

AMP6 Reporter

2017-18 Annual Performance Report
Affinity Water

20 June 2018



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Table of contents

Chapter	Pages
Assurance Statement for Affinity Water's 2017-18 APR	4
Summary Report	6
1. Introduction and Scope of work	6
2. General Comments on Governance, Processes and Reporting	7
3. Findings and Issues Raised During Data Audits	8
3.1. Performance Commitments and ODIs	8
3.2. Reporting of Common Metrics for PR19	10
3.3. Reporting of Data for the Wholesale Cost Assessment Tables	10
3.4. Other Matters	11
Appendices	13
Appendix A. 14	
A.1. Meeting Record	14
Tables	
Table 3-1 Summary of Outstanding Significant Audit Findings	9
Table 3-2 Summary of Notable Issues Encountered during the Audit of the Cost Assessment Tables..	11

Assurance Statement for Affinity Water's 2017-18 APR

Atkins is engaged by Affinity Water to provide independent assurance on non-financial aspects of the annual reporting activities that Affinity carries out. That includes all reporting against Performance Commitments, the Abstraction Incentive Mechanism (AIM) and the Service Incentive mechanism (SIM). Our scope also covers the additional performance information that Ofwat have requested through Information Notice IN 18/07 and the associated IN 17/08 Regulatory Accounting Guidelines. Specifically, our remit includes the following additional data:

- Technical performance aspects of the Cost Assessment tables that are used by Ofwat in its comparative assessment and econometric modelling. This includes Tables 4A, 4D, 4L, (capital expenditure allocation lines), 4P to 4Q of the submission.
- The requirement that water companies submit additional leakage, interruptions to supply and unplanned outage figures that follow a specified methodology that is intended to allow comparative assessment across the water industry (Table 3S of the Ofwat APR tables).

Our scope of audit is specifically designed to provide assurance for the data integrity of the AR 18 PCs, which includes the requirement for the 'shadow' reporting of leakage, customer interruptions and unplanned outage events in accordance with the water industry consistent reporting guidance referred to in Ofwat Information Notice IN 18/07. We have also provided data assurance of the Wholesale Cost Assessment Tables that are required under IN18/07, using similar approaches to our auditing of the PCs. Our audit activities have been designed to support Affinity Water's Assurance Plan, and follow a risk based Audit Plan that was agreed with Affinity Water's regulatory team in March 2018. As part of our preparatory work we considered the risks and audit needs required to provide the Audit Committee with an appropriate level of assurance, and satisfied ourselves that the Audit Plan was sufficient to meet this need. Our scope of assurance therefore included the process, systems and figures audits relating to the Annual Performance Report, and specifically the Outcome Delivery Incentive reporting contained within that report.

Our assurance activities are tailored so that, at the end of the process, we are able to confirm whether

- Affinity Water has appropriate systems, procedures and reporting mechanisms in place to control and meet its reporting obligations.
- Affinity Water understands the accuracy of the data that it is providing and is able to identify where specific reported data may not be appropriate to regulatory expectations. Many of the items that we audit inherently contain an element of uncertainty, so it is not possible to assure their absolute accuracy. However, Affinity Water operates a process of data 'confidence grades' for all of the data used to report against its PCs, and in all cases we provide comment and feedback on the appropriateness of the grades that have been assigned. We also indicate where grades may not be appropriate, or have deteriorated from previous years. Where confidence grades are not used we seek to identify any shortfalls in the reporting processes and highlight any areas of material weakness to Affinity Water.
- The key assumptions and processes that are used to report against Affinity Water's Performance Commitments are consistent with the way that the target was set for the PR14 Final Determination.
- The methodologies that have been used for reporting of the common metrics are consistent with the technical guidance that has been published by Ofwat, and where there are shortfalls these have been identified appropriately using the Red, Amber, Green classifications provided by Ofwat.

Overall, we are able to provide assurance this year against all of the above requirements. The vast majority of reporting processes continue to demonstrate either consistent good practice or incremental improvements from previous years. Where we have previously noted areas of inadequacy in reporting procedures these have now been addressed, and clear written procedures are in place for all Performance Commitments that have been publicly reported on this year. Except where noted below we did not encounter any material issues with the reporting of data for the Wholesale Cost Assessment tables.

After our audit queries were answered we only identified one remaining area of concern in relation to the reporting of Performance Commitments, relating to reporting of leakage (PC W-A1). Our concern relates specifically to the quality of the billed commercial data provided by the Market Operation Services Ltd (MOSL) organisation, which Affinity Water now have to rely on for a key part of their leakage calculation (the non-household night use allowance). Following the Water Industry market separation, MOSL hold and issue all of the non-household billed data, so the quality of this data set is outside of Affinity Water's control. We consider that Affinity Water has appropriately investigated the nature of this uncertainty and used an appropriate sub-sample in its calculation, but nevertheless it does introduce potentially significant uncertainty into the leakage calculation this year.

Reporting of Common Metrics has been carried out in accordance with the guidance as far as possible, and we agree with the RAG classifications that have been applied. The only metric that we have not been able to assure is the 'unplanned outage' calculation, which we understand has been carried out in accordance with the guidance, but were not able to review the process prior to submission.

For the Wholesale Cost Assessment data we identified some errors and areas of mis-understanding in relation to the reporting guidelines, but all significant issues were addressed prior to submission. That includes our concerns raised over the allocation of energy usage between price controls in Table 4Q, which we understand have been addressed, but were not able to re-audit the final process prior to submission.

We confirm that Affinity Water has continued to provide us with full and transparent access to its systems and processes, including unrestricted access to all systems, files and documents that we requested from the Company. During the assurance activities, we had free access to the Director of Regulation and his team and the full cooperation of the people responsible for preparing and reporting the 2017-18 APR and Wholesale Cost Assessment submissions and the supporting information.

Douglas Hunt

Associate Director

Reporter providing Technical Assurance Services to Affinity Water

Summary Report

1. Introduction and Scope of work

This report provides the findings of Atkins' assurance for the 2017/18 report year. Our scope of audit is specifically designed to provide assurance for the figures that Affinity Water will submit to monitor their performance against the PR14 Performance Commitments (PCs) for the report year 2017/18, plus the Abstraction Incentive Mechanism (AIM) and Service Incentive Mechanism (SIM) (Tables 3A to 3D). Our scope also covers the additional performance information that Ofwat have requested through Information Notice IN 18/07 and the associated IN 17/08 Regulatory Accounting Guidelines. Specifically, our remit includes the following additional data:

- Technical performance aspects of the Cost Assessment tables that are used by Ofwat in its comparative assessment and econometric modelling. This includes Tables 4A, 4D, 4L, (capital expenditure allocation lines), 4P to 4Q of the submission.
- The requirement that water companies submit additional leakage, interruptions to supply and unplanned outage figures that follow a specified methodology that is intended to allow comparative assessment across the water industry (Table 3S of the Ofwat APR tables).

We also review other data that is collected as part of Affinity Water's internal annual data collection process, including the reporting of the number of customers receiving low pressure to Water UK, and the recording of Water Sure customer data. The Guaranteed Standards Scheme (GSS) was not within our scope this year.

As part of this year's review we were asked to comment on the action plan that is being put in place to address the major failure against the PC W-C1 (unplanned interruptions > 12 hours) target, which Affinity Water has reported for the past 3 years. That review was limited to providing commentary on the likelihood that the plan will allow Affinity Water to meet its target over the final two years of the AMP.

The scope of our audits covers all reported lines within the elements referred to above, plus the supporting data tables, processes and base data sources that are used to generate those lines of data. We operate a risk based approach to audit so do not examine every source of data, but rather work with Affinity Water to identify areas of potential risk, uncertainty and key assumptions that need to be tested in order to provide the assurance that is required.

Many of the items that we audit inherently contain an element of uncertainty, so it is not possible to assure their absolute accuracy. Where the Company has estimated the level of accuracy in its reported data (through confidence grades), we have reviewed this and provided commentary as appropriate. Although uncertainty exists, we note that the purpose of the Performance Commitment reporting within the Annual Performance Report is to monitor the progress of the Company against the targets that it set itself within its 2014 Business Plan. As a result our assurance includes an evaluation of the consistency of reported figures with the methods, calculations and key assumptions that were used to set the targets for the PR14 Business Plan and associated Final Determination, and, where inconsistencies exist, commentary on their significance. For the Wholesale Cost Assessment tables, the information needs to be of a sufficient standard to ensure that it does not devalue Ofwat's cost assessment process, so we have commented where we have found uncertainties that might be significant enough to cause Affinity Water to be an outlier, with associated regulatory scrutiny.

As with previous years our reporting is carried out on an exception basis, whereby we have concentrated on any issues, concerns or areas of improvement that we identified during the course of our audits. We audit a large number of processes, systems and calculations in order to cover the scope of work described below, and the vast majority of these do not include any areas of exception that we consider are worthy of note within this report. Our scope is confined to the numerical reporting systems used to provide data relating to the areas of scope coverage described above. We are not responsible for assurance relating to financial reporting, or compliance with legal requirements under the Water Industry Act.

2. General Comments on Governance, Processes and Reporting

All reporting systems that are used for reporting against the PCs, AIM and SIM (Tables 3A to 3D of the APR submission) are familiar to us, so we are able to comment on both their adequacy and consistency with previous report years, and in particular whether key assumptions and processes are consistent with the way that the ODI was set. The vast majority of reporting processes continue to demonstrate either consistent good practice or incremental improvements from previous years. Where we have previously noted areas of inadequacy in reporting procedures these have now been addressed, and this year there has been a marked improvement in the time taken for auditees to respond to our audit queries and outstanding issues. Clear written procedures are in place for all PCs and the SIM. Written procedures are not yet in place for the reporting of AIM, but the auditees were very familiar with the requirements and reporting processes. We note that issues raised in previous years regarding the reporting of infrastructure condition (bursts) have now improved following the change in contractors.

For the Wholesale Cost Assessment Tables, because Ofwat has included the requirement as a core part of the APR submission, Affinity Water has now formally integrated the submission process into its core annual data gathering and assurance process. The controls and governance that are in place for this are therefore improving, but still not as well established as the PCs or SIM. For example, we noted one area of reporting in the Wholesale Cost Assessment where it was not possible for us to compare against the spreadsheets used to derive last year's data, as this had never been uploaded to the system and the previous member of staff had left the company. As the Wholesale Cost Assessment reporting is now part of the APR we recommend that additional effort is made to ensure the QA and processes are as well managed as the PCs and SIM data.

Based upon our activities and information collated to date we can state that we believe that:

- We have been given free access to relevant staff and information on request, including unrestricted access to all systems, files and documents that we requested from the Company
- Except where noted below, the processes, procedures and data complied with the required assurance criteria as set out in our scope of works

3. Findings and Issues Raised During Data Audits

3.1. Performance Commitments and ODIs

3.1.1. Significant Findings

As with previous years we have classified the 'exceptions' that we have identified into 'red', 'amber' and 'green' categories. The definition for each category as follows:

- 'Red'. These are material issues that mean that either we cannot provide assurance to that area, or there are issues that present a material reporting risk to the Company, either in terms of inconsistency with the Business Plan PCs, or in terms of the Company's ability to understand whether it has discharged its obligations.
- 'Amber'. These are significant issues that are worthy of comment at the Audit Committee level, and may need to be addressed in order to mitigate the risk to the business in the longer term.
- 'Green' these are relatively minor issues that are designed to provide continuous improvement to the reporting process and are highlighted within the individual audit summaries that we provide for the Company.

We did not identify any 'red' issues during our audits that remained outstanding by the time of submission.

We only encountered one 'amber' issue that remains following the audit process for the PCs and SIM this year. This is summarised in Table 3-1 below, and we note that it is an issue that is effectively outside of Affinity Water's control.

As with all years we encountered a number of 'green' issues representing errors that were fixed prior to submission or continuous improvement type recommendations. These are detailed within the relevant detailed audit summaries and issues logs that we feed back to Affinity Water after each audit.

3.1.2. Key Assurance Statements

Although uncertainties exist within the reported figures, we have reviewed the ODIs that currently report a 'no penalty' classification and in most cases we are confident that the uncertainties that are present are not sufficient to risk a re-classification into a penalty banding. For the leakage figure (W- 1A) there is a risk that the 'true' leakage figure may have breached the penalty band, but the issue relates to MOSL data that are outside of Affinity Water's control. We consider that the leakage calculation for this year includes a reasonable and appropriate assessment of the billed non-household data to try and provide a figure that is consistent with the methodology that was used to set the PC.

The only ODI that is reported as attracting a penalty (W-C1 Unplanned interruptions to supply over 12 hours) has exceeded the penalty deadband by a considerable amount, so there is no risk that the ODI penalty has been mis-calculated or mis-reported.

Table 3-1 Summary of Outstanding Significant Audit Findings

Reporting Area	Nature of Issue	Classification and Rationale
<p>W-A1 Leakage</p>	<p>The issues that we have highlighted for the reporting of leakage in previous years have now all been successfully addressed, however the market separation process and associated reliance on billed non-household data from MOSL has created a significant uncertainty in the non-household night use figure. Affinity Water has taken reasonable steps to quantify the uncertainty and has selected a sub-set of the data (the April to December 2017 records) that provide consistent billing data to last year. We have highlighted this issue as 'amber' because, if the full year MOSL data were taken, then it would mean that the non-household night use allowance would be much lower and hence the leakage target would theoretically be missed. That would not be logical or appropriate in our opinion, but does represent a regulatory risk that Affinity Water should be aware of.</p>	<p>Amber</p>

3.2. Reporting of Common Metrics for PR19

Our audit activities this year covered the reporting of leakage and interruptions to supply according to the 'convergence' technical methodology that Ofwat refers to in information letter 18/07. For the reporting of these metrics, Ofwat require that the technical components that make up the methodology are graded according to a specific red/amber/green categorisation.

For the leakage metric, we found that the method used by Affinity Water is generally compliant with Ofwat's good practice guidance and we agreed with Affinity Water that all components are 'Green', with the following exceptions:

- Coverage and availability of monitoring are both being proposed as Amber by the Company. They are starting to improve both coverage and availability, and it is clear that their process prevents any material impact on the reported figure, so we consider that the Amber grades are appropriate.
- Trunk mains leakage is still appropriately reported as Amber.
- Unmeasured per capita consumption (PCC) is reported as Amber under this part of the assessment, which we consider is appropriate.

For PCC we also found that the method used by Affinity Water is generally compliant with the good practice guidance. The nature of the RAG classification process used by Ofwat for this metric means that we were able to confirm that all of the categories should be reported as 'Green', even though we do have some concerns about the representativeness of the Watcom sample.

For interruptions to supply we found that the method used by Affinity Water is compliant with the recommended good practice, with data assurance on shorter durations incidents being improved from previous years. All categories are appropriately reported as 'Green'.

We confirmed that the risk of severe restrictions in a drought metric reconciled with the technical assessment used to underpin Table 10 of the draft Water Resources Management Plan.

Although we understand that the reporting of unplanned outage has been carried out in accordance with the technical guidance document, Affinity Water was not able to present us with appropriate audit trails prior to submission, so we are unable to provide assurance on that data.

3.3. Reporting of Data for the Wholesale Cost Assessment Tables

Although we encountered a number of errors and areas of non-compliance with the reporting requirements during our audits, many of these were associated with a lack of clarity in the reporting requirements, and Affinity Water took steps to address such issues prior to submission. Some minor errors may remain, and there may be a need to back correct the figures for the allocation of groundwater works numbers by type due to a mis-interpretation of the guidance last year. However, overall the number of non-trivial issues is much smaller than last year and data quality has improved. In terms of data uncertainty, we reviewed all of the confidence grades that are being used by Affinity Water to internally grade accuracy and reliability, and confirmed that we are comfortable with their assessment. We confirm that Affinity Water has taken reasonable steps to provide data that are accurate and in compliance with the reporting requirements and Ofwat definitions.

Some notable issues do remain with the data as reported, which we have highlighted as they have the potential to raise queries by Ofwat or represent areas where Affinity Water has not been able to comply with the reporting requirements. Where we identified risks or issues during our audits we have classified them using an RAG system similar to the that used for the PCs, but with slightly different definitions, as follows:

- Red'. These are material issues that mean that either we cannot provide assurance to that data, or the data are so poor that they do not provide a meaningful reflection of the company's actual position in relation to that Cost Assessment factor.
- 'Amber'. These represent issues that are not significant enough to prevent us assuring the data, but where there are either non-trivial errors in the reported data or areas of uncertainty that are either outside of Affinity Water's own confidence grade or would be considered "unusual" in comparison to industry norms.

- ‘Green’ these are relatively minor issues that are designed to provide continuous improvement to the reporting process and are highlighted within the individual audit summaries that we provide for the Company.

We did not identify any ‘red’ issues during the course of our audits, but two ‘amber’ issues currently remain. These are summarised in Table 3-2, along with the potential risks and implications of those issues. Other than these issues we can confirm that, to the extent revealed by our audits, there were no other significant risks to the reporting process. Although it is not a reporting risk, we noted as part of our audit that the lead communications pipe replacement programme seems to be behind schedule, and there is some hiatus in delivery whilst contractors are being changed. The delivery of the lead CP programme was a key element of the PR14 Final Determination, and is the subject of a formal agreement with the DWI, so regulatory risks from non-delivery would be considerable.

Table 3-2 Summary of Notable Issues Encountered during the Audit of the Cost Assessment Tables

Table, Line and Subject	Issue	Risks and Implications
Table 4Q lines 10 and 11 Meter optants and replacements	Whilst the main selective metering programme is being well managed and is able to report accurately, we are still unable to assure the numbers of optants and meter replacements that have been carried out as these are subject to considerable uncertainty under the current reporting process.	Amber – these are not particularly significant lines in comparison to selective metering, but may be prone to large errors.
Table 4Q lines 24 to 26: Energy usage	At audit we initially raised concerns that Affinity Water was only allocating energy usage at the site level, so for works such as The Denge, Chertsey and Walton there may not have been an effective allocation to water resources. We understand that this has been addressed by using average pumping head ratios and applying that at an aggregate level to energy usage figures, but we were unable to assure that process prior to submission.	Amber – potentially not fully compliant with reporting requirements.

3.4. Other Matters

Reporting of Health and Safety and the recording of vulnerable customers data were well managed and we have no significant comments.

For the ‘customers experiencing low pressure’ metric, as reported to Water UK, there has been an unexpected, very substantial increase this year (from 1,100 to 2,149 properties on the register). These additional properties have largely been identified as a result of pressure loggers being deployed to District Metered Areas (DMAs) as part of the leakage control programme. We have two significant concerns in relation to this:

- 1) It is not clear why this risk was not picked up by hydraulic modelling, which previously formed one of the main risk controls to give confidence that unrecorded pressure failures were not occurring in the supply system. It appears that many of the failures are being caused by network configuration issues that are relatively easy to address (circa 1400 properties are forecast to be removed from the register by next year), but difficult to know about or reflect in hydraulic models. Nevertheless, we would recommend that the lessons learned from this are reflected in the hydraulic modelling update programme and considered when pressure control schemes are being implemented.
- 2) We can only provide assurance on the reported figure because the Regulation team picked up this work and carried out a last-minute cleansing exercise to remove the data of spurious failures and allowable ‘exceptions’. During our initial audit we were presented with a figure of over 4,400 properties, and this problem will persist if the data providers responsible do not carry out suitable checks in future years. If data are going to be reported to Water UK then we would recommend that they are subject

to similar levels of data quality control as the PC and 'shadow reporting' metrics with appropriate accountability held within wholesale operations.

In terms of the forecast interruptions to supply > 12 hours, we reviewed, via telephone interview, the 'Interruptions Recovery Plan' that is being put in place to reduce numbers back in line with the AMP6 target. We have the following observations to make in relation to the ability of that Plan to provide Affinity Water with a reasonable chance of meeting its target in the remaining two years of the AMP:

- The plan is detailed and being managed appropriately, as a project, with tasks that are defined and tracked through a project programme with clear ownership and responsibility.
- The elements of the plan are logical, believable and during the interview Affinity Water were able to show how the proposed measures would avoid the incidents that have led to the large failures over the past three years.
- The equipment and equipment storage facilities that are proposed to support the plan have been funded and the capital procurement is either in place or underway. The contractor issues that were previously present should be addressed by the plan.
- The Plan requires that the Network Control Desk is operating to its full intended role, which will require that the current team gains experience in the role. Whilst that is a reasonable expectation, there is no guarantee that it will work, or that the staff will stay in role, and Affinity had problems recruiting suitably experienced people to those positions.
- The plan requires changes to standby rotas and changes in working arrangements with key personnel, but there does not seem to be any significant budgetary support for the changes, other than small changes to standby payment arrangements. These is, for example, no provision for additional staff or resources to reduce the workload of the staff involved during normal working hours. Obviously, we are not close enough to the process to determine whether this is a real issue, and we understand that the People Team are working closely with managers to deliver the new arrangements. However, this is the one area of the plan where we are less confident of delivery of the intended benefits given the people element and the lack of budgetary support.

Appendices



Appendix A.

A.1. Meeting Record

Audit Type	Audit Activity	Line Numbers	Date
Performance Commitments	W -A1 Leakage	1	14-16 May
	W-A2 Average water use	2	
	W-A3 Water available for use	3	
	W -A4 Sustainable abstraction reductions	4	21st May
	W-A5 Abstraction incentive mechanism (AIM)	5	
	W-B1 Compliance with water quality standards (mean zonal compliance)	6	20th April
	W-B2 Customer contacts for discolouration	7	
	W-C1 Unplanned interruptions to supply over 12 hours - DATA	8	26th April
	W-C1 Unplanned interruptions to supply over 12 hours - INTERVIEW/PROC	8	8th May (pm)
	W-C2 Number of burst mains	9	24th April
	W-C3 Affected customers not notified of planned interruptions	10	
	W-C4 Planned work taking longer to complete than notified	11	
	R-A1 SIM service score	12	15 & 16 May
R-A2 Value for money survey	13	over the phone - 27th April	
Table audits	Table 1: Water quality	All Lines	See Table 1, 20th Apr
	Table 2: Health and safety	All Lines	25th April 14:30
	Table 3: GSS	All Lines	
	Table 4: Service Incentive Mechanism (SIM)	All Lines	
	Table 5: Written Complaints - Information for CCWater		
	Table 6: Telephone contact		
	Table 7: Consumer experience satisfaction survey		
	Table 8: Metering	1-18	22nd May (ii)
	Table 9: Properties, billing and population	All Lines	
	Table 10: Water balance and leakage	All Lines	
	Table 11: Resources	L1-26	24th May
	Table 12: Treatment	L1-29	23rd May
	Table 13: Mains and communication pipes	All Lines apart from Mains Bursts (see WC-2 entry)	17th May
	Table 14: Reservoirs, boosters and average pumping head	L1-16	18th May
	Table 15: Supply interruptions and low pressure	L24-26 Low Pressure (Supply Interruptions included under W-C1 to 4)	24th April
	Table 16: Serviceability	All Lines	
	Table 17: Greenhouse Gas Accounting	L1-11	25th May
	Table 17: Energy consumption	L12-13	25th April (pm)
	Table 18: Abstraction incentive mechanism (AIM)	All Lines	
	Table 19: Vulnerable Customers	All Lines	22nd May (i)
	Table 20: Reporting by Community	All Lines	
	APP5 PR14 Reconciliation Table	All Lines	See PR19 audits
	R10 PR14 Service Incentive Mechanism	All Lines	See PR19 audits
APP31: Past Performance	Block A - Complaints		Confirmation required from AW if this assumption is correct or if definition of major incidents needs to be picked up separately.
	Block B - Major incidents		
	Block C - Compliance with EA statutory requirements		25th April (am)
	Block D - Compliance with DWI statutory requirements		
	Block E - Compliance with Ofwat regulatory requirements		25th April (am)

The following additional audits were scheduled in June 2018

- allocation of capital expenditure for tables 4D and 4L: 8th June
- reporting of common metrics for unplanned outages and risk of severe droughts, plus follow up on energy usage by price control: 19th June

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