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03 October 2025

NAV Policy Team
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Dear All,

**Consultation: Rules for bulk charges for new appointments and variations
(English Undertakers)**

Thank you for the opportunity to respond to this consultation, which you published on 04 September 2025. I can confirm that this response is not confidential. ESP Water Limited (ESPW) is a NAV (New Appointment and Variation) company, which was appointed in July 2022.

ESPW welcomes Ofwat's consultation and the implementation of these rules. As a member of the INA (Independent Networks Association) we have been part of the Bulk Supply Working group collaborating with both Ofwat and incumbent companies on this matter for some time. We believe that these rules are important as fair charging is essential to this market, which in turn supports the delivery of housing growth across England. The rules will also ensure transparency and consistency to allow NAVs to fairly compete in the market and ensure our customers are "no worse off." We also welcome the inclusion of a clear definition of "avoided costs" and the avoided costs table as we think this will support transparency and be helpful for all concerned.

We understand that these rules will come into force on 01 April 2026, but there will be a period of review to resolve technical issues over the next year. We would ask that in the interim, Ofwat still require the incumbents to follow these rules and publish associated tables so that we can use this year to work together to clarify the rules.

Please do not hesitate to contact me on [REDACTED] should you wish to discuss our response or have any further questions.

Yours sincerely,

[REDACTED]

[REDACTED]

Head of Regulations