

Response from Satec Limited

Disconnection Policy Consultation – September 2007

In general we are satisfied with the policy as outlined in the document “Disconnections” dated September 2007, with a few notable exceptions. These are as follows and our comments are attached.

Threshold Level

The proposed threshold level is £500, which would represent an 18 – 24 month billing value for a small volume customer before a temporary (or permanent) disconnection can be processed. If this level is to be carried through, it may be possible for considerable debts to be built up with licensed providers, with little recourse.

The threshold level should be reduced to one of say £200, or as a percentage of the average sector billing value.

Physical Disconnections

For the smallest users, in particular those for convenience stores, it may well be the case that the single water and single sewerage connection will be both that for commercial use in the store and shared by the owner-occupier for domestic use. In such cases it may prove impossible to disconnect the water supply due to the domestic requirement contained within the “commercial supply”. It may be necessary, in these cases for the respective supplies to be separately metered, which would cause additional costs to Scottish Water in the implementation of their metering program.

Meter Based Annual Charges

According to the policy proposal, Scottish Water may continue to charge for the meter installed on the premises during temporary disconnections, even though the LP receives no income during this period. In addition Scottish Water is permitted to charge for surveys, the temporary disconnection and all other relevant costs. This again would seem to be unfair as the LP receives no income and may only recover these charges if the customer reverts to a “normal” supply arrangement. They would not be recovered, except by way of a court action, if the disconnection became permanent.

Disconnections should be a last resort methodology and every attempt would be made to correct the causes prior to this becoming a necessity.

We shall adopt a policy that ensures a full and fair process is managed within the guidelines being finalised.

October 2007

K E Speak
Satec Limited
The Street
Englefield
Reading
Berks. RG7 5ES