



SCOTTISH WATER

Water Industry Commission for Scotland (WICS) ANNUAL RETURN 2024/25

Section B – Outputs to Customers

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Section B – Outputs to Customers

1 Table B1: Restrictions on water use

1.1 Background

Prior to AR22, the B1 table only reported on % of population affected by hosepipe bans. For the AR22 submission, this was amended to cover the use of Water Shortage Orders (WSOs) rather than Hosepipe Bans, reflecting the current legislation. AR22 was the first year that Scottish Water reported on WSOs as part of the AR submission. Additional reporting **Lines B1.6 to B1.8** were also added in AR22 to report the number of red drought impacts trigger breaches (**Line B1.6**) as well as the number of supply systems monitored/not monitored against drought trigger levels (**Lines B1.7 and B1.8**).

AR25 Headlines:

- 0 WSO's (same as AR24)
- 0 Emergency WSO's (same as AR24)
- 0 zones entering Red Trigger (compared with 1 red trigger in AR24)

1.2 Performance Trends

B1.1: Total of zonal populations

The “Total of zonal populations” is calculated as outlined in Table 1 below. Please note that two of these numbers are also reported in the A2 table. The reported number is 5,360 (000's). This does not include the transient tourist population.

The population reported in **Line B1.1** also includes “Population not in households” (an extra 122,060). This is consistent with the total of zonal populations used in the calculation of Security of Supply Index (SoSI) reported in B9.

Table 1: Total of zonal populations.

Line description and number	Value
Unmeasured household population (line A2.3)	5,237,635 ²
Measured household population (line A2.4)	685 ¹
Population not in households – Water	122,060
Total	5,360,380

¹ reported as 0.685 in **Line A2.4** due to 000's units.

² reported as 5,237.635 in **Line A2.3** due to 000's units

The term “Population not in households” describes the estimates of population generally assumed to be currently in institutions e.g., prison or hospitals. Meanwhile, in the A Table commentary, the term ‘Population not in households’ is taken to be the difference between NRS total population and NRS private household population. The ratio of dwellings with water to total dwellings is then applied to calculate the “Population not in households with water.”

AR25 total population has increased by 9,877 (a 0.18% change) compared to the AR24 total reported population of 5,350,503 – an overwhelming majority of the change is in the “Unmeasured household population” category.

B1.3: % Population affected by ordinary water shortage orders

This measure is a calculated line and is the result of **Line B1.2**, the number of people that were subject to WSOs in the year, divided by **Line B1.1**, the total household population reported. The percentage population affected by WSOs in AR25 is zero%. As there were zero WSOs imposed in AR25, the confidence grade of AX has been applied.

B1.4: Population affected by emergency water shortage orders

The definition and requirements for an emergency Water Shortage Order (eWSO) are detailed in Part 7 of the Water Resources (Scotland) Act 2013. An eWSO may be similar to an ordinary WSO but would be implemented more quickly. An eWSO could also be used to implement more significant supply restrictions such as rota cuts and standpipes.

This measure is the sum of the population impacted by an eWSO in the reporting year. This number is derived from the number of people affected by an eWSO; the total for the year being the sum of each discrete order, including where eWSOs may have to be imposed more than once in a Water Resource Zone (WRZ) in the year. Zero eWSOs were imposed in AR25 (same as AR24), consequently a confidence grade of AX has been applied.

B1.5: % Population affected by emergency water shortage orders

This measure is a calculated line and is the result of Line B1.4, the number of people that were subject to eWSOs in the year, divided by Line B1.1 the total reported household population reported. This is the first year this line has been reported therefore no comparison with previous years can be made.

As there were zero% eWSOs imposed in AR25, the confidence grade of A1 has been applied.

B1.6: Monitored reservoir sources breaching the drought impacts (red) trigger

The drought impacts trigger levels for any given water supply system are set out in a Drought Plan document. Each supply system will have a different level of drought risk as well as different potential drought plan options which may be required. However, an overview of the different drought impacts trigger levels is provided below in Figure 1.

Figure 1: Drought impacts trigger levels.

Normal Operation	Reservoir levels are within normal range for time of year. Assets managed under normal operational regime.
Close Monitoring	Reservoir levels below normal for time of year. Early warning that operational measures may be required if levels continue to drop.
Drought Watch	Action likely to be required to reduce demand on the system, such as network re-zoning or active leakage control. If applicable, prepare applications for fast-track CAR / water shortage orders to request permission to use additional sources or reduce compensation flows. Consider establishing Drought Group (which will further expand if the drought continues into the amber and red phases).
Drought Warning	Submit applications for fast-track CAR variation / water shortage order to allow time to be granted prior to red phase and for planning and construction of augmentation arrangements. Continuing demand reduction measures including targeted customer communications to promote water efficiency (pre-requisite for SEPA fast-track CAR applications).
Drought Impacts	Implement fast-track CAR variation / water shortage order actions such as additional supplies, reduced compensation, reductions or prohibition of non-essential use or third party abstractions. Extended demand restrictions.
Emergency	Widespread drought requiring strategic options. Further details are listed in relevant drought plan or drought contingency plan, or in the absence of these the drought contingency plan framework generic checklists.

Zero supply zones entered the red drought impacts trigger level during AR25.

In AR24, one supply zone was reported in the red drought impacts trigger level (Broadford). The difference between AR24 and AR25 is reflective of the different weather conditions experienced in spring and summer 2024 compared to 2023. 2024 saw generally greater than average rainfall across most parts of Scotland and as a result the overall number of drought triggers was less than in recent years, with no supply zones entering the most severe red drought trigger level.

B1.7: Total number of supply systems monitored against drought trigger levels

The reported numbers for these lines are based on a count of the number of water supply systems which are reported internally on a weekly basis in the Water Update Report. This report is used for the monitoring of water resource availability and the communication of potential or on-going drought risk. The reporting groups are determined mainly by the configuration and operation of the supply sources, which in turn determines how the drought trigger levels are modelled.

As a result, a supply system may be comprised of a single loch/reservoir source-feeding a single WTW; or, alternatively, may be based on the combined storage of multiple reservoirs (e.g., up to five reservoirs in the case of the Glendevon WTW system). These combined systems may feed a single WTW; or, in some cases, can be conjoined to supply multiple WTWs (e.g., Glasgow, Edinburgh and Dundee supply systems). The majority of supply systems (79 out of 85) monitored against drought trigger levels are loch/reservoir storage systems. However, there are also six river sites monitored which are also reported against river flow percentile trigger levels. Four of these river sites are large river abstraction locations and two are indicator sites for nearby groundwater sources where resource levels are influenced by surface water river levels.

The total number of supply systems monitored in the AR25 reporting year is 85.

For AR24, the reported total number of supply systems monitored was 85. However, subsequent checks have identified that this should have been reported as 84. The change from 84 in AR24 to 85 in AR25 is due to the formal addition of the Broadford supply zone into the Water Update Report as of May 2024.

B1.8: Total number of supply systems not monitored against drought trigger levels

The total number of supply systems not monitored in the AR25 reporting year is 143. This number is based on the number of WTWs which are not included in the weekly water resource monitoring. The supply systems which are not directly reported on each week are mostly river or groundwater source systems where the standard reservoir storage and drought trigger reporting format is not directly applicable. Smaller loch and reservoir systems are also excluded where there is not sufficient monitoring or model availability to enable weekly reporting against drought trigger levels. These additional systems will still be covered by standard surveillance monitoring and checks by our operational staff. It is worth noting that the 143 supply systems not covered in the weekly monitoring report represent 5% of the total population supplied by Scottish Water.

For AR24, the total number of supply systems not monitored was 144. The reduction of one supply systems is due to the formal inclusion of Broadford WTW in the Water Update Report as of May 2024.

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1.3 Data

1.3.1 Data sources and confidence grades

Data sources and confidence grades are detailed in the Performance Trends section 1.2, where relevant.

1.3.2 Data Improvement Programmes

There were no data improvement programmes during AR25 other than the addition of Broadford supply zone into the Water Update Report.

1.3.3 Assumptions used for forecast data

It is not feasible to forecast AR25 data for **Lines B1.2 to B1.8**. The impact and extent of drought conditions and the subsequent need for water restrictions cannot be reliably forecast from year to year due to it being externally influenced by weather patterns. We do however, monitor the situation closely throughout the year and have a range of planning and operational mitigation measures (e.g., drought plans) which are implemented to manage drought risk.

2 Table B2: Pressure and interruptions

2.1 Overview

Table B2 provides information on properties receiving low water pressure and interruptions to supply.

During AR25, customers from 14,222 properties contacted us due to experiencing low pressure. However, the majority of these were covered by the allowable exclusions such as abnormal demand or short-term operational incidents. The number of contacts increased by 6752 from the 7498 reported in AR24. The reason for this is a data error which was identified during the past year which meant a large number of contacts were not being pulled into the report used for this measure. If the same filter had been applied to AR25, the number of contacts would be similar to previous years. After removal of the exclusions, the number of properties below reference level decreased from 219 to 194 over the year (**Line B2.3**) This is due to a reduction in both CS1 and CS1A properties recorded on the register as well as 3 duplicated CS1A entries which were identified during a review. Properties receiving low pressure are broken into 2 categories. CS1 properties should receive adequate pressure but persistently do not, so receive a Guaranteed Service Standard (GSS) payment. CS1A properties are within 10.5m head of an SR and do not receive a GSS payment as there is no obligation to provide adequate pressure to these properties. For the definition of reference level see the Water Industry for Scotland (WICS) Annual Return Reporting Requirements, Section B - Chapter 2.

The number of properties experiencing interruptions to supply (ITS) decreased significantly across all durations in AR25 compared to that reported in AR24. In AR25 there was an increased focus on mitigating and effectively planning interruptions to supply. One of the most effective drivers of the reduction was improving collaboration amongst teams and effective planning to reduce the impact on properties. There was an introduction of the monthly *ITS review group* where specific ITS events were investigated, analysed and documented. This information discussed and utilised during the meetings. The key findings were fed back to individual teams which enhanced working practices in the field. Within the ITS team analysts identified key root cause analysis themes which affected change within the individual reviews which we shared with teams pan Scotland. The ITS aggregate per month was well below the flight path from April through to August where there was a significant increase in 12 hour events. 2 events in Hamilton and Shetland contributed to the high ITS figure in August. The strong start to the 12 month period continued through to the winter months where there was a significant decrease in named storms (12 in 23/24 compared to 5 in 24/25). Increased resilience planning within the business mitigated the impacts from these weather events through installing generators at critical assets such as booster stations and water treatment works. Whilst there was a focus on mitigating impacts from ITS, the 2nd and 3rd most common cause of ITS events breaching the 6 hour window, is due to the complexity of repair and delay in implementing an alternative supply respectively. This will be the focus of the 25/26.

2.2 Performance Trends

Lines B2.1-B2.4 – Properties receiving pressure / flow below reference level

The number of properties that have received pressure below the reference level covered by the allowable exclusions is 14,222 (**Line B2.4**). This has been derived from the AR25 customer contacts data for pressure and intermittent supply. This represents a significant increase of 6724 from AR24 reported figure of 7,498. However, this increase is attributed to a data error which was identified during the year. The report used to calculate this measure was not selecting all contact records. When replicating the data filtering from previous years the number is similar to previous years. This means the measure will be more accurate for future years. It should be noted that not all customers experiencing low pressure will contact Scottish Water about pressure issues. The figures included in Lines **B2.1 to B2.4** are summarised in Table 3 below.

During AR25, no properties were added to the excluded list (within 10.5m head of a SR). However, a review of the register identified 3 duplicated entries. This reduces the total from 175 to 173 (**Line B2.3b**). The duplicates existed where addresses had been spelled incorrectly on the register. Two properties were added to the CS1 low pressure register list, which are properties eligible for GSS payments. These were added mistakenly following new customer contacts which provided a variation of the same address. However, 24 properties were removed from the CS1 register following infrastructure improvements serving Dolphinton (Scottish Borders) and Braes (Isle of Skye). At the end of the year, 22 properties were on the CS1 list receiving GSS payments (**Line B2.3a**). This is below the target range of 25-40 properties. However, there is limited planned work to remove further properties during this investment period so this number is likely to rise over the next two years.

Whilst projects to remove properties are planned for the year ahead, it is likely that further properties will be identified as not meeting the Low-Pressure Management Approach criteria. These will be added to the register following confirmation through logging.

Table 2: Summary of properties receiving pressure / flow below reference level for AR25.

Line Reference	AR25
Total connected properties (Line B2.1 – BF Line A1.10)	2,828,301
Properties receiving low pressure but excluded from line B2.3 (Line B2.4)	14,222
Properties below reference level at start of year (Line B2.2)	219
Properties below reference level at end of year (Line B2.3)	194
Net increase/decrease	27

Lines B2.5-B2.9 - Properties affected by planned interruptions

Details of planned interruptions are presented below in Table 3.

Table 3: Properties affected by planned interruptions in AR24 and AR25.

Line Ref		2023-2024	2024-2025	Variance	% change
B2.5	Less than 3 hours planned and warned	24717	20899	-3818	-15.45%
B2.6	More than 3 hours planned and warned	36705	23114	-13591	-37.03%
B2.7	More than 6 hours planned and warned	10534	3554	-6980	-66.26%
B2.8	More than 12 hours planned and warned	0	0	0	
B2.9	More than 24 hours planned and warned	0	0	0	

Planned interruptions lasting more than 3 hours in AR25 (**Line B2.6**) affected 23,114 properties, an decrease of 13591 and 37.03% from AR24. This was largely driven by good network behaviours and an increased focus on mitigating interruptions to supply.

Planned interruptions lasting more than 6 hours in AR25 (**Line B2.7**) affected 3,554 properties, an decrease of 6980 (66.26%) from AR24. Similarly to the interruptions lasting more than 3 hours this has been due to better network behaviours and utilisation of new network intervention methods and technology which has reduced customer impact.

There were no planned interruptions lasting more than 12 or 24 hours which has been the case in the last 4 years (**Lines B2.8 and B2.9**).

Lines B2.10-B2.14 - Properties affected by unplanned interruptions

AR25 saw a significant decrease in properties experiencing unplanned interruptions to supply across all durations. These were largely attributed to increased network vigilance and the hard work of field and support staff. An increased use of alternative supplies such as introducing water from other areas of our network or introducing tankers to supply communities can largely contribute to the reduction of properties affected. A collaborative approach to managing and recovering unplanned interruptions to supply contributed to the strong end of year position. Good examples of this collaborative approach would be the introduction of Network intervention Teams Chat. This allows the CEC, ICC and Operations colleagues to be alerted to issues and creates a space for informed decision making during ITS events.

A comparison of the number of properties affected by unplanned interruptions to supply is provided in Table 4 below.

Table 4: Properties affected by unplanned interruptions in AR24 and AR25.

Line Ref		2023-2024	2024-2025	Variance	% change
B2.10	Less than 3 hours unplanned	203311	191253	-12058	-5.93%
B2.11	More than 3 hours unplanned	94899	77015	-17884	-18.85%
B2.12	More than 6 hours unplanned	5662	4374	-1288	-22.75%
B2.13	More than 12 hours unplanned	566	532	-34	-6.01%
B2.14	More than 24 hours unplanned	112	33	-79	-70.54%

Lines B2.15-B2.19 - Interruptions caused by third parties

Overall Interruptions caused by third parties (and outside Scottish Water's control) has decreased in AR25. In AR25 there were 229 properties impacted by third party damage events leading to interruptions to supply which lasted more than 12 hours. 175 of those 229 properties were impacted by only 5 events. Across all metrics (B2.15 to B2.19) the variance there is a significant reduction in third party damage ITS events, in particular the removal of any interruption to supply caused by a third party lasting more than 24 hours (B2.19).

Table 5: Summary of interruptions to supplies caused by third parties for AR24 and AR25.

Line Ref		2023-2024	2024-2025	Variance	% change
B2.15	Less than 3 hours caused by third parties	7260	5241	-2019	-27.81%
B2.16	More than 3 hours caused by third parties	5891	3736	-2155	-36.58%
B2.17	More than 6 hours caused by third parties	1579	540	-1039	-65.80%
B2.18	More than 12 hours caused by third parties	458	229	-229	-50.00%
B2.19	More than 24 hours caused by third parties	22	0	-22	-100.00%

Lines B2.20-B2.24 - Unplanned interruptions (overrun of planned interruptions)

There was an increase in the number of unplanned interruptions compared to AR24. This was predominantly due to two events totalling 535 properties (71% of total properties). A further analysis showed that these failures were due to insufficient time being given to undertake the job.

There was an increase in the number of properties affected for more than 6hrs, 4 events contributed to this. The largest affected 50 properties, this was a mains rehabilitation project in Glenconvinth near Inverness in January 2025.

A comparison of individual lines for AR24 and AR25 is contained in Table 6 below.

Table 6: Summary of unplanned interruptions (overrun of planned interruptions) for AR24 and AR25.

Line Ref		2023-2024	2024-2025	Variance	% change
B2.20	Less than 3 hours unplanned (overruns of planned interruptions)	150	745	595	396.67%
B2.21	More than 3 hours unplanned (overruns of planned interruptions)	1595	1739	144	9.03%
B2.22	More than 6 hours unplanned (overruns of planned interruptions)	24	75	51	212.50%
B2.23	More than 12 hours unplanned (overruns of planned interruptions)	5	0	-5	-100.00%
B2.24	More than 24 hours unplanned (overruns of planned interruptions)	0	0	0	

Line B2.25 - Average supply interruptions greater than three hours (minutes per property)

Average supply interruptions greater than 3 hours is 10.599(minutes per property). There has been a focus of minimising interruptions to supply to our customers. Additional measures to ensure continued focus e.g. scrum calls, Teams Chat and monthly review groups have resulted in this strong end of year position.

Table 7: Summary of supply interruptions > 3 hours (minutes per property) (overrun of planned interruptions) for AR24 and AR25

Line Ref		2023-2024	2024-2025	Variance	% Change
B2.25	Average supply interruption greater than three hours (minutes per property)	14.790	10.599	-4.191	-28.34%

Lines B2.26-B2.29 - Total weighted properties for OPA

Line B2.29 shows a decrease of 1,434 to 5,047 properties experiencing unplanned interruptions to supply this reporting year.

A comparison of total weighted properties for OPA for AR24 is provided in Table 8 and shows an overall decrease. A breakdown of the line calculations are presented in Table 9.

Table 8: Total weighted properties for OPA for AR24 and AR25.

Line Ref		2023-2024	2024-2025	Variance	% change
B2.26	Total number of properties restored > 6 hours	5686	4449	-1769	-31.11%
B2.27	Total number of properties restored > 12 hours	571	532	-72	-12.61%
B2.28	Total number of properties restored > 24 hours	112	33	-79	-70.54%
B2.29	Total weighted properties for OPA (>6 hours)	6481	5047	-1434	-22.13%

It should be noted the weighting has only been applied to Line B2.29.

Table 9: Calculations applied for total weighted properties.

Line ref	Description		OPA weight
B2.26	Total number of properties restored > 6 hours	B2.12+B2.22	1
B2.27	Total number of properties restored > 12 hours	B2.13+B2.23	2
B2.28	Total number of properties restored > 24 hours	B2.14 + B2.24	4
B2.29	Total weighted properties for OPA (>6 hours)	1*(B2.26 - B2.27)+2*(B2.27-B2.28)+4*(B2.28)	

Line B2.30 - Total minutes lost per property

Total minutes lost per connected property for all interruptions but excluding those caused by a Third Party. Details are presented below.

Table 10: Total minutes lost per property

Line Ref		2023-2024	2024-2025	Variance	% Change
B2.30	Total minutes lost per <u>connected</u> property (all incidents)	22.050	17.227	-4.823	-21.87%

Due to the decrease in the total number of supply interruptions, the total number of minutes lost per property dropped in AR25.

Line B2.31 - Total properties impacted by interruptions to supply

The total properties impacted, for all interruptions but excluding those caused by a Third Party.

46612 fewer properties were impacted by ITS events in AR25. In AR25 we have seen a decrease in the total number of interruptions to supply events.

Table 11: Total properties impacted by interruptions to supply

Line Ref		2023-2024	2024-2025	Variance	% Change
B2.31	Total properties impacted by interruptions to supply (all incidents)	361377	314765	-46612	-12.90%

Line B2.32 - Number of incidents that trigger a warning/alert

There has been a 16% reduction in the number of BAD Alerts raised. This coincides with the reduction in the number of ITS events throughout the year.

Table 12: Number of incidents that trigger a warning/alert

Line Ref		2023-2024	2024-2025	Variance	% Change
B2.32	Number of incidents that trigger a warning / alert (as per criteria)	118	99	-19	-16.10%

BAD Alert criteria:

Type of Incident	AMBER	RED
WATER SUPPLY		
No water for greater than 3 hours	400 to 6000 Properties	Greater than 6000 Properties
No water for greater than 6 hours	150 to 3000 Properties	Greater than 3000 Properties
No water for greater than 12 hours	1 to 3000 Properties	Greater than 3000 Properties

2.3 Data

Lines B2.2-B2.4 - Low Pressure

Information on properties receiving low pressure is held on Scottish Water's Low Pressure Register within Microsoft Dynamics, our customer relationship management system. Potential, new low-pressure problems are identified from customer contacts and investigations in connection with investment projects and operational changes. All property numbers contained in Microsoft Dynamics are address-specific and have been subject to data cleansing and checking by pressure logging.

Scottish Water initiates investigations at existing properties where it was believed the historically reported low pressure could be resolved or was erroneous. The pressure was logged at identified sites and where relevant, the properties were removed from the register. No proactive investigations are initiated by Scottish Water to identify new low-pressure properties.

There were no substantial changes to the methodology of previous years.

The Low Pressure Register platform on Microsoft Dynamics will continue to be utilised. This gives better information on case status and an improved reporting on performance figures. P

Planned pressure logging activities will continue to investigate cases and areas with pressure related contacts through the contact center, Customer Alternative Resolution Management (CARM) team or corporate affairs contacts.

2.3.1 Assumptions used for forecast data

There is an assumption made for adding one property every 2 months to the Low Pressure Register with forecasting figure of 6 being added as new issues. Hence, the forecast data for **Lines B2.2a to B2.2c** has been evenly spread across the 2024/25 period. The forecast data for the removal of properties, these have been predicted based on live projects expected to be completed on site by the end of March 2026. An uplift has been applied to the 2025-26 additions due to emerging risks which will potentially result in a higher number of properties being added compared to previous years.

2.3.2 Source of Data and Confidence Grades

The source of data for low pressure is within dynamics. The confidence grade for this data is A1.

Lines B2.5-B2.32 - Interruptions to Supply

Data related to Interruptions to Supply is held on the following software packages:

- Incident related data is captured in Ops Logs by our field technicians where it is monitored and assessed by the Intelligence Control Centre, who are monitoring the event as it happens.
- Once the event is closed it is created as an ITS event in Scottish Water Customer Relationship Management Software (CRM), Microsoft Dynamics. It is here where events over 6 hours are fully investigated, and data is cleansed. Reports are then produced via Power Bi.

Interruptions to Supply data has a confidence grade of A2.

All incident and property data reported in these lines by Scottish Water is held in corporate systems, where data input follows an auditable process.

2.3.3 Data Improvement Programmes

The continuation of the data related improvements for interruptions to supply include:

- The rollout of contingency plans to be embedded into the DOMS app to ensure visibility.
- A review of real-time data logger thresholds for alarms to the ICC.
- The reinvigoration, of the use of maintaining supplies trailers through redeployment, re-equip and fill vacant standby spaces to ensure this asset is available 24/7.

2.3.4 Assumptions made for forecast data

Forecasting for **Lines B2.5-B2.32** is based on 5-year historical data and using an average point.

3 Table B3: Sewage – Internal Flooding

3.1 Overview

Flooding due to sewer overloading is primarily experienced during high intensity, short duration storm events which overwhelm the sewer network and other associated drainage systems. These storm events may not have a significant impact on observed rainfall volumes. Long duration, lower intensity rainfall events may result in higher observed rainfall volumes but generally do not overwhelm the sewer network.

In AR25 we saw a return to similar conditions to those observed two years ago in AR23, where the level of rainfall experienced in most events was such that our sewer network was able to drain effectively resulting in less flooding due to overloaded sewers, with fewer higher intensity, short duration storms. Longer duration, lower intensity rainfall events meant that ground conditions were more permeable because of the relatively high levels of saturation.

In comparison, in AR24, a number of high intensity, short duration storms occurred, where the level of rainfall experienced overwhelmed the sewer network. This change in weather conditions resulted in a marked reduction in both the number of sewer flooding incidents due to sewer overloading and the number of properties affected.

In AR25 we completed 15 capital investment projects to the value of £25m which reduced the risk of internal sewer flooding to 48 properties on the at-risk register (greater than 10% chance of occurrence per annum). (B3.20)

We endeavour to provide long term resolution to customers at the highest risk of sewer flooding. In addition, we implement interim measures where possible. This was the fourth year of delivering an enhanced mitigation service, where possible, to customers in all risk categories of internal flooding to ensure they are better protected from sewer flooding during high intensity rainfall events. Examples of mitigation measures include installing flood doors, smart air bricks and non-return valves to protect customers whilst we develop and deliver longer term flood alleviation schemes. We invested £2.05m installing such mitigation measures at 229 properties in the last year.

Flooding due to other causes is experienced due to blockages, equipment failure and collapses in the sewer network and is not influenced by weather conditions.

To reduce the potential number of incidents due to other causes we have a Planned Cleaning Programme (PCP) to prioritise the maintenance of multiple sewer lengths. Our Maintenance Schedule Task (MST) process for single sewer lengths and small areas of sewer network and enhanced maintenance for CSOs and pumping stations, which both continue to promote targeted regular remedial work across the sewer network.

Customer engagement campaigns target the reduction of blockages by encouraging a reduction in customer behaviours that cause internal flooding.

Table B3 provides a summary of Scottish Water's Internal Flooding performance for the year AR25.

3.2 Performance Trends

Line B3.1 – Number of properties connected to sewerage system

The content of this line is brought forward from **Line A1.20**.

The number of properties reported in this category increased from 2,672,411 in AR24 to 2,690,305 in AR25 (an approximate 0.67% increase).

Lines B3.2 - B3.5 Annual Flooding – Overloaded Sewers

A comparison with the AR24 performance is provided in Table 13 below.

Table 13: Summary of flooding incidents and properties flooded in AR24 and AR25.

Line ref	Descriptions	AR24	AR25	Variance	% change
B3.2	Number of properties flooded in the year	93	18	-75	-81%
B3.3	Number of flooding incidents in the year	43	10	-33	-77%
B3.4	Number of flooding incidents attributed to severe weather	15	2	-13	-87%
B3.4a	Number of properties flooded during the year due to severe weather	36	3	-33	-92%
B3.5	Props. where flooding limited to uninhabited cellars only (o/loaded sewers)	19	1	-18	-95%

The above data shows that both the number of incidents of Internal Flooding Overloaded Sewer (IFOS) and the number of properties affected is significantly lower in comparison to AR24.

This year saw fewer high intensity storms, resulting in less internal sewer flooding incidents than in AR24. The number of properties affected per incident has also decreased, further indicating that rainfall severity has been less in comparison to AR24.

AR25 saw a return to similar conditions to those observed two years ago in AR23, where the level of rainfall experienced in most events was such that our sewer network was able to drain effectively resulting in less flooding due to overloaded sewers, with fewer higher intensity, short duration storms. Longer duration, lower intensity rainfall events meant that ground conditions were more permeable because of the relatively high levels of saturation.

To illustrate the rainfall conditions described above, [Figure 2](#) below shows rainfall volumes from 2015-2024 as well as a percentage comparison of rainfall experienced against long-term average rainfall. Note: Rainfall as a % of the UK average is compared to 1981-2010 before 2021 and is compared to 1991-2020 for 2021 onwards.

Figure 2: 2015-2024 Rainfall Volumes

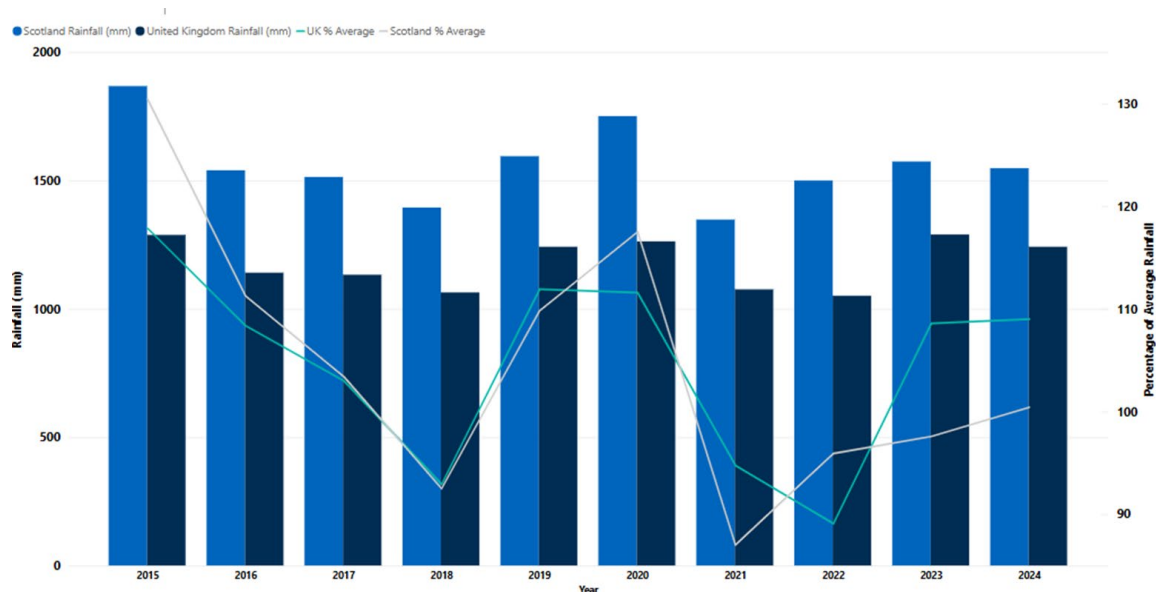
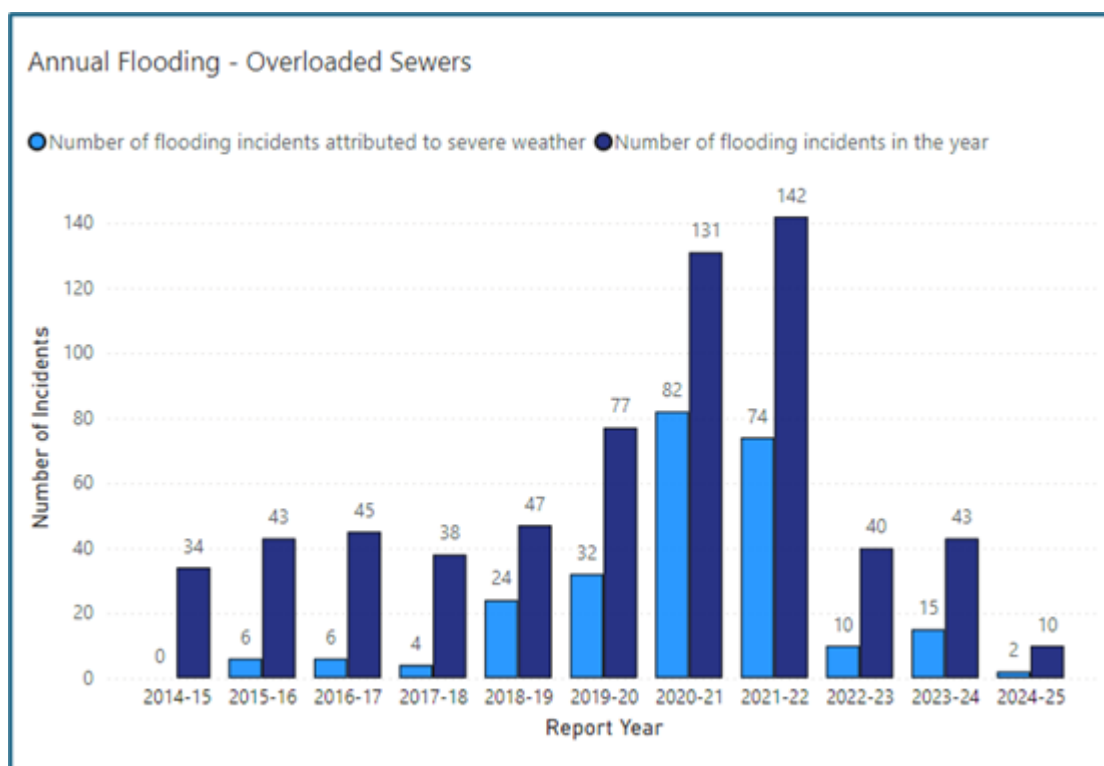


Figure 3 below depicts the total number IFOS incidents from AR15-AR25 in comparison to the number of those incidents eligible for severe weather exemption in each of the years. Years with high numbers of severe weather exemptions illustrate the impact of short duration, high intensity storms.

Figure 3: Annual Flooding - Overloaded Sewers AR15-AR25



Specifically relating to **Line B3.4**, sewer flooding incidents are eligible for severe weather exemptions if they occur in >10-year return period storm events at properties not featuring on

the Internal At Risk Register (ARR) at 2 in 10 or 1 in 10 at the time of the incident or subsequently, by year end following Flooding Investigation Team (FIT) investigation. If multiple properties are affected by an incident, an exemption is only applied if all properties do not feature on the internal ARR as above.

Regarding the 2 incidents eligible for severe weather exemption in AR25, the average return period was 59 years, with one incident recording a return period of around 22 years and the other recording a return period of 96 years. This compares to an average return period of approximately 238 years over the 15 incidents in AR24, with the highest return period incident being >1,000 years.

In addition, since 2021, 573 properties have had flood mitigation measures installed which have potentially reduced the number of customers experiencing and reporting flooding. Further information on this enhanced service, which includes protection to properties experiencing repeat internal sewer flooding in severe weather, is provided in the investment section of this commentary. Scottish Water has an ongoing programme of work to provide flood mitigation measures to protect customers who experience, or are at risk of, sewer flooding due to overloaded sewers.

Lines B3.2 - B3.5 Annual Flooding – Overloaded Sewers

A comparison with the AR24 performance is provided in Table 13 below.

Table 13: Summary of flooding incidents and properties flooded in AR24 and AR25.

Line ref	Descriptions	AR24	AR25	Variance	% change
B3.2	Number of properties flooded in the year	93	18	-75	-81%
B3.3	Number of flooding incidents in the year	43	10	-33	-77%
B3.4	Number of flooding incidents attributed to severe weather	15	2	-13	-87%
B3.4a	Number of properties flooded during the year due to severe weather	36	3	-33	-92%
B3.5	Props. where flooding limited to uninhabited cellars only (o/loaded sewers)	19	1	-18	-95%

The above data shows that both the number of incidents of Internal Flooding Overloaded Sewer (IFOS) and the number of properties affected is significantly lower in comparison to AR24.

This year saw fewer high intensity storms, resulting in less internal sewer flooding incidents than in AR24. The number of properties affected per incident has also decreased, further indicating that rainfall severity has been less in comparison to AR24.

AR25 saw a return to similar conditions to those observed two years ago in AR23, where the level of rainfall experienced in most events was such that our sewer network was able to drain effectively resulting in less flooding due to overloaded sewers, with fewer higher intensity, short duration storms. Longer duration, lower intensity rainfall events meant that ground conditions were more permeable because of the relatively high levels of saturation.

To illustrate the rainfall conditions described above, [Figure 2](#) below shows rainfall volumes from 2015-2024 as well as a percentage comparison of rainfall experienced against long-term average rainfall. Note: Rainfall as a % of the UK average is compared to 1981-2010 before 2021 and is compared to 1991-2020 for 2021 onwards.

Figure 2: 2015-2024 Rainfall Volumes

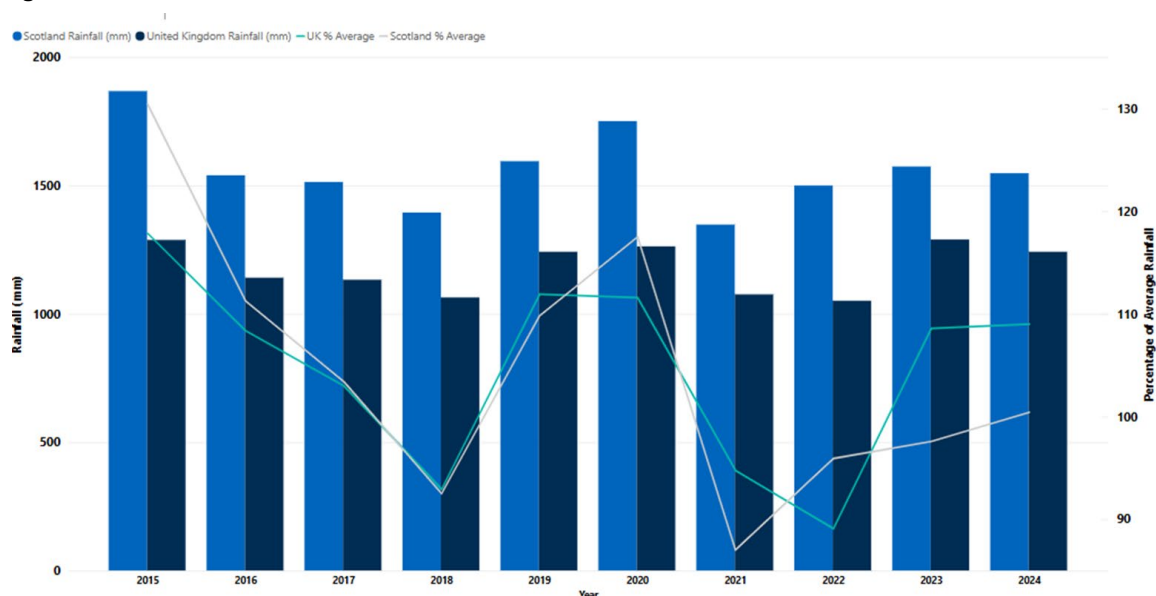
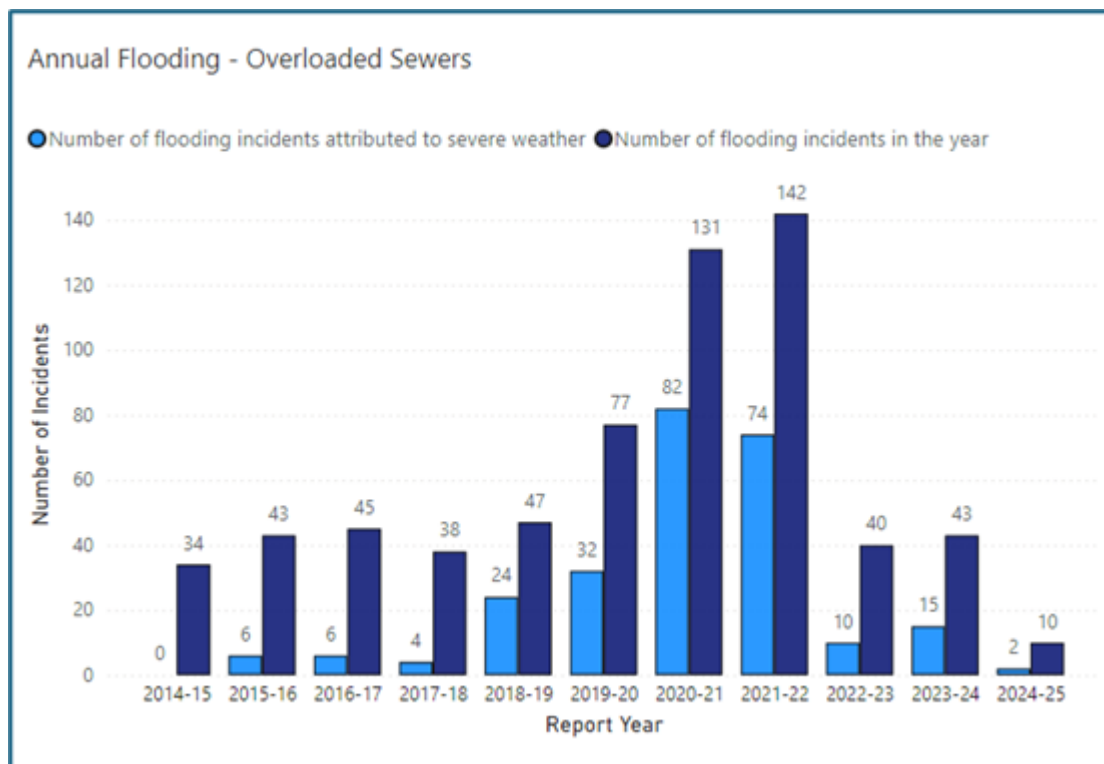


Figure 3 below depicts the total number IFOS incidents from AR15-AR25 in comparison to the number of those incidents eligible for severe weather exemption in each of the years. Years with high numbers of severe weather exemptions illustrate the impact of short duration, high intensity storms.

Figure 3: Annual Flooding - Overloaded Sewers AR15-AR25



Specifically relating to **Line B3.4**, sewer flooding incidents are eligible for severe weather exemptions if they occur in >10-year return period storm events at properties not featuring

on the Internal At Risk Register (ARR) at 2 in 10 or 1 in 10 at the time of the incident or subsequently, by year end following Flooding Investigation Team (FIT) investigation. If multiple properties are affected by an incident, an exemption is only applied if all properties do not feature on the internal ARR as above.

Regarding the 2 incidents eligible for severe weather exemption in AR25, the average return period was 59 years, with one incident recording a return period of around 22 years and the other recording a return period of 96 years. This compares to an average return period of approximately 238 years over the 15 incidents in AR24, with the highest return period incident being >1,000 years.

In addition, since 2021, 573 properties have had flood mitigation measures installed which have potentially reduced the number of customers experiencing and reporting flooding. Further information on this enhanced service, which includes protection to properties experiencing repeat internal sewer flooding in severe weather, is provided in the investment section of this commentary. Scottish Water has an ongoing programme of work to provide flood mitigation measures to protect customers who experience, or are at risk of, sewer flooding due to overloaded sewers.

3.2.1 Lines B3.6-B3.13 - Annual Flooding – Other Causes

B3.6 - Number of properties flooded in the year (Main Sewers Only)

The number of properties in this category has decreased from 85 in AR24 to 49 in AR25.

This line is calculated as the sum of **Lines B3.9a, B3.10a and B3.11a**. In AR25, two properties were affected by one incident caused by tidal effects and have therefore, been included in this line, producing the total of 49 properties.

One location experienced a flooding incident which affected two properties. After investigation by the Flooding Investigation Team this was found to be due to tidal ingress into the sewer network. This was a slightly unusual sewer set up where one half of the CSO had a flap valve to prevent ingress, and the other did not. Modelling of the event showed that the sewer was not overloaded, with positive flow able to be discharged through both parts of the CSO, even when the network experienced ingress from the sea. For this reason, the incident was not classed as sewer overloading, and “tidal effects” was found to be the most appropriate cause to be captured on the system.

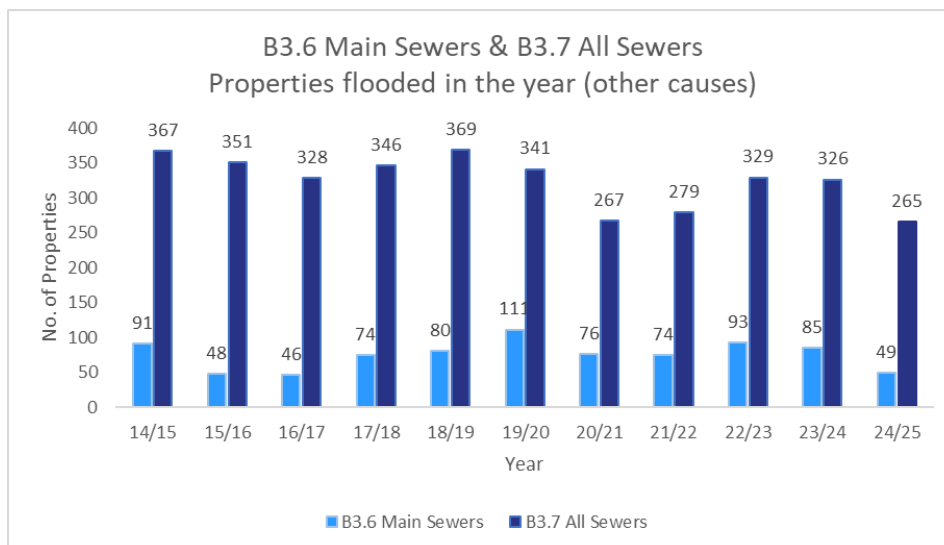
B3.7 - Number of properties flooded in the year (All Sewers)

The number of properties in this category has decreased from 326 in AR24 to 265 in AR25.

The above decreases for lines B3.6 and B3.7 could be attributable to the typical annual variance in system performance, as displayed in figure 4 below.

In addition, in AR25 there has been a focus on accuracy of data for repeat internal sewer flooding as well as a focus on individual case management. A collaborative, cross directorate working group, has been established and is beginning to improve first time resolution for our customers with a view to reducing repeat internal sewer flooding. This focus may also have resulted in improved data accuracy for total incident and property numbers.

Figure 4: Number of properties flooded in the year (All Sewers)



B3.8 - Properties which have flooded more than once in the last ten years (other causes)

In AR23 we were asked to base our reporting on 10 years of data, using an amalgamation of 5 years of data from Microsoft Dynamics (current operational system) and 5 years of data from Promise (previous system). The issues associated with this approach were discussed during the audit, and it was recognised that the confidence grading would be low.

Continuing with this approach in AR25, the number of properties reported in this line has increased from 224 to 262. This increase could be attributed to a more accurate data set as we reduce the number of years taken from our legacy system, Promise. We anticipate that this number will continue to increase until all years of data are gathered from Microsoft Dynamics, removing the issue of data discrepancies between the systems.

All internal sewer flooding incidents, regardless of cause, are monitored through the Flood Management Action Plan (FMAP) process, with repeat incidents within three and five-year timescales highlighted for further analysis. The Sewer Response Alternative Resolution Management (ARM) process, identifies properties with repeat flooding occurring more than three times in any two-year period. In AR24, Scottish Water introduced a focus on properties where our customers have experienced multiple incidents of internal sewer flooding, no matter the time lapse between incidents and causes. This initiative continues in AR25, raising confidence in this information, allowing us to identify the cause and promote remedial action such as rehabilitation of the sewer, thereby reducing the risk and impact of repeat internal flooding for our customers.

B3.9 - Flooding incidents and B3.9a number of properties flooded due to equipment failure

The number of incidents in this category has decreased from 7 in AR24 to 2 in AR25.

The number of properties flooded in this category has decreased from 7 in AR24 to 2 in AR25.

Scottish Water continues to embed a proactive, scheduled maintenance programme for all mitigations delivered by the Flooding Team to reduce the potential for equipment failure. Mitigation measures maintenance is delivered according to Scottish Water's mitigation measures maintenance policy, which sets out the frequency of maintenance based on the type of mitigation measure installed.

The Maintenance Schedule Task (MST) process continues to promote targeted regular remedial work where required for single sewer lengths, small areas of sewer network and enhanced maintenance for CSOs and pumping stations.

B3.10 - Flooding incidents and B3.10a number of properties flooded due to blockages

The number of incidents in this category has decreased from 65 in AR24 to 37 in AR25.

The number of properties flooded in this category has decreased from 73 in AR24 to 39 in AR25.

As set out in the Wastewater Gravity Sewers Management Approach (MA113), we carry out proactive inspections on critical sewers only. This concentrates our funding on the assets which, if they failed, would have the largest societal impact. We do not have a proactive sewer maintenance programme for non-critical single sewer assets or small areas of sewer network as this approach would be cost prohibitive and would not represent value for money for our customers.

The Maintenance Schedule Task (MST) process continues to promote targeted regular remedial work where required for single sewer lengths, small areas of sewer network and enhanced maintenance for CSOs and pumping stations. These actions will serve to reduce the risk of sewer flooding due to blockages.

B3.11 - Flooding incidents and B3.11a number of properties flooded due to sewer collapses

The number of incidents in this category has increased from 5 reported in AR24 to 6 in AR25.

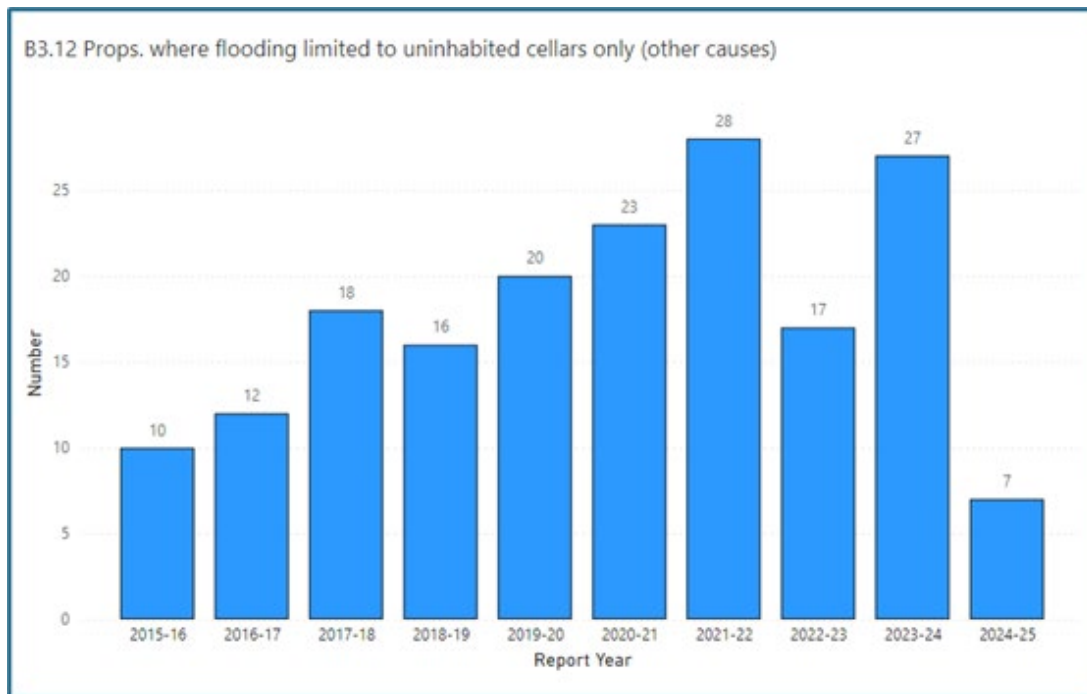
The number of properties flooded in this category has increased from 5 reporting in AR24 to 6 reported in AR25.

Sewer Response continues to carry out CCTV surveys which assist in the identification of sewer collapses. As mentioned previously, proactive inspection and maintenance activities will serve to reduce the risk of sewer flooding due to sewer collapse.

B3.12 - Props. where flooding limited to uninhabited cellars only (other causes)

The number of properties in this category has decreased from 27 in AR24 to 7 in AR25. This variance is attributable to the typical annual variance in system performance as shown in Figure 5 below and is relatively proportionate to the reduction in the number of total properties affected.

Figure 5: Properties where flooding limited to uninhabited cellars (other causes)



B3.13 - Number of flooding incidents in the year

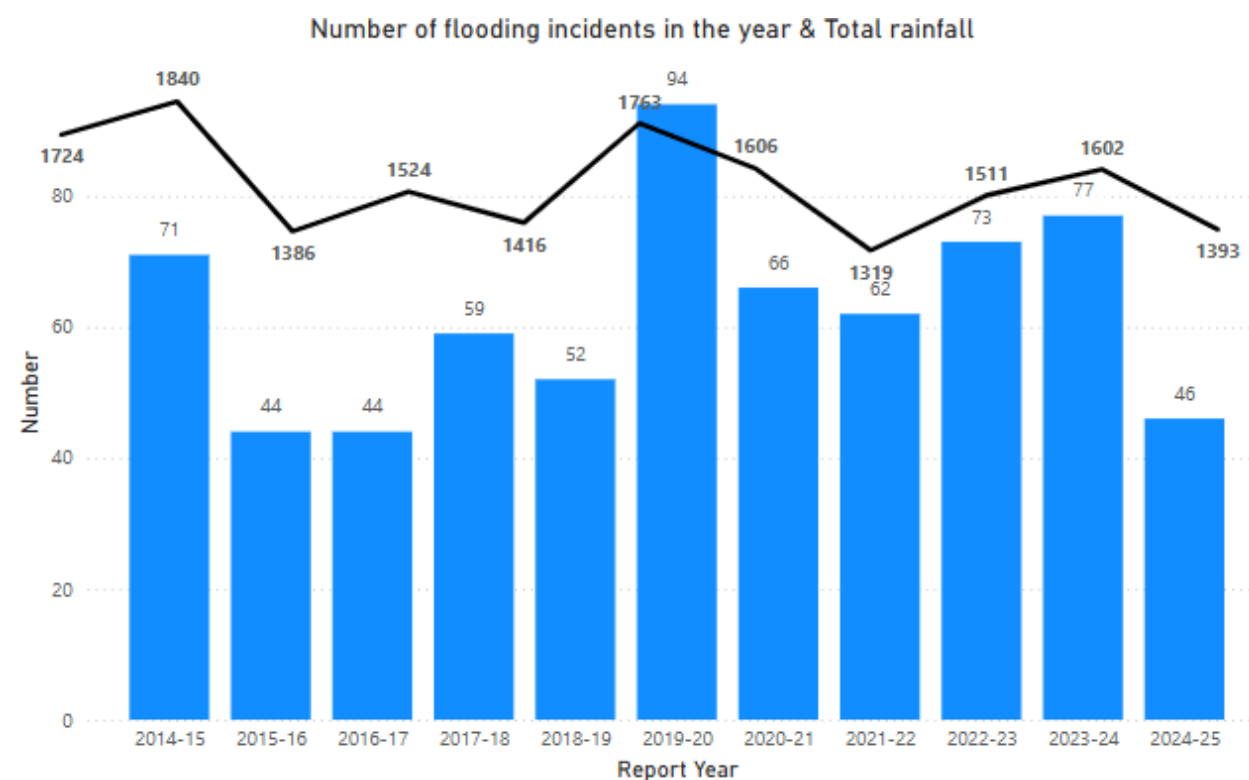
The number of incidents in this category has decreased from 77 in AR24 to 46 in AR25.

This line is calculated as the sum of Lines B3.9, B3.10 and B3.11. In AR25, one incident caused by tidal effects, was also experienced and has therefore been included in this line, producing the total of 46 incidents.

This variance is attributable to the typical annual variance in system performance, as shown in Figure 6 below. Across most years, increases in incidents follow the same pattern as the increases in rainfall. The average number of incidents over the past 5 years was 65, and the average over the 11 years shown was 63.

In AR25 there has been a focus on accuracy of data for repeat internal sewer flooding as well as a focus on individual case management. A collaborative cross directorate working group has been established and is beginning to improve first time resolution for our customers with a view to reducing repeat internal sewer flooding. This focus may also have resulted in improved data accuracy for total incidents.

Figure 6: Number of flooding incidents in the year (other causes) & total rainfall



3.2.2 Lines B3.14-B3.17 - Properties on the "At Risk" Register - (i) At risk summary

B3.14 - 2 in 10 at end of year

The number of properties reported in this category has decreased from 188 in AR24 to 172 in AR25.

B3.15 - 1 in 10 at end of year

The number of properties reported in this category remains unchanged from 142 reported in AR24.

B3.16 - Total 1 in 10 and 2 in 10 properties at risk at end of year

The number of properties reported in this category has decreased from 330 in AR24 to 314 in AR25 (circa 4.8% decrease). The value in this line is the sum of **Lines B3.14 and B3.15**.

This reduction is primarily due to an increase in the number of removals due to capital projects delivered in AR25, as noted in line B3.20

B3.17 1 in 20 risk at end of year

The number of properties reported in this category has increased from 249 in AR24 to 269 in AR25.

In AR25 several flooding investigations led to clusters of multiple properties being added to the internal ARR at 1 in 20. This combined with a typically low number of removals from this category has led to an increase in the number of properties considered to be at this level of risk.

3.2.3 Lines B3.18-B3.19 - Properties on the At Risk Register - (ii) Problem status of properties on the register

B3.18 - Solved but temporary or being tested

The number of properties reported in this category has increased from 238 in AR24 to 242 in AR25.

- AR24 238/330 (72% of ARR) (i.e., **Line B3.18/Line 3.16**)
- AR25 242/314 (77% of ARR) (i.e., **Line B3.18/Line 3.16**)

To protect our customers' properties whilst we develop and deliver longer term flood alleviation schemes, Scottish Water has introduced a target to investigate the potential to offer mitigation on a minimum of 70% of the properties on internal ARR at 1in10 and 2in10. This currently equates to 220 Internal ARR properties.

This focus has driven a shift from 238 properties of the internal ARR in AR24 to 242 properties in AR25 having mitigations installed.

B3.19 - Number of properties on the At Risk Register still to be resolved

The number of properties reported in this category has decreased from 92 in AR24 to 72 in AR25.

- AR24 92/330 (28% of ARR) (i.e., **Line B3.19/Line B3.16**)
- AR25 72/314 (23% of ARR) (i.e., **Line B3.19/Line B3.16**)

As referenced in **Line B3.18**, a focus on mitigation provision has driven a reduction in the number of properties not resolved either by mitigation or solution development from 92 of the internal ARR in AR24, to 72 in AR25.

Table 14: Total properties on Internal ARR - mitigation status

Total properties on ARR	314
B3.18 - Solved but temporary or being tested	242
B3.19 – Number of properties on ARR still to be resolved	72
Attrition (Unable to mitigate/Customer Refusal)	50

Overall, of the 314 internal ARR properties, 242 have mitigation installed, 72 do not. Of this 72, 50 are properties where Scottish Water was either unable to mitigate or the customer refused the offer of mitigation and the remaining 22 are on-going for Assessment / Delivery in AR26.

3.2.4 Lines B3.20-B3.22 - Properties on the At Risk Register - (iii) Annual changes to register

B3.20 - Removed by Scottish Water action

The number of properties reported in this category has increased from 18 in AR24 to 48 in AR25.

Removals due to Scottish Water action are linked to the delivery of our SR21 investment programme and therefore the number of removals will vary each year depending on the particular projects being delivered.

In AR25 we completed 15 investment projects to the value of £25m that reduced risk of internal sewer flooding to 48 properties on the at-risk register (greater than 10% chance of occurrence per annum).

B3.21 - Removed because of better information

The number of properties reported in this category increased from 1 in AR24 to 2 in AR25.

Overall, the number of removals due to better information is consistently low, representing the high confidence/accuracy of investigations. This has been further improved in recent years by the introduction of comprehensive guidance and governance supported by Flooding Investigation Reports (FIR).

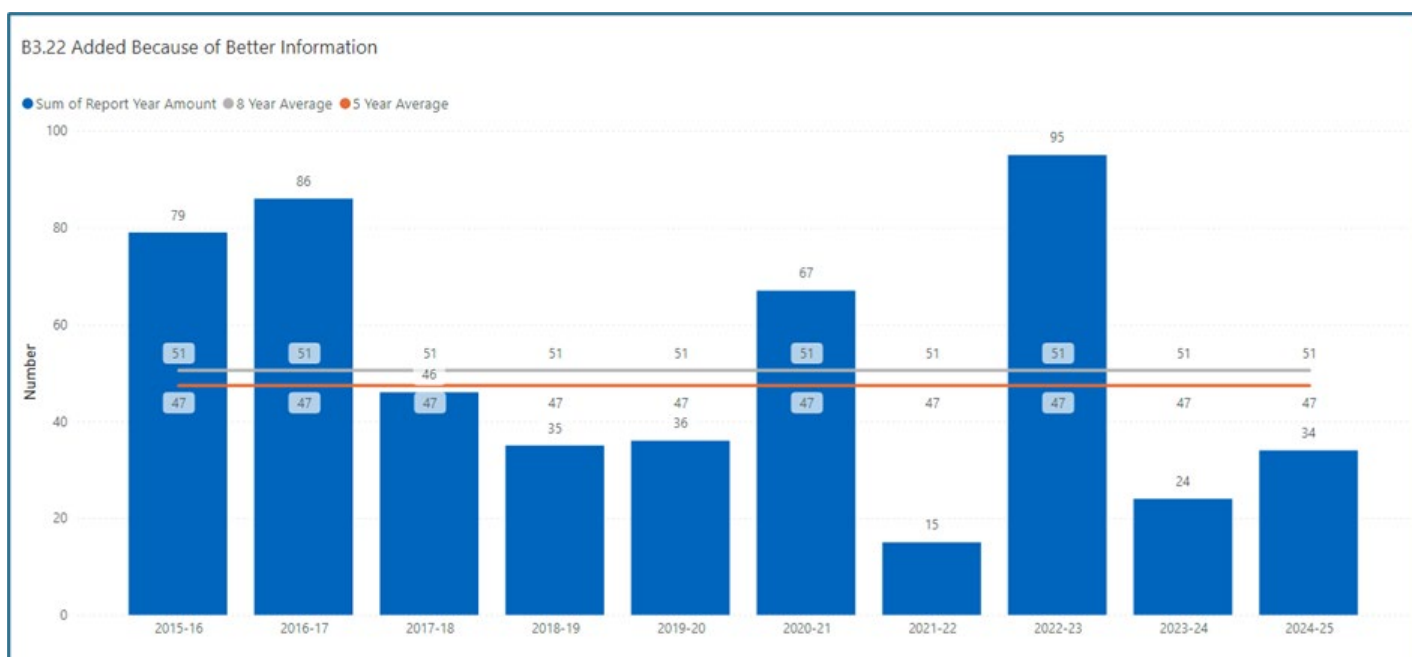
B3.22 – Added because of better information

The number of properties in this category has increased from 24 in AR24 to 34 in AR25.

Figure 7 below illustrates the number of additions per year over the past 10 years.

The average number of internal ARR additions over the last 5 years has been approximately 47 properties per year; and over the 10 years shown below, the average number of ARR additions has been 52.

Figure 7: Added because of better information.



It should be noted that for investment period planning for SR27, Scottish Water continues to use an average of 60 additions to the Internal ARR per year. This reflects the long term average over 15+ years and is considered to be more appropriate for investment planning.

B3.23 - Percentage of population at risk of sewer flooding in a 1-in-50-year storm, based on modelled predictions

The percentage of the population at risk of sewer flooding in a 1-in-50-year storm, based on modelled predictions, was calculated at 4% in AR22 and remains unchanged in AR25.

The data is the result of modelling carried out to assess the risk of flooding from our sewers in compliance with Section 16 of the Flood Risk Management (Scotland) Act 2009. The modelling covers around 90% of the population of Scotland. This modelling is updated every 6 years, and an updated national assessment is not expected to be undertaken until the end of FRM cycle 2 and will be reported in AR28.

3.3 Investment

Scottish Water's Management Approach (MA020) is to reduce flood risk to customers impacted by repeat, high consequence, internal sewer flooding, where this is not disproportionately expensive. This, combined with our ambition to never disrupt the lives of our customers or communities and never flood customers properties due to incapacity in our sewers under normal weather conditions, has seen us commit £86.2m so far in SR21 to deliver 58 capital projects to reduce the risk of internal sewer flooding to 162 properties and remove customers from our internal ARR.

The approved Investment Planning Scenario 2024 (IPS24.2) funding for the flooding programme (MA020) is £173.7m. Assuming such levels of investment in sewer flooding remains available and invested before the end of the investment period, Scottish Water will deliver projects that reduce the risk of sewer flooding. We forecast removal of 190 properties from the internal ARR and 170 locations from the external ARR, of which, 78 are currently forecasted to deliver by July 2027.

As part of our Management Approach, we continue to deliver an enhanced Mitigation Service to provide protection to customers from the risk of flooding through provision of mitigation measures whilst permanent solutions are being identified and implemented. This approach covers the following:

- Properties which experience internal sewer flooding at greater than 5% chance of flooding in a year (1:20)
- Properties which experience repeat internal sewer flooding during severe weather events
- Properties which experience frequent/high impact external sewer flooding

This has seen an increased investment of £2.05m, providing mitigation measures to 229 properties to reduce the impact of internal sewer flooding in AR25, with a further £4.21m for mitigations for 390 properties to be delivered throughout the remainder of SR21.

The ability of Scottish Water to achieve the forecast performance and investment is largely dependent on the weather experienced and its geographical location, throughout the period.

In AR25 we saw a return to similar conditions to those observed two years ago in AR23, where the level of rainfall experienced in most events was such that our sewer network was able to drain effectively resulting in less flooding due to overloaded sewers, with fewer higher intensity, short duration storms. Longer duration, lower intensity rainfall events meant that ground conditions were more permeable because of the relatively high levels of saturation.

In comparison, in AR24, a number of high intensity, short duration storms occurred, where the level of rainfall experienced overwhelmed the sewer network. This change in weather conditions has resulted in a marked reduction in both the number of sewer flooding incidents due to sewer overloading and the number of properties affected.

Should we experience a return to an increase in short duration, high intensity storms with no respite over the remainder of the investment period, we may find that our actual number of sewer overloading incidents, ARR additions and mitigation provision, exceeds the forecast numbers.

3.3.1 Data sources and confidence grades

Internal flooding data is held on the following software packages:

- Cases/Calls regarding internal flooding incidents and properties affected are recorded within Scottish Water Customer Relationship Management Software (CRM), Microsoft Dynamics
- Salesforce Field Service software collates flooding data and integrates with Microsoft Dynamics providing the Flooding Team with more detailed, accurate and comprehensive information regarding flooding incidents and affected properties.
- The Flooding Database which contains all internal sewer flooding risk information, including the Internal “At Risk” Register, is held on InfoAsset Manager (IAM).

Scottish Water has maintained the confidence grading for **Lines B3.2-B3.13** as per AR24. All lines, with the exception of **Line B3.8**, are graded A3.

Line B3.8 has a confidence grading of B4 as the 10-year combined figure is made up of an amalgamation of data from both Microsoft Dynamics software and the historic Promise software, which is then reconciled within a spreadsheet.

Once this 10-year data is extracted solely from Microsoft Dynamics (in AR30) we expect to increase the overall confidence grading to A2.

3.3.2 Lines B3.14-23 have the following confidence grades:

Confidence grades for all lines have been held at the same values as AR24 i.e., B2.

Line B3.23 remains at B2 as an updated national assessment is not expected to be undertaken until the end of FRM cycle 2 in AR28.

3.3.3 AR25 Data Improvement Programmes

Mitigations Programme

In AR25 the mitigations programme is embedded as business as usual, providing a consolidated robust dataset.

Automation of the Flooding Team investigation process

In AR25 we continued to develop our investigations process using Microsoft Dynamics software as our workflow and data repository. This approach simplifies and enhances our data collation and ensures robustness, accuracy and ease of reporting.

Flooding Database Upgrade

In AR25 we started to develop an enhanced software solution for our flooding database, where we hold all flooding information regarding risk and impact for investigated properties and locations.

Storm Analysis

In AR25 we introduced an additional storm analysis software (MAP Rain) on trial, using FEH13 rainfall. This software provides significant time savings for storm analysis, as well as additional functionality for historic long-term analysis.

3.3.4 AR26 Data Improvement Programmes

The following improvements are planned during 2025-26:

Mitigations Programme

In AR26 the mitigations inventory data will be incorporated to the enhanced flooding database data capture, providing a holistic view of flood risk and impact mitigation at relevant locations.

Automation of the Flooding Team investigation process

In AR25 we continued to develop a new procedure to enable the delivery of our investigations process using the Microsoft Dynamics software as our workflow and data repository. This project was anticipated to be delivered in AR25 but has taken longer than expected to implement. This approach simplifies and enhances our data collation and ensures robustness, accuracy and ease of reporting.

In AR26 the procedure will be rolled out and should provide the following benefits:

- Increased use of corporate system
- Fully auditable process
- Controlled data entry
- Enhanced data collation
- Enhanced reporting capabilities
- Increase of confidence grading for **Lines B3.2 - B3.13** excluding **Line B3.8**.

Flooding Database Upgrade

In AR25 we started to develop an enhanced software solution for our flooding database, where we hold all flooding information regarding risk and impact for investigated properties and locations.

In AR26 we will finalise delivery of the enhanced offering and will roll out the functionality. An improved solution will enrich our ability to collate information and increase the robustness and accuracy of our data.

Storm Analysis

In AR26 we will enhance storm analysis software (MAP Rain), to use both FEH13 and FEH22 rainfall for storm analysis. This will allow use of the latest rainfall modelling as well as comparative historic analysis.

3.3.5 Assumptions used for forecast data

Forecasting has been provided for all lines in the B3 table.

Forecasting for **Lines B3.2-B3.13** is based on 3-year and 5-year average incident and property data related to sewer flooding.

Forecasting for **Lines B3.14-B3.22** is based on the current At Risk Register position and predicted additions and removals from the At Risk Register. These predicted additions and removals are based on historic addition trends and the current status of the Flooding Programme.

Line B3.23 is forecasted to remain the same as an updated national assessment is not expected to be undertaken until the end of Flood Risk Management (FRM) cycle 2 and will be reported in AR28.

Confidence grades for forecasted **Lines B3.2-B3.22** have been set at C4. As above, the forecasted numbers are based on average/historic data as well as current status data. A 'C' grading is appropriate given the estimated nature of the forecast. It is recognised that most lines are highly weather dependent.

4 Table B3a: Sewage External Flooding

4.1 Overview

Flooding due to sewer overloading is primarily experienced during high intensity, short duration storm events which overwhelm the sewer network and other associated drainage systems. These storm events may not have a significant impact on observed rainfall volumes. Long duration, lower intensity rainfall events may result in higher observed rainfall volumes but generally do not overwhelm the sewer network.

In AR25 we saw a return to similar conditions as those seen two years ago in AR23, where the level of rainfall experienced in most events was such that our sewer network was able to drain effectively resulting in less flooding due to overloaded sewers, with fewer higher intensity, short duration storms. Longer duration, lower intensity rainfall events meant that ground conditions were more permeable because of the relatively high levels of saturation.

In comparison, in AR24, a number of high intensity, short duration storms occurred, where the level of rainfall experienced overwhelmed the sewer network.

This change in weather conditions has meant that the number of external sewer flooding incidents due to sewer overloading and the number of areas affected is consequently lower in AR25.

Scottish Water has continued to prioritise and undertake External Flooding Overloaded Sewer (EFOS) investigations providing more customers with our assessments of risk classifications for their properties.

In AR25 we completed 15 capital investment projects to combat internal sewer flooding with a value of £25m. Eight of these projects also reduced the risk of external sewer flooding at 21 areas. None of the projects delivered in AR25 had a solely external sewer flooding driver.

The B3a table provides a summary of Scottish Water's External Flooding performance for AR25.

4.2 Performance Trends

4.2.1 Lines B3a.1-B3a.5 - Annual Flooding summary - (i) Overloaded sewers

Table 15 below shows a marked decrease in relation to both the number of External Flooding Overloaded Sewer (EFOS) incidents and the number of areas affected by those incidents in comparison to AR24.

Table 15: Summary of flooding incidents and areas flooded in AR24 and AR25.

Line ref	Descriptions	AR24	AR25	Variance	% change
B3a.1	Areas flooded externally in the year	244	122	-122	-50%
B3a.2	Curtilage flooding incidents in the year	109	48	-61	-56%
B3a.3	Highway flooding incidents	105	53	-52	-50%
B3a.4	Other flooding incidents	22	15	-7	-32%
B3a.5	Total flooding incidents	236	116	-120	-51%

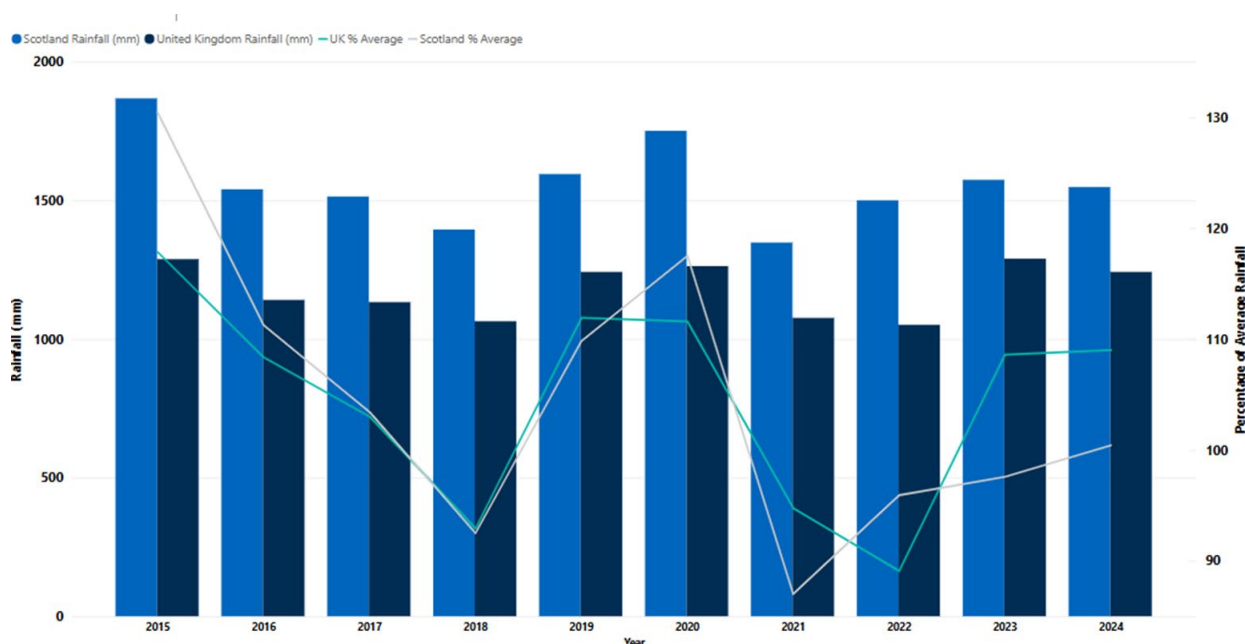
This year experienced a notably low number of high-intensity storms, leading to fewer external sewer flooding incidents compared to AR24.

AR25 saw a return to similar conditions to those observed two years ago in AR23, where the level of rainfall experienced in most events was such that our sewer network was able to drain effectively resulting in less flooding due to overloaded sewers, with fewer higher intensity, short duration storms. Longer duration, lower intensity rainfall events meant that ground conditions were more permeable because of the relatively high levels of saturation.

To illustrate the rainfall conditions described above, Figure 8 below shows rainfall volumes from 2015-2024 as well as a percentage comparison of rainfall experienced against long-term average rainfall. Note: Rainfall as a % of the UK average is compared to 1981-2010 before 2021 and is compared to 1991-2020 for 2021 onwards.

In relation to this average, Scotland received approx. 97% of average rainfall in AR24, rising to 101% of average in AR25. (Equivalent UK-wide values are also provided for comparison only).

Figure 8: 2015-2024 Rainfall Volumes.



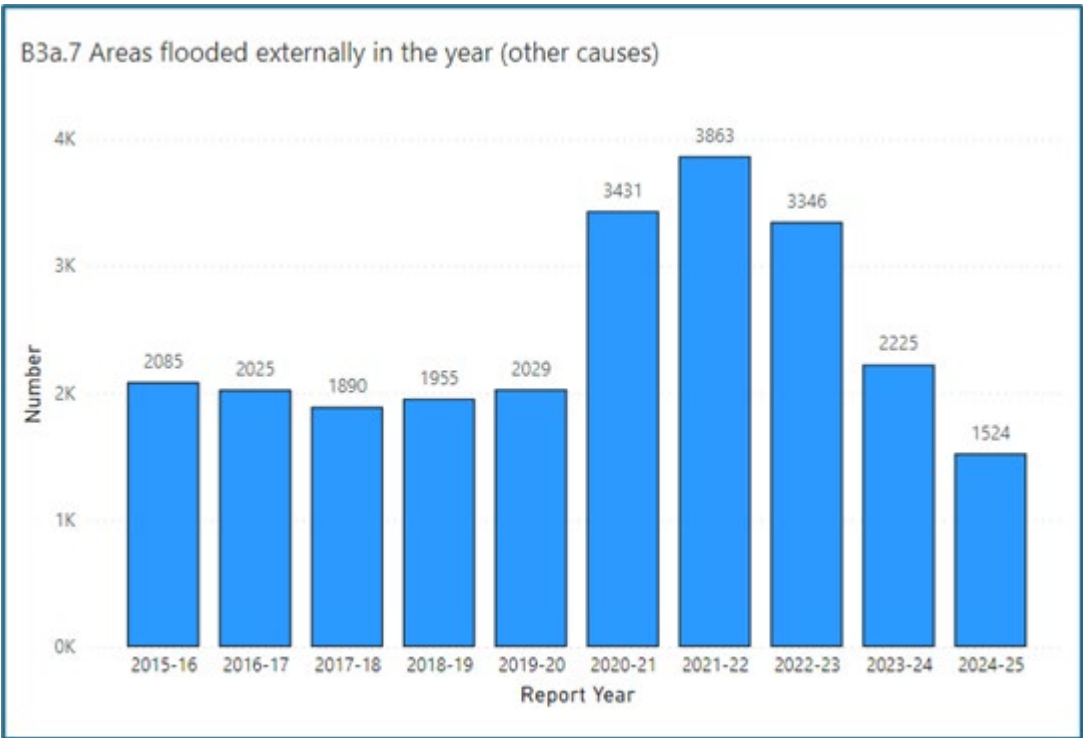
4.2.2 Lines B3a.7-B3a.10 - Annual Flooding summary – (ii) Other causes

B3a.7 - Areas flooded externally in the year (other causes)

The number of areas in this category has decreased from 2,225 in AR24 to 1,524 in AR25.

This change is attributable to the typical annual variance and is in line with the weather patterns experienced in AR25.

Figure 9: Areas flooded externally in the year (other causes)



B3a.8 - Flooding incidents (other causes - equipment failure)

The number of incidents in this category has decreased from 23 in AR24 to 10 in AR25.

Scottish Water continues to promote targeted regular remedial and proactive inspection work where required for single sewer lengths and small areas of sewer network and enhanced maintenance for CSOs and pumping stations.

B3a.9 - Flooding incidents (other causes - blockages)

The number of incidents in this category has decreased from 1,098 in AR24 to 892 in AR25.

Through the Sewer Response Alternative Resolution Management (ARM) process we monitor incidents of repeat flooding. ARM identifies properties with repeat flooding more than three times in any two-year period. This reduction in this number may be attributed to this continued focus.

B3a.10 - Flooding incidents (other causes - collapses)

The number of incidents in this category has increased from 35 in AR24 to 43 in AR25.

Sewer Response continue to carry out CCTV surveys which assist in the identification of sewer collapses.

4.2.3 Lines B3a.11-B3a.14 - Areas on the 1:10, 2:10, 1:20 At Risk register – (i) At-risk summary

B3a.11 - 2 in 10 risk at end of year

The number of areas reported in this category has increased from 1,747 in AR24 to 1,861 in AR25.

B3a.12 - 1 in 10 risk at end of year

The number of areas reported in this category has increased from 1,026 in AR24 to 1,051 in AR25.

Ba3.13 - 1 in 20 risk at end of year

The number of areas reported in this category has increased from 147 in AR24 to 177 in AR25.

4.2.4 Line B3a.14 - 1 in 10, 2 in 10, 1 in 20 risk at end of year

The value in this line is the sum of **Lines B3a.11, B3a.12 and B3a.13**. The number of areas reported in this category has increased from 2,920 in AR24 to 3,089 in AR25.

This is an increase of circa 6% in the total External At Risk Register (ARR) as Scottish Water continue to prioritise and undertake EFOS investigations providing more customers with our assessments of risk classifications for their properties.

4.2.5 Lines B3a.15-B3a.16 - Areas on the 1:10, 2:10, 1:20 At Risk Register - (ii) Problem status

B3a.15 - Problems solved by temporary measures or subject to testing

The number of areas reported in this category has increased from 242 in AR24 to 309 in AR25 (see Table 18 below).

- AR24 242/2920 (8% of ARR) (i.e., **Line B3a.15/Line B3a.14**)
- AR25 309/3089 (10% of ARR) (i.e., **Line B3a.15/Line B3a.14**)

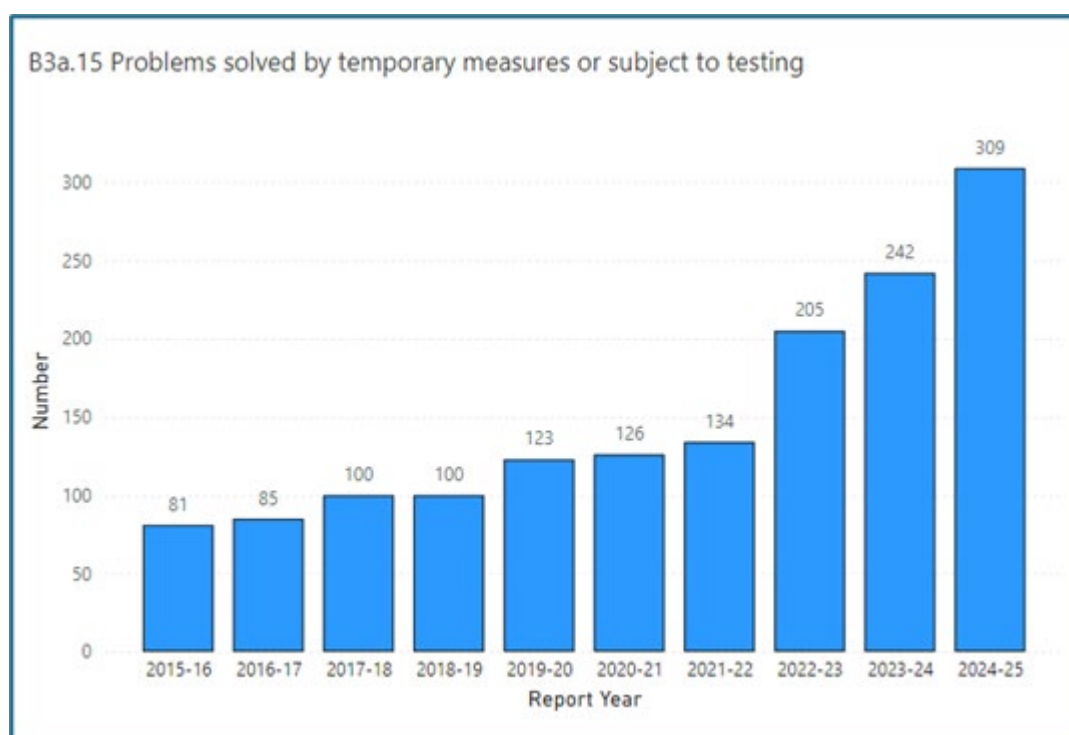
In line with our Management Approach, we continue to provide our enhanced Mitigation Service to deliver temporary measures, where possible, to include areas which experience frequent/high impact external sewer flooding.

Currently this figure represents areas on the external ARR with any temporary measures, including those with temporary measures which only protect against internal sewer flooding outwith our internal ARR.

In AR26 we will investigate the separation of flood risk reduced by temporary measures into internal only and external (curtilage) only categories.

Figure 10 below shows the number of mitigated areas reported in **Line B3a.15** across the last 10 years.

Figure 10: Solved by temporary measures AR16-25.



B3a.16 - Problems awaiting solution

The number of areas reported in this category has increased from 2,678 in AR24 to 2,780 in AR25.

- AR24 2,678/2,920 (92% of ARR) (i.e., **Line B3a.16/Line B3a.14**)
- AR25 2,780/3,089 (90% of ARR) (i.e., **Line B3a.16/Line B3a.14**)

Table 16: Total properties on External ARR - mitigation status

Total properties on External ARR	3,089
B3a.15 - Problems solved by temporary measures or subject testing	309
B3a.16 – Problems awaiting solution	2,780

In line with our Management Approach, we continue to provide our enhanced Mitigation Service to deliver temporary measures, where possible, to include areas which experience frequent/high impact external sewer flooding.

4.2.6 Lines B3a.17-B3a.21 - Areas on the 1:10, 2:10, 1:20 At Risk Register - (iii) Annual changes to 1:10, 2:10, 1:20 register

B3a.17 - Removed by Scottish Water action

The number of areas reported in this category has increased from 16 in AR24 to 21 in AR25.

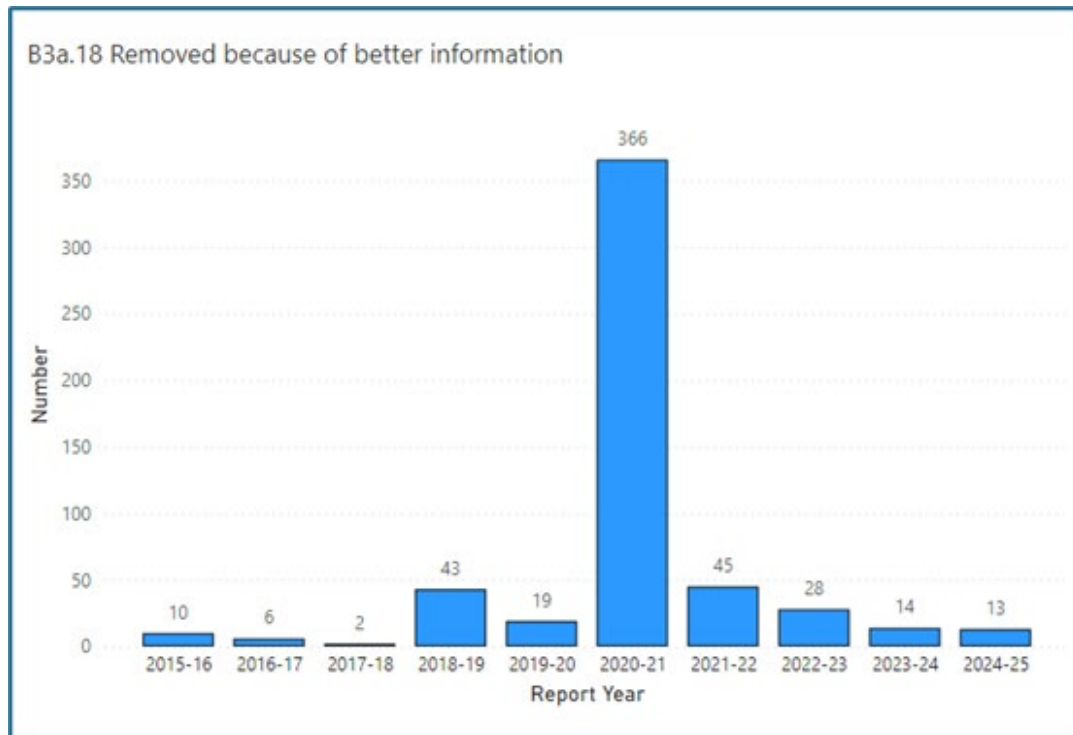
Removals due to Scottish Water action are linked to the delivery of our SR21 investment programme and therefore the number of removals will vary each year depending on the particular projects being delivered.

The 21 removals in AR25 resulted from Scottish Water delivering 8 internal sewer flooding investment projects which also reduced the risk of external sewer flooding. Scottish Water continues to address the highest priority external At Risk Register areas. None of the projects delivered in AR25 had a solely external sewer flooding driver.

B3a.18 - Removed because of better information

The number of areas reported in this category has decreased from 14 in AR24 to 13 in AR25. This decrease represents typical annual variance as shown in Figure 11.

Figure 11: Removed because of better information AR16-25.

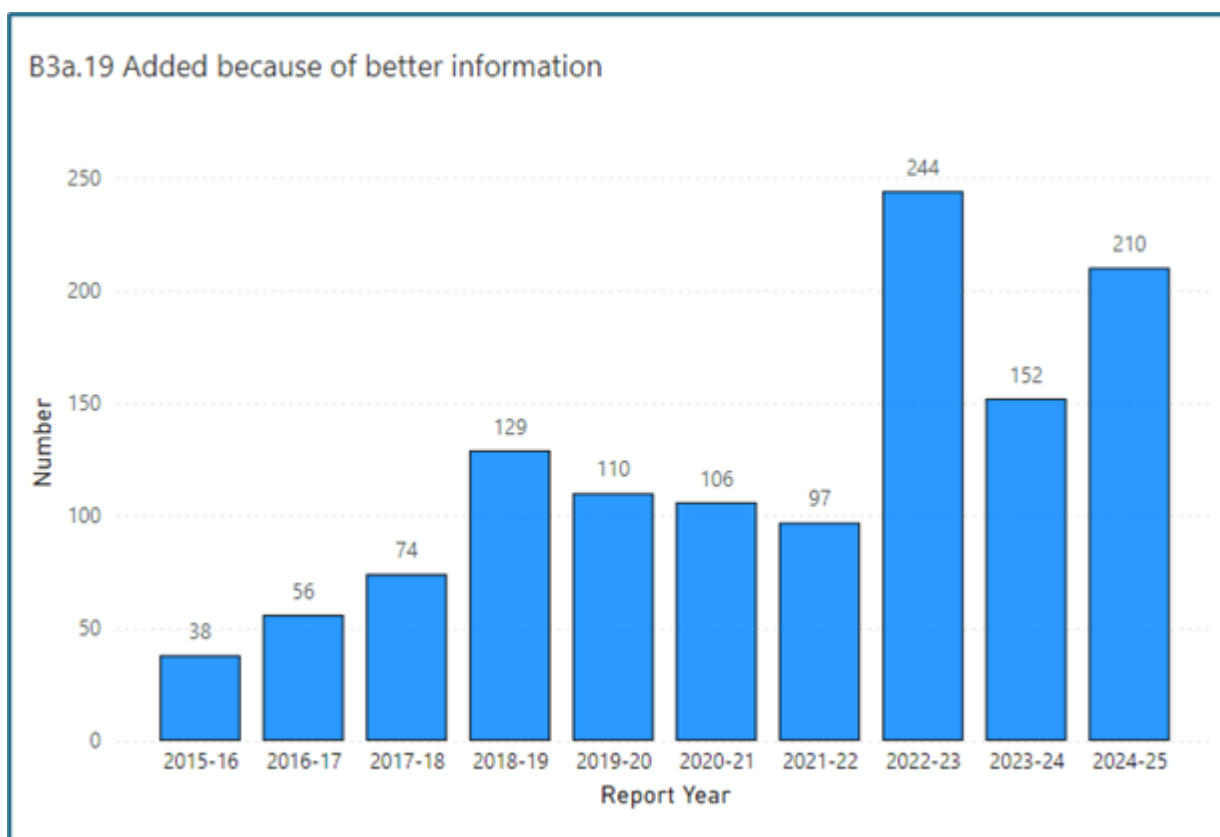


B3a.19 - Added because of better information

The number of areas reported in this category has increased from 152 in AR24 to 210 in AR25.

We continue to investigate high and medium priority incidents of external sewer flooding. In AR25 we carried out 111 high/medium priority external sewer flooding investigations. This is an increase compared to AR24 and has resulted in an increase in additions to the external ARR. Furthermore, one internal flooding investigation also resulted in a high number of related external flooding additions.

Figure 12: Added because of better information AR16-25.



B3a.20 - Added because of increased demand

All additions to the external ARR are identified as being due to better information. Scottish Water carries out Network Impact Assessments or Development Impact Assessments for all new development, ensuring that they do not adversely impact the network. This negates the need to add properties due to increased demand.

For this reason, **Line B3a.20** is reported as zero. We would be happy to discuss the possibility of removing this line in future Annual Return submissions.

B3a.21 - Moved from external to internal register

The number of areas reported in this category has increased from 1 in AR24 to 7 in AR25.

We continue our commitment to investigate high and medium priority incidents of external sewer flooding. Four of the properties moved to the internal register in AR25 were as a result of one investigation.

4.3 Investment

We continue to investigate high and medium priority incidents of external sewer flooding. In AR25 we carried out 111 high/medium priority external sewer flooding investigations. This is an increase compared to AR24 and has resulted in an increase in additions to the external ARR.

Scottish Water's Management Approach for SR21 (MA020) is to reduce flood risk to customers impacted by repeat, high consequence, internal sewer flooding, where this is not disproportionately expensive. This, combined with our ambition to never disrupt the lives of our customers or communities and never flood customers properties due to incapacity in our sewers under normal weather conditions, has seen us commit £86.2m so far in SR21 to deliver 58 capital projects to reduce the risk of internal sewer flooding to 162 properties and remove customers from our internal ARR. This investment has also reduced the risk of external sewer flooding to 92 areas.

The approved Investment Planning Scenario 2024 (IPS24.2) funding for the flooding programme (MA020) is £173.7m. Assuming such levels of investment in sewer flooding remains available and invested before the end of the investment period, we will deliver projects that reduce the risk of sewer flooding and forecast the removal of 190 properties from the internal ARR and 170 locations from the external ARR, of which 78 are currently forecasting to deliver by July 2027.

The ability of Scottish Water to achieve the forecast performance and investment is largely dependent on the weather experienced and its geographical location, throughout the period. In AR25 we saw a return to similar conditions as those seen in two years ago in AR23, where the level of rainfall experienced in most events was such that our sewer network was able to drain effectively resulting in less flooding due to overloaded sewers, with fewer higher intensity, short duration storms. Longer duration, lower intensity rainfall events meant that ground conditions were more permeable because of the relatively high levels of saturation.

In AR25 we saw a return to similar conditions as those seen in two years ago in AR23, where the level of rainfall experienced in most events was such that our sewer network was able to drain effectively resulting in less flooding due to overloaded sewers, with fewer higher intensity, short duration storms. Longer duration, lower intensity rainfall events meant that ground conditions were more permeable because of the relatively high levels of saturation.

In comparison, in AR24, a number of high intensity, short duration storms occurred, where the level of rainfall experienced overwhelmed the sewer network.

This change in weather conditions has meant that the number of external sewer flooding incidents due to sewer overloading and the number of areas affected is consequently lower in AR25.

Should we experience a return to an increase in short duration, high intensity storms with no respite over the remainder of the investment period, we may find that our actual number of sewer overloading incidents, ARR additions and mitigation provision, exceeds the forecast numbers.

4.3.1 Data sources and confidence grades

Data about external flooding is held on the following software packages:

- Cases/Calls regarding external flooding incidents and areas affected are recorded within Scottish Water Customer Relationship Management Software (CRM), Microsoft Dynamics.
- Salesforce Field Service software collates flooding data and integrates with Microsoft Dynamics providing the Flooding Team with more detailed, accurate and comprehensive information regarding flooding incidents and affected areas.
- The Flooding Database which contains all external flood risk information, including the external At Risk Register (ARR), is held on InfoAsset Manager (IAM).

Confidence grades for **Lines B3a.1- B3a.10** have been held at the same values as AR24, A4.

The AR25 and forecasted AR26 confidence grades for these lines are lower than the confidence grades given to the equivalent lines in the B3 table as the Flooding Investigation Team does not review all external sewer flooding incidents. However, Scottish Water has continued to prioritise this and undertake EFOS investigations providing more customers with our assessments of risk classifications for their properties.

Lines B3a.11-B3a.21 remain graded at B4 as per AR24. The data informing these reporting lines is held on a non-corporate, fully auditable database. The confidence grade given for these lines is lower than the confidence grade given to the equivalent lines in the B3 table as approximately 10%-15% of the external At Risk Register data is of poor quality (inherited from Scottish Water predecessor organisations).

4.3.2 AR25 Data Improvement Programmes

Mitigations Programme

In AR25 the mitigations programme embedded as business as usual, providing a consolidated robust dataset. We also developed a decision matrix for provision of external mitigation measures, based on risk level and impact of external sewer flooding incidents on our customers. This is to increase the consistency and speed of decision-making.

Salesforce/Microsoft Dynamics Location Count

In AR24 we identified an issue with property/area counts for external sewer flooding incidents. Most external sewer flooding incidents were reporting as one property or area affected. We implemented a software enhancement to resolve this during AR25 and this functionality is now available.

Automation of the Flooding Team investigation process

In AR25 we continued to develop our investigations process using Microsoft Dynamics software as our workflow and data repository. This approach simplifies and enhances our data collation and ensures robustness, accuracy and ease of reporting.

Flooding Database Upgrade

In AR25 we started to develop an enhanced software solution for our flooding database, where we hold all flooding information regarding risk and impact for investigated properties and locations.

Storm Analysis

In AR25 we introduced an additional storm analysis software (MAP Rain) on trial, using FEH13 rainfall. This software provides significant time savings for storm analysis, as well as additional functionality for historic long-term analysis.

4.3.3 AR26 Data Improvement Programmes

The following improvements are planned during 2025-26:

Automation of the Flooding Team investigation process

In AR25 we continued to develop a new procedure to enable the delivery of our investigations process using the Microsoft Dynamics software as our workflow and data repository. This project was anticipated to be delivered in AR25 but has taken longer than expected to implement. This approach simplifies and enhances our data collation and ensures robustness, accuracy and ease of reporting.

In AR26 the procedure will be rolled out and should provide the following benefits:

- Increased use of corporate system
- Fully auditable process
- Controlled data entry
- Enhanced data collation
- Enhanced reporting capabilities
- Increase of confidence grading for lines **B3a.1-B3a.5**

Flooding Database Upgrade

In AR25 we started to develop an enhanced software solution for our flooding database, where we hold all flooding information regarding risk and impact for investigated properties and locations.

In AR26 we will finalise delivery of the enhanced offering and will roll out the functionality. An improved solution will enrich our ability to collate information and increase the robustness and accuracy of our data.

Mitigations Programme

Currently the reported figure for areas protected by temporary measures represents areas on the external ARR with any temporary measures, including those with temporary measures which only protect against internal sewer flooding outwith our internal ARR.

In AR26 we will investigate the separation of flood risk reduced by temporary measures into internal only and external (curtilage) only categories.

Storm Analysis

In AR26 we will enhance storm analysis software (MAP Rain), to use both FEH13 and FEH22 rainfall for storm analysis. This will allow use of the latest rainfall modelling as well as comparative historic analysis.

4.3.5 Assumptions used for forecast data

Forecasting has been provided for all lines in Table B3a.

Forecasting for **Lines B3a.1-B3a.10** is based on 3-year and 5-year average incident and area data related to sewer flooding.

Forecasting for **Lines B3a.11-B3a.21** is based on the current At-Risk Register position and predicted additions and removals from the At-Risk Register. These predicted additions and removals are based on historic addition trends and the status of the Flooding Programme.

Confidence grades for forecast **Lines B3a.1-B3a.21** have been set at C4. As above, the forecast numbers are based on average/historic data as well as current status data. A 'C' grading is appropriate given the estimated nature of the forecast. It is recognised that most lines are highly weather dependent.

5 Table B4: Customer service

5.1 Overview

Table B4 provides information on written complaints and telephone contacts received by Scottish Water. Scottish Water reports a decrease in the number of formal complaints received in AR25 i.e., 520 compared to 539 in AR24. The decrease in complaints can be seen across the 3 main complaint areas, Water Supply, Wastewater and Infrastructure. Water Supply has seen a reduction in the number of complaints relating to No Water however, those relating to Pressure/Intermittent Supply have increased. Wastewater complaints have seen a reduction in the Choke/Blockage category however, compensation claims have remained at AR24 levels. Infrastructure has reduced by 1 from AR24. The increase in compensation claims noted in AR24 has halted with the proportion of complaints remaining at similar levels in AR25.

In AR25, telephone contacts continued the decreasing trend from AR24, with 270,375 compared to 290,325. Volumes were steady through the year, with spikes in May 2024 and February 2025 due to operational issues. In May 2024 a burst main impacted the ML11- ML12 postcodes on the 30 May 2024. In February 2025, a burst water main in the south side of Glasgow resulted in increased contact volumes between 1 and 4 February 2025. This impacted the G41-G44 postcodes and further bursts along the network occurred after the initial repair.

In AR25 there has been a focus on improving the quality of conversations and achieving first time resolution with customer contacts. Part of this was through providing more time for training and feedback for our customer advisers. With this extra focus, we have seen increases in **Line B4.7** Total calls answered in more than 30 seconds on customer contact lines and **Line B4.8** Average time taken to answer a call on customer contact lines. However, **Line B4.10** Total of abandoned calls on customer contact lines has remained at similar levels to AR24.

5.2 Performance Trends

B4.1 Formal complaints (number of written complaints received)

There was a decrease in the number of formal complaints received during the AR25 period i.e. 520 compared to 539 in AR24 - a decrease of 3.53%.

In AR25, the split of complaints between Compensation Complaint and Complaint has remained on par with AR24, with the reduction seen in both categories at similar levels as shown in Figure 13.

Figure 13: Formal Complaints by Compensation Complaint or Complaint AR24 v AR25

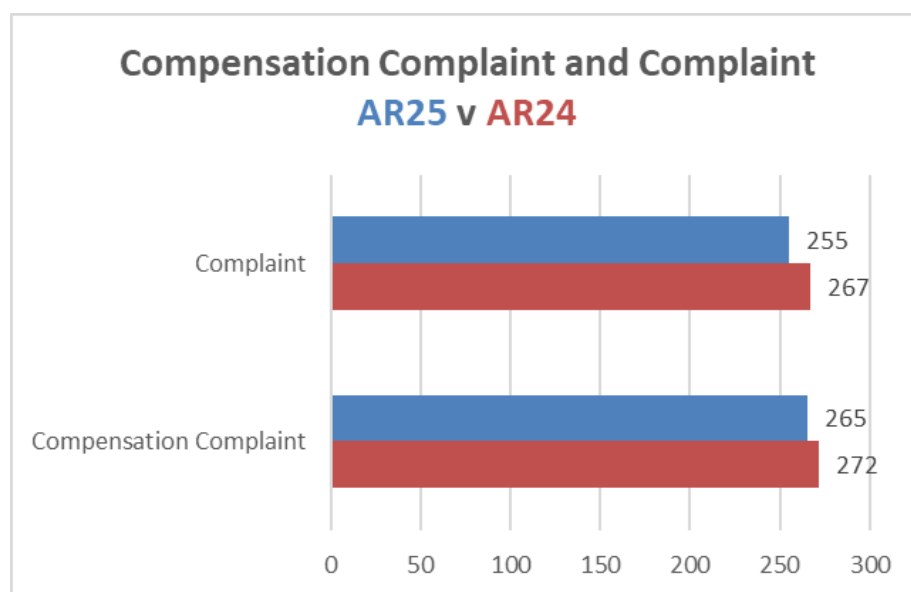


Table 17 below shows the change in volume and percentage across the service areas in AR25:

Table 17: Change in volume and percentage of formal complaints across service types for the AR25 period.

Service Type	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total		Volume change AR24 to AR25	% Change AR24 to AR25
	24	24	24	24	24	24	24	24	24	25	25	25	AR24	AR25		
Byelaws	0	0	1	0	0	0	0	0	0	0	0	0	1.	1.	0.	0.00%
CMA Data Amendment	0	2	0	0	0	0	0	0	1	0	0	0	1.	3.	2.	200.00%
Connection	0	0	0	0	0	0	0	0	0	0	0	0	2.	0.	-2.	-100.00%
Developer Connection	0	0	0	0	0	0	1	0	0	0	0	1	0.	2.	2.	100.00%
Infrastructure	6	4	11	4	5	4	9	15	6	7	7	8	87.	86.	-1.	-1.15%
Metering	0	1	0	1	0	0	0	0	0	0	0	0	3.	2.	-1.	-33.33%
Planned Works/ Maintenance	3	6	2	6	6	6	3	3	5	5	7	6	40.	58.	18.	45.00%
Trade Effluent	0	0	0	0	0	0	0	0	0	0	0	0	1.	0.	-1.	-100.00%
Waste Water	19	17	16	15	19	12	12	9	7	9	14	23	194.	172.	-22.	-11.34%
Water Quality	1	2	1	3	0	0	1	0	0	3	0	1	13.	12.	-1.	-7.69%
Water Supply	14	12	20	16	16	13	15	12	8	11	21	22	195.	180.	-15.	-7.69%
Wholesale Allowance	0	0	0	0	0	1	1	2	0	0	0	0	2.	4.	2.	100.00%
Total:	43	44	51	45	46	36	42	41	27	35	49	61	539	520	-19.	-3.53%

The top three Service Types of complaints in AR24 remained the top three in AR25 i.e., Infrastructure, Wastewater and Water Supply. All three slightly decreased during AR25 - as shown in Table 18.

Table 18: Top 3 service types for complaints across the AR25 period.

Service Type	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total		Volume change AR24 to AR25	% Change AR24 to AR25
	24	24	24	24	24	24	24	24	24	25	25	25	AR24	AR25		
Infrastructure	6	4	11	4	5	4	9	15	6	7	7	8	87.	86.	-1.	-1.15%
Waste Water	19	17	16	15	19	12	12	9	7	9	14	23	194.	172.	-22.	-11.34%
Water Supply	14	12	20	16	16	13	15	12	8	11	21	22	195.	180.	-15.	-7.69%
Total:	43	44	51	45	46	36	42	41	27	35	49	61	539	520	-19.	-3.53%

The main Service Reason for each of the top three Service Types complaints changes from AR24 to AR25. Details of these changes are noted below:

Infrastructure – as per Table C above there was a decrease of 1 complaint in AR25 and the main changes between AR24 and AR25 in the category of “Service Reason” for the complaint were: a decrease of 9 complaints relating to “Cover/Ironwork Fault/Fix”; and an increase of 8 complaints relating to “Reinstatement”.

Wastewater – as per Table C above, there was a decrease of 22 complaints in AR25 and the main changes between AR24 and AR25 in the category of “Service Reason” for the complaint were: a decrease of 16 complaints relating to “Choke/Blockage” and a decrease of 4 complaints relating to “Sewer Flooding”.

Water Supply – as per Table C above, there was a reduction of 15 complaints and the main changes between AR24 and AR25 in the category of “Service Reason” for the complaints were a decrease of 24 complaints relating to “No Water”, a decrease of 5 complaints relating to “Burst/ Leak” and an increase of 8 complaints relating to “Pressure/Intermittent Supply”.

B4.2 Regulator upheld complaints

Scottish Water reports 1 regulator upheld complaint in AR25. This is an increase of 1 from AR24. The upheld complaint from the Drinking Water Quality Regulator (DWQR) relates to a customer who complained both about the water quality and pressure of their water supply. There were occasions when the customer experienced discolouration in the raw water supply that served the property they purchased. A water sample was taken and after analysis it failed Scottish Water parameters.

The DWQR made some recommendations following their review, and Scottish Water is now delivering a Capital project that will bring the property on to a mains supply. These costs will be met by Scottish Water and the customer will then be brought into charge following the completion of these works due May/June 2025.

B4.3 No. dealt with within five working days

In AR25, all 520 complaints were dealt with within five working days. This mirrors the AR24 performance of all 539 complaints, which were also dealt with within five working days.

5.2.1 Lines B4.4-B4.11 - Telephone Contacts

AR25 saw lower levels of telephone calls than during AR24. Our communications team who proactively update customers about incidents in their area prior to them making contact with Scottish Water have helped lower contacts. Customers must sign up for this service and, as the sign up levels increase, our ability to reach more customers will help reduce customer contacts following an operational incident.

B4.4 Total calls received on customer contact lines

We received 270375 calls during the AR25 period compared to 290325 calls in AR24. This represents a drop of 19,950 calls, or an overall 6.87% decrease against AR24. Figure 14 below shows the calls received on customer contact telephone lines broken down by month. Call volumes are less than AR24 in ten months of the year. Only April 2024 and February 2025 have more, with April 2024 returning to more typical volumes compared to AR24 and February 2025 being impacted by the Glasgow bursts. May 2024 had the second highest volumes in AR25 and was impacted by a burst in ML11-12. Similar to AR24 volumes have been more consistent month to month. Figure 15 below shows the volume of lead renewal calls received in AR25 by month. As mentioned in AR24 these contacts continued into the early part of AR25 before returning to more typical volumes.

Figure 14: Total calls received on customer contact lines by month for AR24 and AR25.

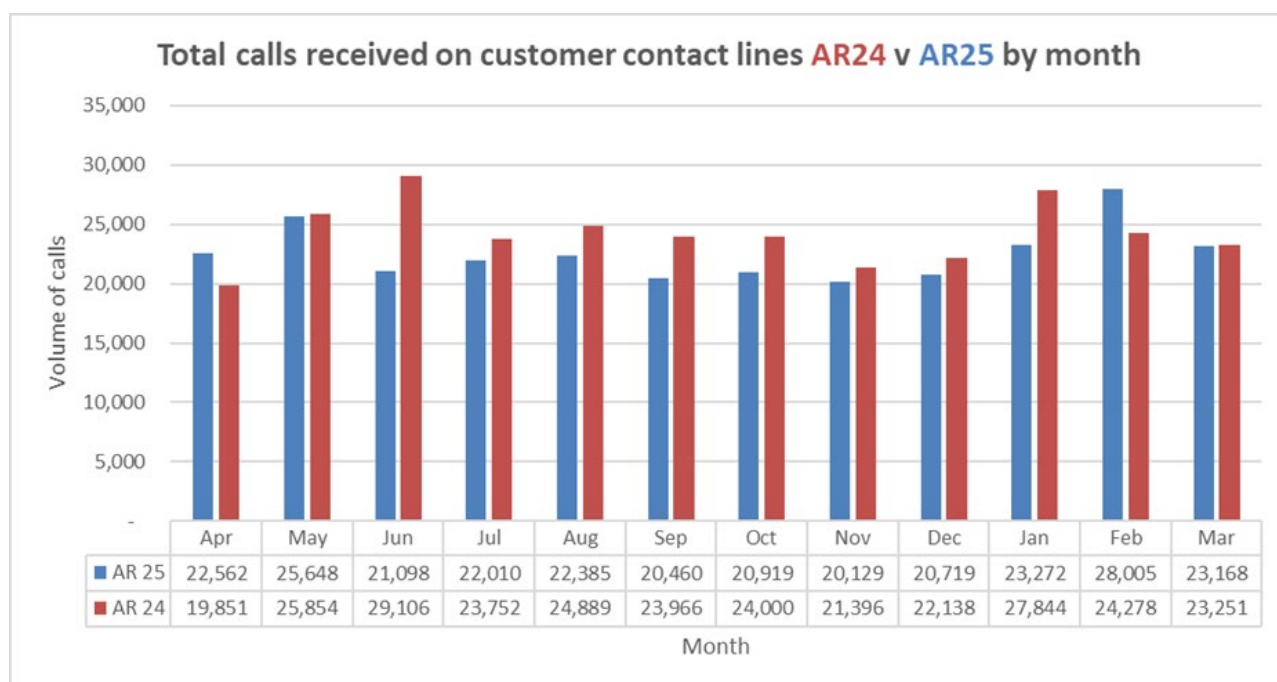
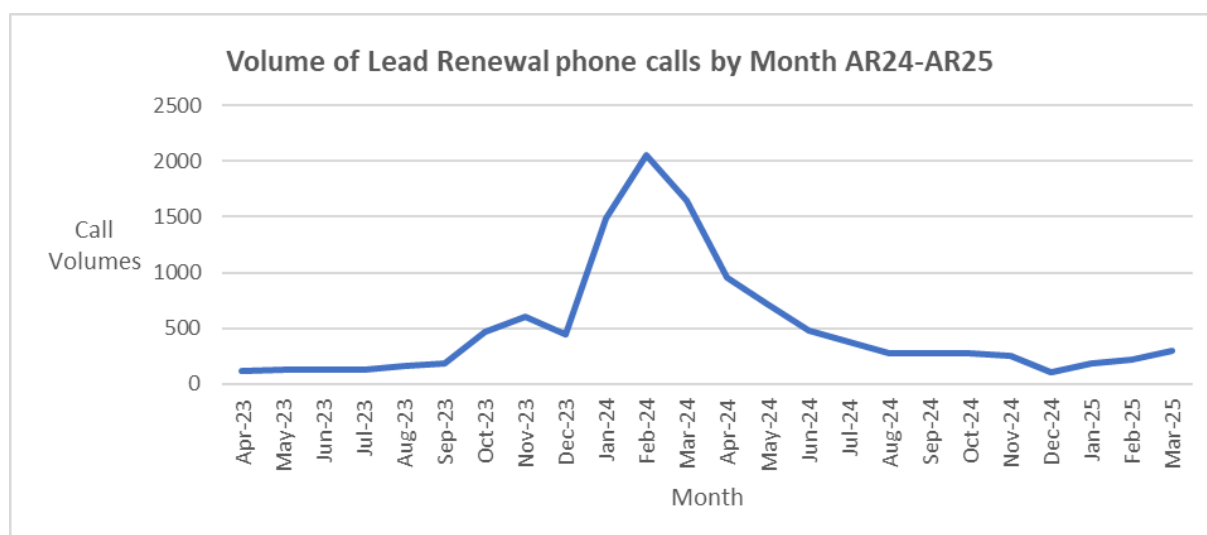


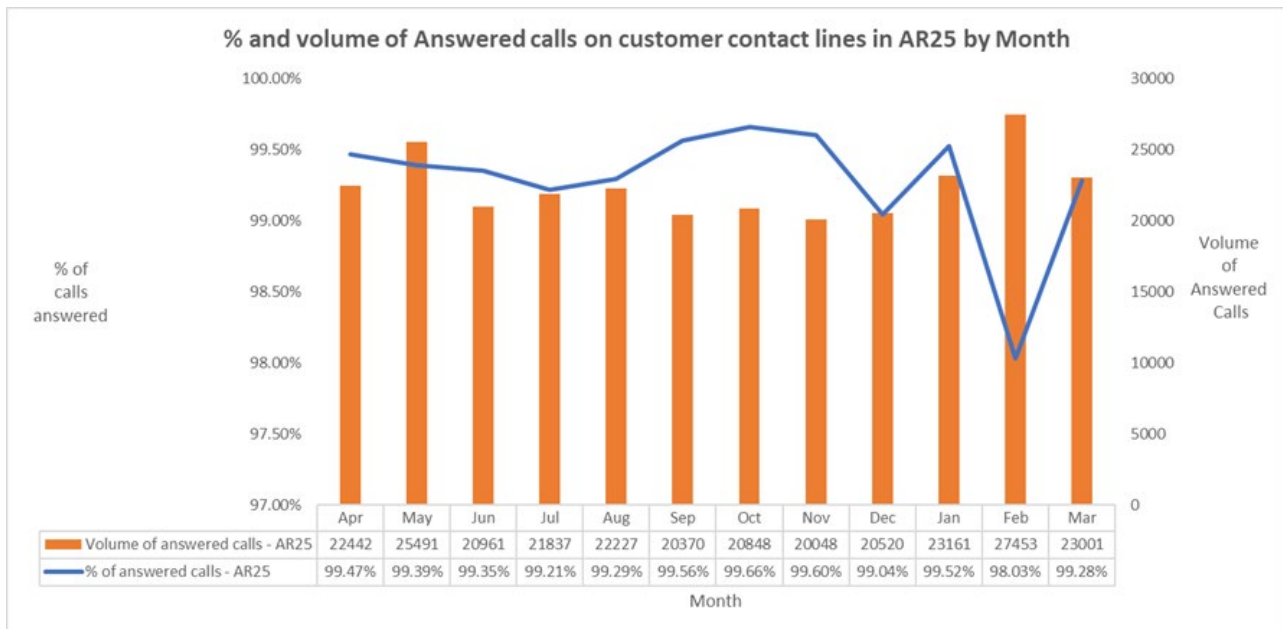
Figure 15: Volume of Lead Renewal phone calls by month for AR24 to AR25.



B4.5 Total calls answered on customer contact lines

We answered 268359 calls (99.25%) in AR25 compared to 288689 (99.43%) in AR24. As with **Line B4.4**, performance has remained constant through the year apart from in February which was impacted following the bursts in Glasgow as shown in Figure16.

Figure 16: Percent and volume of answered calls on customer contact lines per month for AR25.



B4.6 Total calls answered within 30 seconds on customer contact lines

In the AR25 period, 230614 calls (85.29%) were answered within 30 seconds, compared to 272736 calls (93.94%) in AR24. Efforts have been focused to increase training and feedback to our Customer Advisers to help improve our customers experience and first time resolution, which has impacted our performance.

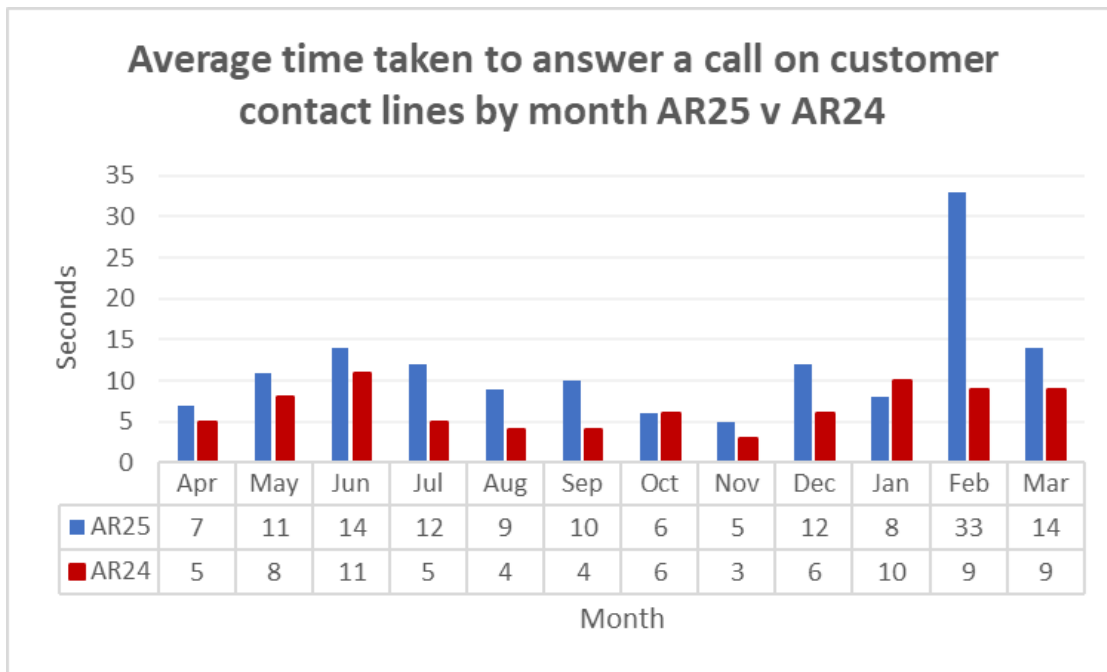
B4.7 Total calls answered in more than 30 seconds on customer contact lines

In AR25, 37745 calls answered after more than 30 seconds (13.96%) compared to 15953 (5.49%) in AR24. As per **Line B4.6**, performance has been impacted by increased training and feedback to our Customer Advisers.

B4.8 Average time taken to answer a call on customer contact lines

In AR25, the average time taken to answer a call to our customer contact line was 12 seconds, compared to 7 seconds in AR24. Figure 17 below shows the average time, by month, and demonstrates a drop in performance from AR24 during AR25. 11 of the month's performance has been lower or on par with AR24, February was impacted with the Glasgow bursts.

Figure 17: Average time taken (seconds) to answer calls on customer contact lines per month for AR25 v AR24.



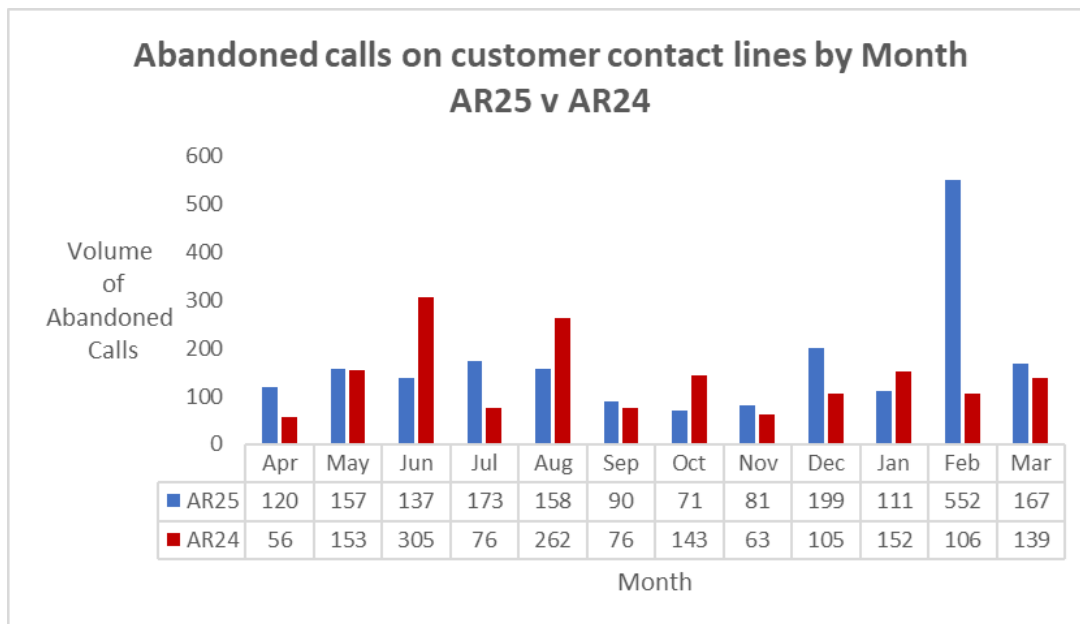
B4.9 All lines busy

In AR25, there were 330 instances of all lines busy compared to 2 in AR24. These occurred in 2 events one in April 2024 when we had 1 call and in December 2024 when we had 329 calls. Both events occurred during times when call volumes were low and are technical issues, rather than our capacity to handle calls. The incident in December 2024, was due to a fault with our provider Puzzel, which impacted other users of their service, and a contingency measure was put in place until this was resolved. We will continue to monitor this, and engage with our call service provider going forward.

B4.10 Total of abandoned calls on customer contact lines

The total of abandoned calls to customer contact lines in AR25 was 2016, compared to 1636 calls in AR24 (23.23% increase). Figure 18 below shows the split of these contacts over AR25 and AR24 and highlights the relatively consistent performance in AR25, with the exception of February which was impacted by the Glasgow bursts, which accounts for the increased volume in AR25.

Figure 18: Abandoned calls on customer contact lines by month for AR24 v AR25.



B4.11 Total Telephone complaints

In AR25, the total number of telephone contacts recorded at initial conversation as a complaint/fault was 102174, compared with 101662 in AR24, an increase of 512 or 0.5%. Looking at the four main service areas the main trends are:

- Wastewater and Water Quality contacts increased by 1476 and 606 contacts during AR25. This represents an increase of 5.56% and 6.66%, respectively.
- Water Supply contacts decreased by 512 during AR25 (1.13%), in part due to proactive communications.
- Infrastructure (missing/damaged ironwork) saw a decrease of 1178 (6.01%) contacts from AR25, mainly due to the reduction of landlord requests from August. This information is shown in Table 19 below.

Table19: 4 main service areas of telephone complaints across the AR25 period.

Service	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total	Diff to AR24
Infrastructure	2109	1984	1626	1607	1497	1439	1443	1404	917	1434	1347	1627	18434	-1178
Waste Water	2704	2808	1994	2228	2190	1779	1923	1936	2485	2658	2528	2788	28021	1476
Water Quality	670	855	797	963	1161	865	1047	834	539	587	723	670	9711	606
Water Supply	3332	4059	3431	3636	3866	3391	3465	3831	4074	4412	4034	3138	44669	-512

5.3 Data

5.3.1 Data sources and confidence grades

In this reporting year data for customer contacts and written complaints is taken from our Customer Relationship Management MS *Dynamics*. Telephone statistics come direct from calls logged on Scottish Water's telephony management system, *Puzzel*.

There were no changes to confidence grades from AR24.

5.3.2 Data improvement programmes

There were no data improvement programmes in AR25.

5.3.3 Assumptions used for forecast data

The forecast for **Line B4.1** is a roll up of the forecast for **Lines B5.7, B6.5 and B6.31**. The forecast for **Line B4.4** is a combination of the forecast for **Lines B4.5 and B4.10**. The forecast for **Line B4.5** is a combination of the forecast for **Lines B4.6 and B4.7**.

The forecast ranges for **Lines B4.9 and B4.10** are based on the last 5 years of data, with **Lines B4.6, B4.7, B4.8 and B4.11** based on data from the last 4 years; with the highest volume being the top of the range and the lowest volume being the bottom.

6 Table B5: Household customer service

6.1 Overview

The purpose of the Household Customer Experience Measure (hCEM) is to capture service levels delivered to household customers and provide a robust means of measuring the quality of, and tracking changes in, the service experience provided to household customers. Performances against a number of quantitative and qualitative indicators are combined to produce an Annual hCEM Score out of 100.

6.2 Performance Trends

6.2.1 Lines B5.1-B5.8 - Household CEM

Line B5.1 hCEM overall score

The hCEM overall score increased from 86.63 in AR24, to 87.37 in AR25, an increase of 0.74.

The improvement was driven on the both the Quantitative and Qualitative sides of the measure, with the majority of elements performing better than in AR24. In the Quantitative side, reductions in Service Issue Contacts, Escalations and Formal Complaints had a positive impact and improved the overall quantitative component. This was slightly offset by an increase in Regulator Upheld Complaints.

On the Qualitative side of the measure, both the Customer Experience Survey and No Experience No Contact improved from AR24, which had a positive impact and improved the overall Qualitative component. The Customer Experience Survey reported our best ever end of year score, which was slightly offset by a decrease in Experience No Contact

In our forecasting for AR25, we have selected a mid-point from our predicted range for each of the individual hCEM components (as reported in other B5 lines below). However, for forecasting the Overall Score, we have calculated that score using the individual mid-point values forecast for each component.

Line B5.2 Customer Experience Survey

"Customer Experience Survey (CES)" has increased from 93.87% in AR24, to 94.15% in AR25, an increase of 0.28%, as shown in B5 Table 20. Our improvement campaigns have helped to reinforce our commitment to delivering customer service excellence. One notable example is the 'Summer of Excellence' from July 2024, which played a role in maintaining high levels of customer satisfaction over the summer period. The campaign focused on two core messages; creating a great first impression and keeping customers informed – both critical to enhancing the overall customer experience. The campaign also involved our contractor partners, including 'Back to Basics' training and coaching. The number of surveys returned increased from 16,534 in AR24, to 18,293 in AR25. This has increased due to surveys now being sent to customers who have raised a service issue via Scottish Waters online portal. There was a higher proportion of surveys in the 5-7 scores (satisfied) bracket which had the effect of driving up the satisfaction score.

Table 20: Customer experience survey scores for AR24 and AR25.

CES Survey	AR25	% of total	AR24	% of total	Change	% Change
1-4 Scores	1070	5.85%	1013	6.13%	57	-0.28%
5-7 Scores	17223	94.15%	15521	93.87%	1702	0.28%
Total Returns	18293	100.00%	16534	100.00%	1759	

Table 21 below looks at the three largest elements of the survey - Septic Tanks HH (Household), Water Supply and Wastewater. There was improvement in the Septic Tanks HH element, with slight dips in Waste Water and Water Supply.

Table 21: 3 largest areas of Customer Experience Survey for AR24 and AR25.

Service area	% of return volume AR25	AR25 score	AR24 score	Difference between AR25 - AR24
Septic Tanks HH	22.06%	96.75%	96.24%	0.51%
Waste Water	41.93%	93.34%	93.46%	-0.12%
Water Supply	27.62%	93.84%	93.87%	-0.03%

Table 22 shows the Septic Tanks HH and CES Performance since AR20. The Septic Tanks HH individual score is above the CES score in every AR year in the table.

Table 22: Septic Tanks HH and CES performance AR20 to AR25.

	Septic tanks HH	CES	Difference Between Septic tanks and CES
AR25	96.75%	94.15%	2.60%
AR24	96.24%	93.87%	2.37%
AR23	94.98%	92.41%	2.57%
AR22	94.09%	92.39%	1.70%
AR21	96.53%	94.09%	2.44%
AR20	94.33%	93.31%	1.02%

Table 23 shows the volume of Wastewater returns and % of those returns against all the returns. Wastewater has always made up the largest % of returns and the AR25 split is following the usual trend.

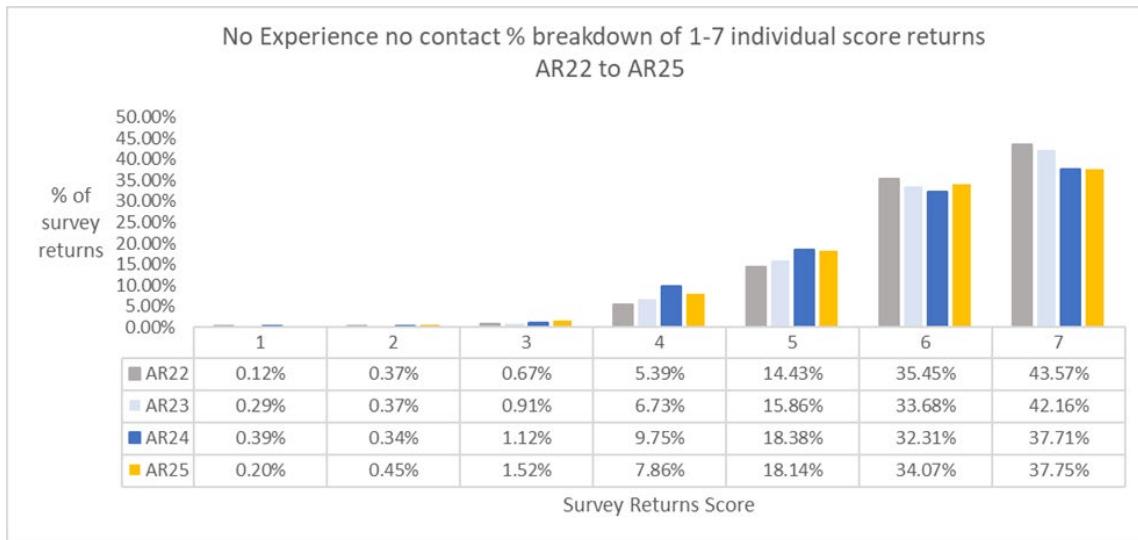
Table 23: Number of wastewater returns and percent of total returns.

	Wastewater Returns	% of Wastewater Return of all returns
AR25	7671	41.93%
AR24	6448	39.00%
AR23	6782	42.25%
AR22	6426	42.33%
AR21	7872	51.85%
AR20	7650	50.39%

Line B5.3 No experience no contact

“No Experience No Contact” increased from 88.39% in AR24, to 89.96% in AR25, an increase of 1.57%. Examination of the survey returns shows the main movement is from the Neither Dissatisfied nor Satisfied score of 4 to the Satisfied scores of 6. This is represented in Figure 19.

Figure 19: Percent breakdown of “No Experience No Contact” 1-7 individual score returns for AR22 to AR25.

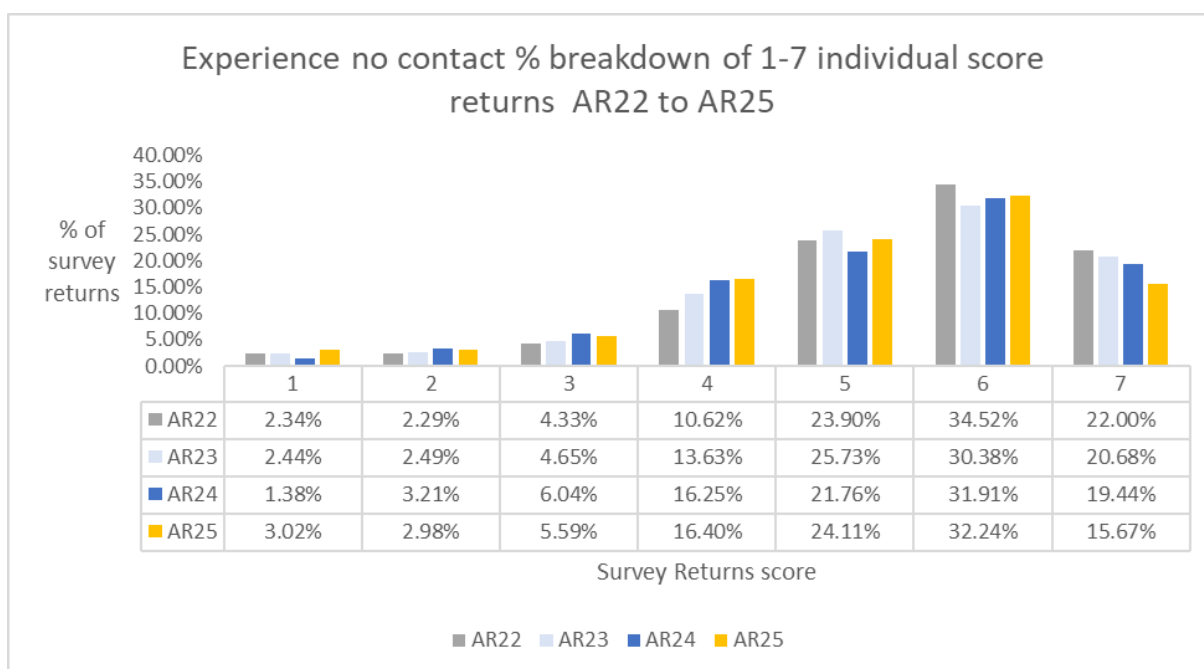


The increase in satisfaction aligns with wider improvement activities, including the new ‘Piped by Us, Owned by You’ advertising campaigns – which has increased overall awareness of public ownership.

Line B5.4 Experience no contact

“Experience No Contact (ENC)” decreased from 73.11% in AR24, to 72.02% in AR25, a decrease of 1.09%. When looking at the scoring of the survey returns, there is a movement from the Very Satisfied 7 to Satisfied and Less Satisfied scores of 6 and 5, with small movement to the Very Dissatisfied 1. This is represented in Figure 20. It is worth noting that this customer group has a much smaller base size – averaging 91 survey returns per month in AR25. Water quality, particularly related to the taste and smell of their tap water, continues to be the most common theme driving dissatisfaction (scores of 1-3) and ambivalence (scores of 4) – although other general service issues and charges are mentioned also. Scottish Water is currently conducting deep dive research into ENC customers who have cited water quality issues to focus improvement actions.

Figure 20: Percent breakdown of “Experience no contact” 1-7 individual score returns for AR22 to AR25.



Line B5.5 Escalations

“Escalations” decreased from 434 in AR24, to 350 in AR25, a decrease of 84. A decrease occurred across the three main areas Water Supply, Wastewater and Infrastructure (missing/damaged ironwork), as shown in Table 24 below. The reduction in escalations is in part, linked to the overall decrease in Service Issue Contacts.

Table 24: Top 3 volume areas of hCEM escalations across the AR25 period.

AR25	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD	Volume Change AR24 to AR25	% Change AR24 to AR25
Infrastructure	7	7	1	9	5	3	3	6	12	10	7	8	78	-15	-16.13%
Waste Water	9	11	4	6	8	4	9	3	7	10	10	26	107	3	2.88%
Water Supply	6	12	6	7	10	5	3	6	21	11	12	10	109	-5	-4.39%

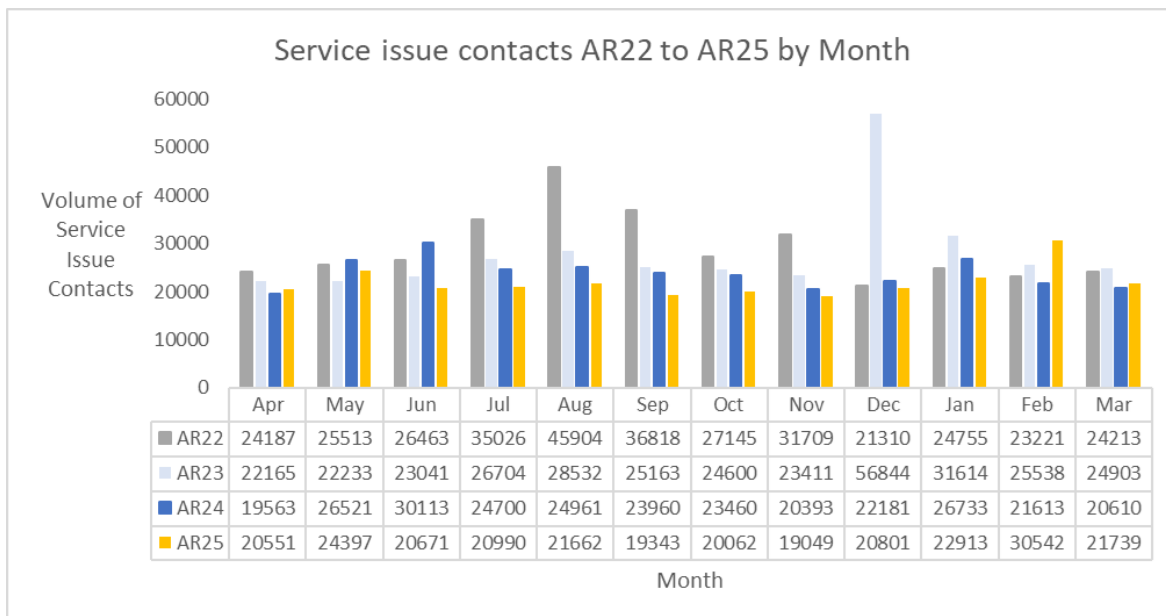
Line B5.6 Service Issue Contacts

“Service Issue Contacts” decreased from 284808 in AR24, to 262720 in AR25, a decrease of 22088, or 7.76%.

In AR25, customers continue to use “Telephone” as the main way of contacting Scottish Water to report a fault. As with **Line B4.4**, there is a similar trend in “Service Issue Contacts”, with AR25 having less contacts than AR24 for 9 months of the year - only April 2024, February 2025 and March 2025 have more. Figure 21 shows the monthly volumes for AR22 to AR25. Volumes have been constant in AR25 without any significant increase in any individual month, compared to AR22 and AR23. However, February 2025 did have the highest volume of Service Issue Contacts since January 2023, following a burst water main in the south side of Glasgow, resulting in increased contact volumes between 1 and 4 February 2025.

The benefit of our communications team who proactively update customers about incidents in their area prior to them making contact with Scottish Water have helped lower contacts. Customers must sign up for this service and as the sign up levels increase, our ability to reach more customers will help reduce customer contacts following an operational incident.

Figure 21: Service issue contacts by month for AR22 to AR25.



Line B5.7 Formal complaints

“Formal Complaints” have decreased from 399 in AR24, to 391 in AR25, a decrease of 8, or 2.01%. Table 25 below shows the volume and % change from AR24 to AR25 for the top three areas of complaints, Wastewater, Water Supply and Infrastructure (missing or faulty cover).

Table 25: Top 3 areas for formal complaints across the AR25 period.

AR25	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total	Volume Change AR24 to AR25	% Change AR24 to AR25
Infrastructure	6	4	10	4	5	4	9	14	6	6	6	8	82.	1.	1.23%
Waste Water	13	13	13	13	13	10	10	7	6	7	13	21	139.	-8.	-5.44%
Water Supply	11	9	14	7	6	7	7	8	3	9	18	21	120.	-6.	-4.76%

The main Service Reasons for each of the top three Service Types complaints changes from AR24 to AR25 are noted below:

Infrastructure – the main change between AR24 and AR25 in the “Service Reason for the Complaint” was a decrease of 6 complaints relating to ‘Cover/Ironwork Fault/Fix’ and an increase of 6 complaints relating to ‘Reinstatement’. Overall infrastructure increased by 1 from AR24.

Wastewater – out of the decrease of 8 complaints in the Table 27 above, the main change between AR24 and AR25 in the “Service Reason for the Complaint” was a decrease of 7 complaints relating to ‘Choke/Blockage’.

Water Supply – out of the decrease of 6 complaints in the above Table 27 above, the main change between AR24 and AR25 in the “Service Reason for the Complaint” was a decrease of 15 complaints relating to ‘No Water’ and an increase of 8 complaints relating to ‘Pressure/ Intermittent Supply’.

Line B5.8 Regulatory upheld complaints

There was one regulatory upheld complaint in AR25. This is an increase of 1 from AR24. Further details of the upheld complaint can be found in **Line B4.2**.

Line B5.9 - Customer Satisfaction Survey

This was a call handling survey which we no longer measure and have no equivalent for and suggest that this line is deleted in Annual Returns. However, for completeness, when this was last reported the figure was 4.67.

6.2.2 Lines B5.10-B5.16 - Assessed Customer Service

Scottish Water stopped capturing “Assessed Customer Service” performance for OPA in April 2021 and, therefore, the information is no longer available. As our score had not changed since SR15, we have to assume that performance was maintained. The “Assessed Customer Service” score is now used to calculate the SR15 OPA for comparative purposes. A fixed score of 37.5 is used for the calculation as this was consistently achieved throughout the 2015-2021 period. We suggest that these lines are deleted in Annual Returns. However, for completeness, we have repeated our most recent commentary (pre-SR21) for the component lines below.

Line B5.10 Revenue and Debt Collection

Scottish Water’s performance in relation to revenue and debt collection from domestic customers is dependent on the performance of the 32 Local Authorities (LA) who manage these customer relationships with us. Scottish Water also manages a few metered domestic customers.

It is not practical to measure the performance of each of the 32 LA. The assessment previously included a sample of five LAs plus our metered customer revenue and debt collection facilities. The sample LAs chosen were Clackmannanshire, Glasgow City, Scottish Borders, Shetland Islands and South Ayrshire. The Water Industry Commission for Scotland (WICS) had previously endorsed this approach following a trial assessment with What Works Scotland.

We have not altered this since WaterWatch Scotland (WWS) was disbanded on the 15 August 2011, as Scottish Water has little or no ability to alter the way in which LAs decide to bill customers. There is also a scoring element within this section which relates to the Watervoice Assessment of debt and revenue collections. As Watervoice no longer exists as an organisation, its views of the debt and revenue procedures of the 32 LAs cannot be ascertained.

Given that actual data is not available, and for the purposes of this submission, we have reported the AR24 score of 2.

Line B5.11 Information to Customers

We do not send any unsolicited mail, apart from our leaflet explaining charges, to our customers. All required information is available on our website or available upon request. Our approach of not sending unsolicited mail is a positive feature, as this can be a cause for complaint for customers.

Given that actual data is not available, and for the purposes of this submission, we have reported the AR24 score of 1.

Line B5.12 Telephone Contact Hours

We operate a 24/7 Customer Engagement Centre, and this has not changed since 2002. For the purposes of this submission, we have reported the AR24 score of 1.

Line B5.13 Compensation Policy

We previously operated two compensation policies for customers, the Guaranteed Service Standards (GSS) and Price Promise compensation policy. From year commencing 2015/16 Scottish Water has combined these two policies and increased the standard value of what was the GSS compensation policy from £20, to £30. The new Service Standards policy remains similar in structure to previous years.

Given that actual data for this line is not available, and for the purposes of this submission, we have reported the AR24 score of 1.

Line B5.14 Supply Pipe Repair Policy

We operate a supply pipe repair policy and publicise this to customers via our website. Specific data on this measure is no longer captured. We have therefore reported the AR24 score of 1.

Line B5.15 Service for Disabled and Elderly Customers

We use our website to let customers know about the additional services we provide to meet the needs of those in vulnerable circumstances. Scottish Water operates a Priority Services Register to prioritise these customers in the event of a loss of supply. Specific data on this measure is no longer captured. We have therefore reported the AR24 score of 1.

Line B5.16 Complaints Handling

The written complaints audit underwent changes after WaterWatch Scotland (WWS) was disbanded in August 2011. On an annual basis WWS audited 25 complaints selected randomly. In agreement with WICS, we then moved to a method of ongoing self-assessment for this measure, whereby 25 randomly selected complaints were audited under the same criteria on a quarterly basis. The average score recorded from the quarterly periods was used to calculate the performance for this section. Specific data on this measure is no longer captured. We have therefore reported the AR24 score of 1.

This audit no longer takes place as there is no ongoing OPA requirement.

6.2.3 Lines B5.17-B5.24 - Service Issue Contacts – household customers

Over the course of the year, there were 262720 (**Lines B5.6 and B5.24**) “Service Issue Contacts” received from household customers by our Customer Engagement Centre. This is a drop of 22088 on the previous year.

The individual elements are outlined below.

Line B5.17 Phone Contacts

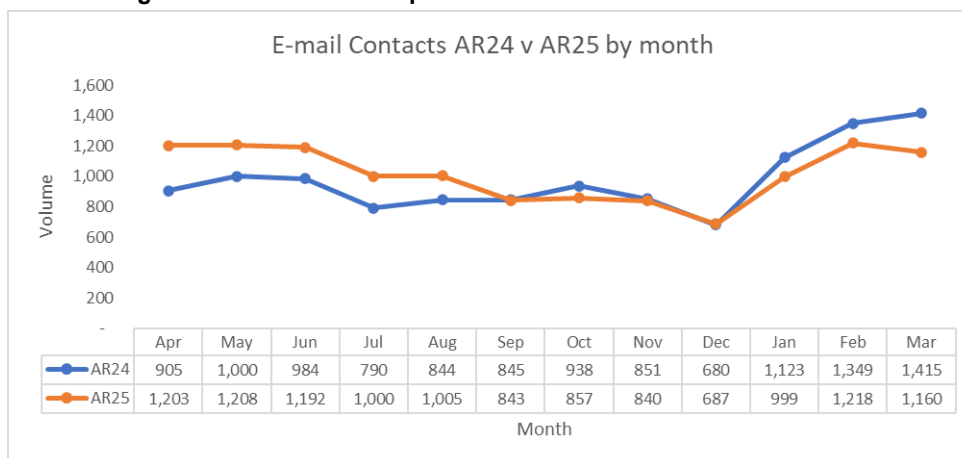
“Phone Contacts” decreased from 285,819 in AR24, to 266,715 during AR25, a decrease of 19,104, or 6.68%. This line follows the same trend as **Lines B4.4 and B5.6**.

Line B5.18 E-mail Contacts

“E-mail Contacts” increased from 11,724 AR24, to 12,212 during AR25, an increase of 488, or 4.16%.

Figure 22 shows increased email volumes within the first 5 months of AR25, highlighting a similar trend to the last 3 months of AR24. This was primarily for the same reason as AR24 with continued Lead Renewal contacts. The rest of the year, with the exception December, had lower volumes than AR24. January 2025 to March 2025 we saw increased Wastewater and Water contacts, driven by the Glasgow bursts and seasonal weather.

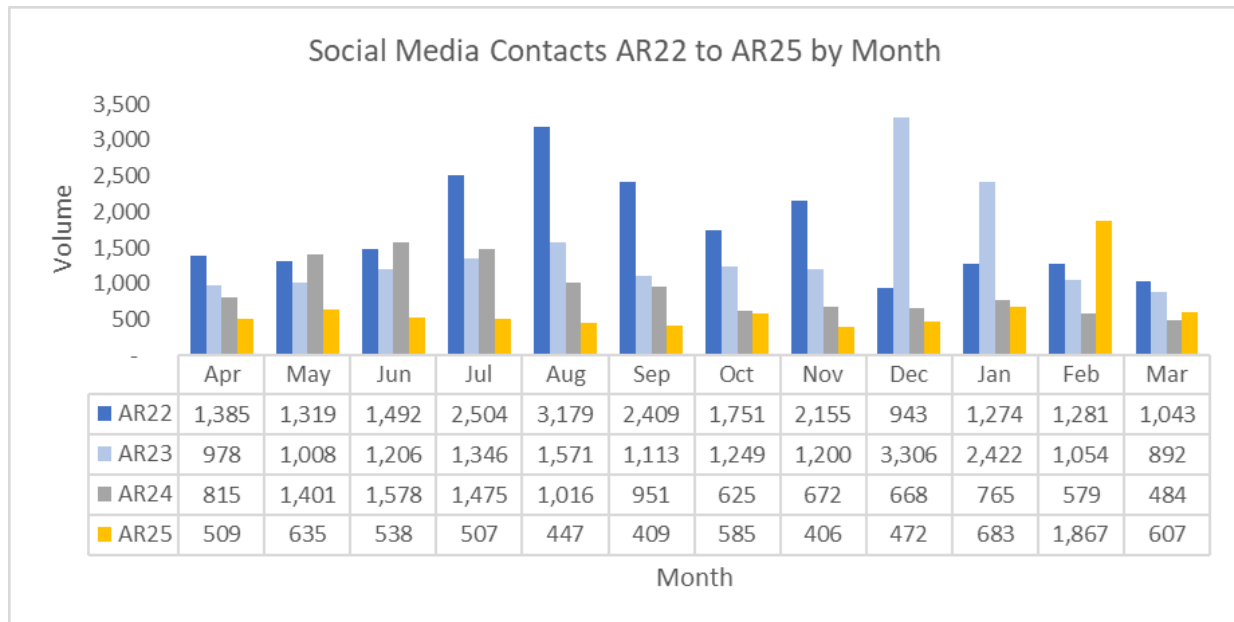
Figure 22: Email contacts per month for AR24 and AR25.



Line B5.19 Social Media Contacts

“Social Media Contacts” decreased from 11,029 in AR24, to 7,665 during AR25, a decrease of 3,364 or 30.50%. This follows the same trend as AR22 to AR24. Figure 23 below shows volumes continue to drop following Twitter’s change to X in July 2023, however volumes picked up from January 2025, with a spike in February 2025 following the bursts in Glasgow.

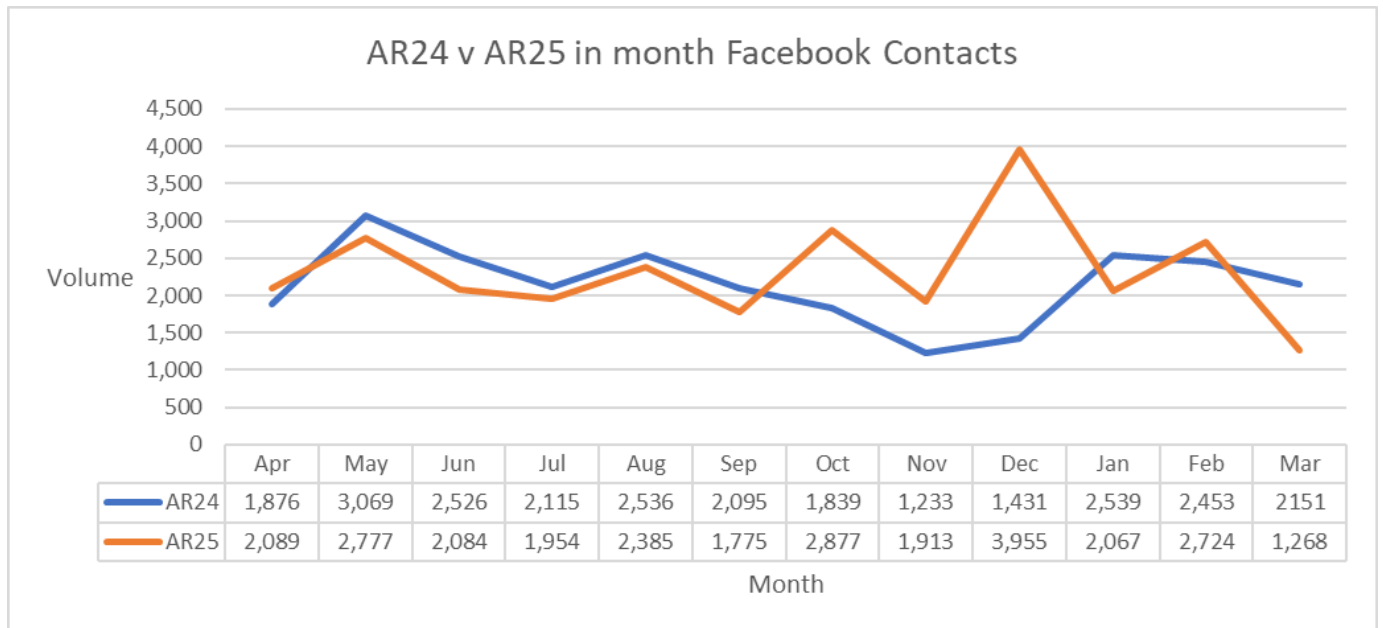
Figure 23: Social Media contacts per month for AR22 and AR25.



Line B5.19a Facebook Contacts

There were 27,868 contacts in AR25, compared to 25,863 in AR24, an increase of 2005, or 7.75%. Figure 24 shows the trend through AR25 which has been similar to AR24 for the first 6 months of the year, however in the last 6 months there was a spike in December 2024, which was due to a water pipe burst in Paisley on the 15 December 2024.

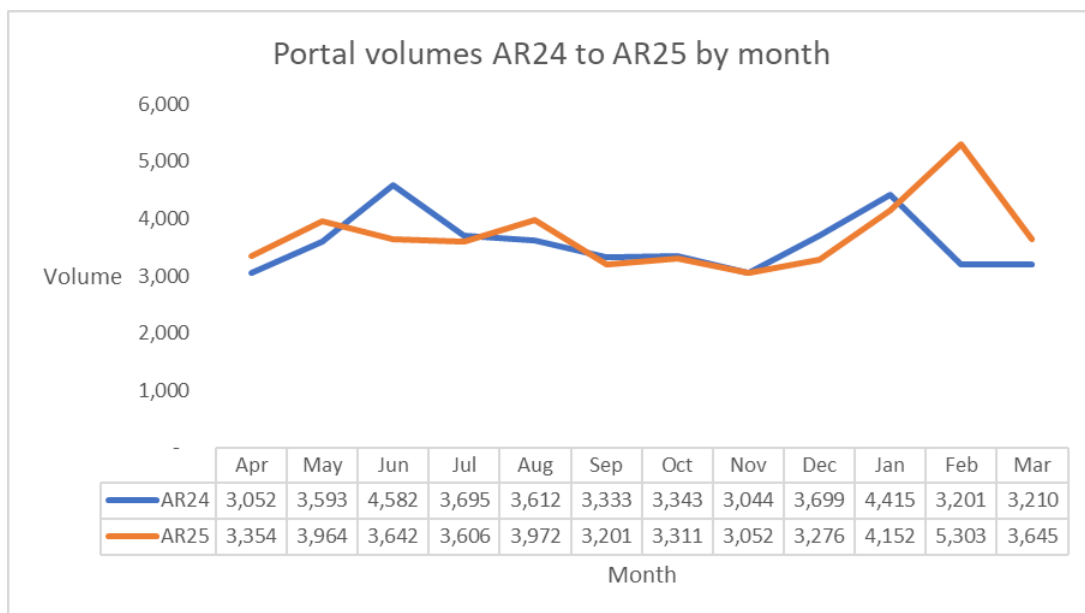
Figure24: Facebook contacts volumes per month for AR24 and AR25



Line B5.20 Portal

“Portal Contacts” increased from 42,779 in AR24, to 44,478 in AR25, an increase of 1,699, or 3.97%. Figure 25 below demonstrates volumes have remained consistent through AR25, with the exception of January 2025 and February 2025 which were impacted by the Glasgow bursts.

Figure 25: Portal contact volumes per month for AR24 to AR25



Line B5.21 Total Contacts

AR25 saw a decrease in the total number of contacts from 351,351 in AR24, to 331,070 in AR25, down 20,281, or 5.77%.

This performance varied across our customer contact channels with phone and social media contacts decreasing, whilst email and portal contacts increased.

Line B5.22 Wanted Contact

"Wanted Contact" decreased from 46,062 in AR24, to 45,999 in AR25 a decrease of 63, or 0.13%.

In AR25, a decision was made to improve our data capture of customer calls, which included more coaching time for our call Advisers. One of the benefits has been improved data capture which has allowed for more calls to be categorised as wanted contacts.

Line B5.23 Non-household Contacts

"Non-household Contacts" increased from 20,481 in AR24, to 22,351 in AR25, an increase of 1,870, or 9.13%. Refer to **Line B6.14** for further details.

Line B5.24 Total Service Issue Contacts (total 'unwanted' HH contacts)

This is the same as **Line B5.6** (262,720).

Lines B5.25-B5.30 - Household Customer Experience

These lines report the various numbers of survey responses and are used to calculate components of the hCEM qualitative score.

Line B5.25 Customer experience survey – total

This increased from 16,534 in AR24, to 18,293 for AR25, an increase of 1,759, or 10.63%.

Line B5.26 Customer experience survey – satisfied

This increased from 15,521 in AR24, to 17,223 for AR25, an increase of 1,702, or 10.96%.

Line B5.27 No experience, no contact survey – total

The total increased from 4,243 in AR24, to 4,506 in AR25, an increase of 263, or 6.19%.

Line B5.28 No experience, no contact survey – satisfied

This increased from 3,751 in AR24, to 4,054 in AR25, an increase of 303, or 8.07%.

Line B5.29 Experience, no contact survey – total

This decreased from 1,171 in AR24, to 1,088 in AR25, a decrease of 83, or 7.09%.

Line B5.30 Experience, no contact survey – satisfied

This decreased from 856 in AR24, to 783 in AR25, a decrease of 73, or 8.48%.

6.2.4 Lines B5.31-B5.42 - Household Customer Experience Measure**Line B5.31 Household customer experience target (range)**

This changed to a target range of 85.0-87.78 for AR24, and has remained unchanged for AR25. For the purpose of the WICS' information request, we have established a baseline figure of 85, which is the lower point of the target.

Line B5.32 Household customer experience - total score

This is the same as **Line B5.1** (87.37)

The reported score in this line is the sum of **Lines B5.34 and B5.39**. The confidence grade for this line is B3 reflecting the confidence grades for **Lines B5.34 and B5.39**.

Line B5.33 Total connected properties at year end

The total is 2,668,004 for AR25. This represents an increase from the 2,648,549 reported in AR24, of 19,455. As in previous years, we cannot calculate this number using the definition provided, as we cannot count connections to individual properties. As such, this figure is the sum of **Lines A1.6 and A1.7**, which is the total number of properties (measured and unmeasured) connected to Water. Water is used as proxy for total connected properties as it has a higher number of connected properties compared to Wastewater.

Line B5.34 hCEM quantitative score

The score was 44.10 for AR25. This represents an increase of 0.52 from the score of 43.58, as reported in AR24. The improved score was mainly driven by reductions in the “Service Issue Contacts” and “Escalation” elements in **Lines B5.35 and B5.36** below. For clarity, this represents a decrease of 4.10 points lost in AR25, compared to 4.48 in AR24, for “Service Issue Contacts” and a decrease of 0.55 points in AR25, compared to 0.68 in AR24, for “Escalations”.

The confidence grade is A3 to reflect the confidence grade allocated to one of the component lines (**Line B5.35 which is A3**).

Line B5.35 Service issue contacts (points lost)

This is 4.10 for AR25 and represents a decrease of 0.38 from 4.48, as reported in AR24. For further details refer to **Line B5.6**.

Line B5.36 Escalations (points lost)

This is 0.55 for AR25 and represents a decrease of 0.13 from 0.68, as reported in AR24. For further details refer to **Line B5.5**.

Line B5.37 Written complaints (points lost)

This is 1.22 for AR25 and represents a decrease of 0.04 from 1.26, as reported in AR24. For further details refer to **Line B5.7**.

Line B5.38 Regulator upheld complaints (points lost)

This is 0.03 for AR25 and represents an increase from 0 as reported in AR24.

Line B5.39 hCEM qualitative score

This is 43.27 for AR25 and represents an increase of 0.23 from 43.04, as reported in AR24. The change to the score was driven by the “No Experience No Contact” and “Customer Experience Survey” elements.

The confidence grade for this line is B2 to reflect the lowest confidence grade allocated to the component **Line B5.40**

Line B5.40 Customer experience survey (points lost)

This is 1.71 for AR25 and represents a decrease of 0.08 from 1.79, as reported in AR24. For further details refer to **Line B5.2**.

The score reported in this line is calculated using the values reported in **Lines B5.2, B5.25 and B5.26**. All four lines have the same confidence grade, B2.

Line B5.41 No experience, no contact (points lost)

This is 1.76 for AR25 and represents a decrease of 0.27 from 2.03, as reported in AR24. For further details refer to **Line B5.3**. The score reported in this line is calculated using the values reported in **Lines B5.3, B5.27 and B5.28**, all of which have a confidence grade of A2. Therefore, the confidence grade for **Line B5.41** is A2.

Line B5.42 Experience, no contact (points lost)

This is 3.26 for AR25 and represents an increase of 0.12 from 3.14, as reported in AR24. For further details refer to **Line B5.4**.

The score reported in this line is calculated using the values reported in **Lines B5.4, B5.29 and B5.30**. All have a confidence grading of A2. Therefore, the confidence grade for **Line B5.42** is A2.

6.2.5 Lines B5.31-B5.42 - Household Customer Experience Measure

The UK Customer Satisfaction Index (UKCSI) is a national benchmark of customer satisfaction conducted by the Institute of Customer Service. Through an online questionnaire conducted twice per year, it asks over 10,000 customers to rate their experiences of dealing with over 200 organisations across 13 sectors.

There is the national survey published by the Institute; organisations need a minimum of 48 responses to appear in this. Given this low and volatile base size (in the past Scottish Water has not appeared in the national results), the Institute also conduct a business benchmarking survey on Scottish Water's behalf which is boosted to 1000 responses.

Both Scottish Water's national **Line B5.43c** (76.1, +0.5) and business benchmark **Line B5.43d** (77.9, +0.9) overall scores have increased in January 2025's wave. Using the more robust benchmarking results, Scottish Water currently rank 1st in the UK Water Sector and 3rd in the Utilities Sector.

The Water Sector overall has been in decline since July 2022, and is currently at lowest ever levels of satisfaction (68.7). This has been driven by significant decreases in overall satisfaction with water companies down south. Questions related to 'emotions and ethics' are at lowest ever levels for the water sector, including – reputation, doing the right thing in business practices, being open and transparent and trust. Scottish Water is performing comparatively well; ranking 1st for these questions in the sector.

Line 5.43a UKCSI national sample - July

This is a new line for AR25 and we are reporting 75.6.

Line 5.43b UKCSI boosted sample - July

This is a new line for AR25 and we are reporting 77.0

This is referred to as the business benchmark in the summary above.

Line 5.43c UKCSI national sample - January

This is a new line for AR25 and we are reporting 76.1.

Line 5.43d UKCSI boosted sample - January

This is a new line for AR25 and we are reporting 77.9

This is referred to as the business benchmark in the summary above.

6.3 Data

6.3.1 Data sources and confidence grades

Data for these tables are derived from Scottish Water's corporate systems. The details can be found in the hCEM Reporter's report. For clarity, phone call volumes come from *Puzzle* our telephony management system, social media volumes come from *Orlo*. emails, portal contacts, wanted contacts, escalations, formal complaints, and regulatory upheld complaints are taken from our Customer Relationship Management system *MS Dynamics*. Customer Experience Survey data is provided by *Rant and Rave* with "No Experience No Contact" and "Experience No Contact" data being provided by YouGov.

There are no changes to confidence grades, however Line B5.34a-d have been give confidence grades of A2.

6.3.2 Data improvement programmes

No significant data improvements were carried out in the year.

6.3.3 Assumptions used for forecast data

In our forecasting for AR25, we have selected a mid-point from our predicted range for each of the individual hCEM components. However, for forecasting the Overall hCEM Score we have calculated that score using the individual mid-point values forecast for each component.

7 Table B6: Non household customer service

7.1 Introduction

The purpose of the Non-household Customer Experience Measure (nhCEM) and the Development Customer Experience Measure (dCEM) is to capture the service levels delivered to non-household and development customers and provide a robust means of measuring the quality of, and tracking changes in, the service experience provided to those customers. Performances against several quantitative and qualitative indicators are combined to produce an Annual Score out of 100 for each measure.

The dCEM went live during AR24.

7.2 Performance Trends

The nhCEM finished the year at 89.35, slightly below AR24. The measure saw reductions in the number of Escalations and Formal Complaints, which was offset by a higher number of Service Issue Contacts, along with slightly lower satisfaction levels in the two Qualitative elements.

Table 26 below shows the total nhCEM points lost between AR24 and AR25, which outlines a decrease of 0.44 points. As per Table A, the Quantitative points have increased, but this has been offset by the Qualitative points which have decreased.

Table 26 – AR25 v AR24 score by Quantitative and Qualitative

	AR24	AR25	AR25 v AR24
Quantitative	45.96	46.10	0.14
Qualitative	43.83	43.25	-0.58
Total nhCEM Score	89.79	89.35	-0.44

On the Quantitative side, we have seen Service Issue Contacts increase from 28,091 in AR24 to 30,209 in AR25, resulting in a loss of 0.14 points year on year. Formal Complaints reduced from 138 in AR24 to 127 in AR25, resulting in an improvement in points lost, of 0.14 points year on year. Escalations reduced from 67 in AR24 to 44 in AR25, resulting in an improvement in points lost, of 0.14 points year on year. Regulator Upheld Complaints were 0 in both years with no points lost. The total Quantitative Points lost in AR24, compared to AR25, decreased by 0.14 points year on year.

On the Qualitative side, both satisfaction measures dipped in AR25 compared to AR24. The Licensed Provider Satisfaction score decreased slightly from 99.34% in AR24, to 99.30% in AR25, resulting in a loss of 0.10 points year on year. The Business End User Satisfaction score decreased from 90.99% in AR24 to 89.62% in AR25, resulting in a loss of 0.47 points year on year. The total Qualitative points lost in AR24, compared to AR25, increased by 0.58 (rounded up to 2 decimal places) points year on year.

dCEM had a very positive year, with the score finishing significantly above the AR24 score. The AR24 score was reported in the old methodology, however we have been able to replicate what the AR24 score would be under the AR25 methodology, and this has also improved. There were positive improvements in all the elements, apart from Formal Complaints, which remained at the same level as AR24.

Most of the improvements to the score related to the Survey Satisfaction results, where both elements ended the year with significantly higher average scores than AR24, contributing towards the highest recorded year to date dCEM score since the measure went live in April 2023. The performance was positively impacted by the dCEM recovery and improvement mission, which was created in AR24 with key stakeholders to improve our Developer customers' experience and in turn, improve the score.

7.2.1 Lines B6.1-B6.7 - Non-household CEM

Line B6.1 nhCEM overall score

This has decreased from 89.79 in AR24, to 89.35 for AR25, a decrease of 0.44 points, or 0.49%.

There were a mixture of results within the Quantitative and Qualitative measures in AR25 – see the paragraphs below.

The Quantitative measure saw an increase in Service Issue Contacts in AR25, compared to AR24 (see **Line B6.4** below), but fewer Formal Complaints (see **Line B6.5** below) and fewer Escalations (see **Line B6.6** below). The net result was an increase in the Quantitative score from 45.96 in AR24, to 46.10 in AR25 – an increase of 0.14 nhCEM points (see **Line B6.42** below)

The Qualitative measure for the Licenced Provider (LP) 12-month score weighted decreased from 6.91 in AR24, to 6.88 in AR25 (see **Line B6.47** below). This decrease was mirrored in the Business End User 12-month score weighted, which fell from 5.61 in AR24, to 5.50 in AR25 (see **Line B6.48** below). This resulted in an overall decrease in the Qualitative score from 43.83 in AR24, to 43.25 in AR25 – a decrease of 0.58 nhCEM points (see **Line B6.49** below).

Line B6.2 LP Experience Survey

This score decreased from 99.34% in AR24, to 99.30% in AR25, a decrease of 0.04%. The number of surveys returned decreased from 1657 in AR24, to 853 in AR25, a decrease of 804 surveys, or 48.52% (see **Table 27** below).

Table 27: LP Experience Surveys

	1	2	3	4	4 - 2	3 - 1	3-1 (as %)
LP Surveys	AR24	% of Total	AR25	% of Total	% Movement in Proportion	Volume Movement	Volume Movement %
Score 1-4	11	0.66%	6	0.70%	0.04%	-5	-45.45%
Score 5-7	1646	99.34%	847	99.30%	-0.04%	-799	-48.54%
Total Returns	1657	100.00%	853	100.00%		-804	-48.52%

Survey returns for AR25 have reduced compared to AR24. Some of the reduction was a result of fewer surveys returned in the first two months of AR25 due to an issue with the LP surveys being blocked by the email protection firewall. After investigation, it was resolved at the end of May 2024, and volumes began to return to expected levels.

In addition, there has been a notable decrease in return volumes in AR25, with some LP return volumes lower than AR24. Contact has been made to encourage further returns via newsletters and direct conversations, however participation is at the LP's discretion.

The confidence grade for this line is A2, to reflect the confidence grades in **Lines B6.21 – B6.24, B6.47 and B6.50**.

Line B6.3 Business End User (BEU) Survey

This score decreased from 90.99% in AR24 to 89.62% in AR25, a decrease of 1.37%.

Table 28 below illustrates the movement of returns in AR25 compared to AR24. The total number of survey returns fell slightly, from 888 in AR24, to 867 in AR25, a reduction of 21 survey returns, or 2.36%.

As the table shows, AR25 had a higher proportion of survey scores in the 'dissatisfied' bracket (scores of 1-4), increasing from 80 in AR24 to 90 (an increase of 10 or 12.50%). In addition, there was a lower proportion of survey scores in the 'satisfied' bracket (scores of 5-7), decreasing from 808 in AR24 to 777 (a reduction of 31, or 3.84%).

The combination of these changes resulted in a lower overall satisfaction % year on year, from 90.99% to 89.62%

The confidence grade for this line is B2, to reflect the confidence grades in **Lines B6.25, B6.26 and B6.48 and B6.51.**

Table 28: BEU Surveys

	1	2	3	4	4 - 2	3 - 1	3-1 (as %)
BEU Surveys	AR24	% of Total	AR25	% of Total	% Movement in Proportion	Volume Movement	Volume Movement
Score 1-4	80	9.01%	90	10.38%	1.37%	10	12.50%
Score 5-7	808	90.99%	777	89.62%	-1.37%	-31	-3.84%
Total Returns	888	100.00%	867	100.00%		-21	-2.36%

Table 29 - BEU Surveys - Change in profile AR25 v AR24

Case Type Profile	AR24			AR25			AR25 v AR24		
	All Returns	Satisfied	%	All Returns	Satisfied	%	All Returns	Satisfied	%
BEU - Infrastructure	1	1	100.00%	0	0	0.00%	-1	-1	-100.00%
BEU - Waste Water	299	278	92.98%	297	270	90.91%	-2	-8	-2.07%
BEU - Water Quality	18	13	72.22%	6	4	66.67%	-12	-9	-5.56%
BEU - Water Repairs	42	35	83.33%	74	53	71.62%	32	18	-11.71%
BEU - Water Supply	257	225	87.55%	215	188	87.44%	-42	-37	-0.11%
Septic Tanks nHH	271	256	94.46%	275	262	95.27%	4	6	0.81%
	888	808	90.99%	867	777	89.62%	-21	-31	-1.37%

As can be seen from Table 29 above, most of the case types show a reduction of satisfaction % from AR25 v AR24, except for Septic Tanks nHH (non Household). Whilst the total of all returns only fell by 21, the total number of satisfied returns fell by 31, which resulted in an overall satisfaction drop of 1.37%.

The main drivers for the change in the BEU surveys AR25 v AR24 were a reduction in satisfaction in BEU – Water Repairs and BEU – Water Supply. Although the number of satisfied returns for BEU – Water Repairs increased from 35 in AR24 to 53 in AR25, the proportion to the total returns has decreased and overall satisfaction has dropped by 11.71%. The number of satisfied returns for BEU – Water Supply fell from 225 in AR24 to 188 in AR25, however the proportion of the total returns was similar, with the overall satisfaction only dropping 0.11%.

Line B6.4 Service issue contacts (WSD & CSC)

The number of contacts in this category increased from 28,091 in AR24, to 30209 in AR25, an increase of 2,118 contacts, or 7.54%.

Table 30 below demonstrates increases across the majority of Wholesale Service Desk components, supplemented by an increase in the Customer Engagement components.

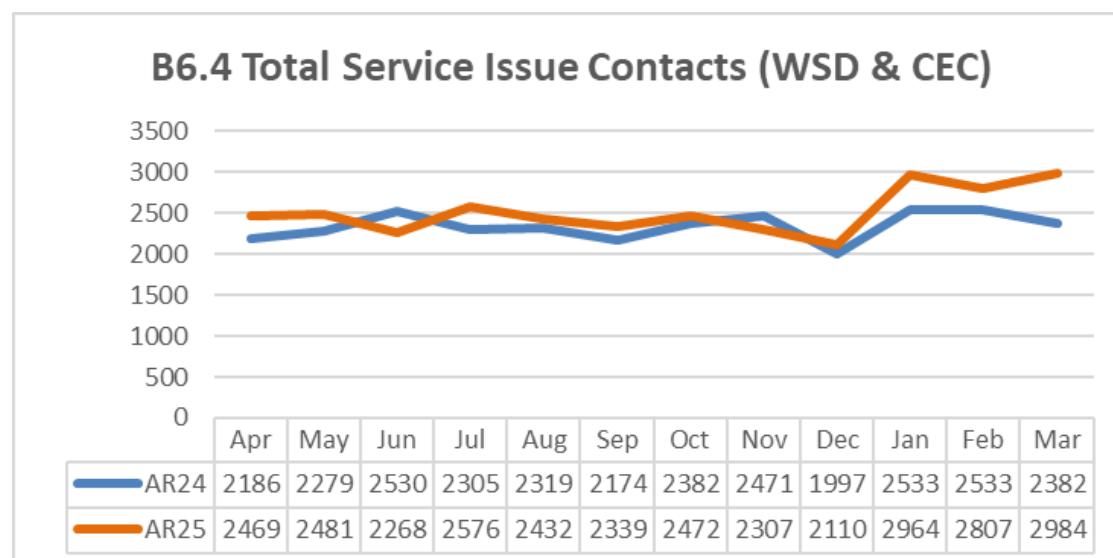
Table 30: Total contacts broken down by contact channel.

Service Issue Component	B6 Table ref		AR24	AR25	Change	% Change
Service Issue Contacts - WSD All Calls	B6.8	+	2941	2986	45	1.53%
Service Issue Contacts - WSD Total Emails	B6.9	+	3164	3198	34	1.07%
Service Issue Contacts - WSD Total Portal	B6.10	+	19384	21719	2,335	12.05%
Service Issue Contacts - WSD Bulk Uploads	B6.11	+	506	293	-213	-42.09%
Service Issue Contacts - WSD Total Wanted	B6.12	-	13223	14728	1,505	11.38%
Service Issue Contacts = Wholesale Service Desk	B6.13	=1	12772	13468	696	5.45%
Service Issue Contacts - CEC All Contacts	B6.14	+	20481	22351	1,870	9.13%
Service Issue Contacts - CEC Wanted Contacts	B6.15	-	5162	5610	448	8.68%
Service Issue Contacts - Customer Engagement Centre	B6.16	=2	15319	16741	1,422	9.28%
Total Service Issue Contacts	B6.17	=1 + 2	28091	30209	2,118	7.54%

This is further covered in the commentary relating to Service Issue Contacts - **Lines B6.8 to B6.16**.

These figures are brought forward from **Line B6.17**. The total monthly volumes are presented in Figure 26 below, which shows a similar trend through the year, and an increase from January 2025, due to a rise in contacts via the CEC. The annual breakdown of these totals by component is shown in Table 30 above.

Figure 26: Volume of service issue contacts (WSD and CEC) by month for AR24 and AR25.



The confidence grade for this line is A3.

Line B6.5 Formal complaints

Formal Complaints decreased from 138 in AR24 to 127 in AR25. This represents a decrease of 11 complaints, or 7.97%. Table 31 below shows the 3 main areas where formal complaints have changed year on year. The main areas that saw a reduction were Wastewater (-14) and Water Supply (-9). This was offset by a rise in complaints relating to Planned Works / Maintenance (+11).

Table 31: Main changes in formal complaints AR24 v AR25

Formal Complaints						
Service Reason	AR24	% of all complaints	AR25	% of all complaints	Volume Change AR25 v AR24	% Change AR25 v AR24
Planned Works/ Maintenance	6	4.35%	17	13.39%	11	9.04%
Waste Water	47	34.06%	33	25.98%	-14	-8.07%
Water Supply	69	50.00%	60	47.24%	-9	-2.76%

In AR25, complaints relating to Water Supply constituted 47.24% of all complaints received, down 2.76% on AR24. Complaints relating to Wastewater constituted 25.98% of all complaints received, down 8.07% on AR24. However, complaints relating to Planned Works/Maintenance constituted 13.39% of all complaints received, up 9.04% on AR24

This figure has been brought forward from **Line B6.19**.

Line B6.6 Escalations

Escalations decreased from 67 in AR24, to 44 in AR25, a drop of 23 escalations, or 34.33%. This figure has been brought forward from **Line B6.18**.

In AR24, there were 43 escalations via the Wholesale Desk and 24 via the Customer Engagement Centre (total = 67).

In AR25, there were 33 escalations via the Wholesale Desk and 11 via the Customer Engagement Centre (total = 44).

The tables below break down the escalations raised via the Wholesale Service Desk (Table 32) and the Customer Engagement Centre (Table 33) by service reason and compare AR25 with AR24.

The number of Wholesale Service Desk escalations were 33 in AR25, compared to 43 in AR24. A reduction of 10, or 23.26%.

Table 32: Wholesale Service Desk escalations main volume changes by service reason and month for AR25, and change compared to AR24.

Escalations Via the Wholesale Service Desk			
Service Reason	AR24	AR25	Volume Change AR25 v AR24
Deregistration	6	4	-2
Gap Site	2	0	-2
LP General Enquiry	5	3	-2
Shared Supply	4	1	-3
SW Meter Fault and Repair	2	4	2
SW Permanent Disconnection	6	2	-4

Table 32 shows a reduction across various service reasons where there has been significant volume change with the exception of Scottish Water Meter Fault and Repair.

The number of Customer Engagement Centre Escalations were 11 in AR25, compared to 24 in AR24. A reduction of 13, or 54.17%.

Table 33: Customer Engagement Centre escalations main volume change by service reason and month for AR25, and change compared to AR24.

Escalations Via the Customer Engagement Centre			
Service Reason	AR24	AR25	Volume Change AR25 v AR24
Choke / Blockage	10	2	-8
General Enquiry	4	2	-2
Location Mains/Services/Sewers	2	0	-2
Toby	2	0	-2

The main movement was in the service reason Choke/Blockage which reduced by 8, as per Table 33 above.

Line B6.7 Regulatory complaints

There were 0 regulatory upheld complaints in AR25, and this mirrors our performance from AR24. This figure was brought forward from **Line B6.20**.

7.2.2 Lines B6.8-B6.17 - Service Issue Contacts - Non-household customers

Service Issue Contacts were up 2,118, or 7.54%, from AR24 (refer to the commentary in **Line B6.4** above).

Line B6.8 Contacts from Licenced Providers (LPs) via Wholesale Desk and Portal - all calls

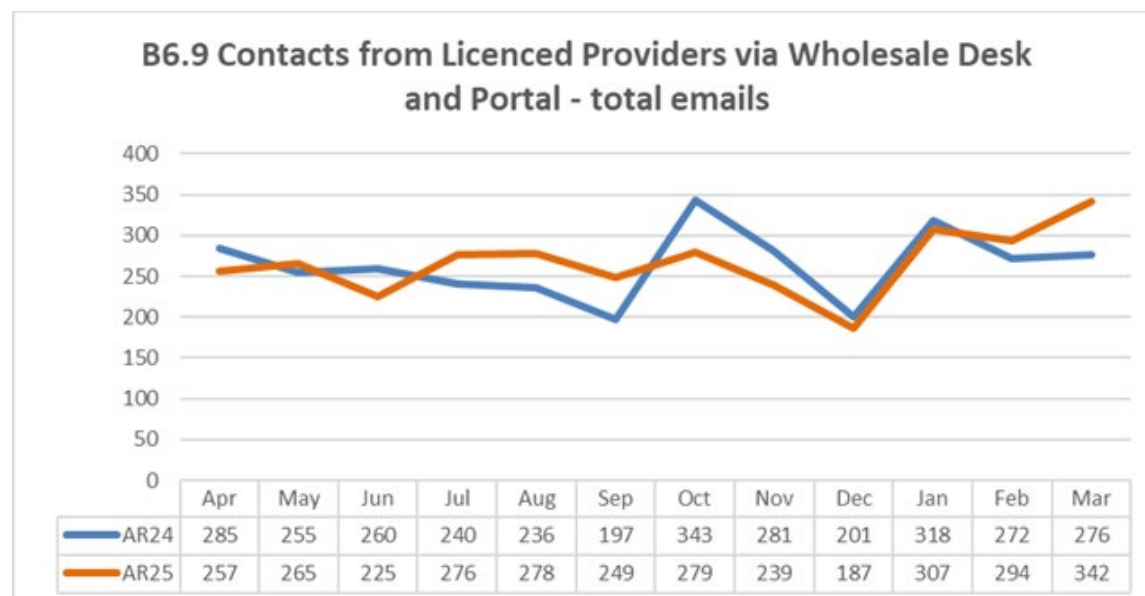
These contacts increased from 2,941 in AR24, to 2,986 in AR25, an increase of 45, or 1.53%. AR25 has seen a marginal increase in calls compared to AR24, with fluctuations throughout the year.

Line B6.9 Contacts from Licenced Providers via Wholesale Desk and Portal - total emails

These contacts increased from 3,164 in AR24 to 3,198 in AR25, an increase of 34, or 1.07%.

AR25 has seen a marginal increase in email contacts compared to AR24, with fluctuations throughout the year, see Figure 27 below. The main changes are decreases in emails relating to Deregistration (-26) and Gap Sites (-30), with increases in emails relating to General Enquiries (+89), which spiked in March 2025.

Figure 27: Volume of contacts from Licenced Providers via Wholesale Desk and Portal (total emails) by month for AR24 and AR25.



Line B6.10 Contacts from Licenced Providers via Wholesale Desk and Portal - total Portal

These contacts increased from 19,384 in AR24, to 21,719 in AR25, an increase of 2,335, or 12.05%. Table 34 below shows the main Service Reason changes between AR24 and AR25.

Table 34: Main changes in contacts from Licenced Providers via Wholesale Desk and Portal (total Portal) - AR25 v AR24

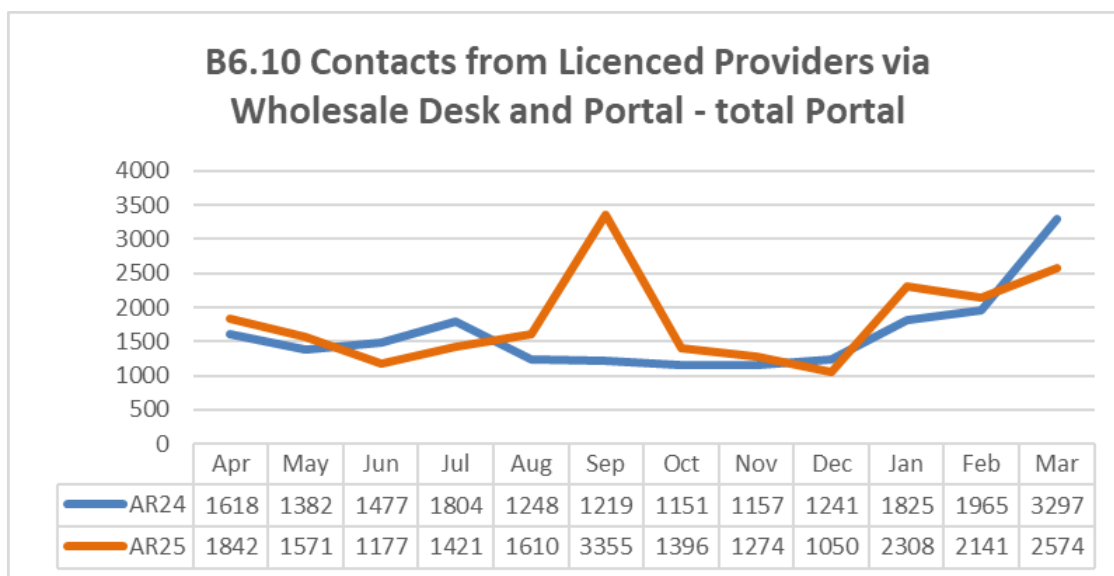
	AR24	AR25	AR25 v AR24
Charitable Exemption	7291	8219	928
Gap Incentive	530	271	-259
LP Temporary Disconnection	548	833	285
Meter Verification	2250	2679	429
SW Meter Fault and Repair	2266	2738	472
TPR, LRV, MT & Address	482	699	217

The increase in the Charitable Exemption totals may be attributed to more charities being awarded charitable status, which qualify them for exemption. The increases in Meter Verifications, Meter Fault Repairs and LP Temporary Disconnections were mainly due to three different Licenced Providers who experienced backlogs and resourcing issues in relation to these job types, which caused a cross over between the last quarter of AR24 and the first quarter of AR25.

The increase in Third Party Reference, Live rateable value, multi tenancy (Third Party Reference, Live Rateable Value, and Multi tenancy) & Addresses is a result of Scottish Water receiving more address updates from LPs, particularly in April 2024, when we received a batch of TPRs from one LP, mainly relating to updating Supply Point IDs (SPID) with troughs.

Figure 28 below shows the profile for AR25 contacts is broadly in line with AR24, except for an increase in September 2024, due to contacts related to charitable exemptions. Exempt customers are required to reapply for exemption each year, confirming their continuing eligibility. This normally happens in the month of March when LPs submit them in bulk, just before the end of the financial year, however in AR25, an LP submitted their charitable exemptions in September rather than March. Figure 28 shows that September volumes spiked, and March fell, as a result.

Figure 28: Volume of contacts from Licenced Providers via Wholesale Desk and Portal (total Portal) by month for AR24 and AR25.



Line B6.11 Contacts from Licenced Providers via Wholesale Desk and Portal - Bulk Uploads

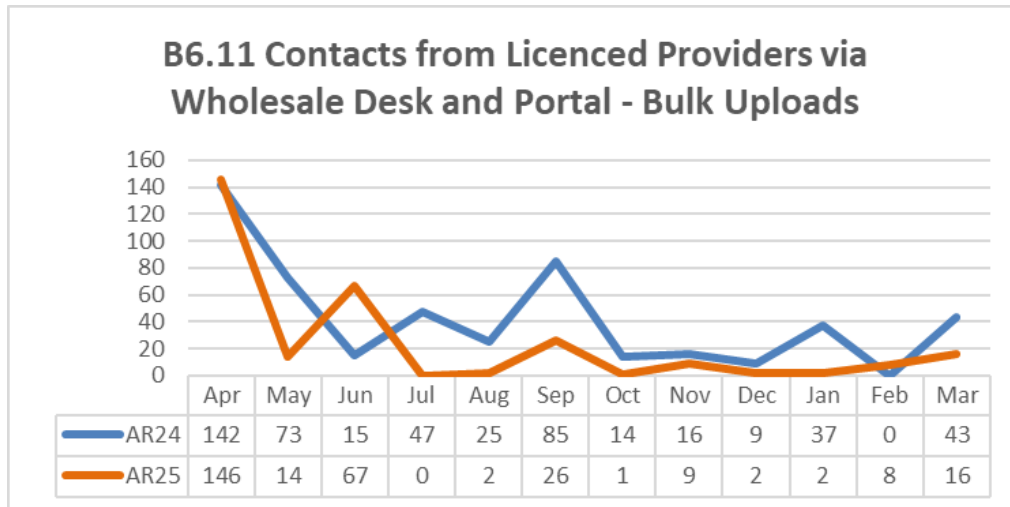
Contacts decreased from 506 in AR24, to 293 in AR25, a reduction of 213, or 42.09%. Table 35 shows the main changes year on year.

Table 35: Main changes in contacts from Licenced Providers via Wholesale Desk and Portal (bulk uploads) AR25 v AR24

	AR24	AR25	AR25 v AR24
Gap Site	433	159	-274
TPR, LRV, MT & Address	70	131	61

Figure 29 below shows contacts in April 2025 mirrored April 2024, then reduced throughout the remainder of the year as they were submitted through the portal instead.

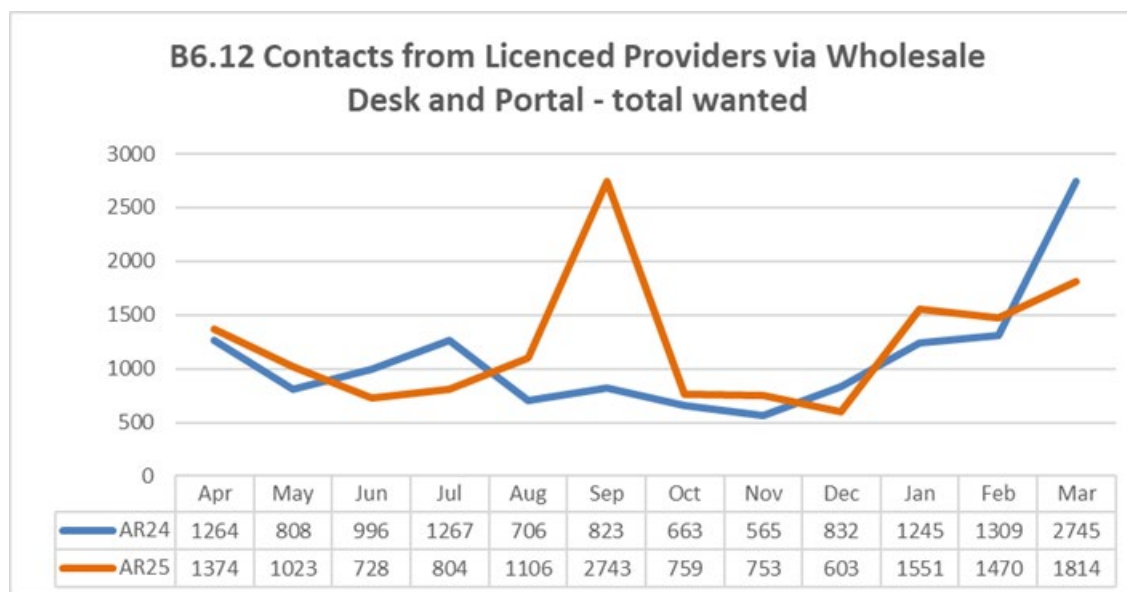
Figure 29: Volume of contacts from Licenced Providers via Wholesale Desk and Portal (bulk uploads) by month for AR24 and AR25.



Line B6.12 Contacts from Licenced Providers via Wholesale Desk and Portal - total wanted
 These increased from 13,223 in AR24, to 14,728 in AR25, an increase of 1,505, or 11.38%.

Figure 30 shows a spike in September and March, which is related to LPs requesting Charitable Exemptions as noted for **Line B6.10**.

Figure 30: Volume of contacts from Licenced Providers via Wholesale Desk and Portal (total wanted) by month for AR24 and AR25.



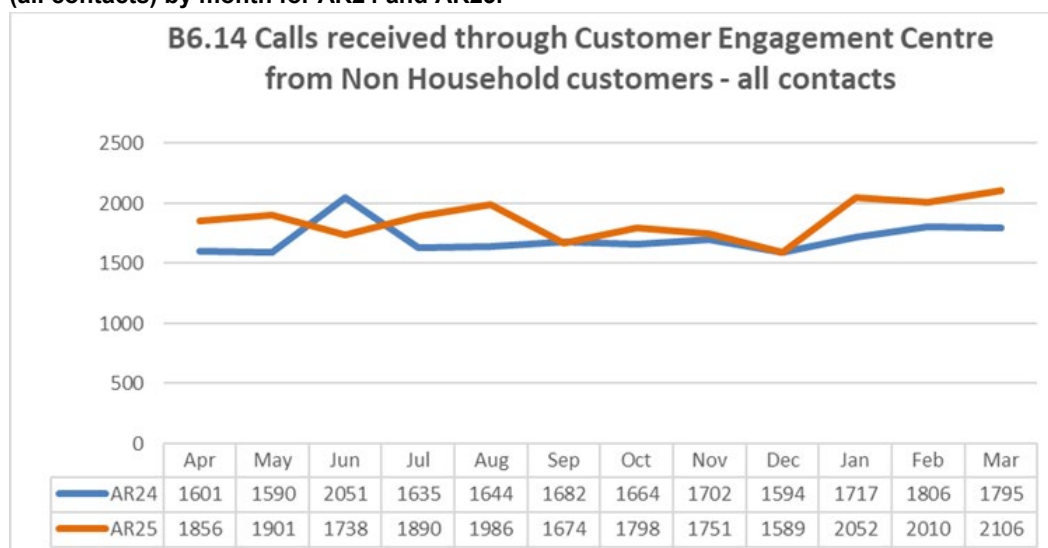
Line B6.13 Contacts from Licenced Providers via Wholesale Desk and Portal - contacts adjusted for permitted exclusions

Contacts, adjusted for permitted exclusions, increased from 12,772 in AR24 to 13,468 in AR25, an increase of 696, or 5.45% (the reason for this is explained in the narrative to **Lines B6.8 to B6.12** above).

Line B6.14 Calls received through Customer Engagement Centre from Non-household customers - all contacts

These contacts increased from 20,481 in AR24, to 22,351 in AR25, an increase of 1,870 or 9.13%. Contacts were broadly in line with AR24, with the exception of a spike in the last quarter of AR25, as per Figure 31.

Figure31: Volume of calls received through Customer Engagement Centre from Non-household customers (all contacts) by month for AR24 and AR25.



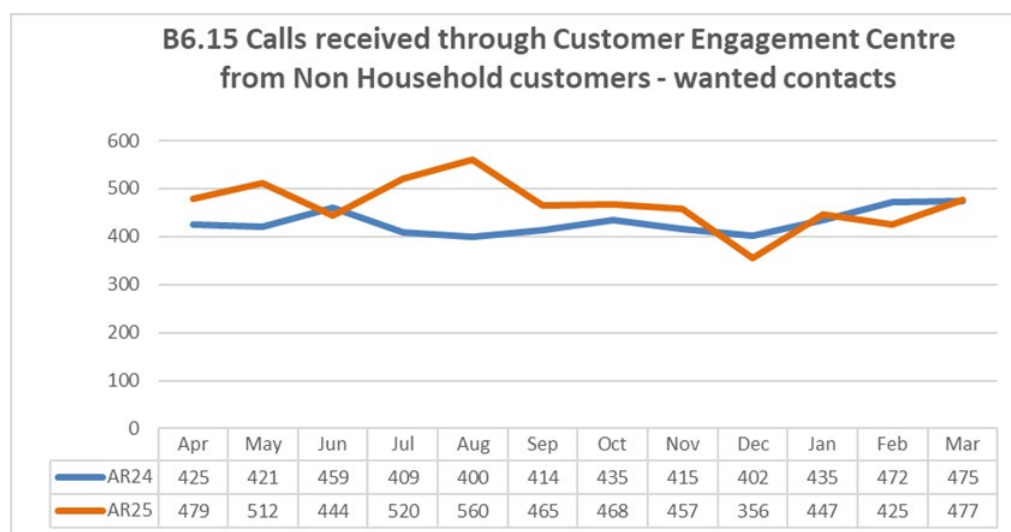
Line B6.15 Calls received through Customer Engagement Centre from Non-household customers - wanted contacts

Contacts increased from 5,162 in AR24, to 5,610 in AR25, an increase of 448, or 8.68%.

In AR25, the increase was in relation to Lead Renewal and Shipping Water, both of which peaked in July and August, but fell in the last 6 months of the year.

Figure 32 below shows the wanted contacts trend for AR24 and AR25.

Figure 32: Volume of calls received through Customer Engagement Centre from Non-household customers (wanted contacts) by month for AR24 and AR25.



Line B6. 16 Calls received through Customer Engagement Centre from Non-household customers - contacts adjusted for permitted exclusions

Contacts increased from 15,319 in AR24, to 16,741 in AR25, an increase of 1422, or 9.28%. The reason for this is explained in the narrative in **Lines B6.14 to B6.15** above.

Line B6.17 Non-household service issue contacts - Total unwanted contacts

This has been reported in **Line B6.4**, and in the commentary for **Lines B6.8 to B6.16** above. The confidence grade for this line is A3.

7.2.3 Lines B6.18-B6.26 - Non-household Customer experience

Line B6.18 Escalations

This has been reported in **Line B6.6**.

Line B6.19 Formal complaints (Form G)

This has been reported in **Line B6.5**.

Line B6.20 Regulator upheld complaints

This has been reported in **Line B6.7**.

Line B6.21 LP Experience survey – total

This total decreased from 1,657 in AR24, to 853 in AR25, a decrease of 804, or 48.52%. This has been reported in **Line B6.2** above.

Line B6.22 LP Experience survey – satisfied

This total decreased from 1,646 in AR24, to 847 in AR25, a decrease of 799, or 48.54%. This has been reported in **Line B6.2** above.

Line B6.23 Ease of service indicator line 1

As AR24, ease of service is not part of the nhCEM measure.

Line B6.24 Ease of service indicator line 2

As AR24, ease of service is not part of the nhCEM measure.

Line B6.25 Business End-User Experience Survey – total

The total survey returns decreased from 888 in AR24, to 867 in AR25, a decrease of 21, or 2.36%. This has been reported in **Line B6.3** above.

Line B6.26 Business End-User Experience Survey – satisfied

This decreased from 808 in AR24, to 777 in AR25, a decrease of 31, or 3.84%. This has been reported in **Line B6.3** above.

7.2.4 Lines B6.27-B6.38 - Developer CEM

Developer CEM (dCEM) went live during the AR24 period. The following lines measure the performance of the individual elements that make up the overall dCEM score.

Line B6.27 Contacts from developers about water and wastewater connections – total

Contacts from development customers about water and wastewater connections decreased from 122,164 in AR24, to 64,427 in AR25, a decrease of 57,737 contacts, or 47.26%.

We can reclassify Line B6.27 for AR24 into the same methodology used for AR25, and contacts from development customers about water and wastewater connections would be 69,582 under this method. The movement between AR24 and AR25 would therefore be a decrease of 5,155 contacts (from 69,582 to 64,427) – a reduction of 7.41%

Figure 33: Volume of contacts from developers about water and wastewater connections (total) by month for AR24 v AR25

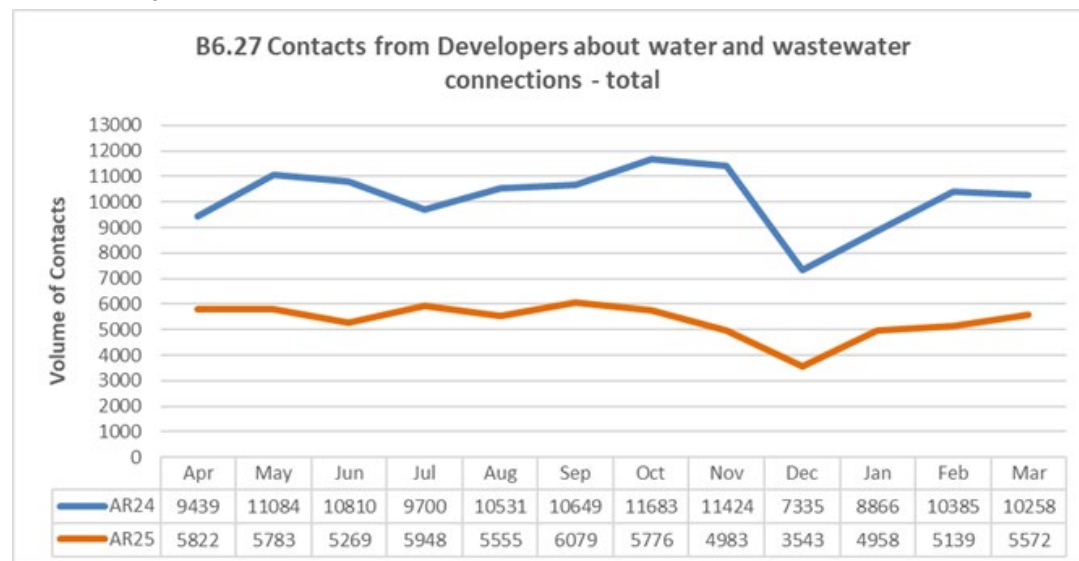
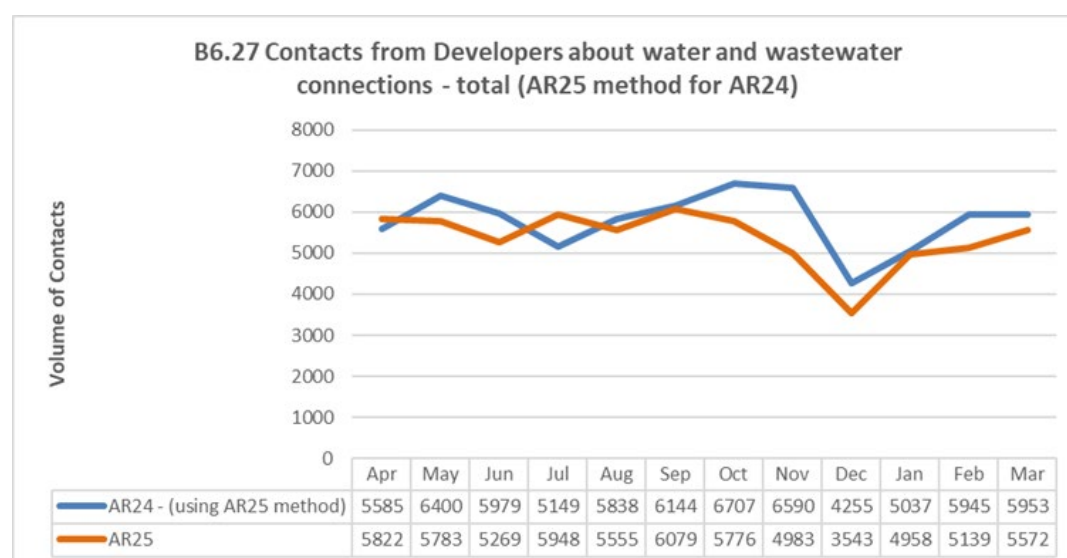


Figure 34 below compares AR24 to AR25, using the same methodology.

Figure 34: Volume of contacts from developers about water and wastewater connections (total) by month for AR24 (AR25 methodology) v AR25



Using the same methodology for both years, contacts in AR25 have broadly followed the same profile month to month as AR24, with the same seasonal drop in December due to the holiday period as per Figure 33 above.

AR25 has seen lower contacts overall, except for April 2024 and July 2024. The improvements over the last 12 months are a result of the targeted programme of improvement established by the dCEM Mission Group. One of the key improvements has been the desire to ensure the survey results are as representative of the whole development community as they can be. Listening post (links within e-mail) are now used by all Development team advisers, and this has led to an increase in the number of survey returns, providing invaluable feedback to inform continuous improvement.

Figure 35 looks at the split of total contacts by input channel, with most customer contacts received via email. Although, an overall reduction we have seen an increase in Portal Requests and Inspection Appointment requests AR24.

Figure 35: Contacts by input channel – old methodology AR24

Contacts by Input Channel	AR24	AR25	AR25 v AR24	% Diff
E Mails	84318	28558	-55,760	-66.13%
Portal requests	19029	19582	553	2.91%
Phone Calls	16581	13723	-2,858	-17.24%
Inspection Appointment Requests	2236	2564	328	14.67%
B6.27 Total	122164	64427	-57,737	-47.26%

Figure 36: Contacts by input channel using AR25 methodology for AR24

Contacts by Input Channel	AR24	AR25	AR25 v AR24	% Diff
E Mails	31736	28558	-3,178	-10.01%
Portal requests	19029	19582	553	2.91%
Phone Calls	16581	13723	-2,858	-17.24%
Inspection Appointment Requests	2236	2564	328	14.67%
B6.27 Total	69582	64427	-5,155	-7.41%

Line B6.28 Contacts from developers about water and wastewater connections - excluded contacts (wanted contacts)

Wanted Contacts decreased from 59,123 in AR24, to 45817 in AR25, a decrease of 13,306, or 22.51%. The contacts have approximately followed the pattern of total connections in Figure R1a above; with a seasonal drop in December due to the holiday period as per Figure 37.

We are able to reclassify Line B6.28 for AR24 into the same methodology used for AR25, and contacts from development customers about water and wastewater connections (wanted contacts) would be 47,354 under this method. The movement between AR24 and AR25 would therefore be a decrease of 1,537 wanted contacts (being 47,354 – 45,817) – a reduction of 3.25%

Figure 38 below compares AR24 to AR25, using the same methodology.

Figure 37: Volume of contacts from developers about water and wastewater connections – excluded contacts (wanted contacts) by month for AR24 v AR25 – old method

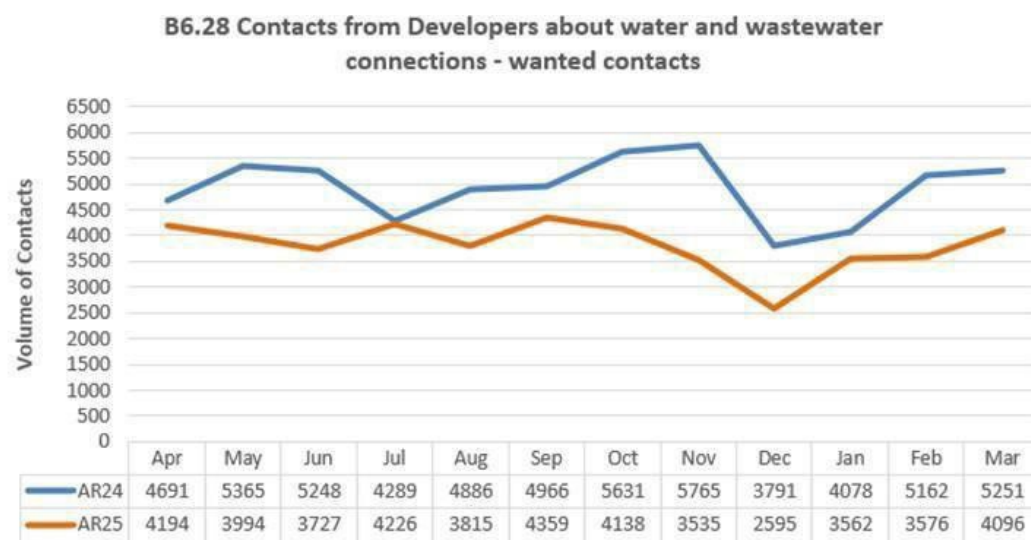
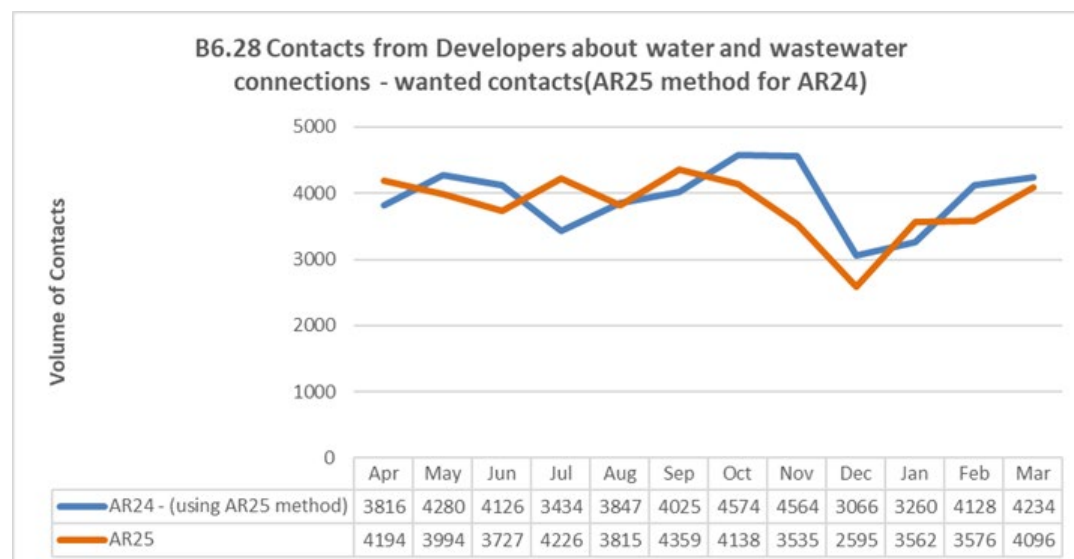


Figure 38: Volume of contacts from developers about water and wastewater connections – excluded contacts (wanted contacts) by month for AR24 v AR25 – new method



Line B6.29 Contacts from developers about water and wastewater connections - contacts adjusted for permitted exclusions

“Unwanted Contacts” after exclusions, decreased from 63,041 in AR24 to 18610 in AR25, a reduction of 44,431, or 70.48%. This total is derived from “Total Contacts” (Line B6.27) less the “Wanted Contacts” (Line B6.28) above, to arrive at a “Net Unwanted Total”.

Using the new methodology for AR24, the Unwanted Contacts after exclusions would decrease from 22,228 to 18,610, a decrease of 3,618, or 16.28%.

The 22,228 is the net of 69,582 – 47,354 (see sections B6.27 and B6.28 for details).

Line B6.30 Development Services escalations

In AR25, we had a total of 3 escalations, down from 6 in AR24, a reduction of 3, or 50.00%. The table below lists the escalation reasons in AR24 and AR25.

Table 36: Escalation reasons

dCEM Escalation Reason AR24 v AR25

Escalation Reason	AR24	AR25
Inspection Request - missed inspection	1	
Framework Partners - delay in attending	1	
Connection - delay in connecting	1	1
Internal Response - delay in responding	1	
GIS Info - delay due to inaccurate data	1	
Connection - issue with cost	1	
Portal - difficulties with process		1
Connections - lack of comms clarity		1
	6	3

Line B6.31 Development Services Formal complaints

In AR25 we had 2 formal complaints, the same as in AR24.

Complaint drivers in AR24 were - a billing issue and dispute over a right to connect.

Complaint drivers in AR25 were - a sewer flooding issue and an inadequate provision of Water and Sewerage Infrastructure.

Line B6.32 Development Services Regulator upheld complaints

In AR25 we had zero Regulator upheld complaints, the same number as AR24.

Line B6.33 Single house connection experience survey – total

In AR25 we had 685 survey returns, up from 295 in AR24 – an increase of 390 returns, or 132.20% (see Table V below). Listening post links are now used by all Development team advisers and this has led to an increase in the number of survey returns providing invaluable feedback to inform continuous improvement.

Line B6.34 Single house connection experience survey – satisfied

In AR25, we had 634 satisfied returns, up from 250 in AR24, an increase of 384 returns, or 153.60% (see B6.33 above regarding the inclusion of Listening Post returns). The satisfaction score (satisfied scores of 5-7) increased from 84.75% in AR24 to 92.55% for AR25, an increase of 7.80% (see Table 37).

Table 37: Single house connection experience survey satisfied scores for AR24 and AR25

	1	2	3	4	4 - 2	3 -1	3-1 (as %)
Developer Service Surveys - Single House	AR24	% of Total	AR25	% of Total	% Movement in Proportion	Volume Movement	Volume Movement %
Score 1-4	45	15.25%	51	7.45%	-7.80%	6	13.33%
Score 5-7	250	84.75%	634	92.55%	7.80%	384	153.60%
Total Returns	295	100.00%	685	100.00%		390	132.20%

Line B6.35 (developer) Ease of service indicator line 1

In AR25 we received 1025 survey returns, up from 539 in AR24, an increase of 486 returns, or 90.17% (see Table W) (see B6.33 above regarding the inclusion of Listening Post returns).

Line B6.36 (developer) Ease of service indicator line 2

In AR25, we received 851 satisfied survey returns, up from 430 in AR24, an increase of 421 surveys, or 97.91% (see B6.33 above regarding the inclusion of Listening Post returns).

The satisfaction score (satisfied scores of 5-7) increased from 79.78% in AR24, to 83.02% for AR25, an increase of 3.24% (see Table 38).

This increase in satisfaction resulted in a reduction of points lost – see **Line B6.62** below. The confidence grade for this line is B2, to reflect the confidence grades in **Line B6.62**.

Table 38: Ease of Service survey satisfied scores for AR24 and AR25.

	3	4	3	4	4 - 2	3 -1	3-1 (as %)
Developer Ease of Doing Business Surveys	AR24	% of Total	AR25	% of Total	% Movement in Proportion	Volume Movement	Volume Movement %
Score 1-4	109	20.22%	174	16.98%	-3.24%	65	59.63%
Score 5-7	430	79.78%	851	83.02%	3.24%	421	97.91%
Total Returns	539	100.00%	1025	100.00%		486	90.17%

Line B6.37 Developer/Connections Experience survey- total

In AR25, we received 456 survey returns, up from 407 in AR24, an increase of 49 returns, or 12.04% (see Table 37).

This increase in satisfaction resulted in a decrease in points lost – see **Line B6.63** below.

Line B6.38 Developer/Connections Experience survey- satisfied

In AR25, we received 339 satisfied survey scores, up from 301 in AR24. The satisfaction score (satisfied scores of 5-7) increased from 73.96% in AR24 to 74.34% in AR25, an increase of 0.38% (see Table 39). There was a slight shift in the proportion of dissatisfied (scores 1-4) and satisfied (scores 5-7). For further details refer to Line B6.60.

The confidence grade for this line is B2, to reflect the confidence grades in **Line B6.62**.

Table 39: Developer / Connections survey satisfied scores for AR24 and AR25.

	3	4	3	4	4 - 2	3 -1	3-1 (as %)
Developer Connections Experience Surveys	AR24	% of Total	AR25	% of Total	% Movement in Proportion	Volume Movement	Volume Movement %
Score 1-4	106	26.04%	117	25.66%	-0.38%	11	10.38%
Score 5-7	301	73.96%	339	74.34%	0.38%	38	12.62%
Total Returns	407	100.00%	456	100.00%		49	12.04%

7.2.5 Lines B6.39-B6.51 - Non-household customer experience measure score

Line B6.39 Non-household customer experience target

In AR24, this was a fixed-target score of 85.4-88.66. The target range in AR25 was 86.0-90.0

Line B6.40 Non-household customer experience - total score

This has been reported under **Line B6.1**

Line B6.41 Connected Non-household properties

This line represents the sum of Lines A1.8 - connected unmeasured non-household properties for water and Line A1.9 - connected measured non-household properties for water. The number of such properties in AR25 is 160,297. This number has decreased from 160,736 reported in AR24, a decrease of 439, or 0.27%.

Line B6.42 nhCEM quantitative score

The nhCEM quantitative score increased in AR25 to 46.10, from 45.96 reported in AR24. This is an increase of 0.14 points, or 0.31%. This is the result of a combined drop in the points lost in the quantitative elements in **Lines B6.43 to B6.46** below, between AR24 and AR25 (which totals 0.14 points).

Line B6.43 Service issue contacts (points lost)

Points lost increased to 46.10 in AR25, from the 1.82 points reported in AR24. This represents an increase of 0.14 points lost, or 7.83%. This reflects the increase in Service Issue Contacts as outlined in **Line B6.4** above.

Line B6.44 Escalations from Licensed Providers (points lost)

The "Escalations" points lost decreased in AR25, to 0.29 from 0.43 reported in AR24. This is a reduction of 0.14 points lost, or 33.51%. This reflects the significant reduction in "Escalations" as outlined in **Line B6.6** above.

Line B6.45 Formal Non-household customer complaints (points lost)

This decreased to 1.65 in AR25, from 1.79 reported in AR24, and represents a decrease of 0.14 points lost, or 7.72%. This reflects the decrease in formal complaints as outlined in **Line B6.5** above.

Line B6.46 Regulator upheld complaints (points lost)

The number of points lost in AR25 was zero, which mirrors the AR24 performance. There were no regulatory upheld complaints in AR25 as outlined in **Line B6.7** above.

Line B6.47 LP experience survey 12-month score weighted

The weighted score in AR25 decreased to 6.88, from 6.91 in AR24, a decrease of 0.03 points, or 0.04%. This reflects the small decrease in the LP Satisfaction score as outlined in **Line B6.2**

above. Survey returns in the dissatisfied bracket of 1-4 are weighted down as per the definition in the nhCEM Definition Document.

Line B6.48 Business end-user experience 12-month score weighted

The weighted score in AR25 decreased to 5.50, from 5.61 in AR24, a decrease of 0.11 points, or 1.97%. This reflects the decrease in the Business End User Satisfaction score as outlined in **Line B6.3** above. Survey returns in the dissatisfied bracket of 1-4 are weighted down as per the definition in the nhCEM Definition Document.

Line B6.49 nhCEM qualitative score

This increased in AR25 to 43.25, from the 43.83 reported in AR24, a decrease of 0.58, or 1.31%. The reported score in this line equates to deducting the values reported in **Lines B6.50 and B6.51** from 50 points (the points apportioned to the Qualitative measure).

B6.50 and B6.51 from 50.00 (the points allocated to the Qualitative Measure).

This is the result of a combined increase in the points lost in the qualitative elements in **Lines B6.50 and B6.51** below for AR25 (which totals 6.74 points).

Line B6.50 LP Experience survey (points lost)

This increased in AR25 to 0.49, from 0.39 reported in AR24. This is an increase of 0.10 points, or 25.64%.

For more details on this refer to **Line B6.2**.

Line B6.51 Business end-user experience (points lost)

This increased in AR25 to 6.25, from 5.78 in AR24, and represents an increase of 0.47 points lost, or 8.13%. For more detail on this refer to **Line B6.3**.

7.2.6 Lines B6.52-B6.63 - Developer customer experience measure score

The purpose of the Developer Customer Experience measure (dCEM) is to inform and drive improvements in service and satisfaction for all those in the Development Community (which includes customers who are making connections to the network for both household and non-household properties) in Scotland. Performance against several Quantitative and Qualitative indicators are combined to produce an Annual dCEM Score out of 100.

The improvements seen over the last 12 months are a result of the targeted programme of improvement established by the dCEM mission. One of the key improvements has been the desire to ensure the survey results are as representative of the whole development community as they can be. Listening post links are now used by all Development team advisers and this has led to an increase in the number of survey returns providing invaluable feedback to inform continuous improvement.

Line B6.52 Developer customer experience target

The target range in AR25 was 78.3-80.5. For the purposes of the WICS' information request, we have established a baseline figure of 78.3, which is the low point of the target range.

Line B6.53 Developer customer experience - total score

In AR25 the score was 82.91, up from 75.92 in AR24, an increase of 6.99 points, or 9.21%.

The confidence grade for this line is B2, reflecting the fact that this line is calculated using the scores reported in Line B6.55 (dCEM Quantitative Score) confidence grade A1 and Line B6.60 (dCEM Qualitative Score) confidence grade B2.

The Quantitative score for AR25 increased to 41.98, from 38.06 in AR24, an increase of 3.92 points, or 10.29%. This was driven by a decrease in points lost for Service Issue Contacts which was slightly offset by an increase in Escalations and Formal Complaints points lost.

The Qualitative score for AR25 increased to 40.93, from 37.86 in AR24, an increase of 3.07 points, or 8.12%. This was driven by a decrease in points lost for both Qualitative measures, the Ease of Service indicator and the Development experience survey (See **B6.61** and **B6.62**).

Line B6.54 Developer Connected properties

The number of Developer Connected properties for AR25 was 16719, down from 37,252 in AR24, a reduction of 20,533, or 55.12%. The reason for the difference is due to the change in methodology as detailed in the paper sent earlier this year, where this number no longer reflects connected properties but the volume of applications and enquiries.

The confidence grading of this line has changed from A3 to A1 due to changes in reporting methodology.

Line B6.55 Developer CEM quantitative score

The developer CEM quantitative score for AR25 was 41.98, up from 38.06 in AR24, an increase of 3.92 points, or 10.29%. Further details of the change are in **Line B6.53** above.

The confidence grading of this line has changed from A3 to A1 due to changes in the connected properties methodology.

Line B6.56 Development services service issue contacts (points lost)

The points lost in AR25 were 7.73, down from 11.75 in AR24, a decrease of 4.02 points, or 34.21%.

The volume of Service Issue Contacts decreased in AR25, as well as Connected Properties also decreasing, which impacted the points lost.

The confidence grading of this line changed from A3 to A1 due to changes in the connected properties methodology.

Line B6.57 Development Services escalations (points lost)

The points lost in AR25 were 0.12, up from 0.11 in AR24, an increase of 0.01 points, or 9.09%.

The confidence grading of this line changed from A3 to A1 due to changes in the connected properties methodology.

Line B6.58 Development Services formal complaints (points lost)

The points lost in AR25 were 0.17, up from 0.07 in AR24, an increase of 0.10 points, or 142.86%

The confidence grading of this line changed from A3 to A1 due to changes in the connected properties methodology.

Line B6.59 Development Services Regulator upheld complaints (points lost)

The points lost in AR25 were zero, the same as AR24.

Line B6.60 Developer CEM qualitative score

The Development CEM qualitative score in AR25 was 40.93, up from 37.86 in AR24, an increase of 3.07 points, or 8.12%.

All scores between 1-4 are taken through a root cause analysis (RCA) process in which the customers are contacted for more information regarding their score. Once this process has been completed, the drivers of dissatisfaction are recorded and any improvements which can be made are carried out.

Line B6.61 Single house connection experience survey

The single house connection experience survey is combined with the development experience survey to calculate a score.

Line B6.63 contains this combined score with no entry against **Line B6.61**.

Line B6.62 Ease of service indicator

The points lost in AR25 were 4.83, down from 6.24 in AR24, a decrease of 1.41 points, or 22.60%.

Line B6.63 Development experience survey

The points lost in AR25 were 4.23, down from 5.90 in AR24, a decrease of 1.67 points, or 28.31%.

Lines B6.64 - B6.65 - Retailer Experience Measure

The Retailer Measure of Experience (R-MeX) is a survey providing a measure of Licenced Provider (LP) satisfaction with wholesaler services in England. Whilst this is conducted on behalf of English water companies by their market operator (MOSL), Scottish Water also conduct an independent benchmarking survey to see how we compare. This is scored out of 10.

Line B6.64 Retailer Measure of Experience survey - August

This is a new line for AR25 and we are reporting a score of 9.00.

Line B6.65 Retailer Measure of Experience survey - February

In the latest wave of research conducted in February 2025, outlined in Table Y below, Scottish Water is ranked 1st for 'Overall Service' with an average score of 9.00 out of 10. For the other questions asked in the survey, Scottish Water also rank 1st for – 'quality of responses to service requests', 'level of engagement and support' and 'quality of data maintenance and improvement'. However potential areas of improvement relate to communication during incidents and effectiveness of financial policies.

Table 40: RMeX survey results for February 2025

Rank	Wholesaler	Overall service	Quality of responses to service requests	Level of communication during incidents	Quality of data maintenance and improvement	Level of engagement and support	Effectiveness of financial policies
1	Scottish Water	9.00	8.69	8.38	8.50	9.25	8.20
2	Affinity Water	8.75	8.67	8.45	8.50	8.75	8.75
3	Northumbrian Water	8.33	8.08	8.45	8.25	8.58	8.08
4	Anglian Water	8.29	7.85	8.58	8.08	8.21	8.46
4	United Utilities Water	8.29	8.29	8.50	8.38	8.57	8.38
6	Portsmouth Water	8.22	8.22	8.33	8.00	8.44	7.89
6	Sutton and East Surrey Water	8.22	8.00	7.88	8.00	8.33	7.78
8	Southern Water	8.18	8.00	8.73	8.45	8.27	8.27
9	Bristol Water	8.14	8.29	8.57	8.29	8.00	8.43
10	Severn Trent Water	8.12	7.62	8.09	8.12	8.06	7.59
11	Wessex Water	8.00	8.40	8.38	8.00	8.30	8.00
12	South West Water	7.75	7.64	8.18	8.00	7.83	7.67
13	Yorkshire Water	7.64	7.64	8.30	8.27	7.45	7.45
14	South Staffordshire Water	7.58	6.83	8.45	7.67	7.67	7.17
15	Thames Water	7.57	6.93	8.36	7.57	8.14	8.00
16	South East Water	7.55	7.00	8.10	8.00	6.80	7.70
		8.10	7.88	8.36	8.13	8.17	7.99

7.3 Data

7.3.1 Data sources and confidence grades

Data for this table are derived from Scottish Water's corporate systems, the details of which can be found in the nhCEM Reporter's Report. However, for clarity, phone call volumes come from Puzzel our telephony management system. Email traffic, portal contacts, wanted contacts, escalations, formal complaints and regulatory upheld complaints are taken from our Customer Relationship Management, MS Dynamics system. LP Experience Survey, Ease of Service Indicator and Business End User Experience Survey data are provided by Rant and Rave.

dCEM data for Phone Call Volumes comes from Puzzel, our telephony management system. Email traffic, portal contacts, wanted contacts, escalations, formal complaints, and regulatory upheld complaints are taken from our Customer Relationship Management MS Dynamics. Single House Connection Experience Survey data and part of the Ease of Service Indicator is provided by Rant and Rave. The Developer/Connections Experience Survey and the remaining part of Ease of Service Indicator is provided by Trinity McQueen.

All the data sources for AR25 are the same as they were in AR24.

Lines B6.54 to B6.58 had their confidence grading changed from A3 to A1, due to the changes in connected properties.

7.3.2 Data Improvement programmes

In AR25 the dCEM mission continued and the change from connected properties to work items was completed.

7.3.3 Assumptions used for forecast data

In our forecasting for AR25, we have selected a mid-point from our predicted range for each of the individual nhCEM and dCEM components. However, for forecasting the Overall nhCEM and dCEM Score, we have calculated the score using the individual mid-point values forecast for each component.

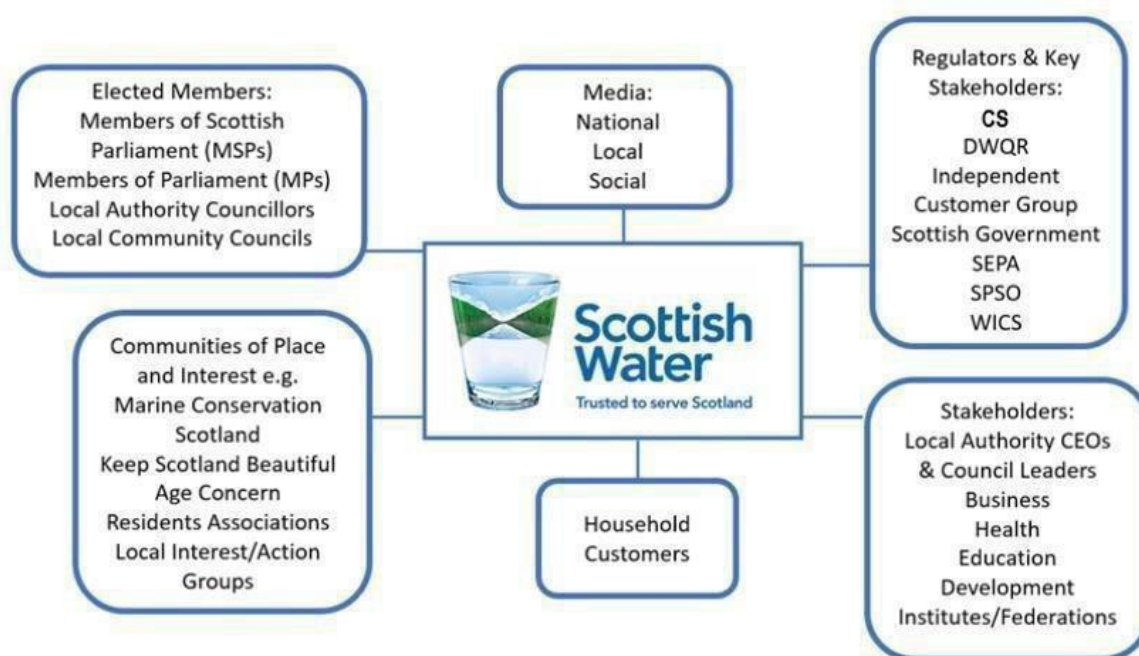
8 Table B6A: Stakeholders & Community Experience Measure

8.1 Overview

The purpose of the Stakeholder and Communities Experience Measure (SCEM) is to provide an overall measure of Scottish Water's reputation as perceived by its stakeholders.

The Stakeholder and Communities Experience Measure includes quantitative and qualitative components and stakeholder groups representing communities of place and interest including media, political, community representatives and customers.

Figure 39 below shows which stakeholders are covered by SCEM.



AR25 was the fourth year of sCEM reporting. The score achieved in AR25 was 78.00 compared to 74.98 recorded in AR24 and 74.48 in AR23, an improvement year on year.

The key drivers for lost points in AR25 were a decrease in the number of surveys received and lower perception response, particularly in the 'contact' category. Main factors in lower perception were:

- Continued influence of media and political stakeholders on the operation and monitoring of overflows
- Corporate enquiries related to remuneration, TU negotiations & Industrial Action and Charges
- Wastewater related issues; Overflow Map showing transparency of overflows

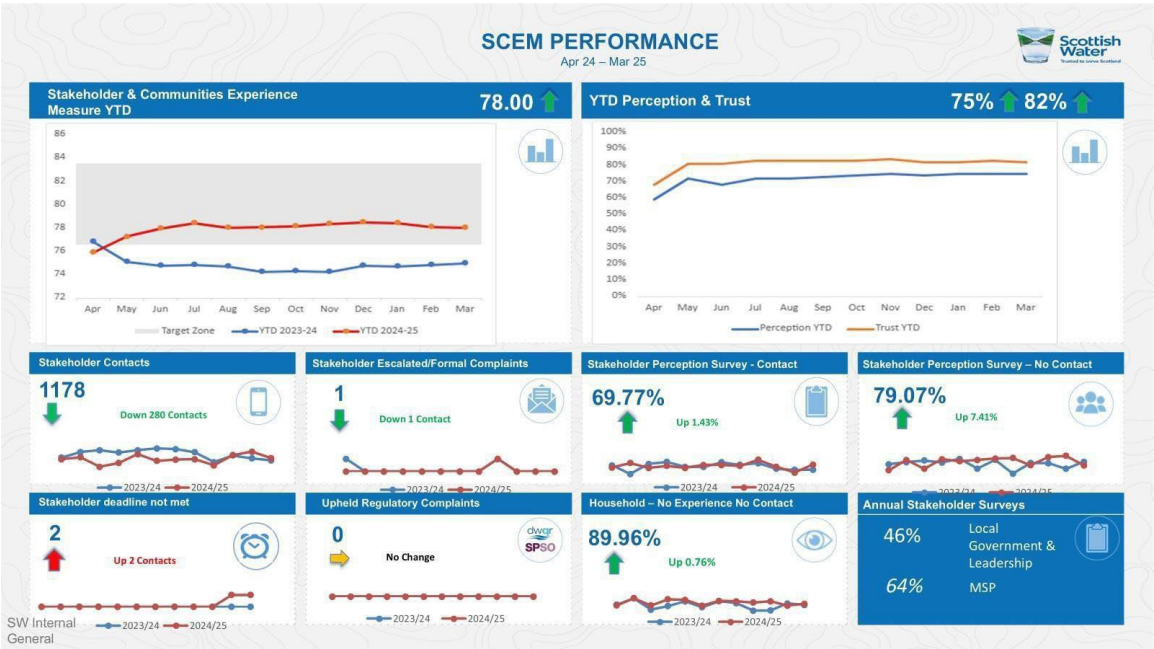
Annual Surveys: MSP survey decreased slightly in AR25 but remains within target. We are continuing with a programme of events to engage with politicians and one to one engagement in areas of interest. While the Local Authority survey showed improvement from AR24, it did not meet the in-year forecast.

Engagement has been ongoing with Council Chief Executives and Leaders and are regularly updated with quarterly stakeholder e-newsletter.

There was improved performance in the number of stakeholder contacts received. Improvements to our processes in AR24 have led to fewer contacts received and a more efficient service for customers and stakeholders. Publicity around the new Text Alert Service and consequent sign ups have enabled the provision of real time information at a local level.

The end of AR24 and into AR25 the launch of 'Piped by us Owned by you' saw an increase in customers knowing that Scottish Water is publicly owned, this has a direct read across to positive trust and sentiment; this gives us permission to ask customers to play an owner's part and adopt positive behaviours around water and wastewater services. To support this, various community engagement events and supermarket field marketing activities were conducted to discuss behaviour change with customers including what to flush and preparing for Winter.

Figure 40: AR24 sCEM Performance Dashboard



Line B6A.1 sCEM overall score

This was 78.00. The quantitative score comprised 42.08 (**Line B6A.13**) or 53.95%, of the points; and the qualitative score comprised 35.92 (**Line B6A.18**) or 46.05%. This is brought forward from **Line B6A.12**.

Line B6A.2 Stakeholder contacts received

In AR25 we received 1,178 stakeholder contacts. This is a decrease of 280 from AR24 when 1458 were reported.

Line B6A.3 Stakeholder enquiries not responded to / Deadline not met

In AR25, we had two enquiries not responded to/deadline not met. This is up 2 from AR24.

Line B6A.4 Stakeholder escalated / Formal Complaints

In AR25, we received 1 escalated/formal complaints. This is down 1 from AR24. The complaint received was in relation to a stakeholder unhappy with our policy on the prioritisation of providing flood alleviation for customers and the timescales to address this.

Line B6A.5 Scottish Government/ Regulator Upheld Stakeholder complaints

In AR25 we received zero Scottish Government/Regulator upheld complaints for the third year.

Line B6A.6 Monthly perception survey – Contact

In AR25 this was reported as 69.77% and higher than the 68.34% reported in AR24.

Line B6A.7 Monthly perception survey - No Contact

In AR25 this was reported as 79.07%. This also saw an increase from 71.66% in AR24.

See introduction to this Performance Trends section 8.2 for more information on what has impacted on the qualitative elements and the improvements being made.

Line B6A.8 Monthly customer perception survey - No Experience No Contact (hCEM)

This is also reported in **Line B5.3**. “No “Experience, No Contact” increased from 88.41% in AR24 to 89.96% in AR25 (more information can be found in the hCEM commentary).

Line B6A.9 MSP Survey (Annual Perception Survey)

In AR25 this decreased from 69% in AR24 to 64.00%.

Line B6A.10 Local Government Leadership Survey (Annual Perception Survey)

In AR24 this increased for the second year to 46.00% from the reported 39.5% in AR24.

Lines B6A.11-B6A.23 - Stakeholder Customer Experience Measure score

Line B6A.11 Stakeholder customer experience target

The target range for AR25 was 76.5-83.5.

Line B6A.12 Stakeholder customer experience - total score

This is reported in **Line B6A.1**

The score reported in this line is calculated using the values reported in **Lines B6a.18** (stakeholder CEM qualitative score – B2) **and B6a.13** (Stakeholder CEM quantitative score – A1). The confidence grade for this line is B2 reflecting the confidence grades for the lines used in the calculations.

Line B6A.13 Stakeholder CEM quantitative score

In AR25 the score was 42.08. This is an increase from the 40.22 reported in AR24. This improvement is reflective of the reduction in the number of stakeholder contacts received.

The confidence grade for this line is A1.

Line B6A.14 Stakeholder contacts received

In AR25 points lost were 7.88 (in AR24 this was 9.76).

Line B6A.15 Stakeholder contacts not responded to/deadline not met

In AR25 points lost were 0.02 (in AR24 this was 0.00).

Line B6A.16 Stakeholder escalated/formal complaints

In AR25 points lost were 0.01 (in AR24 this was 0.03).

Line B6A.17 Regulator upheld stakeholder complaints

In AR25 points lost were 0.00 (in AR24 this was 0.00).

Line B6A.18 Stakeholder CEM qualitative score (points lost)

In AR25, the score was 35.92, a decrease in points lost from 34.77 in AR24. Like AR24 this was driven by performance across our monthly perception surveys.

The confidence grade for this line is B2

Line B6A.19 Monthly perception survey - 'contact' (points lost)

In AR25 “contact” points lost were 3.31 (in AR24 this was 3.60).

The confidence grade for this line is B2.

Line B6A.20 Monthly perception survey - 'no contact' (points lost)

In AR25 “no contacts” points lost were 3.47 (in AR24 this was 3.93).

The confidence grade for this line is B2

Line B6A.21 Monthly You Gov survey - 'no experience, no contact' household customers (points lost)

In AR25, hCEM “No experience, no contact” points lost were 2.05 (in AR24 this was 2.37).

The confidence grade for this line is B2.

Line B6A.22 MSP annual perception survey (points lost)

In AR25, MSP survey points lost were 2.10 (in AR24 this was 1.81).

The confidence grade for this line is B2.

Line B6A.23 Local Government Leadership annual perception survey (points lost)

In AR25 the Local Government Leadership survey points lost were 3.15 (in AR24 this was 3.53).

The confidence grade for this line is B2.

8.2 Data

8.2.1 Data sources and confidence grades

Quantitative data are taken from Scottish Water’s corporate systems including Microsoft Dynamics and Vuelio platforms for logging and tracking enquiries and contacts from stakeholders. These have a confidence grade of A1.

Qualitative data are provided by external research companies for monthly perception surveys with stakeholders and annual surveys with MSPs and local authority leaders. These have a confidence grade of B2.

8.2.2 Data improvement programmes

Work has been undertaken in several areas:

Review of contact types: In AR24 we implemented process changes to better serve both stakeholder and customers. By AR25, these changes had started to prove valuable, as we restructured the team to respond to enquiries more efficiently.

Collaboration with other CEM’s: This has been invaluable in understanding our shared goals. We launched a new 'Text Alert' service campaign, notifying customers of local works in real-time. This initiative has likely reduced service-related contacts from stakeholders, as their constituents are now informed of service issues promptly. Similarly, hCEM has also reported a reduction in service related contacts.

Improvements in monthly perceptions surveys: In AR25 we modified the scoring options to make them more comprehensible for participants. Each score now includes descriptive wording (e.g. 1 - extremely negative to 7 - extremely positive), clarifying the a score of 4 is considered neutral (and counted as negative). We believe this has contributed to a 22% decrease in participants scoring 4 in AR25.

8.2.3 Assumptions used for forecast data

In February 2023, after reviewing sCEM historical data the Board agreed to adjust the sCEM target range due to a higher than anticipated number of stakeholder contacts.

In AR25, with an overall score of 78.00, sCEM was within the target range of 76.5-83.5.

Our AR26 target range is 76.5-83.5

9 Table B7: Customer care - Service Standards performance

9.1 Overview

From 1 April 2015 Guaranteed Service Standards (GSS) and Price Promise merged to a single set of standards called “Our Service Standards”.

If Scottish Water fails to comply with “Our Service Standards” as set out in the Code of Practice, the customer is entitled to a payment. Most of the payments are automatically paid when Scottish Water identifies non-compliance and a small number require our customers to make a claim for payment.

9.2 Performance Trends

In AR25, we have seen a mixed trend across our Service Standards.

Interruptions to supply payments increased from 364 to 1503, mainly driven by repeat interruptions in Falkirk and Kingseat in AR25.

We had hoped to be able to report on the split of payments in AR25 for **Lines B7.7 to B7.10**. However, work is progressing on this, and a solution is being developed which will require system changes to implement. The main issue is the difficulty in establishing what percentage of the payment the customer received over the year. We are now aiming to report this in AR26. In the meantime, we have reverted to reporting the overall number of payments and include these in **Line B7.6** for AR25, as was the case in AR24.

Sewer flooding payments have also increased overall - from 385 to 414 with both Internal and external payments increasing.

Appointments attended on time have increased to 90.29%, which has reduced the number of failed appointments from AR24.

Pressure payments have decreased from 36 in AR24, to 31 in AR25.

Ex-gratia payments decreased from 785 to 322 due to there not being an issue like the water quality issue in Benbecula, Outer Hebrides Benbecula in AR24.

9.2.1 Lines B7.1-B7.4 Planned Interruptions

Planned interruptions warn customers 48 hours in advance and supply is restored within the time given. Payment is made if Scottish Water fails to warn customers or supply is not restored by the time given.

B7.1 Number of Service Standards failure payments paid automatically (planned interruptions)

This was zero in AR25, which mirrored the performance in AR24 and AR23.

B7.2 Number of Service Standards failure payments claimed (planned interruptions)

In AR25, the number of claims made against Scottish Water in relation to interruption to supply decreased to 5, down from 11 in AR24. This is a payment which customers claim, so it will vary depending on the number of customers claiming. 2 of the payments have been to the same customer, this was due to the property being attached to the incorrect water network on our systems. The system has been updated to show the correct network.

B7.3 Total number of Service Standards failure payments made (planned interruptions)

In AR25, this was 5, down from 11 in AR24, a decrease of 6.

B7.4 Total amount paid out for Service Standards failure (planned interruptions)

In AR25, £190.00 was paid out. This was lower than the AR24 figure of £500.00, a decrease of £310.00, or 62%.

Table 41 below shows the average payment from AR24 to AR25, which has decreased from £45.45 in AR24, to £38.00 in AR25. The decrease is due to fewer payments being made to non-domestic customers, who receive £50 for the first 12 hours of interruption and then £25 per 12 hours of further interruption, compared to £30 for domestic customers.

Table 41: Average payment for service standard failure.

	AR24	AR25
Amount Paid	£500.00	£190.00
Payments	11	5
Average Payment	£45.45	£38.00

9.2.2 Lines B7.5- B7.12 - Unplanned Interruptions - (burst main and so on) restore within 12 hours (48 hours for a large main supplying a large area)

B7.5 Number of Service Standards failure payments paid automatically (unplanned interruptions)

The number of payments paid automatically was zero in AR25, which mirrored the performance of AR24.

B7.6 Number of Service Standards failure payments claimed (unplanned interruptions)

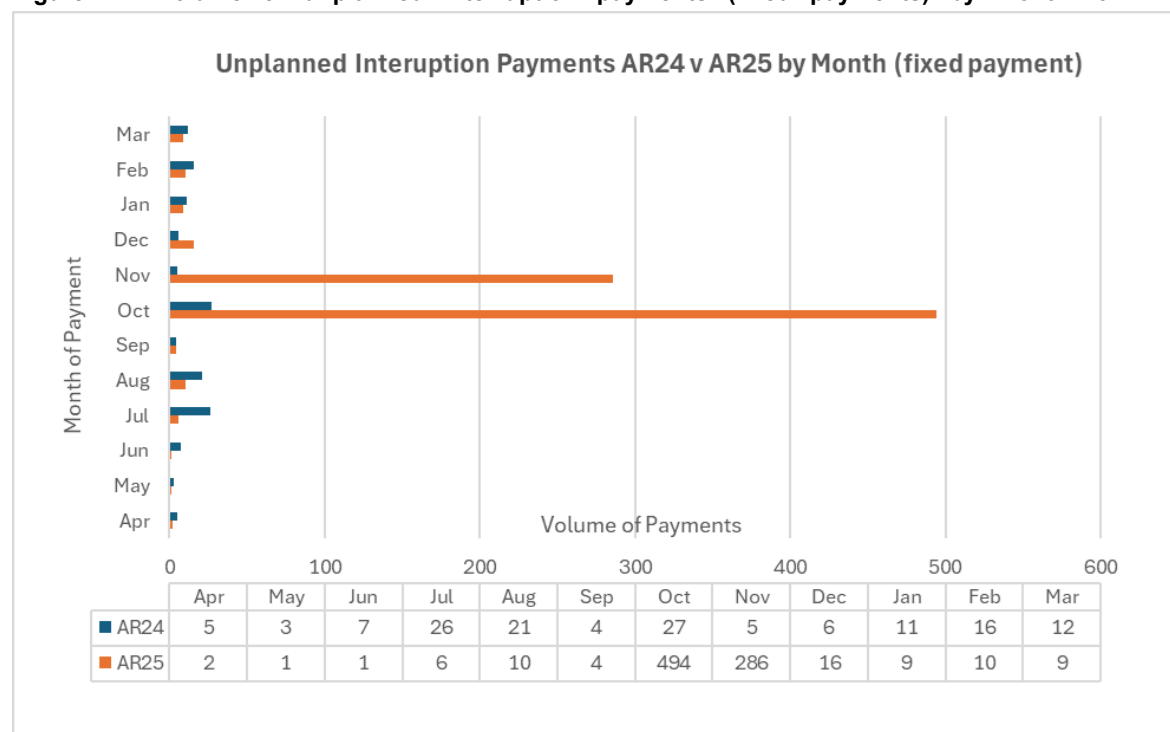
The number of payments claimed was 1503 in AR25, up from the AR24 figure of 364, an increase of 1,139, or 312.91%.

As in AR24, this includes payments related to repeat interruptions **Lines B7.7 to B7.10**, of which there are 655. In April 2023, we developed and implemented a way to automate this. However, after further testing, automation of this was unsuccessful. Further investigations are ongoing to resolve this. We have reverted to reporting the overall number of payments and included these in **Line B7.6**, as was the case in AR24.

The fixed payment accounts for 848 of the payments in AR25, compared to 143 in AR24, which are for all failures - interruption to supply where “you can claim £30, then £15 for every 12-hour period after this that you are without water” for domestic properties; and £50 then £25 for non-domestic properties.

Figure 41 shows how these are split across AR25 and AR24. Unlike AR24, there have been a high number of claims from interruptions, bursts, in Falkirk (735 payments) and Kingseat (57 payments).

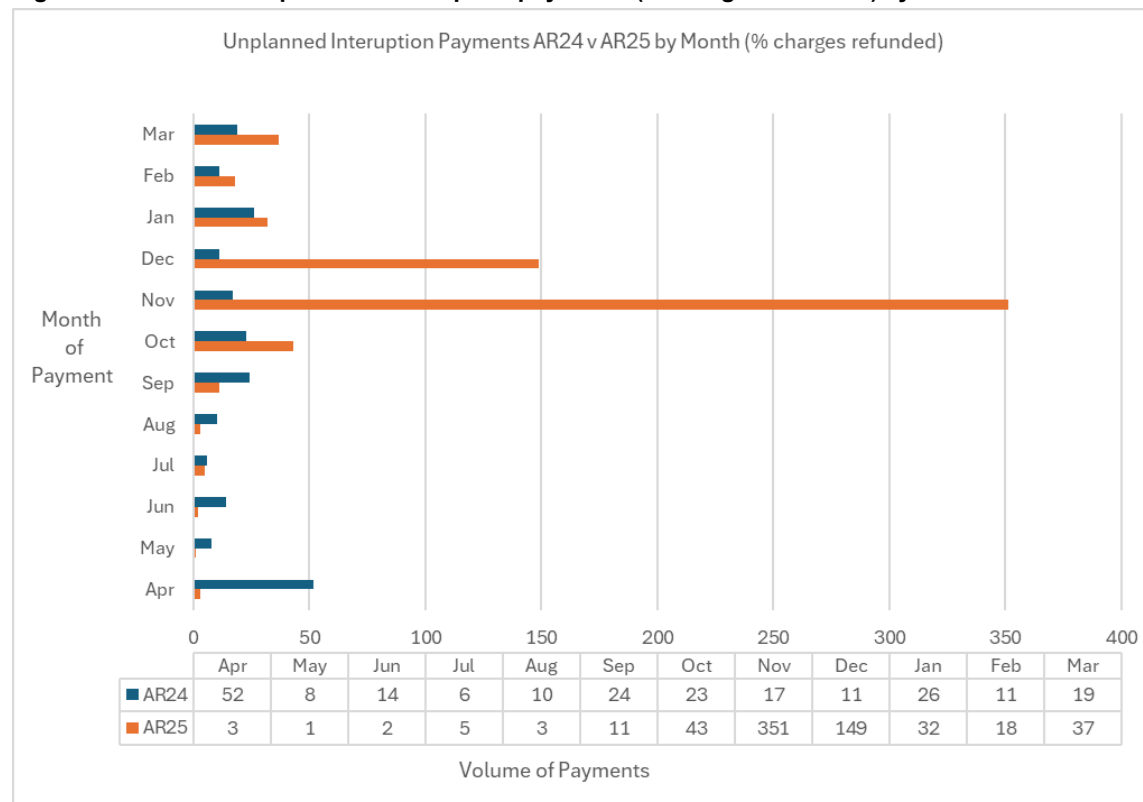
Figure 41: Volume of unplanned interruption payments (fixed payments) by month for AR24 and AR25.



The second split of payments relate to the following statement: “If you report two interruptions in the same financial year, caused by a failure in the network that is not related to work we are carrying out, you can apply to claim a payment of 25% of your annual water charges. If you experience and report subsequent interruptions within the same financial year, you can claim a further 25% for each of those subsequent interruptions, to a maximum of 100% of your water charges”.

There were 655 payments made in AR25, up from 221 payments in AR24, Figure 42 shows the split of these figures by month. As with the payments for one off interruption to supply, there were a couple of repeat interruptions in Falkirk on the 17th August and 16th September, and in Kingseat on the 6th and 16th October. 496 payments were made for the Falkirk interruptions, with 46 for Kingseat.

Figure 42: Volume of unplanned interruption payments (% charges refunded) by month for AR24 and AR25.



B7.7 Number of Service Standards failure payments claimed for two interruptions per year Automated reporting of this line was developed and began implementation in April 2023. However, after further testing, the automation was not successful. Further details of this are included in the performance trends section 9.2. We have reverted to reporting the overall number of payments and include these in **Line B7.6**, as was the case in AR24.

B7.8 Number of Service Standards failure payments claimed for three interruptions per year

Automated reporting of this line was developed and implemented in April 2023. However, after further testing, the automation was not successful. Further details are included in the performance trends section 9.2. We have reverted to reporting the overall number of payments and included these in **Line B7.6**, as was the case in AR24.

B7.9 Number of Service Standards failure payments claimed for four interruptions per year

Automated reporting of this line was developed and implemented in April 2023. However, after further testing, the automation was not successful. Further details are included in the performance trends section 9.2. We have reverted to reporting the overall number of payments and included these in **Line B7.6**, as was the case in AR24.

B7.10 Number of Service Standards failure payments claimed for five interruptions per year

Automated reporting of this line was developed and implemented in April 2023. However, after further testing, the automation was not successful. Further details are included in the performance trends section 9.2. We have reverted to reporting the overall number of payments and included these in **Line B7.6**, as was the case in AR24.

B7.11 Total number of Service Standards failure payments made (unplanned interruptions)

The number of payments claimed was 1503 in AR25, up from 364 claimed in AR24, an increase of 1,139, or 312.91%. In AR25, as was the case in AR24, we are unable to report the split of **Lines B7.7 to B7.10** due to the failure of the system changes necessary to allow us to report on this. We are able to report the total payments for these lines - 655 as these payments are included in **Line B7.6** which details the payment breakdown. In AR25, there have been a high number of claims following interruptions in Falkirk and Kingseat. These payments are claimed by the customer, and this can impact volumes.

B7.12 Total amount paid out for Service Standards failure (unplanned interruptions)

The total amount paid in AR25 was £115,756.99, up from £44,003.57 reported in AR24, an increase of £71,753.42, or 163.06%.

Table 42 below shows the split of payments by reason for payment. This shows an increase in payments for both interruptions to supply and repeat interruptions to supply. Repeat interruptions to supply increased by £51,723.42, making up the majority of the increase. As referenced in **Line B7.11** there were high volumes of claims on the back of interruptions in Falkirk and Kingseat. These payments are claimed by the customer, and this can impact volumes.

Table 42: Split of payments by reason for line B7.12 for AR24 and AR25.

	AR24	AR25	Difference AR25 – AR24
Payments for Interruption to supply	143	848	705
Amount paid	£11,850.00	£31,880.00	£20,030.00
Payments for between 2-5 Interruptions to supply	221	655	434
Amount paid	£32,153.57	£83,876.99	£51,723.42
Total Payments	364	1503	1139
Total Amount paid	£44,003.57	£115,756.99	£71,753.42

Table 43 details the average payment, which has decreased from £120.89 in AR24, to £77.02 in AR25. Table 42 shows there have been a bigger increase in the payments for interruptions to supply, increasing by 705, compared to 434 for payments for between 2-5 interruptions to supply. These tend to be of lower value, which helps explain the decrease in average payment.

Table 43: Average payment for Service Standard failure (unplanned interruptions) for AR24 and AR25.

	AR24	AR25	Difference AR25 – AR24
Amount Paid	£44,003.57	£115,756.99	£71,753.42
Payments	364	1503	1139
Average Payment	£120.89	£77.02	£-43.87

9.2.3 Lines B7.13-B7.20 – Internal wastewater flooding– caused by wastewater from our sewers

B7.13 Number of payments to domestic properties for internal flooding from sewers due to being on the register

The number of payments made in AR25 was 185, compared to 183 in AR24, an increase of 2, or 1.09%. The number of payments offered has increased due to properties being added to the register. There has also been an increase to the number of customers accepting the payment, Table 44 shows the volume of payments offered, paid and % paid.

Table 44: Volume of payments offered, paid and % paid for AR24 and AR25 for line B7.13.

	Offered Payment	Paid	% Paid
AR24	239	183	77%
AR25	253	185	73%

B7.14 Number of payments to domestic properties for internal flooding from sewers due to not being on the register

The number of payments was 136 in AR25, compared to 117 in AR24, an increase of 19, or 16.23%. These payments are claimed by the customer, and this can impact volumes.

B7.15 Total amount paid to domestic properties for internal flooding from sewers due to being on the register

The total amount paid to domestic properties in AR25 was £63,618.04, compared to £59,592.93 in AR24, an increase of £4,025.11, or 6.75%. Table 45 shows the average payment, which has increased from £325.64 in AR24, to £343.88 in AR25. This payment is based on the wastewater charges for the property and will have increased based on increases in the charges. Table 46 shows the changes in charges between AR22, AR23, AR24 and AR25. It can also be affected by the charges at the property. For example, if a property with higher charges is removed from the register, but a property with lower charges is added.

Table 45: Average payment amount for line B7.15 for AR24 and AR25.

	AR24	AR25
Amount Paid	£59,592.93	£63,618.04
Payments	183	185
Average Payment	£325.64	£343.88

Table 46: Unmetered Wastewater Supply Collection Charges.

Unmetered Waste Water Collection				
Council Tax Band	AR22	AR23	AR24	AR25
Band A	£164.46	£171.36	£179.88	£195.66
Band B	£191.87	£199.92	£209.86	£228.27
Band C	£219.28	£228.48	£239.84	£260.88
Band D	£246.69	£257.04	£269.82	£293.49
Band E	£301.51	£314.16	£329.78	£358.71
Band F	£356.33	£371.28	£389.74	£423.93
Band G	£411.15	£428.40	£449.70	£489.15
Band H	£493.38	£514.08	£539.64	£586.98

B7.16 Total amount paid to domestic properties for internal flooding from sewers due to not being on the register

The total amount paid was £42,826.01 in AR25, compared to £33,858.66 in AR24, an increase of £8,967.35, or 26.48% (see Table 47). As with **Line B7.15**, these payments are based on the wastewater charges of the property flooded. As such, the average payment can alter depending on the property.

Table 47: The amount paid, number of payments, and average payment for line B7.16 for AR24 and AR25.

	AR24	AR25
Amount Paid	£33,858.66	£42,826.01
Payments	117	136
Average Payment	£289.39	£314.90

B7.17 Number of payments to non-domestic properties for internal flooding from sewers due to being on the register

These payments are not applicable to non-domestic customers and are therefore reported with a confidence grading of N.

B7.18 Number of payments to non-domestic properties for internal flooding from sewers due to not being on the register

The number of payments to non-domestic properties for internal flooding from sewers due to not being on the register is 86 in AR25, compared to 84 in AR24, an increase of 2, or 2.38%.

B7.19 Total amount paid to non-domestic properties for internal flooding from sewers due to being on the register

These payments are not applicable to non-domestic customers and are therefore reported with a confidence grading of N.

B7.20 Total amount paid to non-domestic properties for internal flooding from sewers due to not being on the register

The total amount paid was £51,039.69 in AR25, compared to £57,190.21 in AR24, a decrease of £6,150.52, or 10.75%. The average payment has decreased from £680.84 in AR24, to £593.48 in AR25 (see Table 48). The payment is based on the Wastewater charges up to a maximum payment of £1,000, as such the average payment can alter depending on the properties flooded.

Table 48: The amount paid, number of payments and average payment for line B7.20 for AR24 and AR25.

	AR24	AR25
Amount Paid	£57,190.21	£51,039.69
Payments	84	86
Average Payment	£680.84	£593.48

9.2.4 Lines B7.21-B7.24 - External wastewater flooding - Caused by wastewater from our sewers

B7.21 Number of payments to domestic properties for external flooding from sewers

In AR25, we made 7 payments to domestic properties for external flooding from sewers, an increase of 6 from the 1 payment in AR24. These payments are claimed by the customer, and this can impact volumes. Restricted access to the property due to external flooding is one of the criteria for these payments.

B7.22 Total amount paid to domestic properties for external flooding from sewers

In AR25, we paid £1,574.23 in payments to domestic properties for external flooding from sewers, compared to £428.40 in AR24. This has increased by £1,145.83, or 267.47%. The average payment has also decreased from £428.40 in AR24, to £224.89 in AR25, as shown in Table 49 below. The payments for these vary depending on the level of charges at the property, hence we see a change in the average payment. These payments are claimed by the customer, and this can impact volumes.

Table 49: The amount paid, number of payments and average payment for line B7.22 for AR24 and AR25.

	AR24	AR25
Amount Paid	£428.40	£1574.23
Payments	1	7
Average Payment	£428.40	£224.89

B7.23 Number of payments to non-domestic properties for external flooding from sewers

These payments are not applicable to non-domestic customers and are therefore reported with a confidence grading of N.

B7.24 Total amount paid to non-domestic properties for external flooding from sewers

These payments are not applicable to non-domestic customers and are therefore reported with a confidence grading of N.

9.2.5 Lines B7.25-B7.29 - Respond to questions about your bill and changing your payment methods - respond within 5 working days

There were no failures reported against this standard.

9.2.6 Lines B7.30-B7.34 - Written response to a formal complaint - respond within 5 working days

There were no failures reported against this standard.

9.2.7 Lines B7.35-B7.42 - Appointments - keeping appointments made more than 24 hours in advance

B7.35 Number of appointments

The number of appointments in AR25 was 3904, down from 4,332 in AR24, a decrease of 428 appointments, or 9.88%.

B7.36 % of appointments made which are kept

The % of appointments made which are kept in AR25 was 90.29%, an increase from 87.69% in AR24. The confidence grade for this line is B3.

B7.37 Number of two-hour time banded appointments made

The number of two-hour time banded appointments made in AR25 was 3902, down from 4330 in AR24, a decrease of 428 appointments, or 9.92%.

B7.38 % of two-hour time banded appointments made which are kept

The % of appointments made which are kept in AR25 was 90.29%, an increase from 87.69% in AR24. The confidence grade for this line is B3.

B7.39 Number of Service Standards failure payments paid automatically (keeping appointments)

The number of payments paid automatically in AR25 was 169, a decrease of 128, from 297 reported in AR24. The number of payments made differs from the number of failed appointments. This is due to some customers refusing the payments or staff being unable to contact the customer to request payment details. As with Lines B7.36 and B7.38 the confidence grading for this line is B3.

B7.40 Number of payments made from claims for failure (keeping appointments)

The number of payments made in AR25 for failing to keep appointments was 9, a decrease of 8, from 17 failures to keep appointments reported in AR24.

B7.41 Total number of Service Standards failure payments made (keeping appointments)

The total number of service standards failure payments made in AR25 was 178. This has decreased from 314 in AR24, a decrease of 136. The decrease is across both claimed and automatic payments. The confidence grading is B3.

B7.42 Total amount paid out for Service Standards failure (keeping appointments)

The total amount paid out for service standards failure in AR25 was £5,170.00. This has decreased from £9,150.00 in AR24, a decrease of £3,980.00.

Table 50 shows the average payment has decreased from £29.14 in AR24, to £29.04 in AR25. This is due to some payments being made to non-domestic customers in AR24 of £20, while domestic customers receive £30.

Table 50: The amount paid, number of payments and average payment for line B7.42 for AR24 and AR25.

	AR24	AR25
Amount Paid	£9150.00	£5170.00
Payments	314	178
Average Payment	£29.14	£29.04

9.2.8 Lines B7.43-B7.47 - Water in gas pipes - give you a call within 2 hours of reporting the fault to give details of what happens next

There were no failures reported against this standard.

9.2.9 Lines B7.48-B7.52 - Water meters - applications. We will let you know the outcome within 10 working days of your application

There were no failures reported against this standard.

9.2.10 Lines B7.53-B7.58 - Water pressure - we will tell you the outcome of our investigations within 5 working days

B7.53 Number of payments made within Service Standards period due to being on the register

The number of payments for AR25 is 29, compared to 36 in AR24. This is due to the number of eligible properties decreasing. Table 51 shows the number of properties eligible for payment and the percentage who have accepted the payment.

Table 51: Volume of payments offered, paid and % paid for AR24 and AR25 for line B7.53.

	Offered Payment	Paid	% Paid
AR24	47	36	76.60%
AR25	35	29	82.86%

B7.54 Number not dealt with within Service Standards period

The number not dealt with within Service Standards period was zero in AR25, this mirrored the performance from AR24.

B7.55 Number of payments for failure to respond (automatic)

The number of payments for failure to respond (automatic) was 2 in AR25, this is an increase of 2 from AR24.

B7.56 Number of payments made from claims for failure to respond

The number of payments made from claims for failure to respond was zero in AR25, this mirrored the performance in AR24. These are claimed payments from customers and volumes are impacted by this.

B7.57 Total number of payments for failure to respond

The total number of payments for failure to respond was 2 in AR25, this increased from 0 in AR24.

B7.58 Total amount paid for Service Standards failure

The total amount paid for service standards failure was £9,979.67 in AR25, compared to £11,166.67 in AR24, a decrease of £1,187.00, or 10.63%. Table 52 below shows the average payment, which has increased from £310.19 in AR24 to £321.92 in AR25. This is made up of

all the payments made in **Lines B7.53 to B7.57**,. **Line B7.53** is a payment of the water charges Scottish Water have paid for the year, while **Lines B7.54 to B7.57** are a £30 payment. The average payment being driven by water charges which can vary depending on the property.

Table 52: The amount paid, number of payments and average payment for line B7.58 for AR24 and AR25.

	AR24	AR25
Amount Paid	£11,166.67	£9,979.67
Payments	36	31
Average Payment	£310.19	£321.92

9.2.11 Lines B7.59-B7.62 - Water quality - affecting the water quality where a 'boil water' or do not use notice' is in place for more than 3 months

There were no failures reported against this standard.

B7.59 Number of restrictions (e.g., boil notices, do not use notices)

The number of restrictions (e.g., boil notices, do not use notices) was zero in AR25. This mirrors the performance in AR24.

B7.60 Number of restrictions (e.g., boil notices, do not use notices) in place for more than 3 months

The number of restrictions (e.g., boil notices, do not use notices) in place for more than 3 months was zero in AR25. This mirrors the performance in AR24.

B7.61 Number of Service Standards failure payments made from claims (water quality)

The number of service standards failure payments made from claims (water quality) was zero in AR25. This mirrors the performance in AR24.

B7.62 Total amount paid out for failure (water quality)

The total amount paid out for failure (water quality) was zero in AR25. This mirrors the performance in AR24.

9.2.12 Lines B7.63-B7.68 - Connection Services - where evidence confirms that we have caused a delay

There were no failures reported against this standard.

B7.63 Number not dealt within the Service Standards period ($\leq$ 32mm outside diameter pipe)

The number not dealt within the service standards period ($\leq$ 32mm outside diameter pipe) was zero in AR25. This mirrors the performance in AR24.

B7.64 Number not dealt within the Service Standards period (>32mm outside diameter pipe)

The number not dealt within the service standards period (>32mm outside diameter pipe) was zero in AR25. This mirrors the performance in AR24.

B7.65 Number of payments made from claims for failure to respond (≤32mm outside diameter pipe)

The number of payments made from claims for failure to respond (≤32mm outside diameter pipe) was zero in AR25. This mirrors the performance in AR24.

B7.66 Number of payments made from claims for failure to respond (>32mm outside diameter pipe)

The number of payments made from claims for failure to respond (>32mm outside diameter pipe) was zero in AR25. This mirrors the performance in AR24.

B7.67 Total number of payments made from claims for failure to respond

The total number of payments made from claims for failure to respond was zero in AR25. This mirrors the performance in AR24.

B7.68 Total amount paid for Service Standards failure

The total amount paid for Service Standards failure was zero in AR25. This mirrors the performance in AR24.

9.2.13 Lines B7.69-B7.70 - Ex Gratia Payments Made

On receipt of a claim, Scottish Water fully investigates the details of the claim with the assistance of the relevant parties. If we establish that a failure has occurred, an ex-gratia offer may be made to the customer. This payment is not considered an admission of liability by Scottish Water, and this does not affect the claimant's legal rights.

B7.69 Total number of ex-gratia payments made

The total number of ex-gratia payments made in AR25 was 322, which is a decrease of 463 from the AR24 total of 785. Unlike AR24, where 376 payments were offered to customers following the impacts of the Benbecula water quality incident (in the Outer Hebrides), there have been no large volume of payments made for an incident in AR25. When you remove the Benbecula payments (376) from the difference between AR24 and AR25 (463) it shows a reduction in payments of 87.

B7.70 Total amount paid out in ex-gratia payments

The total amount paid out in ex gratia payments in AR25 was £77,627.51. This has decreased from £126,647.50 in AR24, a decrease of £49,019.99. This was mainly due to the impact of the water quality payments made for the Benbecula incident, totaling £26,320 in AR24.

9.2.14 Lines B7.71-B7.75 - Major Incidents - A) Failure to provide information

There were no failures reported against this standard.

9.2.15 Lines B7.76-B7.80 - Major Incidents - B) Failure to provide alternative supplies

There were no failures reported against this standard.

9.3 Data

9.3.1 Data sources and confidence grades

Processes and procedures are in place which allow the Service Standards Team to strictly monitor performance on all Scottish Water's service standards. Information is accurately captured, and reports are produced that identify potential non-compliance with our standards. Each notified failure is fully investigated with the assistance of the relevant parties within the business and, if it is established that a failure has occurred, a payment will be issued to the customer.

This team also has responsibility for processing all ex-gratia claims received via a public liability claim against Scottish Water.

The Service Standards Team are fully accredited and operate to ISO9001 standard.

There were no changes to the confidence grades.

9.3.2 Data improvement programmes

There was no significant data improvement in AR25 2024-25.

9.3.3 Assumptions used for forecast data

There are no forecasts in Table B7.

10 Table B8: Water infrastructure and sewerage service

10.1 Overview

The majority of lines reported in this table are repeated from other tables. The data derivations, observations and grades are discussed in their relevant table comments sections and referenced in this section, with limited summaries below.

The Distribution Input and Leakage components of this table, reported in **Lines B8.9 to B8.13**, are from Table A2 **Lines A2.6 to A2.21** and **Lines A2.23 to A2.26**.

10.2 Performance Trends

Water service – distribution

Line B8.1 - Mains bursts per 1000 km

Reported performance of 166.61 bursts per 1,000km was calculated from water mains bursts (8,228), and the total mains length of 49,384.94km. Although the reported number for AR24 was 159.68 this should have been 169.69 due to the number of bursts being underreported in AR24. This was due to an error where locations were mistakenly removed from the report (further details can be found in explanation for Line E6.19). The 166.61 rate is comparable to AR24 (decrease of 2%) due to a similar weather pattern. The differences were that the warmest weather was during May and June 2023 for AR24, and during May and July 2024 for AR25. The coldest weather occurred during January 2025 in AR25, the same as for the AR24 period.

B8.2 - B8.3 Sewerage Service

The numbers reported for this section are derived from Microsoft Dynamics. When a customer reports an incident to the Customer Contact Centre, sewer response field teams investigate. Any incidents which require further work due to sewer damage are passed to Network Analysts for further investigation and to arrange repair. The numbers reported in this section are the filtered incidents which have been deemed as sewer collapse after further investigation. For reporting purposes, we include all cases where the pipe is damaged, and a repair has been necessary and rising mains are included in the reported numbers.

Line B8.2 Total number of sewer collapses

In this category Scottish Water reports as a “collapse” all cases where a sewer is damaged, and a repair has been necessary. The Water Industry Commission for Scotland (WICS) definition for this line states ‘All third-party damage should be excluded where costs are potentially (rather than actually) recovered from a third party.’

The number of reported collapses increased from 2501 in AR24 to 2683 in AR25, a 7.28% increase.

Improvements introduced resulting in the 7.28% increase in reported Sewer Collapses:

- **Increase in CCTV Surveys** – an increase in the number of CCTV surveys carried out by Sewer Response after every repair has resulted in an increase in the number of Sewer Collapses recorded. This resulted in Scottish Water being able to address issues that may have gone undetected before thus preventing any future disturbance to customers.

- **Alternative Resolution Management** – this process involves bringing departments together across functions and working in new ways to resolve complex customer problems. It is used to identify and address repeat appointments to customers. This is helping to identify weak spots in the network and as a result we are finding more issues which are a contributing factor in driving the increase in sewer collapses recorded.

Line B8.3 Sewer collapses per 1000 km

The reported performance of 48.60 sewer collapses/1,000km was calculated from the number of sewer collapses (2683) divided by the total length of sewer which is 55,202.603m.

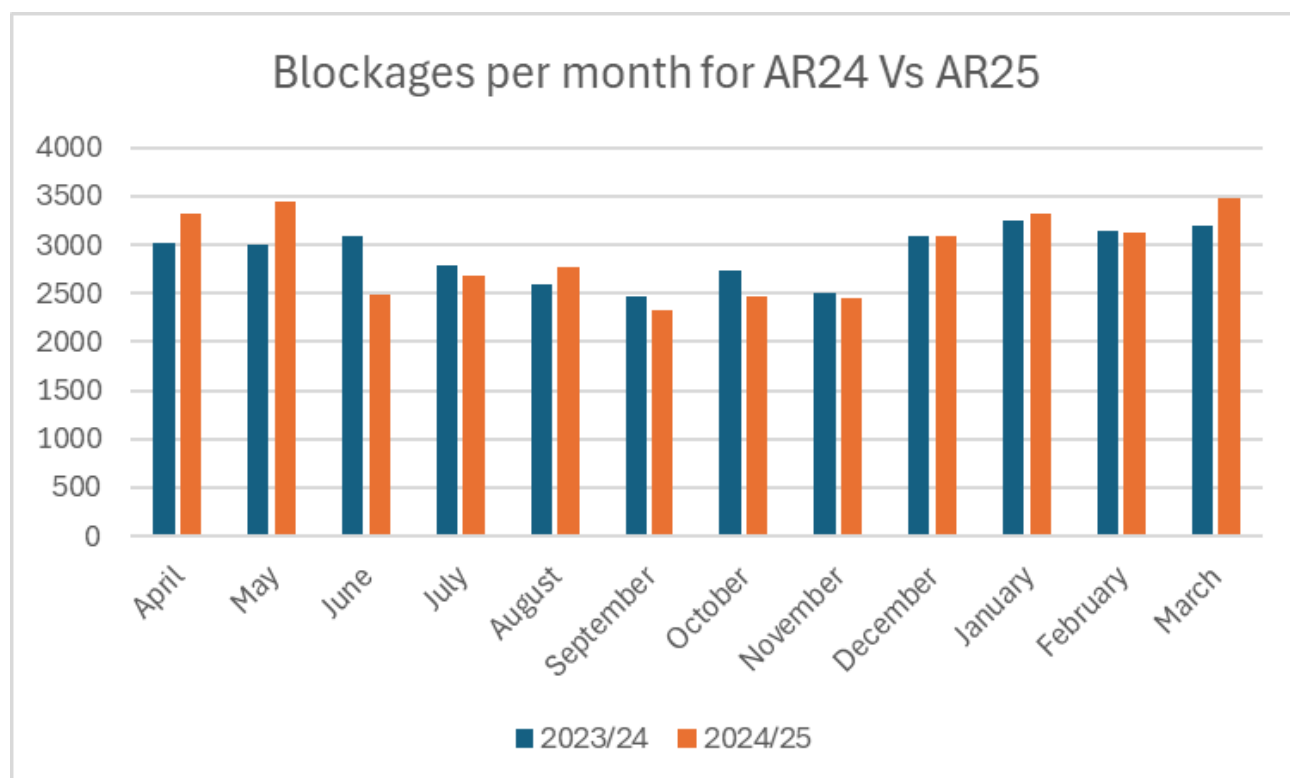
Line B8.4 Total Number of Blockages

The number of blockages for AR25 is 34961, compared to 36,917 in AR23. This represents a slight increase of 44 blockages over the year.

AR25 saw an initial increase in the number of blockages over the first couple of months of the year in comparison to AR24. This was followed by a very similar trend throughout the remainder of the year. Additionally, similarly to AR24, whilst we did see storms throughout the year, the impact of these on sewer blockage volumes was less than had been expected (see Figure 43).

Figure 43: The number of blockages per month for AR24 vs AR25.

	April	May	June	July	August	September	October	November	December	January	February	March
2023/24	3020	2999	3085	2796	2596	2477	2742	2512	3091	3250	3145	3204
2024/25	3324	3448	2486	2673	2772	2318	2473	2444	3098	3322	3131	3472



There are a number of factors which contribute to the overall blockage volumes, these include:

- The impact of our Nature Calls campaign, and thus customer behaviour.

- The impact of individual and area level flood mitigations being delivered.
- The Varying weather patterns dependent on duration and intensity of rainfall and where this rainfall hits.

However, it is not possible to definitively quantify the true impact of each of the above individually.

Line B8.5 Blockages per 1000km

Total length of sewer has increased from 54,689.620m in AR24 to 55,202.603m in AR25, calculation divides length of sewer by 1000km, then choke numbers are divided by this. Blockages per 1000km of sewer thus is reported as 633.32 for AR25.

This indicates that the number of sewer blockages per 1000km has reduced from 638.46 to 633.32.

10.2.1 - Discharges Lines B8.6 - B8.16

These lines have been added prior to AR25 following discussions with WICS.

There are several references in Table B8 and in the definitions document to spills and discharges. The terminology that Scottish Water uses on our website and in our published overflow data is overflows and overflow events because other definitions may indicate that these are accidents or uncontrolled.

As discussed, and agreed with WICS, the published reported and non-reported data for 2024 has been used to populate the new B8.9 - B8.16 lines for consistency. The number of other overflows is based on the new Event Duration Monitors (EDMs) installed to meet our Improving Urban Waters (IUW) routemap commitments.

Background Information

In recent years there has been increasing public and stakeholder interest and scrutiny relating to overflows and overflow data. In December 2021 we published our Improving Urban Waters (IUW) routemap which set out our commitments to improve water quality to support Scotland's River Basin Management Planning (RBMP) objectives, install monitoring from all Combined Sewer Overflows (CSOs) that discharge to the highest priority waters, publication of overflow data to improve transparency, significantly reduce sewer related debris in the environment, and reduce overflows from the sewer network. As the data is now published, WICS requested that overflow data is included in the Annual Return (AR) from 2025.

The IUW routemap had the following commitments relating to overflow monitoring and overflow data publication:

- By the end of December 2024, 1,002 new Event Duration Monitors (EDMs) were installed on CSOs in the highest priority categories. This included CSOs associated with designated bathing and shellfish waters in line with the Improving Waters Routemap commitment.
- By the end of December 2022, for monitored CSOs where data are already currently reported to SEPA, publish spill data annually, identifying the main reason for the spills where possible (e.g. heavy rain, blockages or a flow issue at the treatment works).
- By the end of December 2023, publish spill data annually for all other monitored CSOs.
- By the end of December 2024, publish near real-time spill data for all monitored CSOs.

By the end of December 2024, we installed 1,002 new Event Duration Monitors (EDMs) to meet our IUW commitments. There are ongoing commitments to further increase the number of overflows monitored in future.

We have made available the following overflow event data on our website:

- Reported – Data for overflows that require annual reporting to SEPA covering the most recent 5-year period. The latest published data currently covers the period 2020 - 2024.
- Non-reported - Data for overflows that are currently known to have licence requirements for permanent event duration monitoring and/or have monitoring but do not require reporting to SEPA as part of the annual regulatory return. The latest published data currently covers the period 2022 - 2024.

- **Near Real Time (NRT) Overflow Map** – This went live on our website on the 16th of December 2024. The map is interactive and searchable which allows users to see overflow activity in an area, enabling them to make better informed choices about how they use waterbodies.

Since initial publication to meet IUW commitments, the published overflow data has been updated annually by the end of March each year to include the most recent rolling 5 calendar years data. For non-reported, we will add data each year until we have a rolling 5-year data set.

Whilst the IUW routemap refers to CSOs we have published data for all overflow types including Combined Sewer Overflows (CSOs), Settled Storm Sewage Overflows (SSSO) and Emergency Overflows (EO) that require reporting/monitoring.

Licences do not require permanent EDMs to be installed on all overflows. Several Scottish Water overflows have licence requirements for permanent EDMs and, of these, a subset require annual reporting of overflow events to SEPA by the 31st of January for the previous calendar year.

Some licences require reporting to SEPA every 5 years or reporting of overflow events during the bathing season only. From the 2024 return (2023 data) overflow events have been reported for the whole calendar year where available.

There are several overflows in the published non-reported overflow data where licences require permanent EDMs, but we have not yet been unable to publish data for them. An improvement project is ongoing, these have 'Monitoring improvement project ongoing' in the comments for 2024. We will publish data for these once new EDMs installed start to provide meaningful annual data.

Additional overflows with new EDMs installed to meet IUW commitments are not currently included in the non-reported data publication as a full year's data is not yet available. Going forward the number of overflows on the other non-reported overflow data will increase as the new EDMs installed start to provide meaningful annual data.

There are ongoing commitments to further increase the number of overflows monitored in future. As we continue our installation, review and verification processes, we will look to publish annual data for further monitored overflows where available.

Where new EDMs have been installed, they go through a review and quality assurance process to ensure data is robust. Once the process is complete, they are linked onto our Near Real Time (NRT) Overflow map.

Not all overflows with existing EDMs are currently suitable for use/publication in the NRT overflow map due to existing monitoring limitations (telemetry source/configuration). However, if licences require annual reporting or permanent overflow event monitoring, we will continue to publish data annually where available.

Exclusions

Reasons why overflow events are not available may be because Scottish Water has not been required to collect or report this information. Scottish Water aims to develop approaches to help identify reasons for overflow events and this will become part of future releases of information.

Some parts of the wastewater system are operated on our behalf by Private Finance Initiative (PFI) operators. Where identified as the person responsible for the asset within the licence, these

operators submit flow, and event information directly to Scottish Environment Protection Agency (SEPA) and are not included in our returns to SEPA or in our published data. These assets will be included in the Scottish Water returns and/or published data once assets are transferred back to Scottish Water and we become the responsible person on the licences.

Line B8.6- Number of unsatisfactory intermittent discharges at 31 December of the Report Year

The number of reported UIDs decreased from 907 in AR24 to 892 in AR25. This is a decrease of 15 and is as a result of the outputs of UID intervention development projects, raised on completion of the SR15/SR21 environmental study programmes and agreement of UID prioritisation with SEPA.

The initial development project outputs all related to 'High Priority' UIDs. The 15 assets making up the decrease were confirmed to have a status of 'No Need', which was then agreed with SEPA, and these were subsequently removed from our list of UIDs (known as the UID Register).

This is an ongoing process enabling Scottish Water to meet our Improving Urban Waters (IUW) commitments. The confidence grade for this line remains at A3 in AR25.

Line B8.7 Number of intermittent discharges at 31 December of the Report Year

New line for AR25

The number of intermittent discharges, which includes combined sewer overflows that operate in the event of an overloaded sewer, emergency overflows at pumping stations that operate in the event of mechanical or electrical failure, storm overflows at inlets to works and storm tank discharges that operate in the event that a works has reached capacity, was reported as 4,083 in AR24 under line B8.5, and 4226 in AR25.

The locations of the intermittent discharges are summarised in the table. Intermittent discharges at pumping equipment that is located at a wastewater treatment works is included in the wastewater treatment works (WwTW) count.

ID Location	Nr of ID
Ww Network	2256
WwPS	997
WwTW	973
Total	4226

This increase of 143 in AR25 is mainly a result of the ongoing data cleansing and identification work, which has added several overflows located at WwTWs that were previously not recorded individually in Scottish Water's Ellipse system. The confidence grade has remained the same as AR24 at A3.

Line B8.8 Percentage of unsatisfactory intermittent discharges

New line for AR25.

This is calculated based on the number of Unsatisfactory Intermittent Discharges (B8.6) divided by the total number of Intermittent Discharges (B8.7) multiplied by 100.

Line B8.9 Number of discharges monitored at 1 January of Report Year

New line for AR25

There are a number of reasons why data is not available or cannot be used for reporting/ publication. In some cases, data may be available for some or part of the year but is not used due to data accuracy concerns (e.g. data is not comparable with historical data and/or other monitoring available on-site). Where there are issues with existing monitors used for reporting/ publication these may need to be repaired/replaced. This would not be considered as first-time monitoring.

New EDMs installed to meet our IUW commitments are first-time monitoring.

Reported – The number of overflows monitored at the start and the end of the year for reported is based on the number with full or partial datasets in the published overflow data for 2024 for consistency. The reported and subsequently published data includes a combined overflow measurement point for Balfron, as we are unable to report the CSO, SSSO and EO separately. This is included as 1 measured overflow. **(146)**

Non-Reported -The number of overflows monitored at the start and the end of the year for non-reported is based on the number with full or partial datasets in the published overflow data for 2024 for consistency. **(127)**

Other – This is the number of new EDMs installed to meet IUW commitments that are not currently included in the reported or non-reported numbers. New EDMs to meet IUW commitments were installed and where quality assurance was complete, they were put onto the NRT map. The NRT map was published on the 16th of December 2024. Therefore, on the 1st of January 2024 this would be zero. **(0)**

Total – Reported + Non-Reported + Other = 146 + 127 + 0 = **273**

Line B8.10 Number of discharges monitored at 31 December of Report Year

New line for AR25

There are a number of reasons why data is not available or cannot be used for reporting/ publication. In some cases, data may be available for some or part of the year but is not used due to accuracy concerns (e.g. data is not comparable with historical data and/or other monitoring available on-site). Where there are issues with existing monitors used for reporting/publication these may be repaired/replaced. This would not be considered as first-time monitoring.

New EDMs installed to meet our IUW commitments are first-time monitoring.

Reported – The number of overflows monitored at the start and the end of the year for reported is based on the number with full or partial datasets in the published overflow data for 2024 for

consistency. The reported and subsequently published data includes a combined overflow measurement point for Balfron, as we are unable to report the CSO, SSSO and EO separately. This is included as 1 measured overflow. **(146)**

Non-Reported - The number of overflows monitored at the start and the end of the year for non-reported is based on the number with full or partial datasets in the published overflow data for 2024 for consistency. **(127)**

Other – This is the number of new EDMs installed to meet IUW commitments that are not currently included in the reported or non-reported numbers. New EDMs to meet IUW commitments were installed and where quality assurance was complete, they were put onto the NRT map.

On the 31st of December 2024 there were 1,111 overflows on the NRT map. This consisted of 970 new EDMs and 141 existing EDMs that are already included in the reporting and/or non-reported numbers. Therefore, the number of 'other' on the NRT map on the 31st of December 2024 was 970. A further 32 new EDMs had been installed, however, they were still going through the review and verification process before they were able to be put onto the NRT map. This makes the total other = $970 + 32 = 1,002$.

Total – Reported + Non-Reported + Other = $146 + 127 + 1,002 = 1,275$.

Line B8.11 Percentage of discharges monitored

New line for AR25

This is calculated based on the total number of monitored overflows (B8.10) divided by the total number of intermittent discharges at the 31st of December 2024 (B8.7) multiplied by 100.

Therefore, $1,275/4,226 * 100 = 30.17\%$.

Line B8.12 Discharges monitored uptime

New line for AR25

There are a number of reasons why data is not available or cannot be used for reporting/ publication. Data availability in the year can be affected by communications issues, technical faults. In some cases, data may be available for some or part of the year but is not used due to accuracy concerns (e.g. data is not comparable with historical data and/or other monitoring available on-site). Where there are issues with existing monitors used for reporting/publication these may be repaired/replaced. This would not be considered as first-time monitoring.

New EDMs installed to meet our IUW commitments are first-time monitoring.

The published reported and non-reported overflow data includes number of days data available in the calendar year which events are based on. Where there is no data available the number of days data is 0. These have not been included in the calculations as they are assumed to not be monitored for the purposes of this return.

The reported and non-reported published data for the 2024 calendar year published on our Scottish Water website at the time of submission has been used to determine the uptime for consistency. Average calculations are based on the overflows with data in the reported and non- reported overflow data for 2024.

Reported - The average number of days data for all 146 overflows with data in 2024 was 337. Therefore, the percentage of 2024 is $337/366 \times 100 = 92.08\%$.

Non-reported – The average number of days data for all 127 overflows with data in 2024 was 329. Therefore, the percentage of 2024 is $329/366 \times 100 = 89.89\%$.

Other – This is the number of new EDMs installed to meet IUW commitments that are not currently included in the reported or non-reported numbers. New EDMs to meet IUW commitments were installed and where quality assurance was complete, they were put onto the NRT map within the 2024 calendar year. The NRT map was published on the 16th of December 2024. Therefore, this is not required for AR25 as they became monitored for the first time part way through the year.

Total – There is no calculation in the B8.12 Total cell and there is no reference to this in the definitions or rules. Therefore, a weighted average of the reported and non-reported data has been provided. The weighted total average = $(146 \times 92.08\%) + (127 \times 89.89\%) / (146 + 127) = 91.06\%$.

Line B8.13 Number of spills

New line for AR25

There are a number of reasons why data is not available or cannot be used for reporting/ publication. In some cases, data may be available for some or part of the year but is not used due to accuracy concerns (e.g. data is not comparable with historical data and/or other monitoring available on-site). Where there are issues with existing monitors used for reporting/publication these may be repaired/replaced. This would not be considered as first-time monitoring.

The total number of overflow events for reported and non-reported for the 2024 calendar year aligns with the data published on our Scottish Water website at the time of submission for consistency.

The reported and published data includes overflow events greater than 15 minutes.

This is not comparable with England and Wales due to the different reporting and counting methodologies used.

Reported – The total number of events in the reported data was **16,347**.

Non-Reported - The total number of events in the non-reported data was **8,051**.

Total – Reported + Non-reported = 16,347 + 8,051 = **24,398**.

Additional overflows with new EDMs installed as part of our IUW routemap were not included in the non-reported data for 2024 as a full year's data was not available. As we continue our review and verification processes, we will look to publish data for further monitored overflows where available in the future. These will be included in the non-reported overflow data when published annually going forward.

The published reported and non-reported overflow data includes the start/stop time (dd/mm/yyyy hh:mm:ss) and duration ([h]:mm:ss) for each discrete overflow event greater than 15 minutes. The Overflow Summary tabs in the published datasets include a summary of the overflow event data (total number, total duration and total volume, if required) for overflows at a Scottish Water Unique Measurement Point level.

The current reporting and overflow counting approach used is not the same as the DEFRA 12/24 spill counting methodology. However, the intention is to report and publish the total number of events in the calendar year using the 12/24 approach in future years. Discussions have commenced with SEPA regarding this.

Line B8.14 Average number of spills per monitored discharge

New line for AR25

This is calculated based on Number of Spills (B8.13) divided by Number of Discharges monitored at 1st January 2024 (B8.9). For the total column, only columns Reported and non-reported of line B8.9 are considered.

The total number of monitored overflows in B8.9 includes reported, non-reported and other overflows. As there is no data for the 2024 calendar year for other overflows for 2024 the calculations for the average number of events do not include the number of other overflows in B8.9.

B8.13 includes the number of reported and non-reported overflow events for the 2024 calendar year which aligns with the data published on our Scottish Water website at the time of submission for consistency.

The average number of overflow events in the reported data may be higher than non-reported as the requirement to report is generally based on the size of the network or WwTW (>15,000 Population Equivalent) and/or the sensitivity of the receiving waters. Further information is available in SEPA guidance for WwTW (SG-13) and Sewer Overflows (RM-07).

This is not comparable with England and Wales due to the different reporting and counting methodologies used.

Reported – The average number of overflows has been determined by B8.13/B8.10 for reported only. Therefore, 16,347/146 = **111.97**.

Non-Reported - The average number of overflows has been determined by B8.13/B8.10 for non-reported only. Therefore, $8,051/127 = 63.39$.

Total – The Total average is B8.13/B8.10 for reported + non-reported. Therefore, $24,398 / 273 = 89.37$.

Line B8.15 Volume of spills

New line for AR25

EDMs only provide the start and stop times of overflow events which enables the duration to be determined. They do not provide volume information. Therefore, volume information is not available or published in the non-reported overflow annual data or on the NRT overflow map.

In some cases, we are required by license to report volume or an estimated volume, which is why this is included in the published reported data for some overflows where required and available. Where volume is required but is not able to be reported with the monitoring available, in these cases the volume cells are blank or have no data available.

The total volume of reported overflow events for the 2024 calendar year aligns with the reported data published on our Scottish Water website at the time of submission for consistency. The reported data includes overflow events greater than 15 minutes. (**30,036,002**).

There was volume data in the reported and subsequently published data for 2024 for 53 overflows.

In the reported and subsequently published data for 2024 volume/estimate of volume was required at a further 27 overflows (6 of which had no event or volume data) but we were not able to report this with the monitoring equipment/data currently available.

Line B8.16 Total duration of spills

New line for AR25

The total duration of overflow events for reported and non-reported for the 2024 calendar year aligns with the data published on our Scottish Water website at the time of submission for consistency as agreed.

The reported and published data includes overflow events greater than 15 minutes.

Reported – The total duration of events in the reported data was **124146:05:32**.

Non-Reported - The total number of events in the non-reported data was **84231:27:14**.

Total – Reported + Non-reported = $124146:05:32 + 84231:27:14 = 208377:32:46$.

10.2.2 Lines B8.17-B.21 – Leakage

Line B8.17 Leakage

Total leakage MLE (post adjustment) as a percentage of Distribution Input (DI) is at 25% (rounded from 24.7%) for AR25 and was also at 25% (rounded from 25.3%) in AR24.

Line B8.18 Total Leakage (post-MLE Adjustment)

Scottish Water reports MLE leakage of 453.558 MI/d for AR25. The AR25 leakage value is 8.28 MI/d lower than the 461.84 MI/d at AR24 on a like-for-like basis (see Table 53). See section B8.21 and A2.21 for further details on how this was achieved.

Table 53: Total leakage post MLE comparison.

Report Year	Top-Down Leakage (MI/d)	Bottom-Up Leakage (MI/d)	MLE Leakage (MI/d)
AR11	757	693	699
AR12	661	617	629
AR13	617	561	575
R14	608	553	566
AR15	590	531	544
AR16	531	492	500
AR17	559	480	495
AR18	543	480	492
AR19	472	482	492
AR20	454	467	465
AR21	426	471	463
AR22	431	464	459
AR23	450	455	454
AR24	474	460	462
AR25	479	452	454

Line B8.19 Net Distribution input (DI) treated water (water put into supply)

AR25 saw a slight decrease in Distribution Input (DI) of 1.11MLD (to 1,836.63 MLD) from 1837.73 MLD in AR24. A cooler than average summer meant we saw no significant summer increase unlike AR24. The winter brought a period of cold temperatures from late November through January. This brought an 84ML/d increase in DI over the winter period due to a similar increase in leakage (**A2.21**).

For AR25 3.11% of the data was estimated or constant which is up from 1.79% at AR24. This has remained within a range of 1-5% over the past 16 years but is over the fifteen-year average of 2.17%. There was no manually read data for DI with 96.81% based on telemetry data (AR24 98.21%). AR25 has been a challenging year for telemetry dataset management which has reflected in an increase in estimated data for the period of AR25.

There were 8 replacement meters installed and no new meters installed during AR25

Line B8.20 Leakage target

The target range is 444 to 459 MI/d. Scottish Water uses a spot target of 452 MI/d for AR25 to allow the calculation of Line B8.21.

Line B8.21 Leakage performance against the target

Scottish Water reports MLE leakage of 453.558 MI/d for AR25 (rounded to 454 in the Performance and Prospects report), which is 1.56 MI/d (0.34%) above the OPA target of 452 MI/d for AR25.

Like recent years, where we experienced similar conditions at the start of the year bringing a spike of leakage breakout in late spring (May). This was not to the same extent as the 23/24 spring and summer period, but we had to react to recover from it. As we moved into winter, we experienced a cold but not exceptional period, bringing an increase in leakage over a short period in December and January. Through both periods we could see the impact across hundreds of our district metered areas, all needing individual assessment and recovery. Our increased activity across the entire network helped us deliver the lowest recorded leakage volume in these measured district metered areas, going below 400 MI/d (396.6 MI/d) for the first time.

To manage resources and focus clear action throughout the year, we worked under an incident team structure. A huge effort from resources across all key functions reporting through short interval control helped to coordinate and prioritise all our activity.

We continue to optimise all areas of our activity including trialing new approaches to return to our long-term trend of reducing leakage year-on-year. More information is contained in the Commentary for Table A2.

10.3 Investment – Unsatisfactory Intermittent Discharges (UIDs)

The allocation to MA005 for UIDs is currently £134.1m and is divided between two needs codes – Water Quality (WQ) is £22.7m and Aesthetic (SRD) is £111.4m. As per the agreement with SEPA WQ will be prioritised to meet the measures set out within RBMP3.

The initial SR21 allocation was £207m and was reduced first to £146m then to £128m (IPS 24.1) before being increased to the current level.

As of May 2025 the Latest Best Estimate (LBE) in of spend for SR21 is £136.7m with a spend to date of £39.4m.

Action has been taken which will significantly accelerate the pace of investment against this MA as follows:

- There are currently three construction projects completed, which are Lord Ancrum's Wood CSO, Little Carron SPS CSO and Glensburgh SPS CSO.
- We have started construction for 5 projects and we are forecasting "start on site" for a further 20 projects by the end of the 2025/26 financial year. Many of the projects will be completed within this timeframe.
- We are forecasting that 74 of the current 109 high priority UID needs can be delivered before December 2027, based on the current development programme and on the level of available funding for UIDs set out within IPS25.1. This includes a forecast of 'No build' outputs across SRD and WQ drivers that are evidenced and agreed with SEPA. So far 23 'No build' solutions have been agreed with SEPA.
- By December 2027 we will have developed solutions for 259 UIDs. This will cover all 109 high priority UIDs, the Clyde catchment UIDs (55) and a further 95 UIDs drawn from the pool of 150 medium priority UIDs. Subject to affordability and Scottish Government Investment Group approval, we will deliver UID interventions with the priority focusing on WQ drivers.
- We have identified that 34 of the 109 high priority UID needs are emerging as complex to resolve and where further catchment planning work is required to identify solutions. This includes 7 UIDs with WQ drivers. We anticipate better clarity on the investment requirements within the 2025/26 financial year, following ongoing study activities. However delivery of these projects is forecast beyond SR21. The feasibility, priority and delivery timescale of these will require further discussion with SEPA.
- Current forecasts were developed using assumptions regarding unit pricing rates, typical construction durations and based on the current view of available funding. They are also based upon our understanding of specialist resource availability across the UK. We are investigating several options to support this development work and to reduce resource constraints, including the use of digital tools and resources from outside the UK. We will adjust the forecasts as more information becomes available and update, as necessary.

The outcomes of the successful delivery of MA005 intervention will be:

- Delivered solutions for high priority water quality UIDs by December 2027, for all projects considered affordable against IPS 25.1.
- Delivered solutions for high priority aesthetic UIDs by December 2027, for all projects considered affordable against IPS 25.1.
- Deliver solutions for Clyde catchment high priority and medium priority UIDs which have a hydraulic link to the high priority UIDs.
- Developed solutions for confirmed high priority UIDs by December 2027, for all projects deferred for delivery beyond December 2027.
- Agreed timetables for delivery of all the high priority UIDs and promoting to Scottish Government Investment Group for approval.

10.4 Data

Line B8.1 - Mains bursts per 1000 km

The numbers reported for this return are derived from the approach outlined in the commentary for Table E6, Line E6.16 - Total Length of Mains, and Line E6.19 - Water Mains Bursts; the base numbers used to derive the number for this line.

10.4.1 Lines B8.2 & B8.3 - Sewer Collapses

Since the introduction of Salesforce, Network Analysts are only required to use Ellipse for assignment of fault codes. The reporting methodology has now been revised to report from Salesforce rather than by fault code from Ellipse. Reporting from Salesforce addresses the risk that a fault code has not been assigned. Ellipse Work Order numbers link the data contained within Salesforce and Ellipse. This change in reporting methodology has avoided any reduction in confidence grade which may have otherwise resulted from the new processes implemented when Salesforce was introduced.

It is not feasible to forecast Line B8.3 due to not being able to forecast the total length of total sewers.

10.4.2 Lines B8.4 & B8.5 - Sewer Blockages

The data for this line is sourced from Scottish Water Customer Relationship Management Software (CRM), Microsoft Dynamics. This data has been collected since 2010, ongoing data cleansing and reporting methodology changes had seen a steep decline in volumes over the earlier years through to circa 2015. Since this time the data source, methodology and recording have been static. It is not feasible to forecast this data as it is impacted by customer behaviour and weather.

10.4.3 Lines B8.6 - B8.16 Discharges

The data source informing the removals of intermittent discharges from the UID Register during the AR25 period are the outputs of UID intervention development projects. These projects were raised following completion of the SR15/SR21 environmental study programmes and subsequent SEPA agreement on UID prioritisation.

The UID development projects are where UID solutions are taken through optioneering and detailed design in order to arrive at a scoped and costed solution. The assets making up the decrease in UID numbers were confirmed to have a status of 'No Need', each of these outputs were then presented to and formally agreed with SEPA, thus enabling removal from the UID Register.

This is an ongoing process enabling Scottish Water to meet our Improving Urban Waters (IUW) commitments.

Whilst Scottish Water has published plans (Improving Urban Waters Routemap - Scottish Water) for addressing the highest priority UIDs within the SR21 investment period, it is not possible to forecast UID numbers for future years since performance is dynamic, is informed by new investigations and is impacted by customer behaviour, operational issues in the network and by the weather.

As agreed with WICS the published reported and non-reported data on the Scottish Water website at the time of submission for 2024 has been used to populate the new B8.9 - B8.16 lines for AR25.

The number of 'other' overflows at the 31st of December 2024 is based on the new EDMs installed to meet IUW commitments. The installation numbers are from the progress update email from 31st December 2024 and the number on the NRT map is from a historical website data PowerBI report.

The asset information in the published overflow data is from our corporate asset inventory, Ellipse. There was a standardisation exercise undertaken in late 2024/early 2025 to align the asset and Scottish Water measurement point references being used on the NRT map and in the reported/ non-reported overflow data. This was done in advance of the 2024 return to SEPA and March 2025 annual data publications.

There are agreed processes for the annual flow and event return which have been replicated to an extent for the non-reported overflow data publication. Published reported and non-reported overflow data are based on available data, which may vary between monitoring locations. Published reported and non-reported data overflow data includes all discrete overflow events greater than 15 minutes.

Raw EDM monitoring data goes through several data pipelines before it is available for use e.g. logger on-site to our corporate data repository and then onto apps/tools for viewing/use. The frequency at which data is recorded and received is variable for existing monitoring.

Prior to reporting and/or publication we go through a review and verification process which includes reviewing data availability, comparing calculated overflow event data with previous trends and querying where required.

Occasionally, operational or maintenance issues occur which affect the monitoring or recording equipment. As part of data review processes a decision may be made to exclude data on certain dates if there are data quality/accuracy concerns (e.g. data is not comparable with historical data and/or other monitoring available on-site).

11 Table B9: Security of supply index

11.1 Overview

AR25 is the fourth year of reporting Security of Supply Index (SoSI) and associated Water Resources data from the Supply Demand Balance (SDB) in the SR21 Investment Period, and the fourth consecutive year of reporting these metrics to WICS for use as an international comparator.

The format of the B9 tables is consistent with AR24, with the same six child tables (B9a to B9f) feeding information to the higher-level summary provided in Table B9. The six child tables provide a range of three Level of Service (LoS) intervals for each of two demand scenarios.

- Table B9: Summary overview of SoSI data and results
- Table B9a: SoSI - 1 in 40 Level of Service - Dry Year Annual Average
- Table B9b: SoSI - 1 in 40 Level of Service - Dry Year Critical
- Table B9c: SoSI - 1 in 100 Level of Service - Dry Year Annual Average
- Table B9d: SoSI - 1 in 100 Level of Service - Dry Year Critical
- Table B9e: SoSI - 1 in 150 Level of Service - Dry Year Annual Average
- Table B9f: SoSI - 1 in 150 Level of Service - Dry Year Critical

For each LoS interval reported, the only variation of input data to the SDB model is the hydrological yield, which is modelled at the differing service levels of increasing drought severity (represented using return periods). Demand, population, and all other areas of supply data are consistent between the reported tables, and reflective of directly measured data from AR25, or the best understanding of the current configuration and capability of supply assets.

The yield values used, and hence the resulting SoSI outputs, are currently calculated without any contribution from Drought Planning activities, and therefore represent a fixed asset position of supply capability. It is our intention that future development will allow us to represent Drought Planning resilience via the SDB, although the details of how and when this will be applied in practice are still in discussion.

Unless otherwise stated, this B9 table commentary will focus on results as reported in Table B9a: a one in 40-year drought return period LoS, using Dry Year Annual Average Demands. This maintains perspective with and comparison to the AR24 commentary and reflects the main focus of the internal assurance audit. No methodology, calculations or data differences exist between the different table outputs except for alternative hydrological yield values, and the use of either Dry Year Annual Average demand or Dry Year Critical demand as appropriate.

For AR25 the reported SoSI score for 1 in 40-year DYAA (Table B9a) is 38 points (summarised in **Line B9.4**). This is a reduction of -10 points overall from the AR24 position of 48 points. The worsening SoSI is principally driven by zonal differences in demand, although overall total of Distribution Input data measured over the AR25 period has remained largely similar: the total being 1,836.788 Ml/d Annual Average, a decrease of -0.945 Ml/d from AR24 (-0.05% difference). The population is up slightly to 5,360,380, an increase of 9,877 (0.18%).

The SoSI scores were calculated for a total of 188 Water Resource Zones (**Line B9.1**), which is one less than the reported number as reported in AR24. The reduction is due to the 'mainout' and removal of the Yarrowfeus WRZ (WRZ000234), which is now incorporated into the Howdenwells and Manse Street WRZ (WRZ000224).

At individual Water Treatment Works (WTW) level, there was only one change where the Water Treatment Works at Craighead was replaced; the asset ID number changed from WTW000493 to WTW000831, but this change did not alter the count of, or assignment of WRZ ID numbers.

Of the 188 Water Resource Zones (WRZ), 53 are calculated to be in supply deficit using the 1 in 40 LoS (**Line B9.2**), and it is these zonal deficits that contribute to the overall SoSI position of 38, reduced from a perfect score of 100. The score of 38 is categorised as SoSI band 'D' (**Line B9.5**), being in the range of less than 50 points, and described as 'Large deficit against target headroom'.

The OPA scores presented (**Lines B9.7 to B9.12**) are for reference only, using a planned SoSI score target of 91 that was originally set and attained during the SR10 period, and which aligned with the Water Resource Plans for that investment cycle. Since then, significant revision to the supply data and zonal structure have been introduced that effectively make this planned score outmoded. The revisions have all been undertaken as data and understanding of water supply assets has improved, thus increasing the understanding of supply risks to customers. These improvements directly support the primary function of the SDB as an evidence base for Water Resource related investment appraisals.

Purely for comparative purposes, the OPA contribution from SoSI (**Line B9.12**) is 6.25 weighted points, which is the same as reported in AR24.

The Water Available for Supply Index (WASI) is based on the percentage population in surplus WRZ for two different service levels, 1 in 40-years and 1 in 100-years, using the Dry Year Critical (DYC) demand scenario. Although the new table layout enables Yield Levels of Service intervals of 1 in 40, 100, and 150 years to be reported, only the 1 in 40 and 1 in 100 intervals have historically been used for WASI. Table 54 below shows the history of reported values and includes the latest position for AR25 at the 1 in 40 and 1 in 100 intervals.

Table 54: History of reported values for 1 in 40 and 1 in 100 intervals.

Year	1 in 40	1 in 100
AR14	96.50%	77.60%
AR15	88.90%	71.50%
AR16	87.30%	77.30%
AR17	86.80%	82.20%
AR18	86.70%	70.10%
AR19	86.70%	71.40%
AR20	86.60%	75.90%
AR21	79.80%	61.40%
AR22	76.75%	55.19%
AR23	63.96%	56.85%
AR24	63.24%	52.60%
AR25	63.11%	59.33%
% Change (AR24 to AR25)	-0.13%	6.73%

WASI is the direct equivalent of **Line B9.6** (Percentage in Population in Surplus Zones). The values in the above table are taken from the Dry Year Critical demand scenarios: Tables B9b and B9d. An equivalent score for 1 in 150-year severity could be taken from the same reporting line, but from Table B9f, which results in a value of 38.97%, an increase of just 0.02% from AR24.

For AR25 the WASI results for 1 in 40-year LoS is similar to AR24. There were several changes to WRZ that moved between surplus and deficit status (therefore impacting the Percentage of Population in Surplus Zones), but the overall balance remained relatively similar. For the 1 in 100 year scenario there is a positive change of nearly 7%, and this is caused by the Daer and Camps

WRZ moving from a slight deficit to a slight surplus, which - although there was a minor reduction in modelled hydrological yield - was principally driven by a reduction in annual average demand of 4.4 MI/d.

It is clear that WASI has shown a trend of worsening performance over the period since AR14, which is principally driven by shifts in zonal demand, improved supply data, and general improvements to the understanding of supply risk. It is, however, important to recognise that this measure (along with SoSI) is reflective of our 'fixed asset' supply capability only. The SDB uses hydrological yield values that do not include the wider availability of operational Drought Planning responses that can be used to mitigate drought risks and maintain levels of supply service in certain zones.

Scottish Water is currently drafting the SR27 Business Plan, which will include specific investments aimed at improving our overall supply service levels, and additionally will investigate the plausibility of better representing combined residual supply risks where operational and drought planning responses are considered alongside the fixed asset capability.

Whilst SoSI gives a composite score across all WRZ, examining the breakdown of deficit banding into different categories of percentage deficit severity can give a more detailed and helpful picture. Table 55 below shows, for AR25, the proportions of population and count of WRZ in each deficit band for the 1 in 40-year tables. Here most of the population and zones are either in surplus or the least severe band of deficit, which is indicative of deficits that are similar in scale to headroom uncertainty.

Table 55: Count of WRZ and population proportion in each deficit band for 1 in 40-year table for AR25.

Category	DYAA % Population	DYAA Count WRZ	DYC % Population	DYC Count of WRZ
Band 1 ($\geq 0\%$ Surplus)	69.99%	135	63.11%	101
Band 2 ($< 0\%$ to $> -10\%$ Deficit)	14.26%	26	20.62%	28
Band 3 ($\leq -10\%$ to $> -25\%$)	13.38%	17	13.75%	34
Band 4 ($\leq -25\%$ to $> -50\%$)	2.23%	7	2.36%	17
Band 5 ($\leq -50\%$ Deficit)	0.13%	3	0.16%	8

11.2 Performance Trends

Table 56 shows the top 5 WRZ where SoSI has improved between the AR24 position and the AR25 outputs. The term WAFU is 'Water Available for Use' and is the zonally calculated supply capability, directly representing the supply side of the SDB. This is primarily constrained by asset capability (WTW capacity or Hydrological Yield of the Water Source) or Controlled Activities Regulations (CAR) environmental abstraction licences from SEPA.

Table 56: Top 5 WRZ where SoSI has improved between AR24 and AR25.

WRZ Name	AR24 SoSI Points Lost	AR25 SoSI Points Lost	SoSI Difference	WAFU Change (MI/d)	WAFU Change Comment	DI Change %	Population Change
Inverness	11.55	9.38	-2.17	0.02	WTW Losses DI	-0.032	-0.021
Dhu Loch & Loch Ascog	0.51	0.11	-0.41	0.49	Yield	0.034	-0.014

WRZ Name	AR24 SoSI Points Lost	AR25 SoSI Points Lost	SoSI Difference	WAFU Change (MI/d)	WAFU Change Comment	DI Change %	Population Change
Killiecrankie & Kenmore	2.2	1.88	-0.32	0	WTW Losses DI	-0.033	0.006
Assynt	8.22	8.01	-0.22	-0.03	WTW Losses DI	-0.01	-0.001
Herricks	4.97	4.8	-0.17	0.01	RWML DI	-0.016	-0.007

In four of the five zonal cases from the above table, it is changes in the levels of Annual Average Distribution Input that have directly driven the changes in SoSI. There are also smaller indirect improvements linked to the demand reduction, such as the lower corresponding rate of volumetric WTW losses which has a consequential effect of Water Available For Use. The notable exception to demand driven change is Dhu Loch & Loch Ascog WRZ, where a hydrological yield update improved the WAFU supply side component.

By far the largest individual gain was in Inverness WRZ, where lower demand contributed to a gain of 2.17 SoSI points, demonstrating again the sensitivity of SoSI to demand rate, particularly in WRZ with larger population proportions.

The top 5 WRZ where SoSI points have been lost in AR25 are headed by Turret WRZ, where an annual average demand increase of 3.4 MI/d has worsened SoSI by nearly 5 whole points.

All the most significant worsening of zonal SoSI performance is driven principally by demand differences in AR25 (shown in the Table 57 below), despite the national total Distribution Input between AR24 and AR25 barely changing (~1 MI/d difference).

Table 57: Top 5 list of WRZ where SoSI points have been lost between AR24 and AR25.

WRZ Name	AR24 SoSI Points Lost	AR25 SoSI Points Lost	SoSI Difference	WAFU Change (MI/d)	WAFU Change Comment	DI Change %	Population Change
Turret	7.81	12.76	4.96	-0.3	WTW Losses DI	0.051	-0.018
Fife	10.12	13.28	3.16	-0.47	WTW Losses DI	0.016	0.006
Clatto & Lintrathen & Whitehilllocks	1.52	3.52	2	-0.23	WTW Losses DI	0.027	0.002
Bradán	0.01	1.64	1.64	-0.49	WTW Losses DI	0.062	-0.02
Muirdykes & Camphill	0.1	0.76	0.67	-0.19	WTW Losses DI	0.037	0.001

11.3 Data

Updates to the SDB have continued during AR24 with a mix of planned and opportunistic improvements to the supply side data. The base configuration of WTW has had only one update, related to a new replacement WTW at Craighead:

- Internal replacement of WTW000493 Craighead to replacement works WTW000831 Craighead (WRZ000026 Craighead)

There is no resultant SoSI change at Craighead, this is a like-for-like replacement in respect of capacity.

The data changes that affect the supply side of the SDB (Water Available for Use) can be summarized as follows:

- Three yield updates as a result of model improvements or reviews
- Two WTW Percentage loss rate updates

Not all supply data updates have a direct impact of WAFU, and this is usually the result of the Deployable Output calculations, which utilise the minimum supply constraints. Updates to a supply constraints that is not the minimum (Yield, CAR, WTW Capacity) may not cause any meaningful change in the SDB, unless a new minimum causes a change in supply constraint. Similarly, changes in raw water or peak demand data components will only affect particular constraints and demand scenarios.

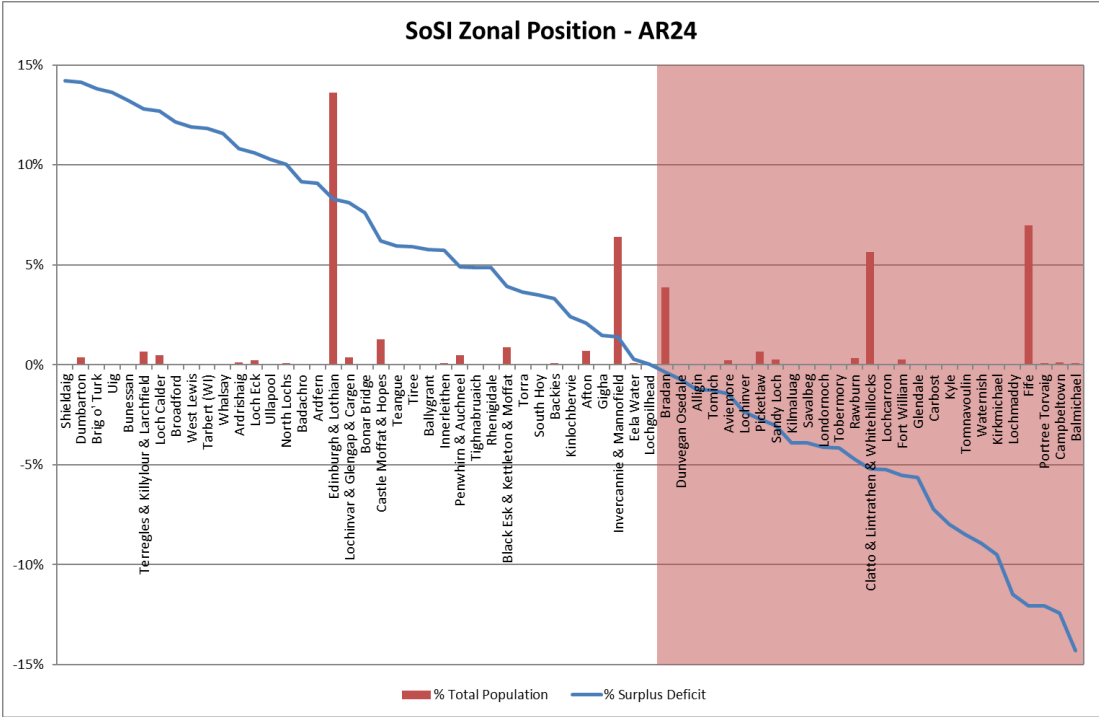
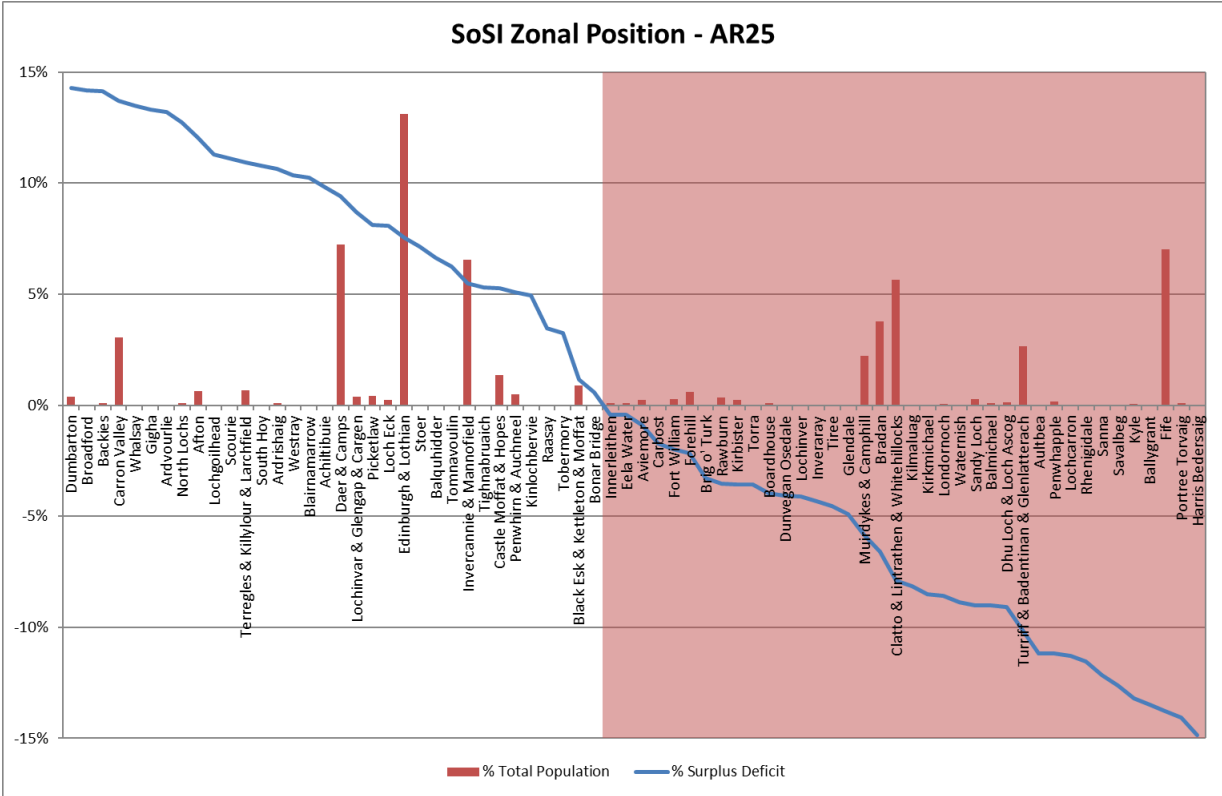
Yield updates have been responsible for notable changes in SoSI performance in previous AR data, but in AR25 the total contribution from the updates only represents a 0.406 point improvement, in this case solely for Dhu Loch and Loch Ascog WRZ.

As an expansion of the analysis around SoSI, it is often useful to have visibility of the Sensitive WRZ that are near to the tipping point of being in either SDB surplus or deficit. The below diagram shows the zones that fall within the range of +/- 15% surplus or deficit and displays the % proportion of total population that is reported for each zone. Zones with large populations drive larger contributing SoSI scores, so this approach is useful for easily observing which zones may be at risk of going into deficit, or where the opposite condition applies.

The red shading to the right-hand side of the chart indicates the deficit zones displayed, i.e., all the zones that have a deficit in the range of <0 to -15%. The blue plotted line of % surplus/deficit crosses zero on the x axis at the point where surplus zones transition to deficit zones. The full extent of all deficit zones extends beyond -15% and is not displayed. The usefulness of this chart lies in recognizing which zones are close to surplus/deficit boundary and are perhaps prone to crossing this boundary in future years, influencing metrics such as total counts of population in surplus or deficit categories, which are highly sensitive to the binary state change between surplus or deficit.

Two charts are displayed, one showing the position for AR25, and second being the previous reported position in AR24.

Figure 44: SoSI Zonal Positions. Zones that fall within the +/- 15% surplus deficit range and the percent of the total population that is reported for each zone (AR25 and AR24 in separate charts).



12 Table B10: Scottish Water Compliance with Water Quality Regulations

12.1 Introduction

DWQR regulates the quality of water supplied by Scottish Water, ensuring that drinking water supplies meet the requirements of the Public Water Supplies (Scotland) Regulations 2014 (as amended in 2017 and 2022). Except for line B10.24 Table B10 is a calendar year of 2024 data submitted by Scottish Water to DWQR and reported on in DWQR's annual water quality report (AQWR).

The AR25 Table B10 return includes:

- Parametric compliance at water treatment works, storage points and consumer taps.
- Cryptosporidium at water treatment works.
- Total compliance.
- Drinking Water Quality Regulator (DWQR) enforcement notices.
- Scottish Water letters of commitment to DWQR.
- DWQR water quality incidents.
- Water quality consumer contacts.
- Second tier complaints.
- Lead.

The following lines are new additions to Table B10 for AR25:

- B10.15c Total compliance including Cryptosporidium compliance (regulatory baseline).
- B10.24 Estimated number of lead pipes remaining in public supply.
- B10.25 Indicator of lead in customers supply pipes.

DWQR Annual Water Quality Reporting and AR25 Timescales

Publication of DWQR's annual water quality report (AWQR) happens around August of each year, after the population of Table B10. For this reason, DWQR approval of Table B10 has not yet been requested for AR25 as their 2024 dataset is still being processed. The DWQR AWQR is used to confirm the number of water quality incidents (Line B10.18) and second tier complaints (Line B10.23) and so confidence grades for these data have been entered as B2 and BX, respectively. Potential changes to these figures are noted in section 12.3 Performance Trends and may lead to differences between the numbers provided during audit in April-25 and final numbers submitted in the final AR25 return.

The Public Water Supplies (Scotland) Amendment Regulations 2022

The Public Water Supplies (Scotland) Amendment Regulations 2022 came into force on 1 January 2023 and transposed the revised Drinking Water Directive (2020/2184) into Scottish law. The Amendment Regulations introduced changes that have affected regulatory sampling programs at consumer taps and these changes are summarised in Table B58 below and are discussed in more detail in section 12.3 Performance Trends. Sampling programs at water treatment works and storage points are unaffected by these changes.

Table 58: Impact of Amendment Regulations 2022 on consumer tap sampling programmes

Reporting Period	Changes due to Public Water Supplies (Scotland) Amendment Regulations 2022
AR24 and onwards	• Addition of seven new regulatory parameters. • A drop of over 15,000 tests per year at consumer taps due to a change from population-based sampling frequencies to distribution input volume-based frequencies. • Introduction of supply point monitoring for new parameter Sum of PFAS.
AR25 and onwards	• Introduction of risk-based sampling at consumer taps for 'Group B parameters*' adding over 43,000 tests at consumer taps in 2024.

*Group B parameters are chemical parameters listed in the Amendment Regulations and are presented in Table B10.14 for information.

Adjustments made to OPA (B10.15b)

In January 2023 seven new water quality parameters were introduced as part of the revised Drinking Water Directive (rDWD). To ensure continuity an adjustment was made which excluded these seven new parameters from the OPA water quality score calculations. The seven parameters being excluded are: chlorate; chlorite; bisphenol-a; haloacetic acids; microcystin-LR; sum of PFAS and uranium.

In January 2024 further changes were made to the sampling programme for customer taps introducing a risk-based approach. Sample frequencies at water treatment works and storage points are unaffected.

From 2024 customer taps tests are split into a) regulatory-baseline and b) regulatory-risk tests. Regulatory-baseline tests will be at a consistent frequency based upon the current Regulations and as such would be comparable year on year. Regulatory risk samples are additional tests and their frequencies are determined by risk assessment and will vary.

To ensure continuity the OPA score will be calculated with the exclusion of both the additional rDWD tests and additional regulatory-risk tests.

12.2 Overview

Parametric compliance

Our strong water quality performance has been maintained with the number of fails reduced compared to 2023, achieving a total compliance figure of 99.934% in 2024. Table 59 summarises water quality performance for the period 2019-24. Periods affected by COVID-19 where storage points and water treatment works were used as substitutes for consumer tap sampling are shaded in grey. Water treatment works, storage point and consumer tap performance improved in 2024 compared with 2023, while *Cryptosporidium* compliance was maintained. Improvements in consumer taps compliance were made despite the increase in risk-based regulatory samples and chlorate failures have reduced significantly, but haloacetic acid risks remain significant.

Table 59: Overview of water quality performance 2019-24

Measure	2019	2020	2021	2022	2023	2024
Water treatment work failures	43	24	24	25	30	23
<i>Cryptosporidium</i> (no. viable oocysts)	8	6	10	19	8	8
Storage point failures	78	60	46	52	72	58
Consumer tap failures	114	73	110	116	134	124
Total compliance (%) (B10.15a)	99.921	99.946	99.937	99.929	99.912	99.934
Total failures	243	163	190	212	244	213
Total tests	307,659	300,904	300,314	298,389	277,762	322,155
No. parameters included	64	61	61	55	62	62

*COVID-19 affected data highlighted in grey

12.3 Climate data

Rainfall, sunshine and temperature data for Scotland have been used to explain differences between 2024 and 2023 performance and are discussed in more detail in later sections.

Figures 44, 45 and 46 summarise MET Office data for rainfall, sunshine and temperature between 2019-24 as monthly year-on-year plots. These figures plot 2023 and 2024 data individually and a third line has been added summarising median monthly figures for the period 2019-24.

Poorer water treatment works performance in Spring has been linked to wet weather, with monthly rainfall figures above 2023 and median 2019-24 figures during this Spring period.

Less sunshine hours in summer 2024 compared with 2023 and median 2019-24 figures are thought to have improved performance for chlorate and potentially overstating the benefits from reduction programs.

Figure 44: Year on year plot of monthly Scotland rainfall data 2019-24 (MET Office)

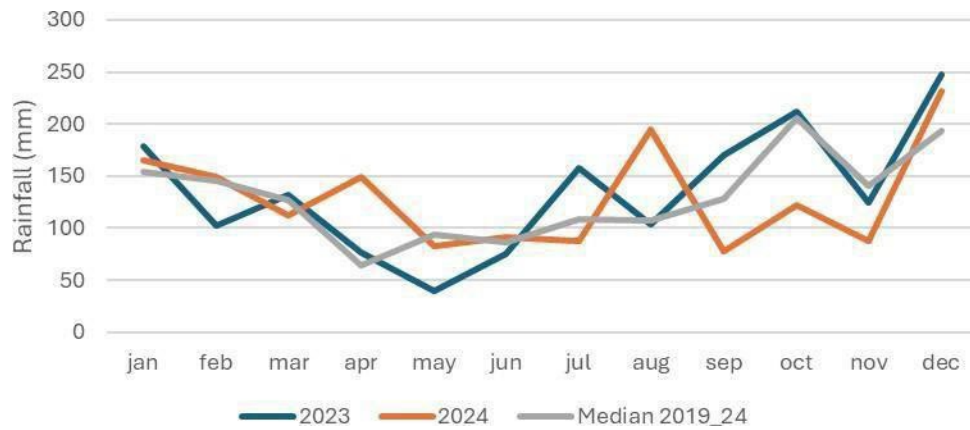


Figure 45: Year on year plot of monthly Scotland sunshine data 2019-24 (MET Office)

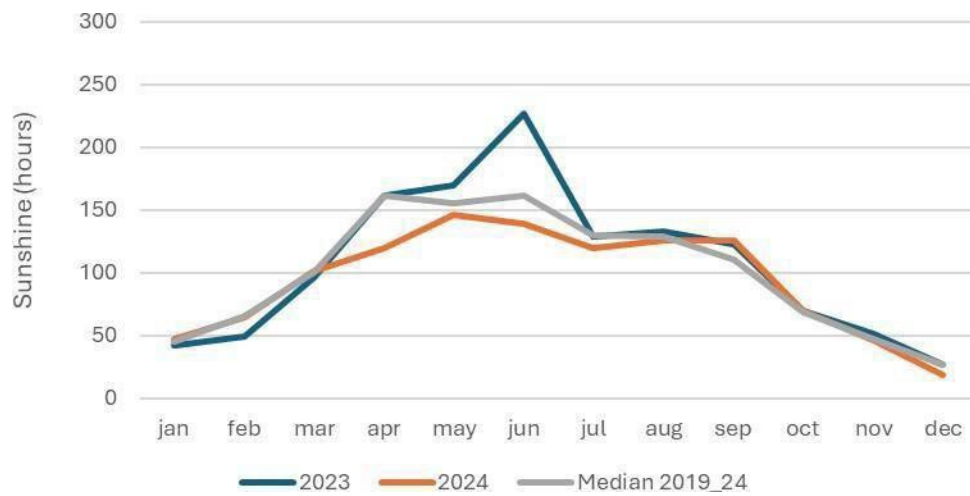


Figure 46: Year on year plot of monthly Scotland temperature data 2019-24 (MET Office)



12.4 Parametric Compliance (B10.1-B10.14)

Water quality performance for the period 2019-24 is summarised in the following sections split by asset type and parameter, including regulatory failures, test numbers and percentage compliance figures.

12.3.1 Water Treatment Works

Water treatment works performance for coliform bacteria improved in 2024 compared with previous years and performance was maintained for turbidity. Table 60 summarises water treatment work's performance for the period 2019-24. The improved coliform bacteria performance was despite multiple failures in April (5) and May (3) which were linked to rainfall figures higher in 2024 when compared with 2023. Performance stabilised before repeat failures in September (3), that also followed higher rainfall figures in August (Figure B10.1). Water treatment works with multiple coliform bacteria failures included Muirdykes (3), Greenock (2), Rosebery (2) and Turriff (3). Turriff and Muirdykes have been linked to clear water tank and chlorine contact tank ingress which have been addressed, while at Rosebery failures are associated with poor coagulation and filter media issues which an ongoing project should address.

Table 60: Summary of water treatment works performance 2019-24

Parameter/Measure	2019	2020	2021	2022	2023	2024
Ammonium	0	0	0	0	0	0
Coliform bacteria	32	18	16	18	26	20
E. coli	3	1	2	0	1	0
Nitrite	0	0	0	0	0	0
Nitrite	3250	3282	3194	3201	3294	3345
Turbidity	8	5	6	7	3	3
Compliance (%)	99.930	99.961	99.960	99.959	99.952	99.963
Total failures	43	24	24	25	30	23
Total tests	61,515	62,129	60,732	60,670	62,253	62,352

12.3.2 Storage Points

Storage point performance for coliform bacteria improved in 2024 compared with 2023 but is worse than previous years. Table 61 summarises storage point performance for the period 2019-24 and shows E. coli performance has been maintained in 2024. Clarklyhill service reservoir accounted three coliform bacteria failures and the remaining 53 were single failures per asset. At Clarklyhill the sample tap has been replaced which is thought to be the root cause of one failure, while the other failures are thought to be linked to ingress through air vents and remedial works have been carried out.

The storage point (TWSP) enforcement notice continues with the delivery of enabling works to allow tanks to be taken out of service for cleaning and inspection and repair and the repair programme itself. While the overall level of risk associated with TWSP is reducing through the investments being made, rainfall will continue to expose the risk from ingress.

Table 61: Summary of storage point performance 2019-24

Parameter/Measure	2019	2020	2021	2022	2023	2024
Coliform bacteria	72	54	44	49	70	56
E. coli	6	6	2	3	2	2
Compliance	99.921	99.939	99.953	99.946	99.925	99.940
Total Failures	78	60	46	52	72	58
Total tests	99,260	98,952	97,086	96,642	96,310	97,090

12.3.3 Consumer Taps

Improvements in consumer taps compliance were made despite the increase in risk-based regulatory samples in 2024. Table B10.5 summarises performance at consumer taps. The table includes summary compliance figures for 2019-24 and lists individual parameter names for those parameters that have had a failure between 2019-24. Periods affected by COVID-19 where storage points and water treatment works were used as substitutes for consumer tap sampling are shaded in grey.

This data includes radon and sum of PFAS which are sampled at water treatment works and are classed as supply points as the regulatory point of compliance is at consumer taps. Data is converted to consumer taps, e.g. a test result for a water treatment works supplying two regulatory supply zones would count as two consumer tap test results. This scaling up of tests would also apply to regulatory failure numbers, although no failures for radon or sum of PFAS were measured in 2024.

Chlorate failures have reduced significantly in 2024 (11 fails) compared with 2023 (23 fails), but haloacetic acid risks remain significant with failures increasing from 10 to 12 between 2023 and 2024. Table 62 summarises consumer tap performance from 2019-24 and the final column notes the difference in figures between 2023 and 2024. Less sunshine hours in summer 2024 compared with 2023 and median 2019-24 figures are thought to have improved performance for chlorate and potentially overstating the benefits from reduction programs (Figure B10.2). The summer of 2024 was cooler, wetter and with less sun hours than previous years, which resulted in lower temperatures for our disinfection chemicals. Our research with Cranfield University shows that one of the easiest ways to prevent chlorate formation is to minimise the risk of solar gain. Keeping hypochlorite stores and kiosks naturally cool and out of the sun reduces temperature of the chemicals which is a key trigger for chlorate formation. Low sun has led to lower than expected chlorate formation, which alongside our focussed reduction programme has contributed to reduced levels compared to 2023. The wet conditions have resulted in smaller reservoir draw downs compared to previous years and less drying and wetting of peat in catchments contributing to lower organics levels in our source waters leading to lower haloacetic acid concentrations compared to previous years. These risks remain under active management.

Odour failures increased in 2024 (15 fails) compared with 2023 (9 fails) with no immediate root cause identified at the times of failure. Resamples passed, no known network activity and no customer contacts reported at the time of these failures. Investigations found that some failures were most likely due to analytical techniques used for preparing chlorinated only supplies for the taste and odour test. This method of analysis has been amended. There is also a possible increasing risk of taste and odour failures due to climate change.

Table 62: Summary of consumer tap performance 2019-24

Parameter/ Measure	2019	2020	2021	2022	2023	2024	Fail Diff 2023_24
Quantitative odour	5	0	0	8	9	15	6
Iron	37	21	22	29	22	25	3
Lead	7	2	4	6	2	5	3
HAA5 Total	0	0	0	0	10	12	2
Hydrogen Ion	1	1	2	3	1	2	1
Nickel	1	7	11	1	0	1	1
Coliform bacteria	37	20	25	38	38	38	0
Copper	0	0	0	1	0	0	0
MCPA	1	0	1	0	0	0	0
THM: Total	3	1	2	1	0	0	0
Aluminium	0	2	2	1	3	2	-1
Clostridium perfringens (incl. spores)	3	0	3	1	1	0	-1
Enterococci	1	1	2	0	1	0	-1
Manganese	10	15	33	17	10	9	-1
Nitrite	3	0	1	2	4	3	-1
Quantitative taste	2	0	0	4	3	1	-2
Turbidity	1	1	0	0	3	0	-3
E. coli	2	2	2	4	4	0	-4
Chlorate	0	0	0	0	23	11	-12
Compliance (%)	99.917	99.946	99.92	99.914	99.882	99.921	-
Failures	114	73	110	116	134	124	-10
No. Tests	137,783	134,610	136,686	134,800	113,454	156,814	+43,360
No. parameters included	64	61	61	55	62	62	-

*COVID-19 affected data highlighted in grey

In AR25 parametric compliance reporting changed from using twelve monthly sample data files submitted to DWQR over the course of a year, to using an annual calendar year extract taken in March-25 and submitted to DWQR in April-25. This dataset was then used for both DWQR and OPA annual reporting, with the aim to have consistency between our regulatory sample data and Scottish Water OPA data.

12.5 Cryptosporidium a Water Treatment Works (B10.15)

Cryptosporidium compliance has been maintained in 2024 compared with 2023 with both years having eight samples containing viable oocysts. Table 63 summarises performance for 2019-24.

There were also 12 detections from Turriff and 1 from Portree where we have UV treatment to render the oocysts harmless. The design and costs for a new Turriff water treatment works are being developed to minimise Cryptosporidium risk. UV treatment for Cryptosporidium has also been added to Mannofield following a detection in 2023, there were no regulatory failures at

Mannofield in 2024. Both Turriff and Mannofield have ongoing Enforcement Notices to develop and deliver medium and long-term water quality improvements.

Rosebery had two detections and front-end coagulation improvements and media top up projects are now in place.

Single detections occurred at Alexandria, Marchbank, Camphill, Stoneybridge, Uig and Waternish. Alexandria's clear water tank integrity issues have been addressed and filter capability improved. At Marchbank remedial actions have been created to improve the filter backwash procedure and replace filter media. Camphill had a valve failure affecting filter backwashing resulting in filter breakthrough of turbidity and remedial actions have been identified. Waternish WTW is a membrane plant, and the detection was due to a split membrane seal which was repaired. Stoneybridge and Uig are Dynasand plants, neither had any issues with their processes at the time of the detections and therefore the root cause is that Dynasand plants are not a complete *Cryptosporidium* barrier.

Table 63: Summary of *Cryptosporidium* performance 2019-24

Measure	2019	2020	2021	2022	2023	2024
No. viable oocysts	8	6	10	19	8	8
No. detections	38	46	25	57	11	21
No. water treatment works with viable oocysts	7	5	6	13	7	7
No. water treatment works with detections	11	8	8	15	8	9
Compliance (%)	99.912	99.885	99.828	99.697	99.861	99.864
No. samples	9,101	5,213	5,810	6,277	5,745	5,899

12.6 Total Compliance (B10.15a-B10.15c)

Three percentage compliance figures are now included in Table B10 and these are summarised in Table 64 below.

Table 64: Summary of compliance measures

Line	Measure	Compliance (%) Rounding to 3 d.p.
B10.15a	Total compliance including <i>Cryptosporidium</i> compliance	99.934
B10.15b	Total compliance including <i>Cryptosporidium</i> compliance (for OPA)	99.932
B10.15c	Total compliance including <i>Cryptosporidium</i> compliance (regulatory baseline)	99.933

Line B10.15a 'Total compliance including *Cryptosporidium* compliance' uses the formula shown below to calculate the proportion of failing regulatory tests as a percentage of the total number of regulatory tests test taken across all asset types and with no exclusions.

$$DWQR \text{ compliance } B10.15a = 100 - \left[\left(\frac{WTW \text{ fails} + SR \text{ fails} + Customer \text{ tap fails} + No. \text{ viable oocysts}}{WTW \text{ tests} + SR \text{ tests} + Customer \text{ tap tests} + Cryptosporidium \text{ tests}} \right) \times 100 \right]$$

Line 65 'Total compliance including Cryptosporidium compliance (for OPA)' also uses this formula to calculate the proportion of failing regulatory tests as a percentage of the total number of regulatory tests test taken across all asset types, some exclusions are applied to the consumer tap failures and tests. For measure B10.15b the seven new revised drinking water directive tests (introduced in 2023) are excluded from the calculation, also excluded are regulatory risk tests (introduced in 2024).

Line B10.15c 'Total compliance including Cryptosporidium compliance (regulatory baseline)' also uses this formula to calculate the proportion of failing regulatory tests as a percentage of the total number of regulatory tests test taken across all asset types, excludes the regulatory risk tests (introduced in 2024).

Table 65: Description of percentage compliance measures included in AR25

Line	Year	Baseline	Risk	rDWD	Failures	Tests	Compliance (%)
B10.15a	2024	✓	✓	✓	213	322,155	99.934
B10.15b	2024	✓	-	-	183	270,159	99.932
B10.15c	2024	✓	-	✓	186	279,244	99.933

12.7 Enforcement (B10.16-B10.17b)

12.7.1 Enforcement Notices (B10.16-B10.16a)

Four enforcement notices were active in 2024 and these are listed in Table 66 below. The contravention of risk assessment requirements enforcement notice was signed off as complete in 2024. No new enforcement notices were issued during 2024.

Table 66: Enforcement notices active during 2024

Site	Reason	Status
Mannofield WTW	<i>Cryptosporidium</i>	Active 2024
Turriff WTW	<i>Cryptosporidium</i>	Active 2024
Pan-Scotland	Treated water storage (TWS) points	Active 2024
Pan-Scotland	Contravention of risk assessment requirements	Closed 2024

12.7.2 Letters of Commitment (B10.17-B10.17b)

Ten letters of commitment were active during 2024 and are listed in Table 67 below. Three were closed during 2024 and a new letter of commitment for haloacetic acid compliance was issued.

Table 67: Letters of commitment active during 2024

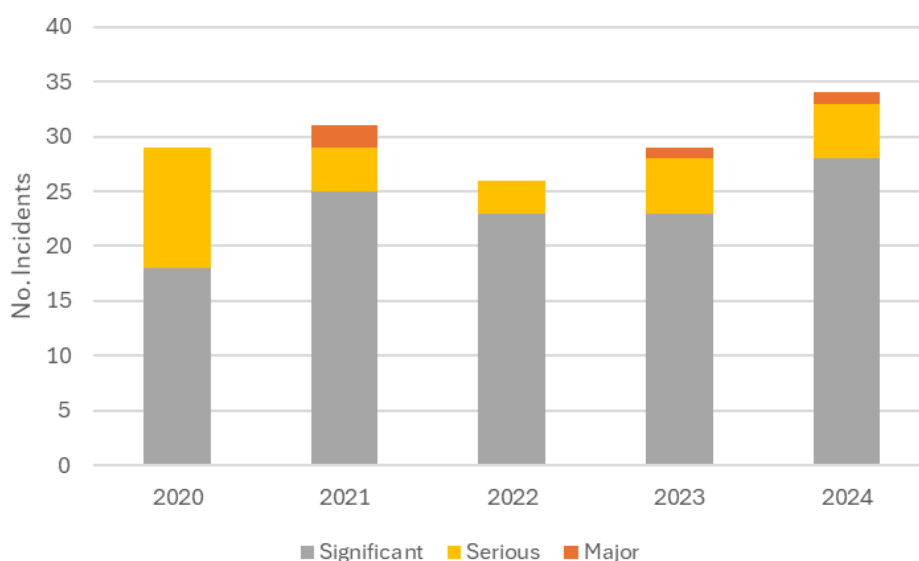
Site	Reason	Status
Pan-Scottish Water	Haloacetic acids	Issued 2024
Bradan WTW	Microbiological risk	Active 2024
Daer WTW	Manganese	Active 2024
Glenfarg WTW	Taste & odour	Active 2024
Pan-Scottish Water	Manganese strategy	Active 2024
Rosebery WTW	Taste & odour	Active 2024
Black Esk WTW	Manganese	Active 2024
Carron Valley WTW	THM/organics	Closed in 2024
Herricks WTW	<i>Cryptosporidium</i>	Closed in 2024
Turriff WTW	pH Adjustment	Closed in 2024

12.8 Water Quality Incidents (B10.18)

Currently 34 water quality incidents have been declared by DWQR in 2024, five more than 2023. Figure 47 summarises annual water quality incident numbers grouped by DWQR category.

DWQR Annual Water Quality Report (AWQR) is being processed and used to confirm the number of water quality incidents (Line B10.18). As a result, the confidence grade for this figure has been entered as B2 and could change. Table B.10 will be reviewed when the AWQR is published, and any necessary amendments will be made. Since the audit in April 2025, incident numbers have been revised twice, once when DWQR downgraded incident DWQIN-0014982 (CRIANLARICH RSZ) to an event and again when water quality event DWQEV-0015242 (ASSYNT WTW) was declared an incident on 03/06/25.

Figure 47 Annual incident numbers grouped by DWQR category 2020-24



The major water quality incident related to a widespread discolouration to the Daer A regulatory supply zone. Table 68 below summarises the number or water quality incidents

by asset type with both water treatment works and regulatory supply zones increasing compared with previous years.

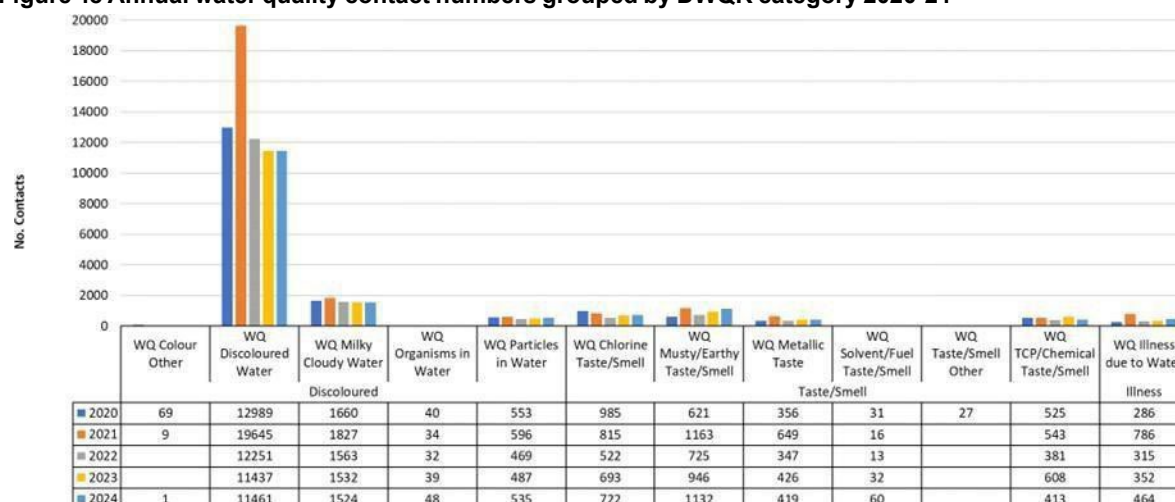
Table 68: Summary of water quality incidents group by year and asset type

Asset type	2020	2021	2022	2023	2024	Total
Water treatment works	18	22	15	22	25	102
Storage points	3	1	4	0	0	8
Regulatory supply zones	8	8	7	7	9	39
Total	29	31	26	29	34	149

12.9 Consumer Contacts to Scottish Water (B10.19-B10.22)

Water quality consumer contacts are submitted to DWQR quarterly with the 2024 return completed in February 2025. 16,779 contacts were reported in 2024 compared with 16,552 contacts in 2023. Figure 48 summarises annual water quality contact data for the past five years grouped by DWQR contact category.

Figure 48 Annual water quality contact numbers grouped by DWQR category 2020-24



The 2021 peak of 19,645 WQ Discoloured contacts shown in Figure B10.5 related to low rainfall which led to many reservoirs in the south and west drawing down to exceptionally low levels, resulting in high dissolved manganese which passed into the supply network causing discoloured water and led to two letters of commitment being agreed with DWQR relating to improvement works at Daer water treatment works and the development of a Scottish Water-wide manganese management strategy. Both letters of commitment are still active and included in Line B10.17. WQ Discoloured contacts in 2022 (12,251) returned to similar numbers recorded in 2020 (12,989) as reservoir levels recovered. WQ Discoloured contacts decreased from 12,251 in 2022 to 11,437 in 2023 supported by our ongoing water mains conditioning and flushing programme. However, numbers have plateaued in 2024 with 11,461 WQ Discoloured recorded.

12.10 Complaints to DWQR (B10.23) Second tier complaints

At the time of audit in April-25, DWQR had completed two investigations into second tier complaints about water quality and details of the complaints can be found at DWQR's website. The first complaint (April 2024) was not upheld but the second (May 2024) was upheld. The upheld complaint related to raw water supply where Scottish Water is identified as a relevant person. In 2025 Scottish Water issued a letter of commitment with a deadline of 31/03/2027 to develop an action plan to bring raw water supplies where Scottish Water is responsible into compliance with the Public Water Supply Regulations and to agree this with DWQR.

On 14th April 2025 DWQR notified Scottish Water that they had begun investigating a second tier complaint that had initially started in 2024 (ref. 2024/51), a draft determination for the complaint has been issued by DWQR as not upheld and this has been entered into table B10. This brings the total number of second tier complaints to three with one upheld. The confidence grade for this figure has been entered as BX to reflect that we rely on the DWQR annual water quality report to confirm final figures for escalated complaints, and this report is usually issued in August.

Following the publication of DWQR's 2024 Annual Water Quality report on 10/09/2025, DWQR have confirmed that complaint 2024/51 has not been upheld and will be included in their 2025 reporting figures. Therefore, the final confirmed number of second tier complaints for 2024 is two, with one upheld and one not upheld. Table B10 has been amended to reflect these updates and complaint 2024/51 will be included in next year's return of 2025 data to match DWQR's reporting figures.

12.11 Lead (B10.24-B10.25)

Lines B10.24 and B10.25 are new and reported for the first time in Table B10 in AR25.

12.11.1 Estimated number of lead pipes remaining in public supply B10.24

Lead communication pipes were baselined in 2012 with a statistical survey across Scotland which found that around 72,000 communication pipes were lead. Since 2012 the total number of lead communication pipes replaced that year has been subtracted from the 72,000 total to give the figure above.

There have however been issues over the years with how the replacement data is collected, and the methodology for calculating the replacement rate has changed over time. There is therefore a low confidence rating on this data. We are looking to re-baseline the total number of lead communication pipes pre SR27.

Numbers for line B10.24:

- Calendar Year until 31st Dec 2024- 47,472 lead communication pipes remaining in public network
- Financial Year until 31st Mar 2025- 47,154 lead communication pipes remaining in public network

These data are also entered into H3.6 & H3.7. A confidence grade of B4 has been given to the data as the replacement data is now part of a corporate system (Salesforce through a PowerBI report) but we know there are areas of missing or unreliable data.

12.11.2 Indicator of lead in customers supply pipes B10.25

Line B10.25 'Indicator of lead in customers supply pipes' is a subset of regulatory lead sample data presented in the parametric compliance dataset. The measure uses the formula shown below to

calculate the proportion of regulatory lead tests with a concentration above 3 micrograms per litre as a percentage of the total number of regulatory lead test taken.

$$\text{Indicator of lead in customers supply pipes} = \left(\frac{\text{Number of Regulatory Zonal Lead Test Results} > 3 \text{ micrograms per litre}}{\text{Total Number of Regulatory Zonal Lead Test Results}} \right) \times 100$$

This measure is reported for the first time in AR25 but it is possible to calculate the figures retrospectively and Table 69 summarises this data for the period 2019-24. COVID-19 impacted

years are shaded grey. The table includes a line for all 2024 tests and then below, split by regulatory risk and regulatory baseline reporting purposes.

Table 69: Summary of regulatory lead test results >3 µg/L

Year	Reporting Purpose	No. Samples >3 µg/L	No. Samples	Percentage Samples >3 µg/L	No. Zones >3 µg/L	No. Zones Sampled
2019	Baseline	44	1,499	2.94	35	285
2020	Baseline	15	772	1.94	13	256
2021	Baseline	21	1,463	1.44	21	278
2022	Baseline	22	1,151	1.91	19	275
2023	Baseline	9	585	1.54	8	278
2024	Baseline	21	1,046	2.01	13	277
2024	Baseline	9	580	1.55	9	277
2024	Risk	12	466	2.58	7	71

*COVID-19 affected data highlighted in grey

12.12 Investment and Improving Asset Capability

Across our investment programme we are:

- Target costs are being finalised for Black Esk WTW and works have begun at Glenfarg WTW, to improve water quality and resilience for customers in Fife and Dumfries & Galloway.
- Developing design and costs for a new Turriff WTW to minimize Cryptosporidium risk for customers in Turriff, Buckie, Banff, Fraserburgh, and surrounding areas.
- Completed the Stage 3b appraisal for a new WTW for Torra on Islay, to be constructed by 2027, enhancing capacity, growth, and water quality.
- Developing designs to start delivery of an upgrade at Winterhope WTW in late 2025 to improve compliance with haloacetic acids, pesticides and microbiology as committed to DWQR.
- Developing options to improve water quality for properties supplied directly from Scottish Water raw water sources across Scotland.
- Project investment appraisals for the water treatment works Core Programme continue to be developed in line with investment priorities. Eela water treatment works achieved Gate 90, with a start on site forecast in the coming months. This project will replace the existing poor condition WTW and clear water tanks (CWT) with a larger capacity works based around ceramic membrane technology to deliver improved water quality and resilience for customers on Shetland.
- New needs to reduce the risks from Haloacetic acids at Penwhirn, Glenlatterach and Londornoch

12.13 Data

Table 70: Summary of data sources, confidence and accuracy grades.

Data type	Source
Parametric compliance	Calendar year 2024 sample data downloaded on 17/03/25. Sample data is extracted from the 'Analytics Model – LIMS' dataset in monthly batches due to download csv size limitations. Formatted file submitted to DWQR and also used for OPA. Data saved at Water Quality Regulation - Annual files - All Document
Enforcement	Details of Enforcement Notices and Letters of Commitment are published on DWQR's website, links below: https://dwqr.scot/regulator-activity/enforcement/ https://dwqr.scot/regulator-activity/letters-of-commitment/ and tracked by SW via a spreadsheet LOC & EN to DWQR Tracker.xlsm (sharepoint.com) saved on the WQR SharePoint site
Incidents	Incidents are declared to Sottish Water by DWQR via e-mail to the Regulation mailbox. These are entered onto a Dynamics database: Incidents All Incidents - Dynamics 365
Consumer contacts to SW	Combination of 4 x quarterly csv data files of regulatory contacts data submitted to DWQR. Files saved at Water Quality Regulation - DWQR information return . Contacts data is extracted from the 'Analytics Model – Ascend Dynamics' dataset
Complaints to DWQR	DWQR notify SW of escalated complaints vis email to the Regulation mailbox. Details of escalated customer complaint determinations are published on DWQR's website, link belo https://dwqr.scot/regulator-activity/consumer-complaint-investigations/consumer-complaint-determinations/
Lead	B10.24 Estimated number of lead pipes remaining in public supply will be covered by the Water Strategy team & B10.25 Indicator of lead in customers supply pipes is a subset of regulatory lead sample data presented in the Parametric compliance dataset.

Confidence grades

There have been no changes to confidence grades for data submitted last year. Most data have a confidence of grade A1 as they relate to regulatory returns data extracted from corporate systems. The exceptions, as for AR24, are data that rely on DWQR's annual report for confirmation, which is usually published around August of each year, these data include: number of water quality incidents & number of escalated consumer complaints.

The confidence grade for new line B10.24 (lead communication pipes) is B4 as the lead replacement data is now part of a corporate system (Salesforce through a PowerBI report) but we know there are areas of missing or unreliable data. The confidence grade for new line B10.25 (indicator of lead) is a subset of regulatory lead sample data and therefore A1.

Data improvement programmes

As noted in 'Data Sources and Methodology – Parametric Compliance' – Parametric compliance reporting has moved away from using 12 x monthly of sample data files submitted over the course of a year, to using an annual calendar year extract taken in March. This dataset is then used for both DWQR and OPA annual reporting, to have consistency between our regulatory sample data and OPA/OARS reporting.

Key highlights and messages

The new drinking water regulations 2023 introduced risk-based frequencies for zonal sampling. This approach was introduced to our sampling programs from Jan-24 onwards, where any Group B parameter assessed as at an elevated risk of failure (through Water Supply Risk Management), will be sampled at an increased Group A frequency under the new regulations. This created two groups of regulatory zonal samples, those at normal or 'baseline' regulatory frequencies and additional 'risk' based frequencies taken over and above the baseline samples. Regulatory baseline samples will be at a consistent frequency based upon the current Regulations and as such would be comparable year on year. In 2025 the LIMS sample scheduling system was set up so that zonal samples could be randomly assigned as regulatory risk or regulatory baseline. For 2024 the tagging of samples as either regulatory baseline or regulatory risk was done retrospectively, using a statistical method presented to and agreed with DWQR and WIC.

Table 71: Group B chemical parameters from the Amendment Regulations 2022

1,2-dichloroethane	Colour	Nitrate
Acrylamide	Copper	Nitrite
Aldrin	Cyanide	Other pesticide
Aluminium	Dieldrin	PAH Total
Antimony	Epichlorohydrin	Pesticides: total
Arsenic	Fluoride	Selenium
Benzene	HAAs	Sodium
Benzo(a)pyrene	Heptachlor	Sum of PFAS
Bisphenol A	Heptachlor epoxide	Tetrachloroethene and trichloroethene
Boron	Iron	Tetrachloromethane
Bromate	Lead	THM: Total
Cadmium	Manganese	Turbidity
Chlorate	Mercury	Uranium
Chlorite	Microcystin-LR	Vinyl chloride
Chromium	Nickel	

13 Table B11a: Pollution Incidents

13.1 Overview

Table B11a contains data for the calendar year to end December 2024 and Financial Year 2024/25. The explanatory text below is in relation to the Financial Year.

AR25 has seen overall numbers remain stable, however there has been a positive step change in numbers of wastewater Category 1 and 2 events with fewer than half the numbers we have seen over the previous 3 years. Operational activities are the main reason for the improvement, with investment helping to provide increased intelligence on asset performance. Although different weather patterns can influence the number and severity of EPIs, there is limited evidence to suggest that this has been a significant factor in the number of Category 1 and 2 incidents over the full year.

Cat 1 and 2 EPIs – An incident team is set up for each potential Category 1 and 2 incident that occurs which has seen collaboration across multiple teams to investigate the event. During a number of these intensive investigations the source of the issue has been identified as being from a Third Party, therefore these events have been agreed as Third-Party EPIs.

In addition to incident teams for Category 1&2s for all EPIs we have used several measures to assist with EPIs detailed below under investment:

- New Event Duration Monitor Team.
- Localised Nature Calls Campaigns.
- Sewer Response pavement stencils.
- ECAS (Environmental Compliance and Services).

There has been a substantial number of events which have been agreed as third party/private/compliant with licence and were therefore discounted from our numbers. As we move through SR21 our focus will be on reducing the significant proportion of incidents which occur on our Wastewater network through increased intelligence and targeted planned maintenance.

The confidence grade for all lines on Table 11a is A1. All events reported in Table B11a have been agreed with SEPA and finalised by 28th April 2025 (as per SEPA e-mail dated 28/04/25).

In AR25 there was a total of 203 environmental pollution incidents (EPIs), an increase of 7 as reported in the AR24 period. In AR25 there were 4 serious Category 1 and 2 events (all Wastewater) compared to eleven in AR24 (all Wastewater).

13.2 Performance Trends

13.2.1 Lines B11a.1-B11a.8 Sewage Related Premises

Financial Year

During the AR25 reporting financial year 188 EPIs were recorded at sewage related premises, where 65% of these incidents were reported on the foul sewer network. 4 of the reported EPIs fell into Category 1 and 2 and are listed in Table [72](#) below.

Table 72: Location of Sewage related EPIs

Sewer Related Premises	Site or Area	Total EPI
Sewage Pumping Station	Gillies Drive SPS	1
CSO	Newton Storm King CSO	1
Foul Sewer	Kinneil Kerse DOA	1
Foul Sewer	Dalmuir DOA	1

For AR25 24/25 there were 5 EPIs compliant with licence within Wastewater.

Calendar Year

During the AR25 calendar reporting year 190 EPIs were recorded at sewage related premises, where 63% of these incidents were reported on the foul sewer network. 4 of the reported EPIs fell into Category 1 and 2 and are listed in Table [73](#) below.

Table73: Location of Sewage related EPIs

Sewer Related Premises	Site or Area	Total EPI
Foul Sewer	Phillipshill DOA	1
Sewage Pumping Station	Gillies Drive SPS	1
CSO	Newton Storm King CSO	1
Foul Sewer	Kinneil Kerse DOA	1

For AR25 there were 4 EPIs compliant with licence within Wastewater.

13.2.2 Lines B11a.9-B11a.12 Water and Surface Water Related Premises

Financial Year

During the AR25 reporting financial year there were 15 EPIs recorded at water related premises, none of which were Category 1 and 2 events.

For AR25 there were zero EPIs that were compliant with the discharge consent within Water assets.

Calendar Year

During the AR25 calendar reporting year there were 12 EPIs recorded at water related premises, none of which were Category 1 and 2 events.

For AR25 calendar year there were zero EPIs that were compliant with licence within Water.

B11a.17 Total Number of Water Company self-reported incidents

During the AR25 period the Total number of self-reported incidents made by Scottish Water was 64, this is a decrease of 3 to those self-reported incidents captured in AR24.

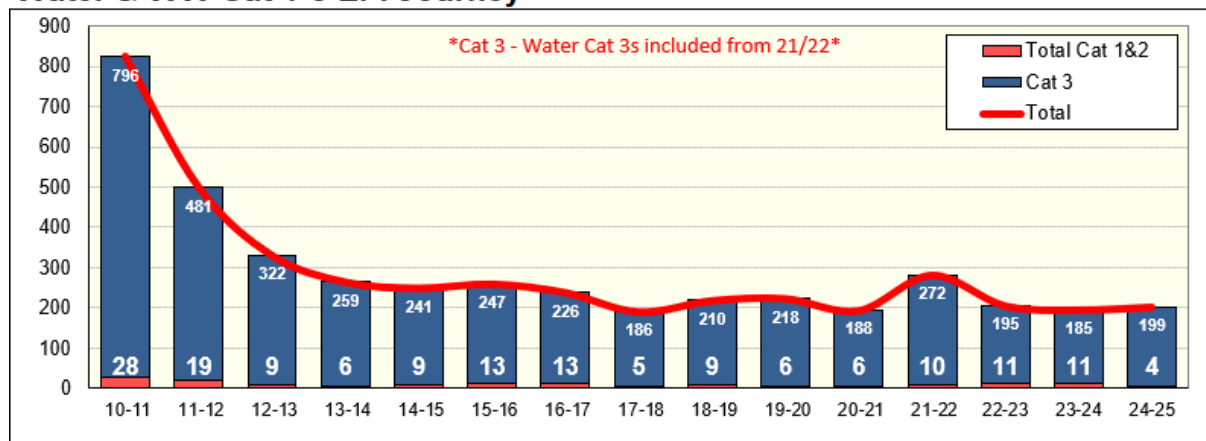
B11a.17 Total Number of Water Company self-reported incidents

During the AR25 calendar period the Total number of self-reported incidents made by Scottish Water was 66.

Pollution Trend Graphs

Figure 49: Water and wastewater category 1-3 EPI journey.

Water & WW Cat 1-3 EPI Journey



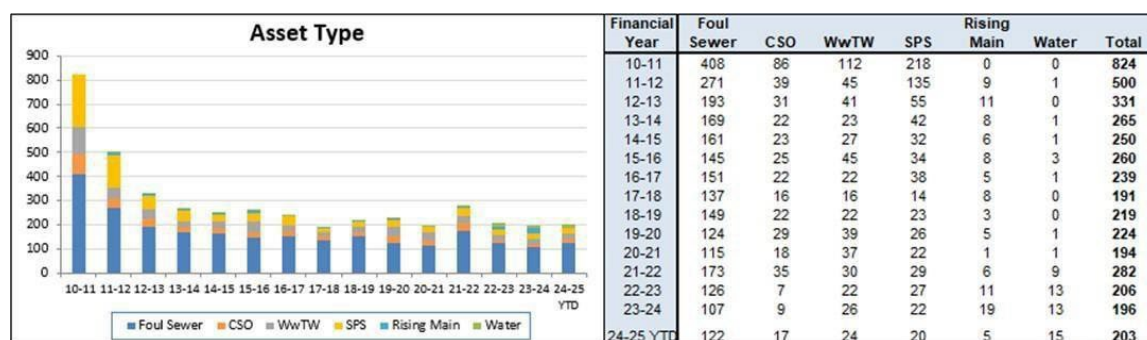
The long-term trend in Figure 49 shows significant reductions in numbers of EPIs followed by a levelling off of performance in subsequent years. AR22 saw an isolated increase in numbers of both measures with a return to more normal levels in AR23. It is suspected that this could have resulted from an increase in SEPA and customer reporting during COVID-19 when more people were working from home and more likely to exercise outdoors.

Root Cause Analysis

The types of assets associated with historic EPIs are summarised in Figure 50 below. This shows that although there has been a marginal increase in the number of incidents associated with water assets, the vast majority of EPIs (typically 94% or above) are associated with wastewater assets.

When EPI reporting first commenced issues related to wastewater non-infrastructure assets (wastewater treatment works and sewage pumping stations) accounted for up to 40% of incidents. Through subsequent focus on the performance of these assets and supporting investment this has fallen to around half this level (24% in AR24). This highlights that the key area of improvement in reducing EPI numbers relates to incidents associated with our wastewater infrastructure assets.

Figure 50: Asset types associated with historic EPIs.



Many of the sewer network events are related to sewer blockages caused by sewer related debris such as wipes and sanitary products. Sewer blockages are more likely during extreme weather events such as prolonged heavy rainfall which we are experiencing more often.

13.3 Investment

B11a - Pollution Incidents

As we move through SR21 our focus will be on reducing the significant proportion of incidents which occur on our wastewater network through increased intelligence and targeted planned maintenance.

We are focused on reducing the number of incidents which occur on our wastewater network through increased use of intelligence, including real time monitors, and targeted planned maintenance.

As part of the Improving Urban Waters Routemap over 1000 CSO monitors have been installed and a CSO spill data portal created on the Scottish Water website. Since this went live in January 2025 we have seen only three Category 3 EPIs coming from these alarms, this number may increase going forward once more monitors are installed in the network.

A new team was created in AR25 to primarily respond to alarms from Event Duration Monitors on our network Combined Sewer Overflows. These team members have been involved in a number of EPI investigations helping us to get to the source of the issue quickly and efficiently. This team have also supported other activities such as pro-active burn walking, more targeted CSO planned maintenance and fitting of depth monitors within the sewer network, all of which help us to reduce the risk of EPIs.

This year has seen more reactive localised Nature Calls campaigns in the Borders and North region. These locations were chosen based on historic high volumes of blockages which can result in EPIs. The settlements included Hawick, Galashiels and Peebles in the Borders, Fort William, Thurso, Wick, Alness, Buckie and Dingwall in the North as well as Cumnock in Ayrshire and Annan in Dumfries and Galloway.

Our Sewer Response teams have also been using pavement stencils in areas where they have been clearing blockages to provide awareness to our customers of the issues experienced within the area.

Work has been ongoing with our framework contractor ECAS (Environmental Compliance And Services) to reduce the impact of Fat, Oil and Grease related chokes within the network. ECAS work with higher risk FSEs (Food Service Establishments) across the country to advise on the need for installation of grease traps, the specification of these and how to maintain them going forward.

13.4 Data

There has been no change to the data sources, confidence grades and methodology from AR24.

Incidents reported by staff members, members of the public and SEPA and action taken to resolve them are recorded in Microsoft Dynamics. The EPI Co-ordinator then updates the Trackers from Microsoft Dynamics and populates the shared Scottish Water/SEPA spreadsheet. Since the SEPA cyber-attack in December 2020, SEPA do not have a system to record pollution events reported to them.

Scottish Water continues to carry out an internal agreement process for all Cat 4 Ops. Events, Cat 3 events where SEPA have not reported and Cat 3 events where both Scottish Water and SEPA agree Cat 3. Agreement calls for the remainder of the events are held monthly with Scottish Water and SEPA and any events where Scottish Water has found third party/land impacts are discussed and agreed.

Calls are scheduled in between the monthly calls if required to discuss more serious events. Following any calls, an up-to-date copy of the agreement tracker is e-mailed to the SEPA personnel involved. If agreement cannot be made, then the escalation process is followed.

Scottish Water provides a monthly data tracker download to the nine SEPA teams for review. This includes a summary of the event, the Scottish Water and SEPA initial category and the agreed category if agreed. All events reported for AR24 have been agreed with SEPA and finalised on 28th April (as per SEPA e-mail dated 28/04/25).

13.4.1 Data Improvements

Incident calls are held for all Cat 1 & 2 pollution incidents.

Internal audit held in 2024 resulting in an action for an overarching Policy & Procedure document to be created for EPIs. This has been created and is in the EPI published documents folder.

EPI TBT Cornerstone learning updated for 2024-25 with a 94% completion rate within WW Operations.

Questionnaire issued to the business to gain feedback on the weekly suite of reports issued for any improvements information required to be added. We will be adding some trend detail into the weekly report on the back of this feedback.

14 Tables B11b and B11c: SEPA Annual Report to the Water Industry Commission for Scotland: Scottish Water Compliance & Discharges Confirmed as Failing

14.1 Table B11b/c Overview

This information was previously submitted by SEPA as an Annual Return to WICS.

Scottish Water has taken over reporting of the data for AR22, AR23, AR24 and AR25. This data was previously sourced from SEPA's Corporate Licensing database. SEPA has advised that the number of Wastewater Treatment Works (WwTWs) assessed for compliance remained static over the years. Since the cyber-attack on the SEPA Systems, this database is no longer available.

As per previous Annual Returns since AR22, we have provided the data using the following sources for compliance assessment and commentary purposes:

- Scottish Water's Licence Database
- Scottish Water's Operator Self-Monitoring (OSM) Annual Monitoring Plan (AMP)
- Scottish Water's LIMS Application

Scottish Water reviewed and updated Table B11b prior to sharing and discussing the changes with SEPA and WICS for AR24. Both parties confirmed that the changes were acceptable. Calendar year compliance has been removed for AR25.

Wastewater Compliance Definitions

Wastewater compliance (for the purpose of tables B11b and B11c) is assessed against the CAR (Controlled Activity Regulations), UWWTD (Urban Wastewater Treatment Directive) and OPA for both calendar and financial years.

Regulatory sampling is undertaken by Scottish Water Scientific Services through Operator Self-Monitoring (OSM). WwTWs are scheduled to be sampled from a pre-determined annual programme from SEPA, otherwise referred to as the Annual Monitoring Programme (AMP).

The exception to this is for bacteriological samples. SEPA undertake this sampling and send results to Scottish Water for inclusion in the compliance calculation.

A sample result remains on the compliance record for twelve months.

There are five ways a WwTW can be classed as failing. B11b/c Table 74 below summarises each:

Table 74: Failing classifications for WwTWs (i.e. reason for failure).

Failing Category	Definition
Look Up Table (LUT)	Exceeds a permitted number of parameters Lower Tier (LT) breaches, as per the LUT (standard appendix in all SEPA licences).
Upper Tier (UT) or pH	Breaches an Upper Tier (UT) parameter limit. pH is also included under this category (measured as a banding).
Annual Mean Concentration (AMC)	Average calculated from a set of samples taken throughout the calendar and financial year. A WwTW will be deemed failing if it fails the AMC limit on 31

Failing Category	Definition
75% Rule	Applies to a small set of WwTWs with single tier licences. A WwTW will be deemed failing if it does not achieve 75% compliance or more on 31 December or 31 March.
Log 10 Mean*	Applies to a small set of WwTWs sampled for Phosphorus as spot samples. Average calculated as Log10. A WwTW will be deemed failing if it fails the AMC limit on 31 December or 31 March.

* In the absence of guidance from SEPA, SEPA confirmed that EA guidance could be used to calculate compliance for sites that have this consented parameter.

Exclusion requests may be submitted to SEPA where there is sufficient evidence to appeal fails against specific clauses contained within the licence (see Table 75). If SEPA accepts an exclusion request, the sample result will be removed from the compliance record.

Table 75: Criteria for Exclusion Request submissions.

Low ambient temperatures (evidenced by effluent temperatures of 5oC or less or freezing of mechanical equipment)
Snow deposits sufficient to affect normal operation of the WwTW
Tidal or fluvial flooding
Weather conditions causing unforeseen loss of power supply to the treatment plant which could not be ameliorated by the reasonable provision and operation of standby facilities
CAS Section 4.3 (Agreed Improvement Plan for bringing discharge back into compliance)
Statutory defence (CAR Reg 48) - unforeseen accidents, force majeure or serious harm prevention

The performance measure for reporting failing WwTWs changed in SR21, moving to Total Compliance which assesses compliance against all quality parameters contained within a SEPA licence. The reason for the change was to ensure that Scottish Water continued to focus on protecting the environment from all licensed quality parameters. Additionally, it aligned with SEPA's Compliance Assessment (CAS) criteria.

Prior to this only a proportion of final effluent sanitary parameters impacted on SR15 OPA compliance. Table 76 lists and compares the parameters used to assess compliance in each of the investment periods.

Table 76: Parameters used to assess compliance with the Overall Performance Assessment (OPA) measure in each of the investment periods (SR15 and SR21).

SR15 OPA	SR21 OPA
BOD (CAR) – LUT	BOD (CAR) – LUT/UT
Suspended Solids (CAR) – LUT	Suspended Solids (CAR) – LUT/UT
Ammonia (CAR) – LUT	Ammonia (CAR) – LUT/UT
Phosphorus (CAR) – LUT	Phosphorus, Nitrogen (CAR) – LUT/UT/AMC
Bacti with UV Disinfection (CAR) – LUT	pH, Bacti, Metals, Organics (CAR) – LUT/UT/AMC
BOD (UWWTD) – LUT	BOD, COD (UWWTD) – LUT/UT
Phosphorus (UWWTD) – AMC	Phosphorus, Nitrogen (UWWTD) – AMC

14 .2 Performance Trends

14.2.1 Lines B11b.1-B11b.4 - (A) Sewage Treatment Works: Total number

Line B11b.1 No. of wastewater treatment works on register during year (in force)

The value of 1406 has been taken from Scottish Water's licence database for AR25. This is reduction of 22 sites when compared with AR24. The AR24 figure of 1428, included some licences that were linked to non-operational assets. Some data cleansing has taken place in the licence database and some of the licences were found to be redundant. This has reduced the overall number of 'active' licences.

The value of 1,202 was used in the AR22 and AR23 reports, this figure taken from the last confirmed SEPA calculation in 2020. In the absence of the SEPA Licence Database due to the cyber-attack, Scottish Water is unable to undertake comparisons and explain the differences between now and then.

A confidence grade of A2 has been assigned to the AR24 and AR25 figures. The line definition was changed for AR24 after consultation with SEPA and WICS.

Lines B11b.2 No. of wastewater treatment works assessed for compliance

For AR25 there were 580 reported which corresponds with the number of assets listed on the Operator Self-Monitoring (OSM) Annual Monitoring Plan (AMP). It also includes PFI sites. SEPA determine which WwTWs should be listed on the Annual Monitoring Plan (AMP) each year. Skirling (a Septic Tank) was removed from the AMP in AR25, hence the reduction of 1.

B11b.3 No. of wastewater treatment works confirmed failing in year

For AR25 , 17 WwTWs Discharges Confirmed Failing under CAR compliance. This is comparable with AR24.

Line B11b.4 %. of wastewater treatment works compliant with licence in the year

For AR25, the percentage of CAR Discharges Compliant with Consent was 98.79%. This is a marginal reduction of 0.02% when compared with AR24.

14.2.2 Lines B11b.5-B11b.8 - (B) Look-up Table Lower Tier Consents

Line B11b.5 No. of wastewater treatment works on register during year (in force)

This is referenced under commentary **Line B11b.1**.

Line B11b.6 No. of wastewater treatment works assessed for compliance

This is referenced under commentary **Line B11b.2**.

Line B11b.7 No. of wastewater treatment works confirmed failing in year

For AR25, there were 6 WwTWs confirmed as failing under the CAR compliance Discharge Look-up Table Lower Tier Consents criteria.

This is an increase of 6, when compared with AR24 (0 was reported).

Further analysis has been undertaken to determine the reasons behind the increase for the failing wastewater treatment works reported in table B11b.7 (Lower Tier Breaches). Three of the sites picked up ammonia fails, two were BOD and one was a bacteriological parameter (E.coli).

The root cause of failure was mechanical breakdown, design capability / asset related deterioration. Weather i.e. prolonged dry weather and low flow may also have been a contributing factor.

Line B11b.8 %. of wastewater treatment works compliant with licence in the year

For AR25, the percentage CAR Discharge Compliance with Consent was 99.57%.

This is a marginal reduction of 0.43% when compared with AR24 when 100% was reported.

14.2.3 Lines B11b.9-B11b.12 - (C) Upper Tier Consents

Line B11b.9 No. of wastewater treatment works on register during year (in force).

This is referenced under commentary **Line B11b.1**.

Line B11b.10 No. of wastewater treatment works assessed for compliance

This is referenced under commentary **Line B11b.2**.

Line B11b.11 No. of wastewater treatment works confirmed failing in year

For AR25, there were 11 WwTWs confirmed as failing under CAR compliance Discharge Upper Tier criteria.

This is an improvement when compared with AR24 when 17 were reported. Operational activity, use of technology, and continuous improvement in data and reporting have helped this.

Line B11b.12 % of wastewater treatment works compliant with licence in the year

For AR25, 99.22% was reported.

This is an improvement when compared with AR24 when 98.81% was reported.

14.2.4 Lines B11b.13-B11b.16 - (D) Single Tier Licences

Line B11b.13 No. of wastewater treatment works on register during year (in force)

The total number of wastewater treatment works on register during year (in force) is 369.

This is calculated from the Annual Monitoring Plan (AMP). The AMP database is not set up to easily produce this number and a manual intervention is required. This is reflected in the confidence grade (A2).

Line B11b.14 No. of wastewater treatment works assessed for compliance

Scottish Water's licence database calculated the number of wastewater treatment works with licenses that only have single tier/absolute limits included in the 2024 Annual Monitoring Plan was 0.

Line B11b.15 No. of wastewater treatment works confirmed failing in year

For AR25, zero WwTWs were reported as failing under the metric CAR compliance Discharge Single Tier criteria.

Line B11b.16 %. of wastewater treatment works compliant with licence in the year

The line definition has changed for AR24 after consultation with SEPA and WICS.

For AR25, Scottish Water report 100.00% compliance.

14.2.5 Lines B11b.21-B11b.24 - (F) Wastewater treatment works confirmed as failing (CAR)

Line B11b.21 Number of wastewater treatment works confirmed as failing (CAR)

For AR25 there were 17 WwTWs confirmed as failing under CAR compliance Discharge as Failing criteria.

This is comparable with AR24.

Line B11b.22 Total population equivalent confirmed as failing

For AR25, the Total Population Equivalent affected by failing WwTWs was 428,378.

This is an increase when compared with AR24 when 183,386 was affected.

Three larger WwTWs contributed to this increase (reference Table B11c).

Line B11b.23 Total population equivalent served by WwTWs (resident) (numeric licences)

The Total Population Equivalent served by WwTWs 6,413,495.

Line B11b.24 Percentage population equivalent confirmed as failing

For AR25, the percentage Population Equivalent confirmed as failing under CAR was 6.68%.

This is an increase when compared with AR24 when 2.83% was reported.

14.2.6 Lines B11b.25-B11b.28 - (G) UWWTD

The numbers reported in these lines are based on the 2024 calendar year only.

Line B11b.25 No. of wastewater treatment works on register during year (in force).

For the 2025 period there were 198 discharges reported.

Line B11b.26 No. of wastewater treatment works assessed for compliance

For the 2025 period there were 198 discharges Assessed for Compliance.

Line B11b.27 No. of wastewater treatment works confirmed failing in year

For AR25, 2 WwTWs were confirmed as failing UWWTD. For AR24, there were 7 failing WwTWs.

[Table 77](#) lists these WwTWs.

Table 77: WwTWs confirmed as failing.

Failing WwTWs (UWWTD) - 2024 v 2025			
2024		2023	
WwTW	Failing Parameter(s)	WwTW	Failing Parameter(s)
Nigg	BOD, COD	Coupar Angus	BOD
South Queensferry	BOD	Erskine	BOD
		Forres	BOD
		Kirkcaldy	COD
		Muir of Ord	BOD
		Nigg	COD
		Skellyton	Total P

Line B11b.28 % of wastewater treatment works compliant with licence in the year

For AR25, 98.99% percentage Population Equivalent were Compliant with Consent during the year. This compares with 97.47% for AR24.

Lines B11b.29-B11b.32 - (H) Wastewater treatment works confirmed as failing (OPA criteria only)

OPA is a financial year measure. The OPA performance measure for failing treatment works changed from 1 April 2021, moving to Total Compliance which assesses compliance against all quality parameters contained within a SEPA licence. Prior to this only a proportion of final effluent parameters impacted on OPA compliance.

Line B11b.29 Number of wastewater treatment works confirmed as failing (OPA)

For AR25, 18 WwTWs were confirmed as failing the Total Compliance (SR21) measure. In AR24, 22 WwTWs were reported as failing (see [Figure 51](#) and [Table 78](#)). In-depth analysis is currently being undertaken to determine the reasons behind this increase and should be available by the end of July 2025.

This equates to a 96.9% compliance rate from the 580 assets listed on the Annual Monitoring Plan (AMP) and sampled under Operator Self-Monitoring (OSM).

Figure 51: Number of WwTWs confirmed as failing the Total Compliance (SR21) measure for AR25 vs AR24.

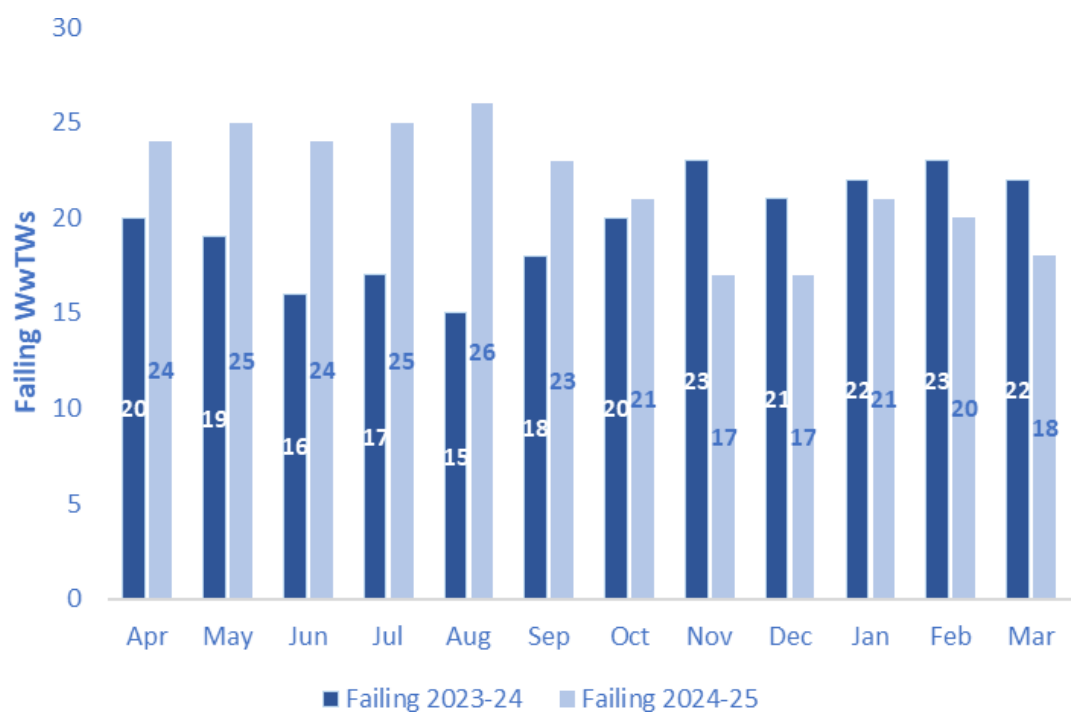


Table 78: Failing WwTWs and Parameters for AR24 and AR25.

Total Compliance Comparison			
AR24		AR25	
WwTW	Failing Parameter(s)	WwTW	Failing Parameter(s)
Banchory	SS (UT)	Aberchirder	BOD (UT)
Croy	SS (UT)	Aviemore	SS (UT), Iron (AMC)
Drumlithie	BOD (UT)	Balmedie	pH
Erschine	BOD (UT)	Blackridge	NH3 (LT/LUT)
Forres	BOD (UT)	Canonbie	SS (UT)
Fyvie	BOD (UT)	Dairsie	BOD (LT/LUT)
Gairloch	E.coli (UT), I.coli (UT)	Daldowie	SS (UT)
Galashiels	pH	East Calder	NH3 (LT/LUT)
Insh	SS (UT)	Fettercairn	SS (UT)
Kinneil Kerse	SS (UT)	Gifford	SS (UT)
Longside	pH	Hatton of Cruden	E.coli (LT/LUT)
Milton of Kildary	SS (UT)	Kinneff	BOD (LT/LUT)
Muir of Ord	BOD (UT)	Kirknewton (Ritchie Camp)	NH3 (LT/LUT)
Neilston	Chromium (UT)	Luss	E.coli (UT)
Nigg	COD (LT / LUT), BOD (UT)	Nigg	COD (LT/LUT), BOD (UT)
Sauchen	pH	Ochiltree	BOD (UT)
Shotts	NH3 (UT), pH	Penicuik	BOD (UT), SS (UT), Iron (AMC)
South Queensferry	BOD (UT)	St Margarets Hope	SS (UT)
Stanley	SS (UT)		
Stevenston	Dichloromethane (UT)		
Tain	E.coli (UT)		
Tyndrum	SS (UT)		

Of the 18 WwTWs reported as failing in AR25, only one of these also failed AR24. This site was Nigg.

For AR25, 56% of the parameters impacting the number of failing WwTWs are upper tier fails. This compares with 95% for AR24. Look Up Table and Annual Average percentages have increased. Upper tier fails are categorised as WwTW failing immediately and remain so for the following twelve months.

Figure 52 shows the comparisons for fail types for failing WwTWs reported in AR24 and AR25.

Figure 52: Parameter Fail Category for AR24 and AR25.



For parameter type fails, BOD, Suspended Solids and Ammonia contribute the most towards failing WwTWs. AR25 is 27%, 32% and 14% respectively compared with 31%, 31% and 4% for AR24.

Figure 53 shows the parameter fail type comparisons for failing WwTWs reported in AR23 and AR24.

Figure 53: Parameter Fail Types for AR24 and AR25



Line B11b.30 Total population equivalent confirmed as failing.

For AR25, the Total Population Equivalent affected by failing WwTWs was 696,092.
This was 569,856 for AR24.

Line B11b.31 Total population equivalent served by WwTWs (resident) (numeric licences)

The Total Population Equivalent served by WwTWs listed on the AMP is 6,413,495.

Line B11b.32 Percentage population equivalent confirmed as failing

For AR25, the Population Equivalent confirmed as failing under OPA criteria was 10.85%.

For AR24, this figure was 8.79%.

Three larger failing WwTWs contributes to this increase (Daldowie, East Calder, Nigg).

Line B11b.33 - Number of wastewater treatment works confirmed as failing (OPA) (SR15 equivalent)

Wastewater compliance under the SR15 metric reported 7 failing WwTWs in AR25 compared with 0 in AR24. [Table 79](#) below contains the list of failing works and failing parameters. Please note that a direct comparison between parameters that failed under the SR15 and SR21 versions of the OPA cannot be made due to the change in assessed parameters (see our response to AR22 query B-36).

Table 79: List of Failing Works and Failing Parameters

SR15 OPA Comparisons			
AR24		AR25	
WwTW	Failing Parameter(s)	WwTW	Failing Parameter(s)
		Blackridge	NH3 (LUT/LT)
		Dairsie	BOD (LUT/LT)
		East Calder	NH3 (LUT/LT)
		Hatton of Cruden	E.coli (LUT/LT)
		Kinneff	BOD (LUT/LT)
		Kirknewton (Ritchie Camp)	NH3 (LUT/LT)
		Nigg	BOD (LUT/LT, UT)

Line B11b.34 - Total population equivalent confirmed as failing (SR15 equivalent)

For AR25, there were 381,886 Population Equivalent affected by failing WwTWs (SR15 equivalent).

For AR24, zero was reported.

Line B11b.35 - Total population equivalent served by WwTWs (resident) (numeric licences) (SR15 equivalent)

For AR25, 6,413,495 population equivalent served by all WwTWs with numeric consents (SR15 equivalent).

Line B11b.36 - Percentage population equivalent confirmed as failing (SR15 OPA equivalent)

For AR25, 5.95% of the population equivalent were affected by failing WwTWs (SR15 equivalent)

For AR24 zero was reported.

15 Table B11c: Failing WwTWs (Calendar & Financial Year)

This table lists the WwTWs reported as failing for both 2024 and/or 2024/25.

Data contained in these tables is used to populate Table B11b. Performance and trends are reported in the B11b Commentary above.

15.1 Investment

The allocation (IPS 2025) to MA084 for WwTW Improvements is £146.9m.

The allocation of MA084 in 2023 was £127m and reduced to £108m in IPS 2024.1.

Live projects currently in development have a latest best estimate of £161.7m with a current committed spend of £23.7m. The remaining investment will be fully committed within the investment period to meet the 2027 regulatory deadline.

The outcomes of the successful delivery of improved water quality for all remaining WwTW pressures identified with River Basin Management Plan (RBMP3) which will be delivered by 2027. Other significant projects include improved bathing water performance at Ayr South and Lower Largo, reduced risk of malodour at Seafeld WwTW, and a WwTW Pass Forward Flow (PFF) compliance study. The PFF study will identify a gap list of apparatus to maintain asset compliance with potential for significant investment demand.

The costs to deliver RBMP3 interventions alone makes up over 75% of MA084 IPS.

The RBMP3 programme has progressed at pace over the last year with many projects reaching Gate 70 status, which is the penultimate stage of solutions development and provides a robust view of costs. In support of this activity, advance procurement of apparatus is enabling the efficient delivery approach which was developed last year. Construction will begin for selected projects during 2025.

WwTWs within the RBMP3 programme are largely addressing a Reactive Phosphorus (RP) quality parameter and Nature Based Solutions (NBS), alternative approaches to meeting the RBMP3 commitments, are currently being investigated at four locations.

Three of the RBMP3 sites within the programme are PFI sites (East Calder, Whitburn and Blackburn WwTWs) returning to Scottish Water in 2029. SEPA has issued license variations to Stirling Water (PFI operators) which require them to deliver improvements by December 2027. Scottish Water has developed solutions to Gate 50 status which will provide a cost benchmark to Stirling Water design proposal which are expected later in 2025.

Through combined growth and RBMP drivers, Nereda treatment is being used at Winchburgh WwTW for RP removal. Ferric dosing was introduced in May 2024 to meet the current target of 0.55 mg/l 95%ile and a standard of 0.38 mg/l once growth is fully realised.

15.2 Data

There has been no change to the data sources and methodology from AR24.

Regulatory samples results are sourced from Scientific Services LIMS. Using these, a consents reference set and a **calculation** spreadsheet, the compliance status is calculated for each WwTW sampled under OSM. Compliance reports are created weekly using Power BI and shared within Scottish Water and with SEPA.

A Confidence Grade of A1 has been given to the data contained in each line in this table. The data is sourced from Scottish Water corporate systems.