

Appendix 8

Governance and Assurance Reports

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Governance and Assurance Report

8.1 Black and Veatch Final Report

Technical Assuror's Statement on Hafren Dyfrdwy's PR19 Business Plan

To support its own internal assurance and governance processes, Hafren Dyfrdwy has appointed Black & Veatch to provide independent technical assurance of aspects of its Business Plan (the 'Plan') for the period 2020 – 2025. The Plan is due to be submitted to Ofwat early in September 2018.

The Black & Veatch team consists of senior professional staff with wide experience of the water industry and its regulation and is led by Stephen Bentley, Technical Information Assuror for the former Dee Valley Water and previously Reporter for another UK water and sewerage company.

The team has reviewed, challenged and provided assurance on aspects of the Plan chosen by the company, which the company assessed as being medium and high risk. The team's role was to provide third-line assurance to validate Plan proposals and data tables, to support first- and second-line assurance carried out by the company itself, as part of the company's assurance framework.

Checks have been carried out by reference to company documentation and data, through interviews with the relevant company staff and with unrestricted access to data in the company's data systems. Full cooperation was shown. Detailed reports have been prepared on each of the areas listed below and Mr Bentley has attended the company's Disclosure Committee and Audit Committee to provide updates on the findings of assurance.

The work carried out and our findings are given below.

Work Carried Out

1. Review of proposed bespoke performance commitments for the May 2018 Ofwat submission

- Reviewed and challenged the process for defining bespoke performance commitments
- Checked that the process used was consistent with the Ofwat methodology
- Checked that customers had been consulted and their views taken into account
- Checked that proposed performance commitments were justified, measurable and supported by customers
- Checked that internal governance had been carried out

2. Review of the company-specific methodology used for:

Affordability and vulnerability

Direct procurement

The approach to bad debt

Resilience

Compliance with statutory obligations

- Checked that the company followed a thorough and rational process to develop methodologies
- Checked that customers and other stakeholders had been consulted
- Checked that methodologies were appropriate to the scale and nature of the company's activities and were consistent with Ofwat methodologies
- Checked the integration of statutory and legislative obligations into the company's Licence to Operate framework

3. Review of the setting of performance commitment targets and financial incentives reviewed and challenged:

- The process for defining regulatory expectations and estimating likely AMP7 upper quartile performance
- The assessment of historical performance and expectations for improvement
- Industry comparisons
- The process for canvassing customer views and taking them into account in the Plan
- Cost benefit analysis
- Checked that internal governance had been carried out

4. Review of proposed cost adjustment claims

- Reviewed and challenged the process used to identify potential cost adjustment claims, including the degree of support from customers and other stakeholders and compliance with the Ofwat methodology
- Challenged the justification of each proposed claim
- Checked that costings were robust
- Checked that the cost and scope of each claim had been optimised for maximum customer benefit and was affordable
- Checked that internal governance had been carried out

5. Checks on selected data tables

- Reviewed and challenged the process used to prepare data for the tables
- Checked that company procedures existed and were used
- Checked how numbers had been estimated
- Checked that numbers were consistent with 3 and 4 above
- Carried out sense-checks on the numbers reported, confirming that numbers were of the right order, showed a realistic trend and did not contain unexplained oddities or step-changes, and challenged zero entries
- We did not carry out detailed audit of the numbers given
- Checked that internal governance had been carried out

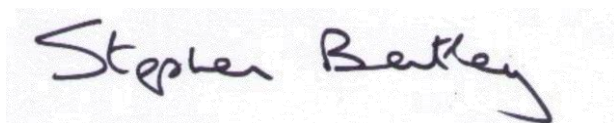
Findings

We have noted the Board Statement included in the Executive Summary of the Business Plan. Our checks support this statement to the extent described below.

From our assurance work, we concluded that:

- The company followed a thorough and rational process to develop its methodologies and approaches to affordability, customer vulnerability, direct procurement, bad debt, resilience and meeting statutory and licence obligations. The process included consultation with customer bodies and other stakeholders. The approaches were appropriate to the scale and nature of the company's operations and geographic area and were consistent with Ofwat methodologies.
- The company followed a thorough and rational process to define proposed bespoke PR19 Performance Commitments (PCs), consistent with the Ofwat methodology, and to set target levels for bespoke and compulsory PCs taking into account regulatory expectations, historical performance, industry comparative performance, customer and CCG views and cost-benefit analysis.
- In defining PCs, the company took into account customer and CCG views on the relative priority of PCs and applied the most stretching targets in areas which customers confirmed as their highest priorities.
- The method used for the calculation of financial Outcome Delivery Incentives (ODIs) complied with Ofwat's methodology. The majority of PCs had financial penalties and rewards. The size of penalties and incentives was based as far as possible on customer willingness-to-pay. Most financial ODIs were proposed to apply in-period, to provide an incentive to make steady progress.
- An effective process was used to identify potential challenges justifying Cost Adjustment Claims (CACs) which met Ofwat criteria and were material. These were challenged internally, by customers and by other stakeholders. The proposed CACs were justified, supported by customers and had been robustly costed.
- Costs had been assessed for each CAC at an appropriate level of detail, based on similar work carried out by the company or estimates provided by others, and were as robust as possible at the planning stage. A proper assessment of options had been carried out and steps taken to optimise work scope and cost.
- The company had governance arrangements in place for the preparation of all aspects of the Plan. These included written methodologies for the preparation of business cases and written procedures for the completion of data tables, internal first- and second-line assurance, and the third-line assurance provided by our work. A risk-based approach was used to select the Plan areas covered by third-line assurance. During the development of the Plan, we reported from time-to-time to the company's Disclosure Committee and Audit Committee and, at the stage of final approval, to the Board.
- During our work, for the areas covered by our third-line assurance checks, we have not uncovered any deficiency in the methodologies used, the proposals made, or the completion of the required data tables, which we consider material.

Yours faithfully,

A handwritten signature in black ink that reads "Stephen Bentley". The signature is written in a cursive, slightly slanted style.

Stephen Bentley - Technical Information Asuror
Black & Veatch

8.2 Internal Audit Future Reporting Processes - Board Statement

Background and scope

As part of the PR19 submission, Ofwat set out in its final methodology that *“they expect a company’s full Board to take collective responsibility for assuring its business plan. To provide confidence in its plan, a company’s full Board needs to provide us with a statement, in its own words, of why it considers all the elements (including supporting data) add up to a business plan that is high quality and deliverable.”*

The Hafren Dyfrdwy Board has composed a statement which includes the required elements as set out by Ofwat. Each element of the statement has evidence to support it including reports from external assurance providers, minutes from STEC and Board meetings etc.

Internal Audit were asked to review evidence for the following statements:

“The business plan will deliver, and the Board will monitor delivery of, its outcomes and performance commitments

The company's proposed approach to reporting on its performance commitments, ODIs and the projections of outcomes is robust”

Detailed observations

As evidence to support the above statements, Internal Audit have reviewed the relevant sections of the Securing Trust, Confidence and Assurance chapter and supporting appendix of the business plan along with the report provided by Jacobs and Black & Veatch on their review of legal and statutory obligations. We have also conducted meetings with the Head of Compliance and the Compliance Manager.

Hafren Dyfrdwy are proposing to continue with their current process of regular reporting through STEC and Board and half and full year assurance reporting of Performance Commitments and ODIs through Disclosure Committee and Audit Committee. The process will continue to follow the three lines of assurance approach with Black & Veatch carrying out technical assurance in this area until 2019 and Jacobs carrying out third line technical assurance until 2025. Shadow performance commitments are already reported in this way.

Hafren Dyfrdwy’s approach to governance includes the Board, STEC and Audit Committee. All of which are consulted and give approval on major regulatory submissions and this process is to be continued going forwards. The Customer Challenge Group are also a regular consultee and have been involved in the PR19 planning process and will continue to be consulted as part of future submissions.

Internal Audit recommends that an Internal Audit review of the reporting process for the PCs and ODIs is included in the 19/20 plan.

Annex A - List of data tables and assurance provide

PR14 Reconciliation Tables (x13) Internal Audit	Black and Veatch (x28)		Financial Model (x32) Internal Audit		Zero tables (x15) Internal Audit	Other (x18) Internal Audit	
App5 App6 App9 App23 App25 App27 App31 WS13 WS15 WWS13 WWS15 R9 R10	WWS3 WWS4 WWn3 WWn4 Bio1 Bio2 Bio3 WWS2 WWS2a Wr6 WS12 WS12a Wn6 Wr8 WWn8	WS3 WS4 Wr1 Wn1 Wn2 App2 WS18 WWS18 App1 App4 App28 WS2 WS2a	App7 App8 App10 App11 App11a App12 App12a App13 App14 App15 App15a App16 App17 App18 App19 App26	App29 App32 Wn3 Wn4 Wn5 Wr3 Wr4 Wr5 WWn5 WWn6 WWn7 Bio4 Bio5 Bio6 R7 R8	R5 R6 WWS12 App33 App3 App21 WS10 WS17 WWS10 WWn2 Bio7 R2 Wr7 WS1a WWS1a	App20 App22 App24 App24a WS1 WS5 WS7 WS8 App30 R4	Wr2 WWS1 WWS5 WWS7 WWS8 WWn1 R1* R3