

UUW19

Final DWMP data tables addendum

October 2023

This document provides the required explanatory notes and commentary where data differs between the DWMP and the business plan submission. It responds to Ofwat's email of 27 July 2023 "Updates on DWMP tables, business plan table queries, PCD worked example and WINEP PR19 reconciliation model."

Contents

1.	Final DWMP data tables addendum.....	3
1.1	Introduction	3
1.2	Structure	3
2.	Overarching changes.....	4
3.	Outcomes	5
3.1	Pollution	5
3.2	Compliance at wastewater treatment works	6
3.3	Sewer collapses	7
3.4	Internal sewer flooding	8
3.5	Storm overflows	9
3.6	External sewer flooding	11

1. Final DWMP data tables addendum

1.1 Introduction

On 31 May 2023, United Utilities Water (UUW) published our first Drainage and Wastewater Management Plan (DWMP) which sets out how we intend to maintain robust and resilient drainage and wastewater systems now and in the future. We developed the plan in partnership with customers and stakeholders across the region to create a stronger, greener and healthier North West. You can view our DWMP on our corporate website¹.

The DWMP forecasts potential expenditure between 2025 and 2050 to ensure that we can achieve the planning objectives and statutory requirements that are set out in the plan. The proposed investment is comprised of an optimised programme addressing performance improvements of non-statutory measures, plus UUW's Water Industry National Environment Programme (WINEP) January 2023 submission and our 25 year plan to achieve the targets set out in the Government's Storm Overflow Discharge Reduction Plan (SODRP).

Since publication of the DWMP in May 2023, UUWs been finalising our business plan submission for Price Review 2024. The DWMP has formed the foundation of our wastewater ambitions for AMP8, and over the course of the last few months, further work has been undertaken to identify opportunities to support our vision and ambitions over the next investment cycle. This has naturally resulted in variations in data between our business plan submission and the DWMP. In particular changes to WINEP drivers and our accelerated WINEP investment have altered the figures as set out in the final DWMP data tables.

On 27 July 2023, UUW received an email from the Ofwat PR24 mailbox titled '*Updates on DWMP tables, business plan table queries, PCD worked example and WINEP PR19 reconciliation model*' detailing that revised DWMP data tables to accompany the business plan submission are not expected. However, it was expected that an explanatory note would be provided where data differs between the DWMP and the business plan submission.

1.2 Structure

The purpose of this addendum is to provide an overview of any material changes between the DWMP and business plan data tables. The structure of this document is as follows:

- **Section 2** provides an overview of over-arching changes since May 2023; and
- **Section 3** presents the data as submitted as part of the DWMP data tables, with the revised data in the business plan submission, along with reasons and justifications for the changes.

¹ <https://www.unitedutilities.com/corporate/about-us/our-future-plans/Our-long-term-plans/dwmp-publication-may-2023/>

2. Overarching changes

Since the DWMP publication in May 2023, there have been a number of ongoing activities as part of preparing our final business plan submission that have resulted in changes to data profiles presented in the final DWMP data tables. These changes impact both performance and expenditure forecasts. A number of these changes can be summarised through over-arching activities that are applicable to the majority of data lines, whereas others are due to a unique reason (section 3).

The following over-arching changes impact all financially related data lines within the DWMP final data tables:

- **Internal and external benchmarking and cost assurance reviews** – UUW takes an iterative approach in refining costs. Initial estimates have been revised, supported by benchmarking, market testing and scrutiny panels, in addition to reviewing the scale of programmes such as the WINEP, comparative benchmarking from early DWMP and APR submission data and various third party assurance activities. This has resulted in a reduction of overhead cost allocation from 15% to 7%, plus a further reduction to capital programme costs of 2.5%. More information on how we deliver efficient costs can be found in Chapter 8 of the business plan submission.
- **Price base 2020/21 uplifted to 2022/23** – the DWMP was developed and reported using price base 20/21 in line with regulator expectations. This is also true for the WINEP. As our business plan submission for PR24 is submitted in price base 22/23, an uplift factor of 1.1277 must be applied to all costs in the final DWMP data tables in order to be comparative to any like-for-like costs in the PR24 tables.

The following changes impact all storm overflows outcome lines specifically:

- **WINEP drivers and Accelerated WINEP development** – the final DWMP was based on UUW's WINEP submission from January 2023. Following publication of the final DWMP in May 2023, continued development of the WINEP, including a number of changes to drivers and also our accelerated programme, has resulted in some storm overflow expenditure shifting forward to AMP7. This has consequently also altered the outcome profiles over the remaining years. The impact of these changes can be seen in Section 3.5.

3. Outcomes

3.1 Pollution

Table 1: Data tables for pollution outcomes highlighting DWMP and LTDS forecasts as well as commentary addressing reasons for any changes

DWMP LTDS

Outcome	Unit	Line reference	AMP7	AMP8					AMP9					AMP10	AMP11	AMP12	Total 25 yr		
			Forecast 2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Total AMP8 (2025-2030)	2030-31	2031-32	2032-33	2033-34	2034-35	Total AMP9 (2030-35)	Total AMP10 (2035-40)		Total AMP11 (2040-45)	Total AMP12 (2045-50)
Pollution incidents – base ¹	nr	1b	19.50	17.55	16.35	16.35	16.35	16.35	82.93	11.98	11.97	11.97	11.97	11.97	59.87	59.87	59.90	56.04	318.62
		LS2.12	16.03	16.03	15.69	14.80	13.79	12.02	72.33	11.72	11.63	11.63	11.63	11.63	58.24	58.08	58.08	54.36	301.09
	<p>Reasons for change: The data presented in LS2.12 differs to the DWMP 1b due to a performance commitment level (PCL) revision in AMP8 as UUW is striving to meet a more ambitious level of performance from base expenditure. For the completion of DWMP data tables a static value for normalisation of pollution incidents based on current sewer length was used in converting total pollution incidents to incidents per 10,000km of sewer length. Following OFWAT guidance, this normalisation of total pollution was revised to match the methodology issued for OUT5 sewer length.</p>																		
Pollution incidents – post enhancement ²	nr	1c	19.50	16.26	16.19	16.10	16.03	15.96	80.53	11.54	11.52	11.51	11.50	11.49	57.55	57.36	57.33	52.47	305.23
		LS1.12	16.03	16.03	15.69	14.80	13.79	12.02	72.33	11.72	11.63	11.63	11.63	11.63	58.24	58.08	58.08	54.36	301.09
	<p>Reasons for change: The data presented in LS1.12 differs to the DWMP 1c due to a PCL revision in AMP8 as UUW is striving to meet a more ambitious level of performance from base expenditure. Performance forecasts for AMP8 in LS1.12 are aligned to the proposed PCL which are primarily driven by operational risks (e.g. sewer blockages), managed through base expenditure. Additionally, whilst we fully expect pollution benefit through storm overflow investment and reduction in surface water runoff entering the combined system via flooding interventions, these benefits are difficult to fully quantify. Storm overflow interventions will reduce consented spills, rather than be aimed at tackling pollution events. For the completion of DWMP data tables a static value for normalisation of pollution incidents based on current sewer length was used in converting total pollution incidents to incidents per 10,000km of sewer length. Following OFWAT guidance, this normalisation of total pollution was revised to match the methodology issued for OUT5. Line 1b and 1c are now aligned as a result of 100% of the performance for this metric being driven by base expenditure.</p>																		

¹ Number of category 1-3 pollution incidents per 10,000km of wastewater network (excluding impact of AMP8 onwards enhancements)

² Number of category 1-3 pollution incidents per 10,000km of wastewater network (including impact of AMP8 onwards enhancements)

3.2 Compliance at wastewater treatment works

Table 2: Data tables for wastewater compliance outcomes highlighting DWMP and LTDS forecasts as well as commentary addressing reasons for any changes

DWMP
 LTDS

Outcome	Unit	Line reference	AMP7	AMP8						AMP9					AMP10	AMP11	AMP12	Total 25 yr		
			Forecast 2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Total AMP8 (2025-2030)	2030-31	2031-32	2032-33	2033-34	2034-35	Total AMP9 (2030-35)	Total AMP10 (2035-40)	Total AMP11 (2040-45)		Total AMP12 (2045-50)	
Compliance at WwTWs – base ⁴	%	2b	98.66	99.00	99.00	99.00	99.00	99.00	99.00	99.00	96.94	96.25	95.56	94.87	94.87	91.43	87.99	84.56	84.56	
		OUT2.14	100.00	100.00	100.00	99.74	99.52	98.33	98.33	97.62	97.62	97.62	97.82	97.82	97.82	97.82	97.82	97.82	97.82	97.82
	<p>Reasons for change: This performance commitment is linked to the supply and demand enhancement case. The data for AMP8 has been entered with the assumption that the enhancement case will be granted and therefore contribute to this measure. There are projects at 12 sites identified within the supply and demand programme. Of the 12 sites, 2 are anticipated to still have descriptive consents, so the impact is based on the prediction that the level of performance delivered from base will be calculated based on 10 of 12 sites having numeric permits. The level of enhancement expenditure predicted for AMP9 in table LS4.50 is similar to that for AMP8, but as per the guidance the table for years 2030-2035 are based on the AMP8 programme cumulative benefit. As UUW has no programme in place as yet however, we are assuming the delivery profile will be as spread evenly across AMP9 and beyond, with the same opex profile as the AMP 8 programme.</p>																			
Compliance at WwTWs – post enhancement ⁵	%	2c	98.66	99.40	99.40	99.42	99.43	99.44	99.44	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
		OUT4.109	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
	<p>Reasons for change: The post enhancement compliance has increased since the DWMP submission reflecting UUW's aspiration to meet the challenging target of 100% compliance. It includes the assumption that our enhancement case is supported therefore the performance from base is less in years when where enhancement performance from UUW's supply and demand programme is anticipated rather than base expenditure. This enhancement performance allows the overall post enhancement performance to be higher than presented in the DWMP tables.</p>																			

⁴ WwTW compliance with permit conditions from base expenditure (excluding impact of AMP8 onwards enhancements)

⁵ WwTW compliance with permit conditions following enhancement expenditure (including impact of AMP8 onwards enhancements)

3.3 Sewer collapses

Table 3: Data tables for sewer collapses outcomes highlighting DWMP and LTDS forecasts as well as commentary addressing reasons for any changes

DWMP
 LTDS

Outcome	Unit	Line reference	AMP7	AMP8					AMP9					AMP10	AMP11	AMP12	Total 25 yr		
			Forecast 2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Total AMP8 (2025-2030)	2030-31	2031-32	2032-33	2033-34	2034-35	Total AMP9 (2030-35)	Total AMP10 (2035-40)		Total AMP11 (2040-45)	Total AMP12 (2045-50)
8b Sewer collapses – base ⁹	nr per 1000km	8b	13.07	12.88	12.68	12.48	12.28	12.09	62.40	11.25	11.30	11.34	11.39	11.43	56.70	57.81	58.91	59.75	295.58
		LS2.20	13.07	12.94	12.80	12.67	12.54	12.41	63.36	12.36	12.30	12.26	12.19	12.14	61.24	59.86	58.49	57.14	300.09
<p>Reasons for change: UUW’s LTS profile for sewer collapses represents a trajectory from our forecast end of AMP7 position to the DWMP optimiser 2050 position of 11.32 incidents per 1000km of sewer. The DWMP optimiser profile showed improvement in sewer collapse performance followed by deterioration. We now instead believe that a stable, linear trajectory towards the DWMP FY50 position is a more realistic delivery profile and have therefore smoothed the profile. For the completion of DWMP data tables a static value was used for normalisation of sewer collapses based on current sewer length. Following OFWAT guidance, this normalisation of sewer collapses was revised to match the methodology issued for OUT5.</p>																			

⁹ Number of sewer collapses

3.4 Internal sewer flooding

Table 4: Data tables for internal sewer flooding outcomes highlighting DWMP and LTDS forecasts as well as commentary addressing reasons for any changes

DWMP
 LTDS

Outcome	Unit	Line reference	AMP7	AMP8						AMP9					AMP10	AMP11	AMP12	Total 25 yr	
			Forecast 2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Total AMP8 (2025-2030)	2030-31	2031-32	2032-33	2033-34	2034-35	Total AMP9 (2030-35)	Total AMP10 (2035-40)	Total AMP11 (2040-45)		Total AMP12 (2045-50)
Internal sewer flooding – base ¹¹	nr	9b	2.88	2.16	2.13	2.12	2.10	2.08	10.59	1.97	2.02	2.06	2.10	2.15	10.30	11.39	12.50	13.54	58.31
		LS2.4	2.88	2.32	2.23	2.15	2.07	1.99	10.76	1.95	1.92	1.90	1.89	1.88	9.54	9.40	9.40	9.40	48.50
	<p>Reasons for change: The data presented in LS2.4 differs to the DWMP 9b due to the use of a static value for normalisation of internal flooding incidents used in the DWMP data tables. This was based on current sewer connection numbers and was used in converting total internal flooding incidents to incidents per 10,000 connections. Following OFWAT guidance, this normalisation of total internal flooding was revised to match the methodology issued for OUT5. The data within the final business plan demonstrates UUW's stretching ambition in this area.</p> <p>DWMP optimiser output shows a performance deterioration over the course of AMP9 and beyond as a result of heightened risk driven by climate change and population growth. However, as per Ofwat's guidance for OUT2, that companies should assume that "they will receive efficient cost allowances to address issues such as network reinforcement required to accommodate growth, so that performance does not deteriorate", we have sought to stretch ourselves regarding performance that can be delivered from base. Therefore, in the PR24 data tables, we have instead defined a profile that displays a gradual decrease in incidents to the re-normalised 1.88 incidents per 10,000 sewer connections predicted by the DWMP optimiser.</p>																		
Internal sewer flooding - post enhancement ¹²	nr	9c	2.88	2.16	2.13	2.11	2.09	2.06	10.55	1.84	1.83	1.82	1.80	1.79	9.08	8.82	8.35	8.13	44.93
		LS1.4	2.88	2.32	2.23	2.14	2.05	1.96	10.69	1.72	1.70	1.68	1.67	1.65	8.42	7.93	7.28	6.87	41.19
	<p>Reasons for change: The DWMP profile was from a mathematical model and not assessed for deliverability. The data presented in LS1.4 differs to the DWMP 9c because the DWMP assumes a step change to the environmentally-adjusted frontier level of performance is made in the first year of AMP8, however, the profile has been smoothed to reflect a more realistic delivery profile. Further, in the PR24 data tables, we have stretched ourselves such that our FY30 PCL is beyond the environmentally adjusted frontier and aligned with the target we set ourselves in our PR19 business plan submission. Following OFWAT guidance, this normalisation of total internal flooding was revised to match the methodology issued for OUT5, rather than using a static value for sewer connections as in the DWMP data tables.</p>																		

¹¹ Total number of internal sewer flooding incidents / escapes per 10,000 sewer connections (excluding AMP8 onwards enhancements)

¹² Total number of internal sewer flooding incidents / escapes per 10,000 sewer connections (including AMP8 onwards enhancement expenditure) (see note 9 on Line definitions tab)

3.5 Storm overflows

Table 5: Data tables for storm overflows outcomes highlighting DWMP and LTDS forecasts as well as commentary addressing reasons for any changes

		DWMP		LTDS																		
Outcome	Unit	AMP7	AMP8					AMP9					AMP10	AMP11	AMP12	Total 25 yr						
		Forecast 2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Total AMP8 (2025-2030)	2030-31	2031-32	2032-33	2033-34	2034-35	Total AMP9 (2030-35)	Total AMP10 (2035-40)		Total AMP11 (2040-45)	Total AMP12 (2045-50)				
4a	Storm overflows - more than 10 spills per year – baseline ¹⁵	nr	1403	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401			
		nr	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453		
		Reasons for change: Changes in WINEP drivers for a number of storm overflows, plus UUW's accelerated WINEP investment programme and alignment to our Defra storm overflow action plan, all of which have continued to develop and be iteratively refined in the period following final DWMP publication have seen revisions to phasing detail.																				
4b	Storm overflows - more than 10 spills per year – base ¹⁶	nr	1402	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401	1401			
		nr	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453	1453		
		Reasons for change: Changes in WINEP drivers for a number of storm overflows, plus UUW's accelerated WINEP investment programme and alignment to our Defra storm overflow action plan, all of which have continued to develop and be iteratively refined in the period following final DWMP publication have seen revisions to phasing detail.																				
4c	Storm overflows - more than 10 spills per year - post enhancement ¹⁷	nr	1402	1401	1401	1401	1069	1014	1014	1013	1013	1013	1013	831	831	608	313	0	0			
		nr	1453	1415	1351	1184	1072	1054	1054	1054	1054	1054	1054	875	875	654	364	0	0			
		Reasons for change: Changes in WINEP drivers for a number of storm overflows, plus UUW's accelerated WINEP investment programme and alignment to our Defra storm overflow action plan, all of which have continued to develop and be iteratively refined in the period following final DWMP publication have seen revisions to phasing detail.																				
5a	Storm overflows (high priority) - ecological harm – baseline ¹⁸	nr	483	459	459	459	459	459	459	459	459	459	459	459	459	459	459	459	459			
		nr	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450		
		Reasons for change: Changes in WINEP drivers for a number of storm overflows, plus UUW's accelerated WINEP investment programme and alignment to our Defra storm overflow action plan, all of which have continued to develop and be iteratively refined in the period following final DWMP publication have seen revisions to phasing detail.																				
5b	Storm overflows (high priority) - ecological harm – base ¹⁹	nr	460	459	459	459	459	459	459	459	459	459	459	459	459	459	459	459	459			
		nr	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450		
		Reasons for change: Changes in WINEP drivers for a number of storm overflows, plus UUW's accelerated WINEP investment programme and alignment to our Defra storm overflow action plan, all of which have continued to develop and be iteratively refined in the period following final DWMP publication have seen revisions to phasing detail.																				
5c	Storm overflows (high priority) - ecological harm - post enhancement ²⁰	nr	460	484	484	484	342	300	300	300	300	300	300	141	141	60	28	0	0			
		nr	450	450	450	450	450	252	252	252	252	252	252	109	110	56	0	0	0			
		Reasons for change: Changes in WINEP drivers for a number of storm overflows, plus UUW's accelerated WINEP investment programme and alignment to our Defra storm overflow action plan, all of which have continued to develop and be iteratively refined in the period following final DWMP publication have seen revisions to phasing detail.																				

¹⁴ totex
¹⁵ Number of storm overflows with more than 10 spills per year.
¹⁶ Number of storm overflows with more than 10 spills per year (excluding impact of AMP8 onwards enhancement).
¹⁷ Number of storm overflows with more than 10 spills per year (including impact of AMP8 onwards enhancement).
¹⁸ Number of high priority overflows causing ecological harm a year
¹⁹ Number of high priority overflows causing ecological harm a year (excluding impact of AMP8 onwards enhancement)

²⁰ Number of high priority overflows causing ecological harm a year (including impact of AMP8 onwards enhancement)

Outcome	Unit	AMP7	AMP8						AMP9					AMP10	AMP11	AMP12	Total 25 yr		
		Forecast 2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Total AMP8 (2025-2030)	2030-31	2031-32	2032-33	2033-34	2034-35	Total AMP9 (2030-35)	Total AMP10 (2035-40)	Total AMP11 (2040-45)		Total AMP12 (2045-50)	
6a	Storm overflows (all) - ecological harm – baseline ²¹	nr	483	459	459	459	459	459	459	459	459	459	459	459	459	459	459	459	459
			450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450
			Reasons for change: As per UUW's final DWMP data table commentary, line 6a is a replication of line 5a as all storm overflows causing ecological harm are defined as high priority. Therefore this line has been updated as a default.																
6b	Storm overflows (all) - ecological harm – base ²²	nr	460	459	459	459	459	459	459	459	459	459	459	459	459	459	459	459	459
			450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450
			Reasons for change: As per UUW's final DWMP data table commentary, line 6b is a replication of line 5b as all storm overflows causing ecological harm are defined as high priority. Therefore this line has been updated as a default.																
6c	Storm overflows (all) - ecological harm - post enhancement ²³	nr	460	484	484	484	342	300	300	300	300	300	300	141	141	60	28	0	0
			450	450	450	450	450	252	252	252	252	252	252	109	110	56	0	0	0
			Reasons for change: As per UUW's final DWMP data table commentary, line 6c is a replication of line 5c as all storm overflows causing ecological harm are defined as high priority. Therefore this line has been updated as a default.																
7a	Storm overflows - designated bathing waters (coastal and inland) – baseline ²⁴	nr	106	103	103	103	103	103	103	103	103	103	103	103	103	103	103	103	103
			111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111
			Reasons for change: Changes in WINEP drivers for a number of storm overflows, plus UUW's accelerated WINEP investment programme and alignment to our Defra storm overflow action plan, all of which have continued to develop and be iteratively refined in the period following final DWMP publication have seen revisions to phasing detail.																
7b	Storm overflows - designated bathing waters (coastal and inland) – base ²⁵	nr	106	103	103	103	103	103	103	103	103	103	103	103	103	103	103	103	103
			111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111	111
			Reasons for change: Changes in WINEP drivers for a number of storm overflows, plus UUW's accelerated WINEP investment programme and alignment to our Defra storm overflow action plan, all of which have continued to develop and be iteratively refined in the period following final DWMP publication have seen revisions to phasing detail.																
7c	Storm overflows - designated bathing waters (coastal and inland) - post enhancement ²⁶	nr	106	103	103	103	88	78	78	78	78	78	78	0	0	0	0	0	0
			111	105	95	83	78	72	72	72	72	72	72	0	0	0	0	0	0
			Reasons for change: Changes in WINEP drivers for a number of storm overflows, plus UUW's accelerated WINEP investment programme and alignment to our Defra storm overflow action plan, all of which have continued to develop and be iteratively refined in the period following final DWMP publication have seen revisions to phasing detail.																

²¹ Number of all overflows causing ecological harm a year

²² Number of all overflows causing ecological harm a year (excluding impact of AMP8 onwards enhancement)

²³ Number of all overflows causing ecological harm a year (including impact of AMP8 onwards enhancement)

²⁴ Number of overflows in designated bathing waters spilling more than 3 times per bathing season

²⁵ Number of overflows in designated bathing waters spilling more than 3 times per bathing season

²⁶ Number of overflows in designated bathing waters spilling more than 3 times per bathing season

3.6 External sewer flooding

Table 6: Data tables for external sewer flooding outcomes highlighting DWMP and LTDS forecasts as well as commentary addressing reasons for any changes

DWMP LTDS

Outcome	Unit	Line reference	AMP7	AMP8						AMP9					AMP10	AMP11	AMP12	Total 25 yr	
			Forecast 2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Total AMP8 (2025-2030)	2030-31	2031-32	2032-33	2033-34	2034-35	Total AMP9 (2030-35)	Total AMP10 (2035-40)	Total AMP11 (2040-45)		Total AMP12 (2045-50)
External Sewer Flooding – base ²⁷	nr	11b	16.43	15.93	15.39	14.84	14.29	13.75	74.20	11.62	11.74	11.86	11.98	12.10	59.31	62.30	65.30	67.80	328.90
		LS2.5	15.66	15.20	14.76	14.41	14.11	13.72	72.20	13.20	12.67	12.17	11.66	11.14	60.84	55.70	55.70	55.70	300.14
	<p>Reasons for change: LS2.5 shows improved performance in comparison to DWMP 11b from base expenditure, forecasting stable performance from end of AMP9. We assume that innovation, efficiencies in delivery from base and synergistic benefits resulting from enhancement investment in other areas will allow UUW to offset the deterioration in performance resulting from climate change and growth reported in our DWMP. Following OFWAT guidance, this normalisation of total external flooding was revised to match the methodology issued for OUT5, rather than using a static value for sewer connections as in the DWMP data tables.</p>																		
External Sewer Flooding - post enhancement ²⁸	nr	11bi	16.43	15.87	15.32	14.76	14.21	13.65	73.80	11.47	11.56	11.65	11.74	11.83	58.24	60.48	62.58	64.06	319.16
		LS1.5	15.66	15.20	14.75	14.40	14.07	13.65	72.07	10.75	10.78	10.81	10.85	10.89	54.08	54.37	54.52	54.14	289.18
	<p>Reasons for change: Following OFWAT guidance, this normalisation of total external flooding was revised to match the methodology issued for OUT5, rather than using a static value for sewer connections as in the DWMP data tables. Additionally to this, since the DWMP was published UUW have revised our forecasted AMP8 starting position to reflect the significant reductions in sewer flooding we've seen as a result of the implementation of our Dynamic Network Monitoring operating model, customer awareness campaigns and Hydraulic Flood Risk Reduction schemes amongst others.</p>																		

²⁷ Total number of internal sewer flooding incidents / escapes per 10,000 sewer connections (excluding AMP8 onwards enhancements)

²⁸ Total number of internal sewer flooding incidents / escapes per 10,000 sewer connections (including AMP8 onwards enhancement expenditure) (see note 9 on Line definitions tab)

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