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/ID303
Date: 07/03/2025
Email: EIRRequests@uuplc.co.uk

Dear [redacted]

Thank you for reaching out with your initial request and further clarification! 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).

The attached link to UUW64 can take you to our overflows Enhancement case (section 6.5 pg 47).

For ease of reference, I have provided the text from section 6.5 below:

6.5 Enhancement rather than maintenance
Ensuring our storm overflow programme is addressing hydraulic constraints (rather than existing or additional maintenance)

6.5.1 Extensive sewer network modelling was undertaken to develop our DWMP and WINEP storm overflow programmes. We have extensive model coverage and our modelling approach follows industry code of practice which is accepted and specified by the EA and allows us to identify where new additional capacity is needed to meet new design performance requirements. The models assume the network is operating at its' optimum and make no allowance for deteriorated performance that might result from a lack of maintenance. This means that solutions developed to address new tighter regulatory standards are built upon existing assets which are assumed to be operating at their full capacity. Therefore, no additional operating or maintenance expenditure, to meet existing obligations, are included in the proposed enhancement investments for 2025-2050. Given that the baseline for our modelling ensures that maintenance requirements are excluded, this provides confidence that the need for enhancement expenditure is certain, incremental and is driven by the new compliance standard required rather than “double counting” existing obligations that should be met through base cost allowances.

6.5.2 We ensure this approach is embedded into our ways of working through our company model guidance and the industry code of practice, where there is a requirement for historic verification of actual performance versus the model prediction. This now includes a check of the spill frequency levels measured through Event Duration Monitoring (EDM) against the forecast from the hydraulic model and is indirectly equivalent to a Stage 1 of a SOAF investigation (which aims to confirm where a high frequency of spill measured by EDM is due to hydraulic capacity issues). This provides reassurance that the need for enhancement expenditure is genuine and not a double count with base cost allowances. We have used this process to screen overflows before inclusion in the AMP8 WINEP to ensure we only include overflows that require additional hydraulic capacity. We therefore have confidence that base costs and enhancement costs will each be appropriately allocated in our

submitted business plan.

6.5.3 To provide additional assurance, in our regulatory return to the Environment Agency for EDMs, we are required to identify the “Primary Reason” for any overflow that is identified as a frequently activating overflow (greater than 40 spills per year). In our regulatory return for 2021 we were a sector leader in complying with this request and our analysis showed that 70 frequently spilling overflows were attributable to “Performance” issues, which includes operational or maintenance matters, some three per cent of the total number of overflows we have. Clearly, there are occasions when operational issues do occur (for example due to power failure, lost telecom connections or asset failures) but we respond urgently to ensure repairs or mitigation works are in place quickly to prevent spills occurring or to at least minimise the number or duration of spills that result from the issues – this prevents them from becoming high-frequency spilling overflows.

6.5.4 This provides further supporting evidence that the majority of reasons for high-spilling overflows in the North West are not due to maintenance or operational issues. High spill frequency overflows that are attributed to operations or maintenance issues are expected to be resolved urgently through our base expenditure, and we have robust processes in place to identify and resolve such issues.

You will be aware that we also produced deep dives for the Storm Overflow enhancements for specific sites, and you have already requested examples of these previously.

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.

Kind Regards,
EIR Team