United Utilities Water Limited
Haweswater House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
Warrington WA5 3LP

Telephone: 01925 237000

unitedutilities.com

Our ref: EIR-1017
Date: 25/09/2026
Email: EIRRequests@uuplc.co.uk

Dear [redacted],

Thank you for your request for environmental information. We appreciate your interest, and we want to let you know that your request has been carefully considered in accordance with the Environmental Information Regulations (EIR). As your query contained a number of different questions, I have restated these in bold type and provided my response below. I have also provided a copy of our original correspondence in *Appendix 1 - EIR-987 Initial Response* and our initial appendix *Appendix A - Risk Assessment 2229950*.

We refer to your response dated 22 September 2026. Your answers need to be reviewed and repeated.

Question 1 – Official job reference number

You supplied an internal work order reference, 04522967. That is not the official job reference. The official reference is the works reference allocated under the street works permitting and coordination regime. This answer should be repeated.

I have checked our records for confirmation of works reference numbers. Please see the below table for a summary of all job reference records we hold information on and their business definitions.

Job Number	Type	Description
04522967	Work Order	A work order represents a specific job that needs to complete as part of a case The work order number is the unique identifier for that work order.
2229950	Case	A case represents a defined piece of work that is managed with a defined end and start. The case number is the unique identifier for that case.
HZ8012229950-01	Streetworks Permit Number	A streetworks permit number is a unique identification code issued by a local highway authority that grants United Utilities the legal right to carry out roadworks or street excavations on a specific

		public highway.

Question 2 – Plots or premises affected
You refused under Regulation 13, suggesting that the request was for names and addresses. The request was for plots or premises, which is a request for locations, not a request for personal data of living identifiable individuals. You did not explain why the location itself could not be disclosed. This answer should be repeated.

I can confirm that the plot, premise or location affected by the permit number cannot be disclosed as location data can be directly related to information on an identified or identifiable natural person ('data subject').

United Utilities cannot provide this information as it could lead to an individual being indirectly identified or identifiable, either directly or when combined with other information. This would therefore contravene the first data protection principle as individuals have a reasonable expectation that their property or location will remain private and not be disclosed to the world at large. As this would contravene the first data protection principle (which is to process personal data lawfully, fairly and transparently) the public interest test also does not apply. This approach is line with UK GDPR legislation, the Data Protection Act 2018 and Regulation 13 of the EIR.

Question 3 – Dates and locations of statutory notices
You relied on Regulation 12(4)(a) and stated that no notices were required. You did not demonstrate that you carried out a reasonable search. A bare assertion that information is not held is not sufficient. This answer should be repeated.

I can confirm that United Utilities does not issue statutory notices when a Free Meter Option (FMO) is invoked by a customer. This information is therefore never created and has not been for this install. I have confirmed this with our Metering team.

A Free Meter Option is when a customer chooses to have a water meter installed to measure their water consumption at their own property. Therefore, as the customer has made the decision to have a meter installed no statutory notice is required. In this case the notice was not required, not produced and subsequently does not exist. Therefore, in line with Regulation 12(4)(a) I cannot provide information on statutory notices, as it is not held.

Question 4 – Copy of the Water Industry Act 1991
You supplied a paraphrase of section 158, a reference to section 168, and a web link to the whole Act. You did not provide a copy of the section. You omitted section 162, section 162(9) and section 219. You did not address the landowner's subsoil. This answer should be repeated.

We note, however, your statement: "Where there is a requirement to install a meter in a private property, on private land, or its associated subsoil, we do so at the request of the property owner, or with their express approval." That statement is noted.

Please see the below list for a summary of direct web links to each of the sections you have requested.

- *Appendix 2 - Section 158 - Link*

- *Appendix 3 - Section 168 - Link*
- *Appendix 4 - Section 162 - Link*
- *Appendix 5 - Section 219 - Link*

The provision of website links / URLs is fully in line with ICO guidance on the provision of Environmental Information and Regulation 6 of the EIR as the original request did not specify a particular format in which the data is to be provided.

However, for ease of reference, I have also provided these sections as PDF attachments to this email:

- *Appendix 2 - Section 158*
- *Appendix 3 - Section 168*
- *Appendix 4 - Section 162*
- *Appendix 5 - Section 219*

If the plot owner gives express approval for a meter installation (i.e. via an FMO) and that meter must be installed in that plot owners subsoil, then that is only done with the plot owners express approval.

United Utilities also has statutory powers under Section 162 to install and connect meters. For any meter installations in the street and outside of the landowner's subsoil United Utilities has powers under section 158(1)(c) and section 158(6) to do this. Please refer to *Appendix 2 - Section 158* (link) and *Appendix 4 - Section 162* (link) for this specific legislation.

Question 5 – Licensed telecommunications operator and licence
You confirmed that United Utilities is a Code operator under the Electronic Communications Code. That is not the same as a licensed telecommunications operator under the Wireless Telegraphy Act 2006. You did not answer whether you are a licensed telecommunications operator. You did not provide a copy of any licence. This answer should be repeated.

I can confirm that United Utilities is licensed to operate telecommunication services in specific frequencies and geographical areas under the Wireless Telegraphy Act 2006. I have provided each license number in *Appendix 6 – United Utilities Wireless Telegraphy Register*. This appendix is a subset of the Wireless Telegraphy Register which is maintained by Ofcom. A link to this website is provided here.

Question 6 – Ofcom certification
You stated that you do not hold Ofcom certification and that there is no requirement to do so. You did not address the licence-exemption regime or declarations of conformity. You did not demonstrate a reasonable search. This answer should be repeated.

I can confirm after a further search that all licenses pertaining to telecommunications being received from the devices installed under job 04522967 are covered under our registration under the Electronics Communications Code and the Wireless Telegraphy Register. Therefore, there is no requirement for a licence-exemption regime or declaration of conformity as all required licenses are in place. Please see here for a list of companies that have been granted powers under the Electronic Communications code: Register of persons with powers under the Electronic Communications Code. For further details on licensing under the Wireless Telegraphy Act 2006, please see my response to question 5.

Question 7 – Privacy policy
You confirmed that a privacy policy exists and provided website links. You did not provide a copy of the policy. You did not confirm that the policy covers the data produced by these devices. This answer should be repeated.

Please see the following link for a copy of our Smart Metering policy - Smart Metering Privacy Policy | United Utilities.

The provision of website links / URLs is fully in line with ICO guidance on the provision of Environmental Information and Regulation 6 of the EIR as the original request did not specify a particular format in which the data is to be provided.

However, for ease of reference I have produced a PDF copy of our Smart Metering Policy. Please see *Appendix 7 – Smart Metering Privacy Policy* for this. I can confirm that the policy covers the data produced by these devices.

Question 8 – Risk assessments
You provided Appendix A and stated that no additional assessments are required, relying on Regulation 12(4)(a). The risk assessment provided records open excavations, underground hazards, pedestrian access and noise as false, and records every control measure as N/A. It is not a credible site-specific assessment. You conflated "not required" with "not held". This answer should be repeated.

I can confirm that there is no requirement for additional economic, social, or environmental assessments associated with this activity. Subsequently no such assessments exist because they are not required. Therefore, under Regulation 12(4)(a) of the EIR we cannot provide any such assessments, as they are not held.

For records with a control measure of "N/A" this confirms that the control measure for that record is not applicable as the particular hazard was not deemed to be present, following an initial assessment. Control measures in risk assessments are things put in place to reduce the risk and prevent the harm from a hazard that exists.

Question 9 – Insurance and accreditations
You refused under Regulation 12(5)(e). You did not apply the harm test. You did not apply the public interest test. Accreditations such as NRSWA qualifications are not confidential commercial information. This answer should be repeated.
I can confirm that Arqiva Group Limited (our Smart Metering contractors) hold public liability insurance. This is a mandatory requirement as part of their commercial agreement with us. Please see *Appendix 8 - Public Liability Insurance* for information confirming that they hold this insurance. All personal information from this appendix has been fully redacted. This is in line with UK GDPR legislation, the Data Protection Act 2018 and Regulation 13 of the EIR.

All parties who work for United Utilities or via our contractors require their 'New Roads & Street Works Accreditation' (NRWSA) as a standard part of our contract with them. UUW routinely carries out checks to confirm all people within teams hold this accreditation whilst they are working. I can also confirm at the time of the work specified that the team leader working on the install held NRWSA accreditations. These accreditations started 13 April 2026 and expire 13 April 2031. Evidence of this accreditation is provided in *Appendix 9 - Streetworks Accreditation*. All personal information from this appendix has been fully redacted. This is in line with UK

GDPR legislation, the Data Protection Act 2018 and Regulation 13 of the EIR.

We hope that this response answers your request. However, if you're not satisfied with how we've handled it, you can request an internal review. To do this, please write to us at Environmental Information Office, Haweswater House, Lingley Mere, Warrington, WA5 3LP or email us at EIRRequests@uuplc.co.uk, addressing your request to [redacted], and explaining why you're unhappy with our response. We'll be very happy to review your request and ensure we've done everything we can to assist you.

Any request for an internal review should be made within 40 working days of receipt of this response, and we will reply within 40 working days from receipt of the request for internal review.

Many thanks

[]

We'd love to hear your feedback on how we handled your request! If you have a moment, please complete our short survey here – your input helps us improve our service.