

**5th November 2025**

**Response by the Independent Water Forum for Northumbrian Water to the CMA's Provisional Determination on the 2025-2030 Business Plan**

The Independent Water Forum appreciates the opportunity to comment on the CMA's Provisional Determination on Northumbrian Water's plan.

We are concerned that the CMA has not addressed the long-standing issue of asset maintenance and has chosen to leave this issue to the OFWAT review.

We welcome the extra resources that will be support investment to improve resilience against power outages that are causing pollution incidents.

We are concerned that the CMA's Provisional Determination that frontloads costs onto consumers' bills means they are paying up front for investments. Whilst this helps Northumbrian Water from a financial perspective, it does not help the company build trust with its customers and also goes against all consumer research, which shows that consumers prefer smooth bill increases over time rather than a large increase in one year as proposed.