



# NAV Bulk Charges

## On-site avoided Ongoing Costs

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## Seeking feedback

This document aims to give you the information you need to understand our on-site avoided Ongoing Costs adjustment for Bulk Charges that apply to New Appointments and Variations (“NAVs”). The figures within this document are subject to change. We would appreciate your comments and feedback on the document. Please send your comments to [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk).

## Changes to this document

Throughout the year we are working to improve our services and we may issue updates to this document as appropriate.

## Revision history

Date	Version	Changes
29 January 2026	1.0	Publication

## Introduction

This document provides additional detail to that set out in the NAV Tariff Document 2026/27<sup>1</sup> relating to the on-site avoided Ongoing Costs adjustment within our NAV Bulk Charges, according to the wholesale-minus approach used for the setting of those charges.

The Bulk Charging Working Group (“BCWG”), chaired by Ofwat, was a group of industry representatives from Incumbent water companies and NAVs. The aim of the BCWG was to assess the Bulk Charges that NAVs were subject to relative to the Ofwat guidance published at the time, understand the differences in the charges applied and the approaches used by Incumbents and to conclude on future best practice on setting Bulk Charges.

As a part of this work, the BCWG issued a template for Incumbents to use when detailing the on-site avoided Ongoing Costs that are considered to be avoided by the Incumbent when a NAV operates a Site. This is one part of the ‘wholesale-minus’ approach to setting NAV Bulk Charges as set out in the original Ofwat guidance<sup>2</sup>.

The template issued by the BCWG was primarily intended for use by Incumbents using the ‘bottom-up’ methodology for calculating on-site avoided Ongoing Costs. It sets out detailed cost categories that would be considered for inclusion individually when such Incumbents build up from first principles the adjustment to apply to their underlying Wholesale Charges.

An alternative methodology for the on-site avoided Ongoing Costs adjustment is the ‘top-down’ approach. This uses higher level cost data, such as that disclosed in relevant tables of the Incumbent’s Annual Performance Report (“APR”), to determine the adjustment to be applied to the Incumbent’s underlying Wholesale Charges.

Thames Water’s approach to the application of the on-site avoided Ongoing Costs adjustment within the wholesale-minus charging framework is to use the ‘top-down’ approach. As the ‘top-down’ approach does not lend itself to fully and meaningfully populating the BCWG template, we are not able to publish it as a part of this document. Instead, this document sets out in more detail our ‘top-down’ approach utilising (as far as possible) the categories within the BCWG template.

Since the disbanding of the BCWG, Ofwat published charging rules<sup>3</sup> for the setting of NAV Bulk Charges in November 2025 to take effect for the 2026/27 Charging Year. For 2026/27, these charging rules do not change the requirements on Incumbents with regards to using the wholesale-minus approach for the setting of the on-site avoided Ongoing Costs adjustment. As such, we continue to use the ‘top-down’ approach and are publishing this document to provide the same level of detail for the on-site avoided Ongoing Costs adjustment as in previous years.

From the 2027/28 Charging Year, rule 21 of the Ofwat charging rules for NAV Bulk Charges states that Incumbents will need to specify their Avoided Costs in accordance with the Avoided Costs table set out in the ‘Common Terms and Worked Examples – Bulk Charges’ document, due to be updated by Ofwat during 2026/27.

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<sup>1</sup> [NAV Tariff Document 2026-27](#), Thames Water, January 2026

<sup>2</sup> [Bulk charges for new appointees – guidance on our approach and expectations](#), Ofwat, January 2021

<sup>3</sup> [Rules for Bulk Charges for New Appointments and Variations](#), Ofwat, November 2025

## Wholesale-minus approach to setting NAV Bulk Charges

As per the Ofwat charging rules for setting NAV Bulk Charges, a 'wholesale-minus' approach should be used as the method of calculating the charges to be levied by Incumbents. This involves deducting from the relevant Wholesale Charges the on-site Avoided Costs that an Incumbent would incur if it, instead of a NAV, were to provide services to customers on a Site. The adjustments made to the relevant Wholesale Charges are per the list below and are also set out in our NAV Tariff Document 2026/27.

- On-site avoided Ongoing Costs
- Renewal and Replacement Costs of On-site Assets
- Network losses (referred to as Leakage in the Ofwat charging rules)
- Phased legacy discount adjustment (for water service)
- On-site Sewage Pumping Station ("SPS") costs (for wastewater service, where relevant)

Note that our relevant Wholesale Charges starting point is deemed to be the wholesale volumetric charge applied to our metered household customers.

The table below shows how the NAV Bulk Charges are derived from the relevant Wholesale Charges starting point.

**Table 1: Derivation of NAV Bulk Charges from relevant Wholesale Charges**

2026/27 charges	Water £ per m <sup>3</sup>	Wastewater £ per m <sup>3</sup>
Relevant Wholesale Charges starting point	2.7346	1.4721
On-site avoided Ongoing Costs	(0.2711)	(0.1840)
Renewal and Replacement Costs of On-site Assets	(0.3699)	(0.0613)
Network losses	(0.0738)	(0.0397)
Phased legacy discount adjustment	(0.1375)	n/a
<b>NAV Bulk Charge (excluding on-site SPS discount)</b>	<b>1.8823</b>	<b>1.1871</b>
On-site SPS costs	n/a	(0.1674)
<b>NAV Bulk Charge (including on-site SPS discount)</b>	<b>1.8823</b>	<b>1.0197</b>

The rest of this document focuses on detailing the derivation of the on-site avoided Ongoing Costs adjustment.

## On-site avoided Ongoing Costs calculations

Under the Ofwat charging rules, the Ongoing Costs of operating and maintaining the on-site assets should be assessed with reference to the costs that the Incumbent avoids as a result of the fact that the NAV is serving the Site rather than the Incumbent.

This section details our approach to the calculation of on-site avoided Ongoing Costs for our water and wastewater services.

We have used data tables 4J and 4K from our APR<sup>4</sup> to derive the relevant on-site avoided Ongoing Costs. Note that the costs included in these tables are not currently adjusted to identify only the on-site costs (i.e. they are not amended to represent only the 'last mile').

For each relevant upstream service (namely Treated Water Distribution and Sewage Collection), the avoided costs are taken from the following categories of the relevant APR table:

- Power;
- Other operating expenditure;
- Costs associated with Traffic Management Act;
- Costs associated with lane rental schemes;
- Discharge consents, charges and permits (for wastewater services); and
- Costs associated with Industrial Emissions Directive (for wastewater services).

All other operating expenditure categories on tables 4J and 4K are deemed to be either costs that are not avoided by the Incumbent or, in the case of 'Renewals expensed in the year', costs that are included within the adjustment for the Renewal and Replacement Costs of On-site Assets.

For each upstream service, we then average the calculated avoided costs over the last three reported years and inflate to reflect the equivalent costs that would be incurred in the upcoming Charging Year.

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<sup>4</sup> [Annual Performance Report 2024/25](#), Thames Water, July 2025

## Water service calculations

The calculation of the on-site avoided Ongoing Costs included in the NAV Bulk Charges for water service is mostly based on information published in the APR for the past three years. The relevant data was reported as Treated Water Distribution within the Water Network Plus price control and is shown in Table 2.

**Table 2: Water Network Plus – Treated Water Distribution avoided costs**

	APR ref.	Units	2023	2024	2025	Average
Power	4J.1	£m	51.2	52.8	46.7	
Other operating expenditure	4J.6	£m	121.5	132.6	149.0	
Costs associated with Traffic Management Act	4J.11	£m	32.5	27.6	28.0	
Costs associated with lane rental schemes	4J.12	£m	2.7	1.7	1.6	
Total avoided costs (Outturn prices)	-	£m	207.8	214.7	225.3	
Total avoided costs (2026/27 prices)*	-	£m	240.7	235.7	239.6	238.7
Total length of potable mains	6C.1	km	31,927	32,010	32,035	31,991

\*Inflated with financial year averages of CPIH monthly indices, as published by the Office for National Statistics ("ONS") or available in an internal consensus forecast.

Using the three-year average figures from Table 2, the total avoided costs were divided by the total length of potable mains to obtain an avoided costs discount of £7.46 per metre.

Based on the PR24 business plan submission, we estimated that each new customer property is served by 4.1 metres of new water mains. These assumptions result in an avoided costs discount of £30.95 per property.

To convert into a discount per m<sup>3</sup>, we took our forecast annual consumption per household for water services (118.9 m<sup>3</sup> per property, as used in our 2026/27 tariff modelling) and reduced this figure by 4% to reflect the increased water efficiency of properties on new developments. This results in an annual water consumption figure per property of 114.2 m<sup>3</sup>, which leads to a calculated discount for on-site avoided Ongoing Costs of £0.2711 per m<sup>3</sup> of clean water.

## Wastewater service calculations

Similar to water service above, the calculation of the on-site avoided Ongoing Costs included in the NAV Bulk Charges for wastewater service is mostly based on information published in the APR for the past three years. The relevant data was reported as Foul, Surface Water Drainage (“SWD”) and Highway Drainage (“HD”), within the Wastewater Network Plus price control. Table 3 displays the data relating to the Foul component.

**Table 3: Wastewater Network Plus - Foul avoided costs**

	APR ref.	Units	2023	2024	2025	Average
Power	4K.1	£m	20.1	24.2	21.9	
Other operating expenditure	4K.6	£m	89.4	90.3	180.8	
Canal & River Trust abstraction charges/ discharge consents	4K.8	£m	0.8	0.8	0.8	
EA / NRW abstraction charges/ discharge consents	4K.9	£m	1.2	0.6	0.8	
Other abstraction charges/ discharge consents	4K.10	£m	0.4	0.3	0.9	
Costs associated with Traffic Management Act	4K.11	£m	0.5	0.8	0.2	
Costs associated with lane rental schemes	4K.12	£m	0.3	0.4	0.7	
Costs associated with Industrial Emissions Directive	4K.13	£m	0.0	0.0	0.0	
Total (Outturn prices)	-	£m	112.8	117.5	206.2	
Total (2026/27 prices)*	-	£m	130.6	128.9	219.2	159.6
Total length of foul sewers	7C**	km	80,361	80,425	80,477	80,421

\*Inflated with financial year averages of CPIH monthly indices, as published by the ONS or available in an internal consensus forecast.

\*\* Lines 16, 19 and 22.

Using the three-year average figures from Table 3, the total avoided costs were divided by the total length of foul sewers to obtain an avoided costs discount of £1.98 per metre.

Based on the PR19 and PR24 business plan submissions, we estimated that each new customer property is served by 8.6 metres of new foul sewers. These assumptions result in an avoided costs discount of £17.06 per property, for the Foul component.

In addition to Foul avoided costs, the NAV Bulk Charges for wastewater also take into account avoided costs that relate to SWD and HD. These were calculated from the data in Table 4.

**Table 4: Wastewater Network Plus – SWD and HD avoided costs**

	APR ref.	Units	2023	2024	2025	Average
Power	4K.1	£m	4.1	4.9	4.5	
Other operating expenditure	4K.6	£m	17.3	17.4	29.8	
Canal & River Trust abstraction charges/ discharge consents	4K.8	£m	0.2	0.2	0.2	
EA / NRW abstraction charges/ discharge consents	4K.9	£m	0.2	0.1	0.2	
Other abstraction charges/ discharge consents	4K.10	£m	0.1	0.1	0.2	
Costs associated with Traffic Management Act	4K.11	£m	0.1	0.2	0.0	
Costs associated with lane rental schemes	4K.12	£m	0.1	0.1	0.1	
Costs associated with Industrial Emissions Directive	4K.13	£m	0.0	0.0	0.0	
Total (Outturn prices)	-	£m	22.0	22.8	34.9	
Total (2026/27 prices)*	-	£m	25.5	25.1	37.1	29.2
Total length of surface water sewers	7C**	km	28,994	28,976	28,948	28,973

\*Inflated with financial year averages of CPIH monthly indices, as published by the ONS or available in an internal consensus forecast.

\*\* Lines 17, 18 and 20.

Using the three-year average figures from Table 4, the total avoided costs were divided by the total length of surface water sewers to obtain an avoided costs discount of £1.01 per metre.

Based on the PR24 business plan submission, we estimated that each new customer property is served by 4.1 metres of new surface water sewers. These assumptions result in an avoided costs discount of £4.19 per property, for the SWD and HD components.

The sum of all components of the wastewater avoided costs discount amounts to £21.25 per property.

To convert into a discount per m<sup>3</sup>, we took our forecast annual usage per household for wastewater services (120.3 m<sup>3</sup> per property, as used in our 2026/27 tariff modelling) and reduced this figure by 4% to reflect the increased water efficiency of properties on new developments. This results in an annual usage figure per property of 115.5 m<sup>3</sup>, which leads to a calculated discount for on-site avoided Ongoing Costs of £0.1840 per m<sup>3</sup> of wastewater.



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