



**SUBMISSION TO THE COMMISSION FOR REGULATION OF
UTILITIES ON**

**PROPOSED DECISION PAPER ON IRISH WATER'S PROPOSED
NON-DOMESTIC TARIFF FRAMEWORK**

MAY 2019



Introduction to An Fóram Uisce

An Fóram Uisce (the Water Forum) was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. An Fóram is the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram consists of 26 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and also public water consumers. Approximately 50 different organisations were involved in the nomination of members.

An Fóram's main concern in relation to the provision of drinking water is that the citizens and businesses of Ireland should have access to safe, potable drinking water supplies and in relation to waste water, that all services are provided and maintained in a manner that safeguards public health and environmental well being. The cost of access to both services, and their on-going service provision, should be based on an economically reasonable, fair and transparent basis.

An Fóram's response to the proposed decision regarding Irish Water's Non-Domestic Tariff Framework Proposals.

An Fóram notes its role in relation to the CRU consultation requirements in accordance with the provisions contained in the Water Services Act 2017. An Fóram received a presentation from the CRU on the proposed policy at a special meeting held on the 26th July 2018 and submitted its response the following month.

An Fóram received a further presentation from the CRU with regard to its proposed decision at a meeting held on the 1st May 2019. At that meeting, An Fóram noted the various elements of the proposed decision and in particular the proposals to address the various issues and concerns raised by An Fóram in its August 2018 submission.

An Fóram is pleased to note that the proposed decision addresses the issues raised by it and/or provides a satisfactory explanation in relation to certain queries. Of particular note is that the proposals contain a range of incentives to encourage water conservation which is very much welcomed by An Fóram.

An Fóram notes and welcomes the proposals with regard to customer classification which will assist in relation to transparency and clarity. It further notes the proposal to introduce a 4th band (for annual consumption equal to or greater than 250,000m³) which is welcome. However, we would re-iterate our request for consideration to be given to further splitting band 2 (between 1,000m³ and 19,999m³) on the basis that there is a huge variation within that band. The difficulties with charging at the edge of bands is noted which we understand is due to the fact that bands are not linear.

In relation to trade effluent charging arrangements, and as before, An Fóram notes that this current proposal does not provide for any change to the charges applied to Trade Effluent discharges due to the fact that Irish Water do not, at this point in time, have sufficient information to provide for same.

An Fóram understands that proposals will be forthcoming by 2020 and would restate its wish that same would be progressed at the earliest possible time.

Conclusion

An Fóram would like to thank the CRU for presenting at its meeting, for addressing the issues of concern raised in its August 2018 submission and for this opportunity to further submit in relation to the proposed policy. It hopes that its views will be of assistance in finalising same and is available to assist in any way it can in relation to this process.

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Please address any correspondence as follows:

Sharon Kennedy,

Senior Executive Officer,

An Fóram Uisce,

Civic Offices,

Limerick Road,

Nenagh,

County Tipperary