

# UUWR\_01

## PR24 Draft Determination: UUW Representation

# Summary of our representation and guide to reading our submission

**August 2024**

This document contains a summary of our representations on Ofwat's draft determination and provides signposting to each of our representation documents.

Reference to draft determination documents:

Ofwat Information notice IN 24/02,

Ofwat Information notice IN 24/06,

Ofwat Information notice IN 24/07.

## Summary

We welcome Ofwat's ambition to deliver PR24 determinations that set companies on the path for long term transformation that will deliver better outcomes for customers and the environment. United Utilities Water submitted a high quality and ambitious plan to deliver step change improvements in the North West. Whilst we are pleased that many aspects of our plan have been recognised and accepted by Ofwat, we do not believe that the draft determination as a whole supports the outcomes that we need to deliver and that our stakeholders want to see. This representation in response to the draft determination balances those areas where we are able to align to Ofwat's view and those areas where we consider Ofwat should review its approach.

### Storm Overflows

We recognise that customers and stakeholders are particularly concerned about the health of the region's rivers and waterbodies and the discharges from storm overflows. Improvements are also a legal requirement that UW must deliver. The scale of the challenges embedded in Ofwat's draft determination allowances are such that it would not be possible to deliver these requirements within the allowances proposed by Ofwat. We have identified significant shortcomings in Ofwat's approach to estimating allowances and material improvements that can be made to its models. In recognition that Ofwat may require additional evidence, beyond UW's model improvements, to support an uplift of the cost allowance, we have also sought to provide Ofwat with substantial evidence on how the factors included within our models manifest in site-specific cost pressures that align with engineering rationale, contained in 90 individual overflow deep-dives.

We have also made meaningful adjustments to our proposed costs in this area: a £250m reduction has been applied on a site specific basis reflecting solution optimisation and is reflected in our draft determination tables. We also propose that we take a further £250m efficiency challenge as a top-down adjustment. These efficiencies are not applied at a site by site basis but reflect an expectation that we will be able to identify some (as yet unidentified) efficiencies across our portfolio of projects. It seems likely that the cost levels in Ofwat's assumed efficient frontier will be based on interventions that may offer short term cost saving opportunities by – for example – utilising some solutions that have both a lower cost and a lower expected lifespan. We will look to utilise such opportunities where they arise and in doing so will reduce the overall cost in AMP8.

### Certainty on adaptive plan at Davyhulme, Eccles and Wigan

Since the submission of our business plan in October 2023, we have continued with our constructive engagement with the Environment Agency to deliver best value plans and interventions. We are pleased to confirm that our adaptive plans at Davyhulme, Eccles and Wigan are now approved. We are providing evidence to Ofwat that these schemes are now clearly defined, costed and deliverable. Importantly, we have partners already engaged in these schemes, working towards on time completion of the schemes for the benefit of customers and the environment. With this additional certainty and the evidence we have provided, we are confident Ofwat has the required information to reassign these schemes to its enhanced engagement and cost sharing mechanism.

### Overall downward skew of risk and return

The draft determination risk and return balance has been set punitively and we believe Ofwat has not secured that companies face a "fair bet" opposite allowed returns and the incentive package. Several performance commitments are too skewed to the downside and do not meet the basic criteria of 'stretching but achievable'. ODI rates have proven to be highly volatile in the run up to the draft determination; these need to be more calibrated both to the areas of performance they reflect and to customer valuations. Caps and collars are also an essential part of the performance incentive suite. In general, we observe that they are not applied when they would be appropriate and that in those circumstances where they are applied, they are often at too distant a level to provide any meaningful impact on expected outcomes. Ofwat's approach to the internal sewer flooding measure and its application to UW is a clear example of these flaws, although there are also a number of other performance commitments that also require review. This includes the approach adopted industrywide for C-MeX.

The overall outcome of the draft determination reflects many individual examples where Ofwat appears to have meaningfully "aimed down" either when considering specific cost allowances or a modelled approach. This

includes introducing enhanced sharing mechanisms, which are welcome, but not allowing reasonable baseline allowances for expected costs in, for example, bioresources or business rates. Likewise, it is confounding that Ofwat does not recognise that the impact of the post-Balmforth regulatory regime is that there are a higher number of higher cost interventions in our reservoir safety regime.

### **Price Control Deliverables framework**

We also provide extensive commentary on the PCD framework that has been incorporated into the draft determinations. We believe there are many improvements that should be made to ensure it is capable of implementation and can support the efficient and effective delivery of improvements for customers and the environment. As presently constructed, the PCD framework would likely serve to undermine the efficiency and innovation benefits that have been achieved from Ofwat's totex and outcomes framework. It represents an untested and highly uncertain regulatory intervention that needs to be better explained and understood and has been subject to very limited industry engagement so far.

### **Financeability**

Whilst we understand that there are many aspects of draft determination financeability assessment that are reasonable and justified in principle, we do have concerns that the notional company financeability assessment may not actually provide comfort that efficient companies in the sector are, in fact, financeable. Moody's has already flagged that unless there are changes in Ofwat's final determination, its assessment of water company business risk has increased. We present evidence regarding the impact that several of Ofwat's mechanisms have in reducing financeability and ratings headroom. We also present evidence that Ofwat should increase its allowance for the cost of capital as part of ensuring that a strong case can be made for equity investment to support the very large capital programmes required for AMP8.

### **Further plan developments**

Since the submission of our business plan in October 2023, there have been a number of externally driven changes as a result of the evolving regulatory landscape, which were not present in our business plan or reflected in the draft determination. Most notably this includes new legal obligations from the DWI relating to PFAS and some significant changes contained in the latest WINEP published by the Environment Agency on 5 July 2024. We have included these changes wherever we can and identified other issues that need to be resolved, including a proposed expansion of coverage for emergency overflows. We would be keen to either resolve them before final determination, or identify the route through which they will be dealt with after the final determination.

### **Moving forward towards the final determination**

We are encouraged that Ofwat has made clear that it will take into account further evidence provided by companies as it proceeds towards its final determinations. In the time available, we have sought to make comprehensive and meaningful representations to assist Ofwat in making its decisions. The remainder of this document provides a guide to the various elements of our representation as an aid to navigation and signposting. We would be keen to use the remaining time before final determinations to engage further with Ofwat to support the final determination process.

## Contents

<b>1.</b>	<b>Guide to reading our representation.....</b>	<b>5</b>
<b>2.</b>	<b>United Utilities Water Limited Board Assurance Statement.....</b>	<b>6</b>
<b>3.</b>	<b>Company representation proforma .....</b>	<b>6</b>
<b>4.</b>	<b>Our representations.....</b>	<b>6</b>
4.1	Storm Overflows .....	6
4.2	Gated Mechanism .....	9
4.3	Internal Sewer Flooding .....	9
4.4	Bioresources.....	9
4.5	Reservoir .....	9
4.6	Cost and PCD .....	10
4.7	Outcomes .....	11
4.8	Balance of Risk and Return and Financeability .....	12
4.9	Plan Updates .....	12
4.10	Cyber resilience.....	13
4.11	United Utilities Briefing Note .....	13
<b>5.</b>	<b>Data tables and models .....</b>	<b>13</b>
5.1	Data tables .....	13
5.2	Models .....	14

## Appendices

<b>Appendix A</b>	<b>Full list of UW representation files.....</b>	<b>16</b>
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# 1. Guide to reading our representation

We were pleased to be recognised by Ofwat as having the highest score in its quality assessment on our original Business Plan submission and have continued with this rigour in preparing our company representation. Within the time constraints we have been operating under, we have provided a substantial suite of well evidenced representations. These are accompanied by an assurance statement from the UUW Board.

Ofwat set out within its Information notices [IN 24/02](#), [IN 24/06](#) and [IN 24/07](#) a number of expectations for companies to meet when providing their draft determination representations. We can confirm we have satisfied these requirements within our representation:

## **Guide to reading representation** ✓

As our representation is presented across multiple documents. This document - UUWR\_01\_Executive Summary and guide – provides an accessible guide that details the structure of our documentation and supporting appendices. We also provide a brief description of the representation area, and have included where appropriate, the details of the supporting documents and appendices.

## **Company representation proforma** ✓

We have populated Ofwat's 'representation proforma' and published this on our company website.

## **Document naming convention** ✓

We have adopted a naming convention for all our documentation, where all documents start with company acronym (UUWR), followed by the document number (01-110), followed by the title of the document.

## **Redaction** ✓

We want to be as transparent as possible in the information we present as part of our representation. However, we have needed to anonymise or redact a few details in versions of appendices and tables published on our website. This has been done where they contain commercially sensitive information or in the interests of security. We have populated our company proforma document UUWR\_03\_Response\_Proforma, worksheet RP3 with the details of necessary redactions.

## **Publication on the company website** ✓

We have published our representations on our company website alongside our submission to Ofwat. We provide hyperlinks to all documents, except for where commercially confidential or security details prevent it from being disclosed.

## **One version of company business plans and accompanying data tables** ✓

We have submitted one version of our business plan representation and accompanying business plan data tables, including Ofwat's additional data tables. This representation version of business plan data tables is consistent with the delivery of all legal obligations.

In addition to this submission, we are also engaged with Ofwat relating to the active procurement activities relating to our Direct Procurement for Customers scheme for the Haweswater Aqueduct. As this is a live procurement which is running parallel to our company representation, we would expect the outcome of this procurement to be reflected in the Final Determination.

The following sections of this document provide an accessible guide to aid the navigation of our representations in response to Ofwat's draft determination. Throughout this document, we have provided a brief description of the representation area and, where appropriate, have detailed the supporting documents and appendices.

In summary:

- Section 2 provides signposting to the UUW Board Assurance statement and supporting documentation
- Section 3 provides signposting to the "Company Representation Proforma" requested by Ofwat.
- Section 4 provides signposting to our substantive representation documents
- Section 5 provides signposting to the data tables and models that support our representation

## 2. United Utilities Water Limited Board Assurance Statement

**UUWR\_02 Board Assurance Statement:** This document is the final UUW Board Assurance Statement that supports the UUW PR24 business plan representations. This document was approved by the Board of directors of United Utilities Water Limited. It is signed by all members of the Board.

The document below (UUWR\_06) summarises the findings of our aggregate assurance provider, Deloitte LLP, as reported to the UUW Board. It has been provided to Ofwat but not published in line with the terms of the agreed transmittal letter.

- UUWR\_06\_Assurance aggregation summary report– Provided by Deloitte LLP.

## 3. Company representation proforma

**UUWR\_03 Company representation proforma:** This excel file is our completed version of Ofwat’s "Company Representation Proforma" and comprises the four worksheets:

- RP1 - We provide responses to questions and actions given by Ofwat in the draft determination, and signpost to further evidence;
- RP2 - We provide and signpost further evidence relating to costs;
- RP3 - We provide details of our representation that has been redacted;
- RP4 - We provide and signpost evidence of where we have identified:
  - new issues that need to be addressed for the final determination (all areas except cost assessment);
  - actions that need to be completed for the final determination such as errors or inconsistencies in Ofwat assessments.

## 4. Our representations

### 4.1 Storm Overflows

**UUWR\_10 Overflows:** We recognise that customers and stakeholders are particularly concerned about the health of the region’s rivers and waterbodies and the discharges from storm overflows. The improvements are also a legal requirement that UUW must deliver. This document provides our representation on Ofwat’s draft determination to ensure we can deliver the step change those customers and communities want to see. It provides coverage of cost allowances and cost modelling as well as representations on the performance commitment and price control deliverable.

In recognition that Ofwat may require additional evidence, beyond UUW's model improvements, to an uplift of the cost allowance, we have also sought to provide Ofwat with site specific deep dive evidence on 90 schemes. As this contains detailed site-specific data these documents have not been published due to them containing commercially sensitive information and/or in the interests of security.

**Table 1 Storm Overflow site specific evidence**

Document Reference
UUWR_10.01_Overflow evidence_08UU101381-Stockport WwTW 016940151ST
UUWR_10.02_Overflow evidence_08UU102420-Lancaster WwTW 017270050ST
UUWR_10.03_Overflow evidence_Pennington Flash-(Multiple)
UUWR_10.04_Overflow evidence_08UU102417-Garstang WwTW 017260046ST

Document Reference
UUWR_10.05_Overflow evidence_08UU101285-Carleton Hall Templebank CSO EDE0116SO
UUWR_10.06_Overflow evidence_08UU101379-Macclesfield WwTW 01691009ST
UUWR_10.07_Overflow evidence_08UU102423-Lytham PS FYL0003SO
UUWR_10.08_Overflow evidence_08UU101158-Dukinfield WwTW 016940087ST
UUWR_10.09_Overflow evidence_08UU101005-King Street PS COP0049SO
UUWR_10.10_Overflow evidence_08UU102441-Frederick Street Pumping Station BRW0044SO
UUWR_10.11_Overflow evidence_08UU100997-Graving Dock PS
UUWR_10.12_Overflow evidence_08UU100995-GlazeburyWwTW 016920350ST
UUWR_10.13_Overflow evidence_08UU102415-Palace Nook PS BRW0097SO
UUWR_10.14_Overflow evidence_08UU100983-Chorley WwTW 017060016ST
UUWR_10.15_Overflow evidence_08UU101368-Philips Road CSO BBN0167SO
UUWR_10.16_Overflow evidence_08UU102422-Lamaleach CSO FYL0002SO
UUWR_10.17_Overflow evidence_08UU101231-Shap WwTW 017670025SO
UUWR_10.18_Overflow evidence_08UU101157-Dearham WwTW 017570068SO
UUWR_10.19_Overflow evidence_08UU101007- Long Hey Road CSO WIR0094SO
UUWR_10.20_Overflow evidence_08UU102452-No 76 Middle Brook CSO BOL0039
UUWR_10.21_Overflow evidence_08UU101382-Sale WwTW 016940149SO
UUWR_10.22_Overflow evidence_08UU100977-Kirkway CSO ROC0136SO
UUWR_10.23_Overflow evidence_08UU101173-Plumbland WwTW 017570072ST
UUWR_10.24_Overflow evidence_08UU101103-Milnrow Road CSO ROC0103SO
UUWR_10.25_Overflow evidence_08UU101380-Biddulph WwTW 016810052ST
UUWR_10.26_Overflow evidence_08UU101020-Skipool PS WYR0076SO
UUWR_10.27_Overflow evidence_08UU101146-Brookside CSO COP0091SO
UUWR_10.28_Overflow evidence_08UU101026-Town Beck CSO LAK0059SO
UUWR_10.29_Overflow evidence_08UU101217-Little Clifton WwTW 017570045ST
UUWR_10.30_Overflow evidence_08UU101371-St Bees PS COP0097SO
UUWR_10.31_Overflow evidence_08UU101197-Elterwater PS LAK0025SO
UUWR_10.32_Overflow evidence_08UU101325-Irlam WwTW 016940133ST
UUWR_10.33_Overflow evidence_08UU102418-Station Road CSO FYL0014SO
UUWR_10.34_Overflow evidence_08UU101136-Ambleside WwTW 017370024ST
UUWR_10.35_Overflow evidence_08UU101085-Central PS WIG0100SO
UUWR_10.36_Overflow evidence_08UU101018-Rookery CSO NEW0038SO
UUWR_10.37_Overflow evidence_08UU101120-Tebay Sewage PS EDE0079SO
UUWR_10.38_Overflow evidence_08UU101030-Penn Lane (Weston Point, Point R) CSO HAL0060SO
UUWR_10.39_Overflow evidence_08UU101041-Corporation Street CSO TAM0099SO
UUWR_10.40_Overflow evidence_08UU101093-Bear Street CSO – BUR0037SO
UUWR_10.41_Overflow evidence_08UU101364-Heywood (Botany) STW CSO ROC0139SO
UUWR_10.42_Overflow evidence_08UU101378-Westminster Road CSO MAC0062SO
UUWR_10.43_Overflow evidence_08UU101029-Weston Street/Viking Street CSO BOL0115SO
UUWR_10.44_Overflow evidence_08UU101110-Raglan Street CSO TAM0020SO
UUWR_10.45_Overflow evidence_08UU101243-Hall Nook CSO WAR0007SO
UUWR_10.46_Overflow evidence_08UU101367-Parr Brook CSO BRY0133SO
UUWR_10.47_Overflow evidence_08UU101094-Inskip Street CSO BUR0022SO
UUWR_10.48_Overflow evidence_08UU101077-Rishton Lane CSO BOL0127SO

Document Reference
UUWR_10.49_Overflow evidence_08UU100979-Adjacent Duxbury Mill PS CSO CHR0024SO
UUWR_10.50_Overflow evidence_08UU101058-Turner Bridge CSO BOL0092SO
UUWR_10.51_Overflow evidence_08UU101012-Orrell House Farm CSO WIG0173SO
UUWR_10.52_Overflow evidence_08UU101369-Oxford Street West/ Pottinger Street CSO TAM0045SO
UUWR_10.53_Overflow evidence_08UU101348-Zulu Street CSO BOL0109SO
UUWR_10.54_Overflow evidence_08UU100989-East Lancs Road PS WIG0179SO
UUWR_10.55_Overflow evidence_08UU101036-Sherborne Street CSO MAN0052SO
UUWR_10.56_Overflow evidence_08UU101154-Coppull New Road/Butterworth Brow CSO CHR0050SO
UUWR_10.57_Overflow evidence_08UU101151-Church Lane CSO (CREWE) CRE0043SO
UUWR_10.58_Overflow evidence_08UU101156-Dean Wood CSO WLN0020SO
UUWR_10.59_Overflow evidence_08UU101096-Kirkhall Lane Sewer WIG0107SO
UUWR_10.60_Overflow evidence_08UU100998-Grove Road CSO TAM0096SO
UUWR_10.61_Overflow evidence_08UU101046-Chapel-en-le-Frith WwTW 016940168ST
UUWR_10.62_Overflow evidence_08UU101032-Lytham Road CSO TRA0038SO
UUWR_10.63_Overflow evidence_08UU101059-Albert Road CSO BOL0095SO
UUWR_10.64_Overflow evidence_08UU101119-Tan House Lane/Moss Bank Road SO HAL0052SO
UUWR_10.65_Overflow evidence_08UU101247-Boothroyden Road CSO ROC0018SO
UUWR_10.66_Overflow evidence_08UU101240-Frankby Close CSO WIR0087SO
UUWR_10.67_Overflow evidence_08UU101126-Water Street CSO ROC0097SO
UUWR_10.68_Overflow evidence_08UU101025-Thermal Road Port, Causeway WIR0132SO
UUWR_10.69_Overflow evidence_08UU101271-Threapland WwTW 017570074ST
UUWR_10.70_Overflow evidence_08UU101047-Worsley WwTW 016940139ST
UUWR_10.71_Overflow evidence_08UU101109-Radford Street CSO SAL0079SO
UUWR_10.72_Overflow evidence_08UU101345-Sheridan Way CSO TAM0015SO
UUWR_10.73_Overflow evidence_08UU101066-Agecroft PS SAL0097SO
UUWR_10.74_Overflow evidence_08UU101116-Sheepfoot Lane CSO OLD0032SO
UUWR_10.75_Overflow evidence_08UU101065-Bury New Road CSO BRY0130SO
UUWR_10.76_Overflow evidence_08UU101193-Chorley New Road/Beaumont Road CSO BOL0096SO
UUWR_10.77_Overflow evidence_08UU101274-Bank Lane CSO PEA0043SO
UUWR_10.78_Overflow evidence_08UU101332-Maple Avenue CSO BRY0086SO
UUWR_10.79_Overflow evidence_08UU101078-Carr Mill Road CSO STH0059SO
UUWR_10.80_Overflow evidence_08UU101356-Briarlands Close CSO STK0123SO
UUWR_10.81_Overflow evidence_08UU101073-Percy Street CSO PRE0003SO
UUWR_10.82_Overflow evidence_08UU100984-Crown Street (Town Dyke Orchard) CSO CAR0042SO
UUWR_10.83_Overflow evidence_08UU101217-Oxford Street/Ainsley Street BRW0091SO
UUWR_10.84_Overflow evidence_08UU102419-Southport (Bank End) WwTW 017030100ST
UUWR_10.85_Overflow evidence_08UU102416-Croston WwTW 017060017ST
UUWR_10.86_Overflow evidence_08UU100988 – Dunham Massey WwTW 016940003ST
UUWR_10.87_Overflow evidence_08UU101295a–Aspin Lane MAN0031
UUWR_10.88_Overflow evidence_08UU101028-Upton Storm Tanks WIR0071SO
UUWR_10.89_Overflow evidence_08UU101316-Great Asby WwTW 017680364SO
UUWR_10.90_Overflow evidence_08UU101099-Manchester Road/Park Lane CSO WIG0199SO
<b>Total 90</b>



## 4.2 Gated Mechanism

**UUWR 11 Gated Mechanism:** This document describes our observations on the gated processes that Ofwat has proposed with its draft determination. We acknowledge there are merits to the two mechanisms, and with amendments there are clear benefits to managing large and complex schemes. This document also provides evidence as to why we consider that the four WINEP schemes Ofwat has allocated to the "Large Scheme Gated Process" are not suitable for that process. Given that there is now much more certainty about the scope, cost and deliverability of these schemes – following approval for our adaptive plans from the Environment Agency – we consider that they are appropriate for the "Enhanced Engagement and Cost Sharing" scheme. We also highlight that new WINEP schemes at Windermere, as new additions to the plan, would be well suited to inclusion in the "Large Scheme Gated Process."

This document is supported by the following 3 appendices, all of which are published on our website:

**Table 2 UUWR\_11\_Gated Mechanism appendices**

Document ID	File Name
UUWR_11.1	<a href="#">UUWR 11.1 Appendix - Davyhulme WwTW</a>
UUWR_11.2	<a href="#">UUWR 11.2 Appendix - Eccles WwTW</a>
UUWR_11.3	<a href="#">UUWR 11.3 Appendix - Wigan WwTW</a>
<b>Total</b>	<b>3</b>

The Windermere enhancement case is provided separately, as [UUWR 78](#).

## 4.3 Internal Sewer Flooding

**UUWR 12 Internal sewer flooding:** This document outlines our response to Ofwat’s Draft Determination for the internal sewer flooding performance commitment. This representation builds upon our October 2023 Business Plan document UUW30 – Performance commitments technical document - PR24\_ISF\_Internal Sewer Flooding, where we presented compelling evidence to demonstrate why a common PCL is inappropriate and distorts incentives across the industry.

## 4.4 Bioresources

**UUWR 13 Bioresources:** This document contains our representations on Ofwat’s draft determination of the Bioresources price control. We recognise that Ofwat has taken account of the very substantial representations from the industry regarding Bioresources and the need to manage uncertainty regarding future regulatory requirements. Our representations seek to address material implications of the draft determination that, unless resolved, will significantly undermine our ability to deliver a compliant, reliable and resilient service in AMP8.

## 4.5 Reservoir

**UUWR 14 Reservoir:** United Utilities submitted a cost adjustment claim for additional costs associated with maintenance of our fleet of impounding reservoirs within our original business plan. Ofwat has specifically invited UUW to provide additional evidence to support this claim within our company representation. This document provides the additional evidence required for Ofwat to make the necessary adjustments within its final determination.

This document has been identified as requiring partial redaction due security concerns. A redacted version of the document is published on our website and provided in full to Ofwat. Details of the redactions can be found in [UUWR 03 Company representation proforma](#).

## 4.6 Cost and PCD

**UUWR 20 Cost and PCDs:** This document provides an overview of UUW's representations on Ofwat's proposed approach to cost assessment and Price Control Deliverables (PCD) as set out in its Draft Determination (DD). Some, but not all, issues raised in this document are supplemented by separate standalone representation documents. In these cases, this document provides an overview and signposts the reader to our more detailed response on that issue.

This document is supported by the following 15 appendices, all of which are published on our website:

**Table 3 UUWR\_20\_Cost and PCDs appendices**

Document ID	File Name
UUWR_22	<a href="#">UUWR 22 Salford WwTW</a>
UUWR_25	<a href="#">UUWR 25 Real Price Effects and frontier shift</a>
UUWR_26	<a href="#">UUWR 26 Business rates</a>
UUWR_27	<a href="#">UUWR 27 Enhancement modelling consultation</a>
UUWR_29	<a href="#">UUWR 29 Lead pipe replacement</a>
UUWR_30	<a href="#">UUWR 30 Carbon Net Zero Enhancements</a>
UUWR_32	<a href="#">UUWR 32 Water WINEP</a>
UUWR_33	<a href="#">UUWR 33 Phosphorus removal</a>
UUWR_34	<a href="#">UUWR 34 Vyrnwy re-lining in AMP8</a>
UUWR_35	<a href="#">UUWR 35 Raw water quality deterioration</a>
UUWR_38	<a href="#">UUWR 38 Investigations</a>
UUWR_40	<a href="#">UUWR 40 Water Trading</a>
UUWR_42	<a href="#">UUWR 42 Wastewater supply and demand</a>
UUWR_44	<a href="#">UUWR 44 Leakage</a>
UUWR_45	<a href="#">UUWR 45 Economic Insight - PCD</a>
<b>Total</b>	<b>15</b>

In addition, 3 documents have been identified as requiring partial redaction due to commercial confidentiality. Redacted versions of the documents are published on our website and provided in full to Ofwat.

**Table 4 UUWR\_20\_Cost and PCD partially redacted appendices**

Document ID	File Name
UUWR_36	<a href="#">UUWR 36 Smart metering</a>
UUWR_39	<a href="#">UUWR 39 Resilience uplift</a>
UUWR_41	<a href="#">UUWR 41 AWINEP</a>
<b>Total</b>	<b>3</b>

Details of the redactions can be found in [UUWR 03 Company representation proforma](#)

## 4.7 Outcomes

**UUWR 50 Outcomes:** This document provides an overview of UUW’s representations on Ofwat’s proposed approach to outcomes as set out in its Draft Determination (DD). Some, but not all, issues in this document are supplemented by separate standalone representation documents. In these cases, this document provides an overview and signposts the reader to our detailed response on that issue.

This document is supported by the following 13 appendices, all of which are published on our website:

**Table 5 UUWR\_50\_Outcomes appendices**

Document ID	File Name
UUWR_51	<a href="#">UUWR 51 Customer (C-Mex)</a>
UUWR_53	<a href="#">UUWR 53 Operational GHG PCs for Water and Wastewater</a>
UUWR_54	<a href="#">UUWR 54 Discharge permit compliance</a>
UUWR_55	<a href="#">UUWR 55 Bathing water quality</a>
UUWR_56	<a href="#">UUWR 56 Total pollution incidents</a>
UUWR_58	<a href="#">UUWR 58 Customer contacts about water quality</a>
UUWR_60	<a href="#">UUWR 60 Severe water supply interruptions</a>
UUWR_62	<a href="#">UUWR 62 Biodiversity</a>
UUWR_63	<a href="#">UUWR 63 Unplanned outage</a>
UUWR_64	<a href="#">UUWR 64 Business demand</a>
UUWR_66	<a href="#">UUWR 66 Wonderful Windermere definition document</a>
UUWR_67	<a href="#">UUWR 67 Bespoke PC - Embodied GHG Emissions</a>
UUWR_68	<a href="#">UUWR 68 Embodied GHG definition document</a>
<b>Total</b>	<b>13</b>

The following 1 document has been identified as requiring partial redaction due to commercial confidentiality. A redacted version of the document is published on our website and provided in full to Ofwat.

**Table 6 UUWR\_50\_Outcomes partially redacted appendices**

Document ID	File Name
UUWR_65	<a href="#">UUWR 65 Wonderful Windermere PC</a>
<b>Total</b>	<b>1</b>

Details of the redactions can be found in [UUWR 03 Company representation proforma](#)

## 4.8 Balance of Risk and Return and Financeability

**[UUWR 70 Balance of Risk and Return and Financeability](#)**: This document outlines our representation on WACC, risk and return balance, financeability and financial resilience, equity issuance, and dividends.

This document is supported by the following 2 appendices, both of which are published on our website:

**Table 7 UUWR\_70\_Balance of Risk and Return and Financeability appendices**

Document ID	File Name
UUWR_71	<a href="#">UUWR 71 Balance of Risk and Return and Financeability - Consultation responses</a>
UUWR_72	<a href="#">UUWR 72 Cost of capital</a>
<b>Total</b>	<b>2</b>

## 4.9 Plan Updates

**[UUWR 75 Plan updates](#)**: This document provides an overview of the external regulatory driven changes that were not present at the time of our business plan submission and as such not included within Ofwat's Draft Determination.

This document is supported by the following 9 appendices, all of which are published on our website:

**Table 8 UUWR\_75\_Plan Update appendices**

Document ID	File Name
UUWR_77	<a href="#">UUWR 77 New WINEP</a>
UUWR_78	<a href="#">UUWR 78 Windermere - Enhancement case</a>
UUWR_79	<a href="#">UUWR 79 Village Drains - Enhancement case</a>
UUWR_80	<a href="#">UUWR 80 Water WINEP - Enhancement cases</a>
UUWR_83	<a href="#">UUWR 83 AMP8 Assurance</a>
UUWR_84	<a href="#">UUWR 84 Princes Street - Enhancement case</a>
UUWR_85	<a href="#">UUWR 85 Staveley - Enhancement case</a>
UUWR_86	<a href="#">UUWR 86 Bunbury - Enhancement case</a>
UUWR_87	<a href="#">UUWR 87 Eccles - Enhancement case</a>
<b>Total</b>	<b>9</b>

The following 2 documents have been identified as requiring partial redaction. Redacted versions of these documents are published on our website and provided in full to Ofwat.

**Table 9 UUWR\_75\_Plan Update partially redacted appendices**

Document ID	File Name
UUWR_76	<a href="#">UUWR 76 PFAS - Enhancement case</a>
UUWR_82	<a href="#">UUWR 82 Deliverability</a>
<b>Total</b>	<b>2</b>

Details of the redactions can be found in [UUWR 03 Company representation proforma](#)

## 4.10 Cyber resilience

**UUWR 89 Cyber resilience:** This document provides our response to Ofwat's request for information regarding our approach to cyber resilience and associated risks, including detailing the independent assessment of our approach

## 4.11 United Utilities Briefing Note

**UUWR 05 United Utilities Briefing Note:** This document is provided in response to Ofwat’s request for each company to submit a briefing document which highlights up to five points it wants to bring to Ofwat's attention and discuss at its company representation meeting. It has been stipulated that the briefing document should be no more than two A4 pages and include a summary of each point.

Caution should be taken when reading this document in isolation as the restriction of ‘5 key points’ does not reflect the breadth of United Utilities representation.

# 5. Data tables and models

**UUWR 93 Data table commentary:** This document provides a commentary and supporting information for the data tables submitted in response to Ofwat’s draft determination. We have provided the document to aid the review of our data tables and the associated changes made in our representation.

This commentary document should be read in conjunction with the commentaries previously submitted with our business plan submission in October 2023. These can be found on our website and provide details of the approaches taken to fill out the data tables. This document does not reproduce the content of the previous commentaries, instead highlighting where there have been changes to our data. There are a number of reasons that data may have changed, for example:

- A reassessment of our position in light of new data, for instance updates to historical data following submission of the Annual Performance Report for 2023/24 to Ofwat.
- Responding to queries Ofwat sent to us after our October 2023 submission.
- A change in our position due to accepting Ofwat’s draft determination.
- A change in our position as we are proposing a compromise position with Ofwat.

This document explains why data have changed and signposts any other relevant documents.

## 5.1 Data tables

*Table 10 Data tables*

Document ID	File Name
UUWR_91	<a href="#">UUWR 91 Additional data tables</a>
UUWR_92	<a href="#">UUWR 92 New additional data tables</a>
UUWR_107	<a href="#">UUWR 107 Additional large scheme tables</a>
<b>Total</b>	<b>3</b>

The following data table has been identified as requiring partial redaction. We have redacted any information relating to FY25 operational performance. A redacted version of the data table is published on our website and provided in full to Ofwat.

**Table 11 Data tables**

Document ID	File Name
UUWR_90	<a href="#">UUWR_90 Data tables</a>
<b>Total</b>	<b>1</b>

Details of the redactions can be found in [UUWR 03 Company representation proforma](#)

## 5.2 Models

**Table 12 Models**

Document ID	File Name
UUWR_94	<a href="#">UUWR_94 Cohort analysis (Wastewater)</a>
UUWR_95	<a href="#">UUWR_95 Cohort analysis (Water)</a>
UUWR_96	<a href="#">UUWR_96 Financial Model</a>
UUWR_98	<a href="#">UUWR_98 Summary of business plan data tables v4</a>
UUWR_101	<a href="#">UUWR_101 RCV Feeder Model</a>
UUWR_102	UUWR_102_Reconciliation models (zip) – containing 102.001 to 102.020
UUWR_102.002	<a href="#">UUWR_102.002 PR19IPD01 ODI-performance-model-2023_24_Final</a>
UUWR_102.003	<a href="#">UUWR_102.003 PR24-DD-Green-recovery-time-value-of-money-adjustment-model-v1.4-UUW</a>
UUWR_102.004	<a href="#">UUWR_102.004 PR24-DD-Land-sales-United-Utilities 19-Aug-24</a>
UUWR_102.005	<a href="#">UUWR_102.005 240807 NWT&amp;STT-P24-DD-RAPID-Strategic-regional-water-resources-reconciliation-model</a>
UUWR_102.006	<a href="#">UUWR_102.006 Bilateral-entry-adjustment (BEA) reconciliation model</a>
UUWR_102.007	<a href="#">UUWR_102.007 Cost-of-new-debt-indexation-reconciliation-model</a>
UUWR_102.009	<a href="#">UUWR_102.009 Green-Recovery-cost-allowance-adjustment-reconciliation-model</a>
UUWR_102.010	<a href="#">UUWR_102.010 PR24-DD-C-MeX-PR19-reconciliation-model</a>
UUWR_102.011	<a href="#">UUWR_102.011 PR24-DD-Developer-services-reconciliation-model-UUW</a>
UUWR_102.012	<a href="#">UUWR_102.012 PR24-DD-D-MeX-PR19-reconciliation-model</a>
UUWR_102.013	<a href="#">UUWR_102.013 PR24-DD-PR19-Bioresources-Reconciliation-UUW</a>
UUWR_102.014	<a href="#">UUWR_102.014 PR24-DD-PR19-WINEP-recon-model-UUW</a>
UUWR_102.015	<a href="#">UUWR_102.015 PR24-DD-Residential-retail-reconciliation-UUW</a>
UUWR_102.016	<a href="#">UUWR_102.016 PR24-DD-Revenue-forecasting-incentive UUW</a>
UUWR_102.017	<a href="#">UUWR_102.017 RPI-CPIH-wedge-true-up-reconciliation-model</a>
UUWR_102.018	<a href="#">UUWR_102.018 Tax-reconciliation-model</a>
UUWR_102.019	<a href="#">UUWR_102.019 United-Utilities-In-period-adjustments-model-IPD2023-FD</a>
UUWR_102.020	<a href="#">UUWR_102.020 Water-trading-incentive-model-Dec-2020-v2.0</a>
UUWR_103	<a href="#">UUWR_103 Revenue Adjustments Model</a>
UUWR_106	<a href="#">UUWR_106 Reconciliation commentary</a>

Document ID	File Name
UUWR_109	<a href="#">UUWR 109 Backcast – WINEP</a>
UUWR_110	<a href="#">UUWR 110 Storm overflows supporting analysis 1</a>
UUWR_111	<a href="#">UUWR 111 Storm overflows supporting analysis 2</a>
<b>Total</b>	<b>29</b>

The following model has been identified as requiring partial redaction. A redacted version of the data table is published on our website and provided in full to Ofwat.

**Table 13 Data tables**

Document ID	File Name
UUWR_102.008	<a href="#">UUWR 102.008 Cost-sharing-total-costs-Reconciliation</a>
<b>Total</b>	<b>1</b>

In addition, the following model has been identified as requiring redaction in full, Ofwat has been provided this model in full.

**Table 14 Data tables**

Document ID	File Name
UUWR_102.001	UUWR_102.001_PR24-DD-ODI-performance-model-2024_25-United Utilities-August 2024
<b>Total</b>	<b>1</b>

Details of the redactions can be found in [UUWR 03 Company representation proforma](#)

## Appendix A Full list of UW representation files

**Table 15 Full list of 189 submission files**

Ofwat ID	Doc Name	Includes Redaction	Link
UUWR_01	UUWR_01_ Summary of our representation and guide to our submission		<a href="#">Link</a>
UUWR_02	UUWR_02_Board Assurance Statement		<a href="#">Link</a>
UUWR_03	UUWR_03_Company representation proforma		<a href="#">Link</a>
UUWR_04	Not utilised		
UUWR_05	UUWR_05_ United Utilities Briefing Note		<a href="#">Link</a>
UUWR_06	UUWR_06_Assurance aggregation summary report	Yes	
UUWR_07	Not utilised		
UUWR_08	Not utilised		
UUWR_09	Not utilised		
UUWR_10	UUWR_10_Overflows		<a href="#">Link</a>
UUWR_10.01	UUWR_10.01_Overflow evidence_08UU101381-Stockport WwTW 016940151ST	Yes	
UUWR_10.02	UUWR_10.02_Overflow evidence_08UU102420-Lancaster WwTW 017270050ST	Yes	
UUWR_10.03	UUWR_10.03_Overflow evidence_Pennington Flash-(Multiple)	Yes	
UUWR_10.04	UUWR_10.04_Overflow evidence_08UU102417-Garstang WwTW 017260046ST	Yes	
UUWR_10.05	UUWR_10.05_Overflow evidence_08UU101285-Carleton Hall Templebank CSO EDE0116SO	Yes	
UUWR_10.06	UUWR_10.06_Overflow evidence_08UU101379-Macclesfield WwTW 016910009ST	Yes	
UUWR_10.07	UUWR_10.07_Overflow evidence_08UU102423-Lytham PS FYL0003SO	Yes	
UUWR_10.08	UUWR_10.08_Overflow evidence_08UU101158-Dukinfield WwTW 016940087ST	Yes	
UUWR_10.09	UUWR_10.09_Overflow evidence_08UU101005-King Street PS COP0049SO	Yes	
UUWR_10.10	UUWR_10.10_Overflow evidence_08UU102441-Frederick Street Pumping Station BRW0044SO	Yes	
UUWR_10.11	UUWR_10.11_Overflow evidence_08UU100997-Graving Dock PS	Yes	
UUWR_10.12	UUWR_10.12_Overflow evidence_08UU100995-GlazeburyWwTW 016920350ST	Yes	
UUWR_10.13	UUWR_10.13_Overflow evidence_08UU102415-Palace Nook PS BRW0097SO	Yes	
UUWR_10.14	UUWR_10.14_Overflow evidence_08UU100983-Chorley WwTW 017060016ST	Yes	
UUWR_10.15	UUWR_10.15_Overflow evidence_08UU101368-Philips Road CSO BBN0167SO	Yes	
UUWR_10.16	UUWR_10.16_Overflow evidence_08UU102422-Lamaleach CSO FYL0002SO	Yes	



Ofwat ID	Doc Name	Includes Redaction	Link
UUWR_10.17	UUWR_10.17_Overflow evidence_08UU101231-Shap WwTW 017670025SO	Yes	
UUWR_10.18	UUWR_10.18_Overflow evidence_08UU101157-Dearham WwTW 017570068SO	Yes	
UUWR_10.19	UUWR_10.19_Overflow evidence_08UU101007- Long Hey Road CSO WIR0094SO	Yes	
UUWR_10.20	UUWR_10.20_Overflow evidence_08UU102452-No 76 Middle Brook CSO BOL0039	Yes	
UUWR_10.21	UUWR_10.21_Overflow evidence_08UU101382-Sale WwTW 016940149SO	Yes	
UUWR_10.22	UUWR_10.22_Overflow evidence_08UU100977-Kirkway CSO ROC0136SO	Yes	
UUWR_10.23	UUWR_10.23_Overflow evidence_08UU101173-Plumbland WwTW 017570072ST	Yes	
UUWR_10.24	UUWR_10.24_Overflow evidence_08UU101103-Milnrow Road CSO ROC0103SO	Yes	
UUWR_10.25	UUWR_10.25_Overflow evidence_08UU101380-Biddulph WwTW 016810052ST	Yes	
UUWR_10.26	UUWR_10.26_Overflow evidence_08UU101020-Skipool PS WYR0076SO	Yes	
UUWR_10.27	UUWR_10.27_Overflow evidence_08UU101146-Brookside CSO COP0091SO	Yes	
UUWR_10.28	UUWR_10.28_Overflow evidence_08UU101026-Town Beck CSO LAK0059SO	Yes	
UUWR_10.29	UUWR_10.29_Overflow evidence_08UU101217-Little Clifton WwTW 017570045ST	Yes	
UUWR_10.30	UUWR_10.30_Overflow evidence_08UU101371-St Bees PS COP0097SO	Yes	
UUWR_10.31	UUWR_10.31_Overflow evidence_08UU101197-Elterwater PS LAK0025SO	Yes	
UUWR_10.32	UUWR_10.32_Overflow evidence_08UU101325-Irlam WwTW 016940133ST	Yes	
UUWR_10.33	UUWR_10.33_Overflow evidence_08UU102418-Station Road CSO FYL0014SO	Yes	
UUWR_10.34	UUWR_10.34_Overflow evidence_08UU101136-Ambleside WwTW 017370024ST	Yes	
UUWR_10.35	UUWR_10.35_Overflow evidence_08UU101085-Central PS WIG0100SO	Yes	
UUWR_10.36	UUWR_10.36_Overflow evidence_08UU101018-Rookery CSO NEW0038SO	Yes	
UUWR_10.37	UUWR_10.37_Overflow evidence_08UU101120-Tebay Sewage PS EDE0079SO	Yes	
UUWR_10.38	UUWR_10.38_Overflow evidence_08UU101030-Penn Lane (Weston Point, Point R) CSO HAL0060SO	Yes	
UUWR_10.39	UUWR_10.39_Overflow evidence_08UU101041-Corporation Street CSO TAM0099SO	Yes	

Ofwat ID	Doc Name	Includes Redaction	Link
UUWR_10.40	UUWR_10.40_Overflow evidence_08UU101093-Bear Street CSO – BUR0037SO	Yes	
UUWR_10.41	UUWR_10.41_Overflow evidence_08UU101364-Heywood (Botany) STW CSO ROC0139SO	Yes	
UUWR_10.42	UUWR_10.42_Overflow evidence_08UU101378-Westminster Road CSO MAC0062SO	Yes	
UUWR_10.43	UUWR_10.43_Overflow evidence_08UU101029-Weston Street/Viking Street CSO BOL0115SO	Yes	
UUWR_10.44	UUWR_10.44_Overflow evidence_08UU101110-Raglan Street CSO TAM0020SO	Yes	
UUWR_10.45	UUWR_10.45_Overflow evidence_08UU101243-Hall Nook CSO WAR0007SO	Yes	
UUWR_10.46	UUWR_10.46_Overflow evidence_08UU101367-Parr Brook CSO BRY0133SO	Yes	
UUWR_10.47	UUWR_10.47_Overflow evidence_08UU101094-Inskip Street CSO BUR0022SO	Yes	
UUWR_10.48	UUWR_10.48_Overflow evidence_08UU101077-Rishton Lane CSO BOL0127SO	Yes	
UUWR_10.49	UUWR_10.49_Overflow evidence_08UU100979-Adjacent Duxbury Mill PS CSO CHR0024SO	Yes	
UUWR_10.50	UUWR_10.50_Overflow evidence_08UU101058-Turner Bridge CSO BOL0092SO	Yes	
UUWR_10.51	UUWR_10.51_Overflow evidence_08UU101012-Orrell House Farm CSO WIG0173SO	Yes	
UUWR_10.52	UUWR_10.52_Overflow evidence_08UU101369-Oxford Street West/ Pottinger Street CSO TAM0045SO	Yes	
UUWR_10.53	UUWR_10.53_Overflow evidence_08UU101348-Zulu Street CSO BOL0109SO	Yes	
UUWR_10.54	UUWR_10.54_Overflow evidence_08UU100989-East Lancs Road PS WIG0179SO	Yes	
UUWR_10.55	UUWR_10.55_Overflow evidence_08UU101036-Sherborne Street CSO MAN0052SO	Yes	
UUWR_10.56	UUWR_10.56_Overflow evidence_08UU101154-Coppull New Road/Butterworth Brow CSO CHR0050SO	Yes	
UUWR_10.57	UUWR_10.57_Overflow evidence_08UU101151-Church Lane CSO (CREWE) CRE0043SO	Yes	
UUWR_10.58	UUWR_10.58_Overflow evidence_08UU101156-Dean Wood CSO WLN0020SO	Yes	
UUWR_10.59	UUWR_10.59_Overflow evidence_08UU101096-Kirkhall Lane Sewer WIG0107SO	Yes	
UUWR_10.60	UUWR_10.60_Overflow evidence_08UU100998-Grove Road CSO TAM0096SO	Yes	
UUWR_10.61	UUWR_10.61_Overflow evidence_08UU101046-Chapel-en-le-Frith WwTW 016940168ST	Yes	
UUWR_10.62	UUWR_10.62_Overflow evidence_08UU101032-Lytham Road CSO TRA0038SO	Yes	

Ofwat ID	Doc Name	Includes Redaction	Link
UUWR_10.63	UUWR_10.63_Overflow evidence_08UU101059-Albert Road CSO BOL0095SO	Yes	
UUWR_10.64	UUWR_10.64_Overflow evidence_08UU101119-Tan House Lane/Moss Bank Road SO HAL0052SO	Yes	
UUWR_10.65	UUWR_10.65_Overflow evidence_08UU101247-Boothroyden Road CSO ROC0018SO	Yes	
UUWR_10.66	UUWR_10.66_Overflow evidence_08UU101240-Frankby Close CSO WIR0087SO	Yes	
UUWR_10.67	UUWR_10.67_Overflow evidence_08UU101126-Water Street CSO ROC0097SO	Yes	
UUWR_10.68	UUWR_10.68_Overflow evidence_08UU101025-Thermal Road Port, Causeway WIR0132SO	Yes	
UUWR_10.69	UUWR_10.69_Overflow evidence_08UU101271-Threapland WwTW 017570074ST	Yes	
UUWR_10.70	UUWR_10.70_Overflow evidence_08UU101047-Worsley WwTW 016940139ST	Yes	
UUWR_10.71	UUWR_10.71_Overflow evidence_08UU101109-Radford Street CSO SAL0079SO	Yes	
UUWR_10.72	UUWR_10.72_Overflow evidence_08UU101345-Sheridan Way CSO TAM0015SO	Yes	
UUWR_10.73	UUWR_10.73_Overflow evidence_08UU101066-Agecroft PS SAL0097SO	Yes	
UUWR_10.74	UUWR_10.74_Overflow evidence_08UU101116-Sheepfoot Lane CSO OLD0032SO	Yes	
UUWR_10.75	UUWR_10.75_Overflow evidence_08UU101065-Bury New Road CSO BRY0130SO	Yes	
UUWR_10.76	UUWR_10.76_Overflow evidence_08UU101193-Chorley New Road/Beaumont Road CSO BOL0096SO	Yes	
UUWR_10.77	UUWR_10.77_Overflow evidence_08UU101274-Bank Lane CSO PEA0043SO	Yes	
UUWR_10.78	UUWR_10.78_Overflow evidence_08UU101332-Maple Avenue CSO BRY0086SO	Yes	
UUWR_10.79	UUWR_10.79_Overflow evidence_08UU101078-Carr Mill Road CSO STH0059SO	Yes	
UUWR_10.80	UUWR_10.80_Overflow evidence_08UU101356-Briarlands Close CSO STK0123SO	Yes	
UUWR_10.81	UUWR_10.81_Overflow evidence_08UU101073-Percy Street CSO PRE0003SO	Yes	
UUWR_10.82	UUWR_10.82_Overflow evidence_08UU100984-Crown Street (Town Dyke Orchard) CSO CAR0042SO	Yes	
UUWR_10.83	UUWR_10.83_Overflow evidence_08UU101217-Oxford Street/Ainsley Street BRW0091SO	Yes	
UUWR_10.84	UUWR_10.84_Overflow evidence_08UU102419-Southport (Bank End) WwTW 017030100ST	Yes	
UUWR_10.85	UUWR_10.85_Overflow evidence_08UU102416-Croston WwTW 017060017ST	Yes	

Ofwat ID	Doc Name	Includes Redaction	Link
UUWR_10.86	UUWR_10.86_Overflow evidence_08UU100988 – Dunham Massey WwTW 016940003ST	Yes	
UUWR_10.87	UUWR_10.87_Overflow evidence_08UU101295a–Aspin Lane MAN0031	Yes	
UUWR_10.88	UUWR_10.88_Overflow evidence_08UU101028-Upton Storm Tanks WIR0071SO	Yes	
UUWR_10.89	UUWR_10.89_Overflow evidence_08UU101316-Great Asby WwTW 017680364SO	Yes	
UUWR_10.90	UUWR_10.90_Overflow evidence_08UU101099-Manchester Road/Park Lane CSO WIG0199SO	Yes	
UUWR_11	UUWR_11_Gated Mechanism		<a href="#">Link</a>
UUWR_11.1	UUWR_11.1_Appendix - Davyhulme WwTW		<a href="#">Link</a>
UUWR_11.2	UUWR_11.2_Appendix - Eccles WwTW		<a href="#">Link</a>
UUWR_11.3	UUWR_11.3_Appendix - Wigan WwTW		<a href="#">Link</a>
UUWR_12	UUWR_12_Internal sewer flooding		<a href="#">Link</a>
UUWR_13	UUWR_13_Bioresources		<a href="#">Link</a>
UUWR_14	UUWR_14_Reservoir	Yes	<a href="#">Link</a>
UUWR_15	Not utilised		
UUWR_16	Not utilised		
UUWR_17	Not utilised		
UUWR_18	Not utilised		
UUWR_19	Not utilised		
UUWR_20	UUWR_20_Cost and PCDs		<a href="#">Link</a>
UUWR_21	Not utilised		
UUWR_22	UUWR_22_Salford WwTW		<a href="#">Link</a>
UUWR_23	Not utilised		
UUWR_24	Not utilised		
UUWR_25	UUWR_25_Real Price Effects and frontier shift		<a href="#">Link</a>
UUWR_26	UUWR_26_Business rates		<a href="#">Link</a>
UUWR_27	UUWR_27_Enhancement modelling consultation		<a href="#">Link</a>
UUWR_28	Not utilised		
UUWR_29	UUWR_29_Lead pipe replacement		<a href="#">Link</a>
UUWR_30	UUWR_30_Carbon Net Zero Enhancements		<a href="#">Link</a>
UUWR_31	Not utilised		
UUWR_32	UUWR_32_Water WINEP		<a href="#">Link</a>
UUWR_33	UUWR_33_Phosphorus removal		<a href="#">Link</a>
UUWR_34	UUWR_34_Vyrnwy re-lining in AMP8		<a href="#">Link</a>
UUWR_35	UUWR_35_Raw water quality deterioration		<a href="#">Link</a>
UUWR_36	UUWR_36_Smart metering	Yes	<a href="#">Link</a>
UUWR_37	Not utilised		
UUWR_38	UUWR_38_Investigations		<a href="#">Link</a>
UUWR_39	UUWR_39_Resilience uplift	Yes	<a href="#">Link</a>
UUWR_40	UUWR_40_Water Trading		<a href="#">Link</a>
UUWR_41	UUWR_41_AWINEP	Yes	<a href="#">Link</a>

Ofwat ID	Doc Name	Includes Redaction	Link
UUWR_42	UUWR_42_Wastewater supply and demand		<a href="#">Link</a>
UUWR_43	Not utilised		
UUWR_44	UUWR_44_Leakage		<a href="#">Link</a>
UUWR_45	UUWR_45_Economic Insight - PCD		<a href="#">Link</a>
UUWR_46	Not utilised		
UUWR_47	Not utilised		
UUWR_48	Not utilised		
UUWR_49	Not utilised		
UUWR_50	UUWR_50_Outcomes		<a href="#">Link</a>
UUWR_51	UUWR_51_Customer (C-Mex)		<a href="#">Link</a>
UUWR_52	Not utilised		
UUWR_53	UUWR_53_Operational GHG PCs for Water and Wastewater		<a href="#">Link</a>
UUWR_54	UUWR_54_Discharge permit compliance		<a href="#">Link</a>
UUWR_55	UUWR_55_Bathing water quality		<a href="#">Link</a>
UUWR_56	UUWR_56_Total pollution incidents		<a href="#">Link</a>
UUWR_57	Not utilised		
UUWR_58	UUWR_58_Customer contacts about water quality		<a href="#">Link</a>
UUWR_59	Not utilised		
UUWR_60	UUWR_60_Severe water supply interruptions		<a href="#">Link</a>
UUWR_61	Not utilised		
UUWR_62	UUWR_62_Biodiversity		<a href="#">Link</a>
UUWR_63	UUWR_63_Unplanned outage		<a href="#">Link</a>
UUWR_64	UUWR_64_Business demand		<a href="#">Link</a>
UUWR_65	UUWR_65_Wonderful Windermere PC	Yes	<a href="#">Link</a>
UUWR_66	UUWR_66_Wonderful Windermere definition document		<a href="#">Link</a>
UUWR_67	UUWR_67_Bespoke PC - Embodied GHG Emissions		<a href="#">Link</a>
UUWR_68	UUWR_68_Embodied GHG definition document		<a href="#">Link</a>
UUWR_69	Not utilised		
UUWR_70	UUWR_70_Balance of Risk and Return and Financeability		<a href="#">Link</a>
UUWR_71	UUWR_71_Balance of Risk and Return and Financeability - Consultation responses		<a href="#">Link</a>
UUWR_72	UUWR_72_Cost of capital		<a href="#">Link</a>
UUWR_73	Not utilised		
UUWR_74	Not utilised		
UUWR_75	UUWR_75_Plan updates		<a href="#">Link</a>
UUWR_76	UUWR_76_PFAS - Enhancement case	Yes	<a href="#">Link</a>
UUWR_77	UUWR_77_New WINEP		<a href="#">Link</a>
UUWR_78	UUWR_78_Windermere - Enhancement case		<a href="#">Link</a>
UUWR_79	UUWR_79_Village Drains - Enhancement case		<a href="#">Link</a>
UUWR_80	UUWR_80_Water WINEP - Enhancement cases		<a href="#">Link</a>
UUWR_81	Not utilised		
UUWR_82	UUWR_82_Deliverability	Yes	<a href="#">Link</a>
UUWR_83	UUWR_83_AMP8 Assurance		<a href="#">Link</a>

Ofwat ID	Doc Name	Includes Redaction	Link
UUWR_84	UUWR_84_Princes Street - Enhancement case		<a href="#">Link</a>
UUWR_85	UUWR_85_Staveley - Enhancement case		<a href="#">Link</a>
UUWR_86	UUWR_86_Bunbury - Enhancement case		<a href="#">Link</a>
UUWR_87	UUWR_87_Eccles - Enhancement case		<a href="#">Link</a>
UUWR_88	Not utilised		
UUWR_89	UUWR_89_Cyber resilience		
UUWR_90	UUWR_90_Data tables	Yes	<a href="#">Link</a>
UUWR_91	UUWR_91_Additional data tables		<a href="#">Link</a>
UUWR_92	UUWR_92_New additional data tables		<a href="#">Link</a>
UUWR_93	UUWR_93_Data table commentary		<a href="#">Link</a>
UUWR_94	UUWR_94_Cohort analysis (Wastewater)		<a href="#">Link</a>
UUWR_95	UUWR_95_Cohort analysis (Water)		<a href="#">Link</a>
UUWR_96	UUWR_96_Financial Model		<a href="#">Link</a>
UUWR_97	Not utilised		
UUWR_98	UUWR_98_Summary of business plan data tables v4		<a href="#">Link</a>
UUWR_99	Not utilised		
UUWR_100	Not utilised		
UUWR_101	UUWR_101_RCV Feeder Model		<a href="#">Link</a>
UUWR_102	UUWR_102_Reconciliation models (zip) - multiple		
UUWR_102.001	UUWR_102.001_PR24-DD-ODI-performance-model-2024_25-United Utilities-August 2024	Yes	
UUWR_102.002	UUWR_102.002_PR19PD01_ODI-performance-model-2023_24_Final		<a href="#">Link</a>
UUWR_102.003	UUWR_102.003_PR24-DD-Green-recovery-time-value-of-money-adjustment-model-v1.4-UUW		<a href="#">Link</a>
UUWR_102.004	UUWR_102.004_PR24-DD-Land-sales-United-Utilities 19-Aug-24		<a href="#">Link</a>
UUWR_102.005	UUWR_102.005_240807 NWT&STT-P24-DD-RAPID-Strategic-regional-water-resources-reconciliation-model		<a href="#">Link</a>
UUWR_102.006	UUWR_102.006_Bilateral-entry-adjustment (BEA) reconciliation model		<a href="#">Link</a>
UUWR_102.007	UUWR_102.007_Cost-of-new-debt-indexation-reconciliation-model		<a href="#">Link</a>
UUWR_102.008	UUWR_102.008_Cost-sharing-total-costs-Reconciliation	Yes	<a href="#">Link</a>
UUWR_102.009	UUWR_102.009_Green-Recovery-cost-allowance-adjustment-reconciliation-model		<a href="#">Link</a>
UUWR_102.010	UUWR_102.010_PR24-DD-C-MeX-PR19-reconciliation-model		<a href="#">Link</a>
UUWR_102.011	UUWR_102.011_PR24-DD-Developer-services-reconciliation-model-UUW		<a href="#">Link</a>
UUWR_102.012	UUWR_102.012_PR24-DD-D-MeX-PR19-reconciliation-model		<a href="#">Link</a>
UUWR_102.013	UUWR_102.013_PR24-DD-PR19-Bioresources-Reconciliation-UUW		<a href="#">Link</a>
UUWR_102.014	UUWR_102.014_PR24-DD-PR19-WINEP-recon-model-UUW		<a href="#">Link</a>
UUWR_102.015	UUWR_102.015_PR24-DD-Residential-retail-reconciliation-UUW		<a href="#">Link</a>
UUWR_102.016	UUWR_102.016_PR24-DD-Revenue-forecasting-incentive_UUW		<a href="#">Link</a>
UUWR_102.017	UUWR_102.017_RPI-CPIH-wedge-true-up-reconciliation-model		<a href="#">Link</a>

Ofwat ID	Doc Name	Includes Redaction	Link
UUWR_102.018	UUWR_102.018_Tax-reconciliation-model		<a href="#">Link</a>
UUWR_102.019	UUWR_102.019_United-Utilities-In-period-adjustments-model-IPD2023-FD		<a href="#">Link</a>
UUWR_102.020	UUWR_102.020_Water-trading-incentive-model-Dec-2020-v2.0		<a href="#">Link</a>
UUWR_103	UUWR_103_Revenue Adjustments Model		<a href="#">Link</a>
UUWR_104	Not utilised		
UUWR_105	Not utilised		
UUWR_106	UUWR_106_Reconciliation commentary		<a href="#">Link</a>
UUWR_107	UUWR_107_Additional large scheme tables		<a href="#">Link</a>
UUWR_108	Not utilised		
UUWR_109	UUWR_109_Backcast – WINEP		<a href="#">Link</a>
UUWR_110	UUWR_110_Storm overflows supporting analysis 1		<a href="#">Link</a>
UUWR_111	UUWR_111_Storm overflows supporting analysis 2		<a href="#">Link</a>
<b>Total</b>	<b>189</b>		

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**Water for the North West**