levels in Blithfield reservoir during 2023/24 and in other selected years.



Figure 2 Blithfield levels for the review period (1 April 2023 to 31 March 2024)

2023 saw a typical spring and summer in terms of Blithfield's storage position, with the level steadily declining in line with the previous 5 years. Learning from the events of 2022 and how Blithfield could rapidly drop in level, we utilised the Nethertown pumpback scheme, which pumps water back into the reservoir to help with recovery, between May and September.

The River Severn Regulation System limited the abstraction of Hampton Loade from 29th May to 8th July, and again in early September, with a total of 49 days of regulation. This is in line with the average number of regulation days for the last 5 years. Through proactive work, we were both able to comply with Severn regulation and meet demand.

We commenced Blithfield conservation meetings in September 2023 as Blithfield's level had gone below the reservoir's drought monitor curve (DMC). The output from several groundwater sites, such as Prestwood, was increased and our water efficiency messaging

was stepped up. Significant rainfall from Storm Babet in late October meant that Blithfield levels rose from 60% to 100% in 20 days. Conservation meetings ended as we reached 100% in Blithfield by November (Figure 2).



Figure 3 Rainfall for Blithfield against long term average levels (1 April 2023 to 31 March 2024)

With a fairly average year our supply for the year was sufficient to meet both demand and target headroom. We did not need to apply for a drought permit and we did not restrict customers' use. With typical winter and spring rainfall meant that we were at 100% across the winter and by April 2024.

Our raw water abstracted figure of 392.66 MI/d aligns with our abstraction licence returns.

3.1.1 Communicating with the Environment Agency

We are sharing our water resources situation with the EA regularly, sending weekly situation reports to explain our strategic position as well as any forecast changes that could affect our water supply and demand. We will also send increased levels of information as necessary, should there be threats to our supply (e.g. if there are large unplanned site outages) and if we forecast high demands. This has immediately improved the transparency of our water resources position with the EA and will ensure that both parties are coordinated in their responses to any high demands and drought.

We continue to have regular meetings with members of the EA at all levels to ensure consistent and collaborative discussions regardless of the current water resources position.

3.2 Outage

We assessed our outage in WRMP19 to accommodate potential short-term or temporary loss in the volume of water available for supply. The outage allowance is calculated in-line with UKWIR standard methodology and EA guidance. This includes both planned and unplanned outage and differs to the Ofwat methodology for calculating annual outage as this looks to measure asset health rather than water availability, and therefore excludes many types of outages, such as for water quality purposes.

Our total annual average outage for 2023/24 was greater than forecast at 29.8 MI/d. As outlined below this was mainly driven by planned outage for AMP7 enhancement schemes.

We have continued to use our traffic light system for outages. It has proved to work well for our operational teams in giving a structured response time depending on the water resource position.

- Green water resources and demand are normal; unplanned outage to be responded to next working day.
- Amber water resources are below average or demand is above average; unplanned outage to be responded to same day.
- Red water resources are below average and we are below the drought monitoring curve; unplanned outage must be responded to within 2 hours.

Our most significant outage this year was at Chilcote PS where the site was removed supply following an inspection failure of the contact tank. The site was out of service for a total of 194 days but returned to supply upon completion of contact tank remedial works on 10/04/2024. Typical output for the site approximately is 6.5 MI/d.

Unplanned outage this year has consisted predominantly of minor reductions in flow from our groundwater sources rather than full station shutdowns:

- Hopwas PS was reduced in flow to 2.0 MI/d to maintain water level and remains at this flow.
- Borehole 1 at Maple Brook was removed from supply following a bacteriological water quality failure resulting in loss of output of approximately 2.0 Ml/d reducing site output to approximately 7.0 Ml/d. This reduction remains in place.
- Pipehill PS was reduced in flow following a deterioration in performance of the Multiport Port valve associated with the nitrate treatment process, this reduction in site output from 12 MI/d to 9 MI/d remains in place.
- Slitting Mill Borehole 2 was removed from supply following a bacteriological water quality failure. The borehole was returned to supply following completion of enhanced treatment upgrade on 10/04/2024 and is now back in supply at full output of 7.8 Ml/d.
- Kinver PS Borehole 2 was removed from supply following a rise in turbidity from the borehole. Output from the site was reduced to 12 Ml/d which remains in place.
- Prestwood PS was reduced to 10 MI/d, a reduction of 10 MI/d from its normal output of 20 MI/d due to a rise in turbidity following a recent station refurbishment. The reduction remains in place.

Planned outages during 2023/24 were predominantly the result of the continued programme of treatment enhancement throughout AMP7 and business as usual cleaning programmes at both Hampton Loade and Seedy Mill.

3.3 Water Quality

In AMP7 we have extensive improvement plans underway at both of our surface water treatment works – Hampton Loade and Seedy Mill. This work involves adding tertiary treatment to both sites. As reported last year, the Seedy Mill project is now fully commissioned and complete.

For Hampton Loade we were successful in our bid for Green Recovery funding to install Ceramic filters which is the largest retrospective installation of these in the UK. The Hampton Loade project is running on a revised project plan and is set for completion in March 2025.

DWI notices we have currently are detailed below:

• Hampton Loade - Hampton Loade Water Treatment Works SST-2021-0001 -Disinfection by products, Taste and Odour, Customer acceptability and Clostridium perfringens

Hampton Loade receives varying water quality based on its offtake from the River Severn. At certain times of the year, we see increases in Geosmin, and to manage this we reduce the flow through the works to increase the contact time throughput the process to remove the issue. During these instances, we balance the flows by increasing flows from Seedy Mill. Due to a relatively mild summer in 2023, this was managed as BAU without any concerns with Blithfield conservation. The upgraded treatment process will address this, and the other parameters listed in the notice.

• Seedy Mill Water Treatment Works SST-2018-0003 - Disinfection and Customer Acceptability

The completed upgrade works at the site are a key element of the notice resolution, and we are now working on refining the process and measuring changes to customer acceptability as a result.

• Hampton Loade and Seedy Mill Distribution Network - SST-2018-0004 – Disinfection by products and Customer acceptability.

This is a combination of the above points. The long-term plan works at these sites will resolve these issues.

 Kinver Water Treatment Works - SST-2018-0001 – Increasing trends and failure of blending regime (involving Pumping Station) to be able to maintain nitrate levels below PCV.

Notice SST-2018-0001 relates to **Kinver WTW and Cookley WTW** where the supply water is compliant with the regulatory standard for nitrate, however is reliant upon the blending of water sources. Online monitoring is in place, with appropriate shutdowns, to prevent the

supply of unwholesome water, prior to and following blending of the sources. Upon outage of either source, downstream areas are supplied from other water treatment works, however, this poses a longer-term risk especially during periods of high customer demand.

Additional supply resilience is required in the event of process failure (e.g. loss of pumping from one of the lower nitrate raw water sources), when spikes in nitrate concentrations occur. If a spike in nitrate results in the site to shut down, there is a risk to the supply of customers. This notice is to mitigate the increasing trends in nitrate concentration for a number of the raw water sources.

The proposed solution at Kinver WTW involved the relining of both boreholes to a depth of 60-80 meters (from current depth of 21.7m) and (2) lowering the pumping levels. The proposed solution identified for **Cookley WTW** involves the relining of Borehole 3, to a depth of 90m (from the current depth of 30m).

Unfortunately following some delays encountered due to the borehole casing at Kinver falling down into the borehole after installation, there has been a delay to the deliver of this work. Our rephased plan will require some additional testing with proving of the solution being between February and April 2025 and project completion for 30 April 2025.

• Slade Heath Pumping Station - SST-2019-0002 – Chlorthal and pesticide removal

We have temporary GAC vessels - but we can purchase and use in advance of the media being exhausted. The permanent solution is to deliver an ION exchange installation and continue our catchment management in the area to reduce the impacts of agricultural land management. This programme is currently in the design phase, with a plan for completion in March 2026. To mitigate any potential risk to water quality in the meantime, Slade Heath will only operate using the GUC vessels, if it is needed in summer 2024. Once the media in these vessels has been exhausted, the site will be out of service until the upgrade work is completed.

3.4 Water Industry National Environment Programme (WINEP)

The below details our progress against deliverables for 2023/24.

3.4.1 Sustainability Changes

In WRMP19, our approach to the sustainability reductions required in AMP7 was to sustainability reductions for AMP7 was to include the medium position (of three possible scenarios we identified) within our baseline assessment of DO, which is a reduction of 6MI/d. We have continued to work with the Environment Agency to better understand the risks and implement solutions, and an update on this is outlined below:

Bourne Brook

The augmentation scheme (augmenting flows during low flows in the Crane Brook) that was trialed and proposed in AMP6 was ultimately deemed as non-cost beneficial. The EA also

agreed that the Canal and Rivers Trust should provide some form of augmentation which would be done through the new authorisations work currently ongoing. There is a holding line in the AMP8 WINEP to cover our involvement in this work until the CRT work is completed. We would look to vary the scheme to remove it in AMP9 once we know the impact of CRTs involvement in the catchment.

Licence changes derived from the No Det workstream has yielded outputs that will impose a 15 year average to licences in the group licence. This is equivalent to approximately 3.6 MI/d reduction across the Lichfield licence group of sources. We are also planning in AMP8 to deploy a range of in channel and catchment improvements on the Darnford Brook with supplementary monitoring. This work in addition the licence changes that are already agreed should provide environmental benefits in the catchment.

Rising Brook

A licence change was completed in 2021 that re-apportioned volumes around the sources on the Slitting Mill/Moors Gorse/ Brindley Bank group licence but also resulted in an overall reduction in group licence volume of approximately 1Ml/d. It is anticipated that this licence configuration will be carried over upon renewal in 2025 and form the basis of the No Deterioration licence changes in AMP8. A second signal test which shuts down borehole 3 and pumps the well at Moors Gorse is now underway which will assess changes to flows further upstream in the Rising Brook catchment. Reporting for this test will be completed in autumn this year and will further inform the licence renewal and changes in 2025 and beyond.

Lichfield Tributaries

A desk study is underway that will assess impacts on the Little Hay Brook as a result of proposed No Det licence changes in AMP 8. Monitoring will be undertaken in the first year of AMP8 on the Darnford Brook that will finalise the scope of delivery of in channel and catchment improvements in the watercourse. This course of action has been chosen as opposed to licence changes as a modelling undertaken in the AMP7 identified that licence reductions would not directly impact or improve flows in the Darnford Brook.

As outlined last year, we have agreed our future no det sustainability reductions with the local EA teams which will deliver a 18.29 MI/d reduction in DO upon implementation in AMP8.

3.4.2 Catchment Management

Our catchment management work has continued through 2023/24 with us expanding our reach with farmers.

We have continued our work with our trial farms in our region, including in the Blithfield catchment. Some of the trial work looks at continuing the under-sowing of crops and advice around volumes and distribution of fertiliser. We have also been working to improve water efficiency and resilience among our farming community, with our Spring grant scheme supporting several rainwater harvesting installations in our area. We are looking to continue promoting and expanding this offering across our catchments.

3.5 Deployable output (DO)

DO is the volume of water we can access under the worst historic drought conditions (dry year annual average) in our region constrained by - licensed volume, water quality, water treatment processes and how the water is moved through the network. DO for 2023/24 was 398.09 MI/d, compared to our WRMP19 forecast of 388.64 MI/d.

3.6 Water available for use

There have not been any significant changes to WAFU this year, with the exception of a minor reduction at Maple Brook PS which was revised down due to WQ impacts preventing the site from maintaining full licenced volume. Sandhills, Shenstone and Brindley Bank have been removed from the WAFU but were not included in the SDB at WRMP19 so does not impact DO.

3.7 Bulk supply agreements

We provide several bulk water supplies to Severn Trent Water – including a significant volume from our River Severn treatment works – and receive a very small number in return. We have a number of emergency bulk supply points close to our border so that we can share resources if the need arises.

There have been no changes to bulk supply agreements during the review period.

3.8 Exported potable water

Potable water exported is 37.38 MI/d. These are legacy cross border supplies to Severn Trent. They are not subject to bulk supply agreements and are under standard commercial terms and consumption varies based on demands.

3.9 New appointments and variations (NAVS)

During AMP7, several appointments have been granted by OFWAT and we now have three licensed water undertakers in our area of supply:

- Independent Water Networks Limited
- Leep Networks (Water) Limited
- ESP Water Limited

The bulk transfer agreement indicates the maximum demand the development can take, but the actual demand is measured using meters on our network. This volume is included in our DI represented in the accompanying tables, as per the guidance.

We are working with the NAVs on key topics within the WRMP and we have also discussed drought plans, levels of service, water efficiency plans and messaging, joint customer

communications and metering. We will continue to work with these organisations, and others that may be granted licences in our area, to ensure a consistent approach to these areas.

The summary of our bulk supply transfers are detailed in the table below.

|--|

Licensed undertaker	Number of sites in SST operating area	Bulk supply arrangement (MI/d)		
Independent Water Networks Limited	5	0.72		
Leep Networks (Water) Limited	4	0.93		
Total	10	1.65		

3.10 Climate change impact on supply

We completed work on the impacts of climate change in preparation for WRMP19. We have made no changes to this nor to any other changes to our supply forecast, during the review period.

3.10.1 Unbilled water

Unbilled water consists of the sum of legal and illegal unbilled water. Legal unbilled water is the volume of water used by our customers and not billed such as standpipe water use, voids with consumption and accounts held in query. Components are measured company specific estimates, this year it was 1.05 Ml/d. Illegal unbilled water is, by the very nature of this component, an estimated volume. It is generally described as water theft and covers water use which the company is not generally aware of. This year it was 0.54 Ml/d. These estimates go through an annual auditing process.

3.11 Distribution system operational use (DSOU)

Our process losses have increased in the last year, taking us lower than our WRMP19 forecast position. Each year the DSOU (and legally taken and illegally taken unbilled) might change as the calculations are based on annual reviews and changes to the components. Therefore, being unlikely to match the volumes in the WRMP19 which are fixed volume forecasts.

In 2023/24 DSOU was 1.09 MI/d, this use of potable water incorporates uses from our network due to operational reasons and is not leakage or customer use. Treatment work

losses and other operational use such as run to waste and not recorded in distribution input was 17.63 MI/d.

3.12 Drought Plan

Our latest drought plan was published in August 2022 and there have been no changes to this since this date.

In our previous annual review, we stated we would continue work on the Blithfield potable infusion to determine its viability as a drought option. Throughout 2023/24 we have undertaken some detailed analysis on this option and how changes to our demand profiles post Covid could impact its feasibility.

The theory behind the scheme was:

- The objective of the scheme was to increase reservoir storage using excess water from the strategic treated water network.
- This scheme was designed for use after periods of extended low rainfall when reservoir storage is depleted.
- Excess water would only be available in the winter months when customer demand is low and there are no other operation problems such as maintenance shutdowns, excessive leakage or pollution of water supplies.

Our analysis showed the following:

- We would only expect to use this as an option 1 in 20 years.
- During the trial the company would operate at risk with very low headroom this is due to the fact that Blithfield would need to be below 50% for the trail to commence and assumes the average demand we would expect to see in this circumstance (based on 2022 demand levels, which is the last time the reservoir dropped below 50%). This means we do not have enough headroom to safely operate, and guarantee supplies during a trial under these conditions.
- Once in operations and during winter use, the company would operate at negative headroom and lose strategic storage. This is because we would be moving potable water from the south of our grid and based on current average demand levels, this creates areas in our system where we would see a reduction in strategic storage.
- The scheme would therefore be increasing raw water resources at Blithfield by reducing potable water resources in the strategic grid.
- The scheme would deliver limited benefits in reality operation for 60 days would deliver circa 3% increase at the reservoir.
- There is a significant capital cost to setup of circa £50k with additional circa £15k of licence costs (irrespective of whether the scheme is utilised). There is also the cost of treating water twice.
- Given risks to company supply demand position and limited benefit provided at the reservoir, it is recommended to not take forward as drought option.

In the summer of 2024, we are expecting the publication of the guidance for the next round of drought plans. Pre-consultation on these will begin in the autumn of 2024, with draft plans submitted the following year for review and consultation.

4. Demand

4.1 Impact of weather events on demand

During 2023/24 we were well prepared and due to planning through weather tracking, and resource readiness, we were able to respond quickly to the increases in leakage. And as figure 4 highlights, we managed to keep leakage generally on a downward trajectory, with a Christmas period rise in leakage but then being driven down during the 2024 winter months.

The overall leakage profile for the year can be seen below:





4.2 Demand Profile

The Post MLE Distribution Input (DI) for South Staffs Water is 320.95 MI/d excluding bulk imports and including bulk exports.

Throughout this AMP period, DI was heavily affected by both Covid-19 and unprecedented weather events. The WRMP19 DYAA Distribution Input is compared to the 'in year' DI. Our DI has remained higher than our WRMP19 forecast, although relatively flat around 324 MI/d for the final reported annual average DI for 2020/21, 2021/22 and 2022/23, and is now reduced in 2023/24.

4.2.1 Leakage

Leakage has continued to reduce over the first four years of AMP7. It is slightly above target for 2023/24, reporting 64.1 Ml/d vs a forecast figure of 56.91 Ml/d. As outlined in further

detail in section 4.6 the WMRP19 target was set prior to the Ofwat methodology, our Ofwat target for 2023/24 was 61.2 MI/d.

4.2.2 Per Household Consumption (PHC)

Table 2 shows the movement of Household Consumption (excluding Supply Pipe Leakage and Meter Under Registration) for the period 2019/20 (pre-covid) to AR24 (MI/d). This shows the effect of the Covid-19 pandemic, and the weather-related increase in household consumption. We note that two of the five years are recognised as not being Dry Years, however, in 2023/24 we achieved an outturn similar to 2019/20.

	APR20	APR21	APR22	APR23	APR24	WRMP Forecast 2023/24
Measured Household Consumption (MI/d)	56	63	71	64	60	78
Unmeasured Household Consumption (MI/d)	113	138	132	130	126	103
Total Household Consumption (MI/d)	169	201	203	194	186	181

Table 2 Household consumption

Consumption was higher in 2023/24 than the DYAA WRMP19 forecast in, 1) total household consumption and, 3) unmeasured household consumption but lower in 2) measured household consumption. However, consumption overall has been consistently falling since the increase seen during the Covid-19 period.

Our 'in year' 2023/24 Total Household PHC is 4 MI/d higher than the WRMP19 forecasted for 2023/24.

4.2.3 Per Capita Consumption (PCC)

Over the AMP we have had a significant focus on water efficiency which has supported this decrease in PCC. Alongside this we have established an internal stakeholder water balance working group, and a consumption monitor working group. These working groups continually assess the system billing and maintenance reports and have completed a deep dive on the billing reports to produce better data and information. During this year the working groups will continue to carryout assurance of the billing files and critical system files.

The per capita consumptions below compare the period 2019/20 to 2023/24 as 'in year' outturns vs WRMP19 DYAA. Again, there is a consistent downward trend since the Covid-19 period.

	APR21	APR22	APR23	APR24	WRMP Forecast 2023/24
Household measured (l/h/d)	134.76	119.92	110.46	110.46	124.00
Household unmeasured (l/h/d)	167.48	158.4	158.75	155.64	133.00
Total Household (I/h/d)	151.58	148.99	142.89	136.86	128.54

Table 3 SST per capita consumption profile for the AMP to date vs. WRMP19

We continue to maintain the long-established unmeasured household consumption monitor. Data within the model goes back as far as 2006 and is maintained on a regular basis. The process continues to be peer reviewed by Ovarro consultants and part of our assurance commitment.

We extract measured household consumption from our new billing system that we installed in 2023 called Aptumo. Meters are read once a year and billed twice yearly, with the second bill being based on an estimated reading.

We have continued to invest in the water balance throughout AMP7 and 2023/24. Investment has been made in our household consumption monitors, night use monitors, measured non-household consumption monitors, and water balance component studies.

We are pleased that the establishment of an internal Water Balance working group and Consumption working group the investment in the water balance process has resulted in robust and positive audit results.

4.2.4 Non-Household Consumption

Since 'Open Water' came into force in 2017, non-household customers have had the choice of selecting their own retail billing company. As a result, we now access meter reading and consumption data via the 'Central Market Operating System' (CMOS), with a monthly report generated from merging the CMOS consumption reports with our own consumptions reports. The water balance working group has worked with our retail helpdesk to continue to improve the consumption data we receive.

Our non-household consumption in 2023/24 was 63.7 MI/d, which is higher than the WRMP19 forecast of 55.5 MI/d. To understand this further, in the past year we have completed a deep dive on the various categories of non-household consumption, which included more accurate review of the in-year Legacy Long Unread Meters and Long Unread Meters. This has included additional meter readings and review on our logged data records to calculate an average daily consumption (ADC), rather than the historic established method of allocating a standard ADC. We have also reviewed and adjusted consumption records we have received from the Retail Market through CMOS to address identified inaccuracies in non-household consumption. This has included where groups of properties or meters have been incorrectly allocated on reports.

As part of the water balance process we have got the Aptumo Billing Team to conduct more frequent file maintenance, and set up more rules in the systemised consumption report

process to identify and remove erroneous customer readings. This is the first year we've had a full billing period with the Aptumo system and removal of readings was previously completed in a manual way. The processes have been audited as part of the Annual Performance Review and we received full support. Going forward we will continue to complete these activities.

4.3 Demand forecast, including population and property forecasting

We have updated our property and population growth forecasts as part of our WRMP24 development. We have made no changes to our WRMP19 assumptions.

4.4 Metering

We have continued to see customers requesting a meter to be lower than forecast. At our customer hub in Wednesbury, the team promote metering and have spoken extensively to customers on this topic. Customers have told us that the cost-of-living crisis is still their main concern in this region, and they do not wish to risk changes to their bill profile as many fear rises and prefer a predictable bill which does not fluctuate, as seen on rateable values.

Our WRMP19 strategy was for optants to increase our penetration. Covid-19 impacted on this as customers were unable to have meters fitted and had focus elsewhere. This, and the cost-of-living crisis are circumstances outside of our control and have meant that we have seen less optants, and therefore a lower meter penetration than predicted.

We acknowledge that there are water saving benefits associated with metering, and that a change of strategy would be required if we are to achieve the metering penetration forecast in WRMP19. We developed a catch-up plan, shared in last year's review, and we discuss this in section 4.5.1 below.

Households are entitled to a free meter installation and can switch back to being charged on an unmeasured basis at any time within two years of choosing to have a meter fitted. Our customers supported this non-compulsory approach to metering during the consultation period for our AMP6 and AMP7 business plans. We have reviewed this as we have developed our WRMP24 draft plan following the classification of the South Staffs Water area as water stressed, and the continued high demand in our area post Covid-19. We have also engaged with our customers on their views of compulsory metering and smart metering. As such, our WRMP24 draft plan proposes to deliver universal metering by 2035, with all new meters fitted to be AMI ready smart meters.

In 2023/24, 3,591 unmeasured households in the South Staffs region switched to a meter, and installed 29 new meters to previously unmetered non-household premises. We have also had 2,633 new connections, both domestic and non-household, to our network which have all had meters fitted.

As such, the year-end total meter penetration for 2023/24 is 42.2%. This compares to 2022/23 meter penetration (including voids) of 41.55%.

We continue to undertake annual MUR surveys of our meter stock. This is compliant with Ofwat consistency guidance and follows industry best practice.

We continued to renew household meter connections during the review year and have replaced 2,332 meters in 2023/24. We have also replaced 43 non-household meters.

4.4.1 Metering Action Plan

As outlined above, we are behind our AMP7 projected position due to the Covid-19 impacting our ability to attend customer properties to install meters, and the cost-of-living crisis making customers reluctant to switch to a meter leading to an overall reduction in requests. Our WRMP19 meter penetration forecast was 47%, compared to our actual position of 42.2%.

Our existing metering improvement plans worked to provide more information to customers around metering, highlighting the benefits, both financial and environmental, and the protection offered, as they can switch back within the first two years. As well as educating customers on why we should reduce water consumption.

However, the cost-of-living crisis and ongoing uncertainty has meant this hasn't yielded the results desired. We had proposed a plan to undertake an extensive programme in 2024/25 to catch up this backlog of meter installations by fitting 'ghost' meters – this is where we install meters but do not immediately charge the customer based on the meter consumption.

For a house to be counted in our metering penetration figures the property must be billed by a meter. The 'ghost' meter plan would mean that we would not switch customers to metered bills during AMP7 and therefore would not be counted in our figures. We have therefore reviewed the suitability of this approach and determined that we will not be undertaking the original catch up programme as planned. Although, we do plan to still fit circa 3,500 ghost meters in this way in preparation for AMP8 and to help us gain feedback from customers on the switching process.

Another option would be to install meters in a similar way, but switch customers in year to a bill, essentially compulsory metering. Following subsequent customer engagement, we are not proposing to install compulsory metering in year 5 of AMP7 as we will not have the time to engage with our customers appropriately to make them aware of the approach, why we're doing it, what it will mean for them and the support we can offer. We believe that rushing into a compulsory metering programme will cause significant worry and distress for a substantial proportion of our customers, and therefore we will not be progressing with this approach either.

We acknowledge that this means we will not meet our AMP7 projected metering position; however, we believe that our optant strategy was a forecast of the number of customers who we believed would request a meter and our influence over this is limited. The world events detailed above are out of our control and have had the most significant impact on the number of customers requesting a meter. We propose to deliver a catch-up programme in year 1 of AMP8 when we will be undertaking our compulsory universal metering programme and we are actively using year 5 of AMP7 to prepare for this. As such, it will not impact on our WRMP24 approach or supply demand balance and will ensure we deliver the projected metering penetration in early AMP8.

We had previously detailed how we had applied for the Defra accelerated spend for metering. We cannot accelerate activity until our baseline delivery has been achieved, and therefore there will be no acceleration of metering in AMP7.

4.5 Leakage management and reductions

Total leakage in 2023/24 is 64.1 Ml/d. This relates to our Ofwat target of 61.2 Ml/d.

In 2023/24 leakage was reduced by 1.2 MI/d from 65.3 MI/d in 2022/23. This is despite entering 2023/24 in a really high position post the freeze thaw events and harsh winter of 2022/23. We were also still in recovery mode from the cyber incident which impacted our ability to target leakage in the way we would normally do on our trunk main system. Due to this, leakage in the first three months of the year was much higher than planned. We recovered the position by July and August and since then have been driving down leakage levels well. Leakage levels are now at their lowest ever values due to the these efforts.

Since April 2022 we have undertaken an increased amount of work on all 4 aspects of PALM (Prevent, Aware, Locate, Mend) in order to continue to maintain and further reduce leakage. For all 4 aspects these include but are not limited to:

Prevent:

- Undertaken a pressure management study completed by an external company.
- Examining optimisation opportunities with our current pressure management and new pressure management opportunities.
- Currently optimised ~70 DMA level current pressure management schemes with a benefit of 2.8MI/d
- Have built five new DMA pressure management schemes.

Aware:

- Recruited 2x new leakage analysts
- Invested in and trialling SMEs tool "Paradigm" A forecasting model for our DMAs to give us a detailed demand breakdown for hydraulic areas and the ability to predict consumptions and expected burst flows.
- Undertaken 3 different network wide satellite surveys during this period to help us find hidden leaks on our network
- Developed a lift and shift Acoustic logger program and purchasing the latest Acoustic lift and shift and permanent loggers
 - ~700 lift and shift loggers
 - ~1350 new Permanent Acoustic Loggers, with all fitting to be completed by end of June 2024

Locate:

- Expanded Internal Leakage Technician Resource from 34 to 43 FTE (20% increase)
- Recruited 7 external logging resource FTE
- Employed an external contractor (4 FTE) to undertake our satellite survey follow ups.
- Employed an external contractor to undertake intensive Trunk Main Leakage investigations on our network (2/3 FTE)
- Continuing to expand our "find" equipment and innovative solutions.

Mend:

- Increased number of repair teams from 16 to 20 (~20% increase)
- Implemented an in-house Customer Works Team to enable us follow up on CSLs quicker and more efficiently and get them repaired in a timely manner. Since implementation we have seen a huge improvement in CSL run times

We continue to calculate bottom-up leakage using data obtained from DMAs, which monitor an area of approximately 1,000 to 2,000 properties. We provide further details of our 2023/24 leakage and PCC performance in the annual performance report (APR) that we will submit to Ofwat in July 2024.

4.6 Consistency in reporting methodology

We achieved full compliance in 2023/24 for per capita consumption in both regions.

4.7 Water efficiency

We have continued with our BAU water efficiency activities. These include:

- Use of Get Water Get Fit online and virtual customer water efficiency audits and provision of water saving devices.
- Water efficiency messaging with social media and our website.
- Engagement at local community events promoting metering and sharing water efficiency advice and products.
- Education in schools in our region.
- Direct engagement with our customers at our Customer Hub at Wednesbury sharing metering and water saving advice, as well as support for vulnerable customers.
- Offering of incentives to Developers for water efficient house building.

During 2023/24 the Company has distributed over 20,000 water saving devices in the South Staffs region saving circa 0.13Ml/d.

As a result of the Covid-19 pandemic, we saw customer use over 10 l/p/d more water. We developed a detailed PCC reduction plan, and as a result have seen PCC reduce consistently since the pandemic. We have continued with our PCC plan throughout 2023/24, increasing

our funding for water efficiency work by over 30%. In addition to the BAU activities outlined above, we have several notable schemes that span over years 4 and 5 of AMP7, and these are detailed below.

4.7.1 Water Efficiency in Faith and Diverse Communities

In May 2023, we were awarded £270,000 from Ofwat's <u>Innovation Fund</u> for a diversity-led water efficiency project. The aim of this project is to better understand how water is used and valued in different faiths and cultures within the communities we serve.

The project involves us working with faith groups, experts and a range of organisations supported by academic research led by the University of Cambridge – Faculty of divinity providing insight into the relationship with water and faith, practical uses of water and some of the barriers and opportunities to better engage diverse communities.

This research will enable us to develop more effective water efficiency measures, behaviour change campaigns and bespoke water-saving products to support customers of different faiths and cultures to reduce their water use and build public trust.

We think the project will deliver a number of key objectives for us, including water savings of around 200,000 litres and enable us to develop a more inclusive water efficiency framework and toolkit linked to faith and culture that can be adapted and scaled up across the sector. And we think it will help us to establish new channels of communication and stakeholder relationships with our hard-to-reach communities.

In March 2024, we launched our first campaign for the project in partnership with Cambridge Central Mosque. This focused on the opportunity to save water during the Islamic practice of Wudu (ablution), the ritual washing performed in preparation for prayer and worship. We are planning other campaigns moving into our South Staffs region and will report on these in next year's annual report and financial statements.

In addition, we have launched a campaign in the South Staffs region related to cooking across these communities, primarily focusing on the washing of rice. We have developed relationships with several influencers, including Ping Coombes, the winner of Masterchef in 2014. Ping will share her stories of her Malaysian heritage and the relationship with rice washing to help encourage behavioural change in this space.

4.7.2 Ofwat Innovation Fund success

We have been successful in another Ofwat Innovation Fund bid, joint with Severn Trent Water, to look at reducing consumption through incentivisation using Nectar points. This programme will trial in the Severn Trent/South Staffs Water area, with learnings that can be shared across the Cambridge region.

4.7.3 Behavioural change campaigns

In 2023, we delivered a highly successful behavioural change in our Cambridge region, called "Can for the Cam", asking customers to ditch the hose and use a watering can to water their gardens. We are building on this campaign in 2024, and part of this campaign will involve employing our own plumber for three months to repair leaky loos that customers report to us via a dedicated website. We are looking at how we take the success of this campaign and deliver the benefits in the South Staffs region, adapting it to ensure it is appropriate and relatable, and create the clear link to the cost savings that can be achieved as a result of reducing consumption, which we know is a clear focus are of our customers in this region.

4.7.4 Eco Tariff Trial

As highlighted above, the affordability is a key concern for our customers and a driver in their behaviour and relationship with water. As a result, in year 5 we will be undertaking an eco-tariff trial. For customers that are not eligible for our Assure tariff but are still struggling to pay due to the cost-of- living crisis, we will trial offering the Assure 60% discount on their essential usage only, based on number of occupants.

The below diagram shows how the tariffs will align to our existing tariff structure, with eligible customers receiving the Assure discount tariff up to their essential use threshold and paying the standard tariff for usage above this level.

This approach will be supported with water efficiency advice and devices to help the customer manage their usage levels and reduce their bills through reducing consumption, in addition to the discounted support. Customers must be on or opt for a meter to be eligible for the tariff.



Whilst the trial will enable us to support more customers and enhance affordability, a key deliverable is to measure the implications of the approach on consumption behaviour. With our current social tariff, Assure, we apply a discount across the whole bill. In doing so, we reduce the incentive to cut down non-essential consumption as it costs much less. Whilst our primary aim for this innovative charging trial is to support affordability, we want to recognise the potential for the approach to support our wider environmental goals.

By tracking consumption changes and using surveys of participants, we will assess whether our customers are using and valuing their water differently as a result of the trial. We will also ask participants about the impact this has on their mental and physical wellbeing, to analyse any risks of increasing bill anxiety with the threshold levels or reducing essential usage for hygiene, to ensure we consider any unintended negative impacts for customers.

4.7.5 Non-household consumption reduction

Our WRMP19 does not include any non-household reduction activity; however, we recognise this is an important area for consumption reduction and whilst our WRMP24 includes activities in this area from 2025, we believed it was important to start work before that, and so have been developing some collaborative approaches and initiatives.

We have developed an innovative partnership with Whitbread. This partnership will see us jointly deliver water savings across the Premier Inns and restaurants across the Cambridge region in 2024 by through a trial to retrofit properties with water efficient devices such as installation of upgraded WC valves, water-efficient showerheads, and flow restricted taps. Following a review of this trial, if successful, we will then look to deploy across the South Staffs region at pace. We are already engaging with retailers and other non-household business to explore similar opportunities.

5. Headroom and options

5.1 Target headroom forecast

We update our target headroom every five years as part of the WRMP process. We commissioned Mott Macdonald to do this work for our WRMP19. This is described in Appendix Q to WRMP19 and is available on our <u>website</u>¹. We have not made any changes to this since publishing our WRMP19.

We have included the WRMP19 target headroom in our supporting data tables for this submission. However, it should be noted that headroom relates to uncertainty, and as the year has now passed, some of those uncertainties are resolved, for example:

- Climate change impacts on supply (S8) and demand (D3) (equates to 0.62 Ml/d)
- S5 gradual groundwater pollution impacts to DO
- D2 demand forecast uncertainty

With these elements removed, this equates to a reduction of 45% in target headroom, and so we have updated our target headroom in the accompanying data tables to 5.45 Ml/d compared to the WRMP19 value of 8.26 Ml/d.

5.2 Selected options

In our WRMP19, we identified the need to undertake work at Somerford and Slade Heath to improve the output from these sites to support our forecasts and improve our resilience. A feasibility trial has been completed on the site in 2023/24 which has indicated that further work is required to be able to finalise the solution. Further work shall be undertaken in 2024/25, with the scheme proposed to be completed in 2025/26. This aligns with our WRMP24 data tables.

Our demand side option performance is discussed in section 4 above.

5.3 Supply-demand balance

We have a supply demand balance for 2023/24 of -13.23 MI/d compared to the forecast of 14.59 MI/d for a dry year. We have continued to see a sustained higher household PCC following Covid-19 due to permanent changes to behaviour. We have driven reductions in PCC, with an additional 6 I/p/d reduction in 2023/24 and an associated 5 MI/d reduction in DI.

Planned outage has also been a driver for our negative SDB and is a primary focus for us, as outlined above.

 $[\]label{eq:south} ^1 www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-management-plan.pdf.$

6. Forward look

2022/23 has seen our water efficiency activities continue to deliver a further step change in household consumption reduction, reducing PCC from 143 l/p/d to 137 l/p/d – a reduction of 6 l/p/d. This demonstrates that our improvement plan in this area is yielding results, are we are keen to build on this in year five as we look to reduce PCC even further towards our end of AMP7 WRMP19 forecast of 128.1 l/p/d.

However, we believe there is a new baseline position for household consumption for the South Staffs region, as per our submission to Ofwat in 2023. Our detailed investigation has shown that customers are working from home more, and that these customers would previously have worked outside of our supply zone area such as Birmingham (and therefore Severn Trent Water). This is supported by the fact we have not seen a corresponding decrease in non-household consumption in AMP7; in 2023/24 non-household consumption was a total of 63.7Ml/d compared to the WRMP19 forecast of 55.52 Ml/d. Increases in both household and non-household consumption lead to the higher DI we are seeing, which is the prime reason for our negative supply demand balance position.

Whilst our leakage was marginally above our Ofwat target for year 4 of the AMP, this was due to the impact of the freeze thaw events at the end of the previous year. Since then, we have increased resources and deployed over 2000 loggers on our network and have recovered our leakage position, in a strong position now for year 5.

Therefore, reducing both household and non-household consumption is our main focus for 2024/25. Our WRMP19 did not include any activity on non-household reduction, but we are working with retailers and non-household businesses to explore and deliver options to reduce consumption. Our PCC reduction plan continues and we look to bring some of the successful behavioural change elements from our Cambridge activities over to the South Staffs area.

We have submitted our revised WRMP24 and are awaiting direction from the Secretary of State regarding publication of this. Due to the general election on 4th July, it will be autumn before we receive direction on this. Likewise, we have submitted our draft business plan, PR24, to Ofwat and await the draft determination on this in early July. We will provide our response and representation on this, with the final determination due in December 2024. We will ensure any potential impacts on the WRMP24 are reflected accordingly.

We continue our work with Water Resources West as they develop the final plan to ensure alignment with the WRMPs. We are supporting WRW with expanding our work with the non-PWS sectors, as we look to bring additional engagement and input from these sectors to support the development of the next regional plan.

Following the drought of summer 2022, we adopted the lessons learnt that we identified from the review of the drought that we undertook and took an enhanced precautionary approach to preserving Blithfield in spring 2023. This meant that at the start of June 2023, Blithfield level was just over 90% and we didn't cross the drought monitoring curve until the

end of August. Despite this positive position, we held bi-weekly conservation meetings to ensure clear focus and a proactive approach to the management of all assets across the region.

We have now made this BAU and are already replicating this in 2024. The wet weather has meant that we have seen Blithfield at 100% for 6 months, which is the longest time recorded, and we are still at 100% at the beginning of June. However, we will still hold our conservation meetings across summer as we maintain a cautionary approach, and are implementing our summer use customer campaign to encourage water saving as part of educating our customers on the environmental link to their water usage.

6.1 Preparing for AMP8

We are mindful that we are not where we would like to be with regards to SDB and have outlined above our plan for year 5 to enable us to start AMP8 in a good position. We have published our draft WRMP24 and await direction from the Secretary of State to publish as a final version.

We are working with all sectors in the region, and through Water Resources West (WRW), to ensure abstraction is sustainable and meets the needs of water users and the environment into the future.