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Dear Ofgem

Wessex Water response to Ofgem RIIO-ED3 sector specific methodology consultation

Thank you for the opportunity to respond to your consultation.

Water and sewerage companies like Wessex Water provide an essential service to customers and the environment. The provision of a secure and reliable energy supply to our critical infrastructure is vital to us being able to fulfil our statutory duties.

We consider that the RIIO-ED3 methodology could and should be significantly improved to reflect this criticality. The current and proposed mechanisms influencing DNO performance and resilience investment do not fully reflect the needs of these essential services and the knock-on impacts of power failure, including potentially significant environmental harm. This can include very short-term power failures.

There is an opportunity now to deliver greater system-wide resilience through stronger and better aligned incentives for DNOs.

In 2024, 48% of pollutions at Wessex Water's sewage pumping stations and water recycling centres (also known as sewage treatment works) had power failure identified as the primary root cause. Of these power related issues, 91% were due to either blackouts or brownouts.

We support the call for a dedicated resilience mechanism for wastewater infrastructure, recognising the need to keep critical wastewater assets in supply as a core requirement.

Water UK has submitted a response on behalf of the industry, and we ask Ofgem to consider Wessex Water's position on individual questions as aligned with that response.

Yours sincerely,



Eoghan Kilroy

Head of Waste Strategy