



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

Domestic Customer Handbook

22nd MAY 2020

Introduction to An Fóram Uisce

An Fóram Uisce | The Water Forum (hereafter referred to as An Fóram) 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 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, equitable, fair and transparent basis.

One of the functions of An Fóram outlined in the Water Services Act 2017 is to **advise and provide observations to the Commission for Regulations of Utilities (CRU):**

- i. **in relation to the performance by Irish Water of its functions, and**
- ii. **when requested in writing in that behalf by the Commission, on any consultation document prepared by the Commission in respect of water services provided by Irish Water.**

Submission to CRU on Domestic Handbook

An Fóram would like to thank the CRU for facilitating an online meeting and presenting on the Irish Water Domestic Customer Handbook and the CRU proposed amendments to same to the An Fóram Uisce Water Services Standing Committee on 3rd April 2020.

In this consultation, An Fóram is making a response on:

- a. Domestic Customer Handbook Review

Domestic Customer Handbook Review

An Fóram Uisce welcomes the fact that the CRU has approached this review with a view to prioritising protecting customer interests, to ensure that IW services are delivered in a sustainable manner and that it operates with efficiency.

Objectives of the Review

There is a clear need to update the Domestic Customer Handbook to reflect changes in legislation and water policy since its original publication including, the removal of domestic water charges and the introduction of excess use charges in 2019. The CRU has an extremely important function in monitoring Irish Water's interactions with its customers and it is important that the learnings from this process inform this review. In addition, learnings from International best practice in the setting of overarching Principles to guide Irish Water interactions with customers is critical going forward. We consider the CRU proposed timelines for changes and updates to the handbook to be appropriate.

An Fóram support the proposed CRU Overarching Principles to treat customers in a fair, honest, transparent and professional manner as a minimum and that information provided in all mediums is consistent, accurate and clear as expected of all communications issued by Irish Water.

These, along with the identified 'more prescriptive' General Obligations, provide a combined approach considered more appropriate for Irish Water as the sole provider of public water and wastewater services in Ireland.

Domestic Customer Charter

Increasing the minimum penalty payment to €30 would provide greater impetus to IW to address the issue with more immediacy and it would encourage customers with a complaint to seek recompense, hopefully resulting in greater consumer trust. An Fóram recommends that the late payment be increased to €20 proposal as this will encourage more efficient practice to resolve consumer complaints in a timely manner. The 6-week timeframe would seem manageable to ensure that IW has a chance to minimise costs relating to this measure.

An Fóram supports the setting of timeframes for leak investigations and repairs as this will prioritise water conservation within IW and help impart the importance of water conservation to customers, whereas timeframes for meter installation and pipework ownership queries will help build trust in the utility.

Updating the Customer Charter with details of the First Fix Free scheme and the Excess Use charges is required and An Fóram believes it is very important to promote and raise awareness of these changes within the Customer Charter.

We welcome enhanced communications options for vulnerable customers during unplanned interruptions giving the option for customers on the priority service register to discuss their specific needs with IW. An Fóram recognises the policy of not charging

customers who are liable for charges during a boil water notice however it is important that water conservation is not negatively impacted as a result of such policies which we recommend be kept under review.

Code of practice on Communications

An Fóram supports the CRU proposal to include new requirements around water conservation measures such as informing customers how to reduce their water usage should they experience Excessive Use. This will provide greater awareness and promotion of conservation measures that are available. An Fóram is interested in working with Irish Water and the CRU to develop and deliver awareness and communications around the promotion of water conservation measures with the domestic and non-domestic customer base.

An Fóram believes it is important that customers are made aware that full details of the Excessive Use charge, along with clear details of allowances and exemptions for medical needs and that these, as well as Terms and Conditions, are available online or by post or email if requested.

Unplanned interruptions are distressing for customers and An Fóram supports clear, specific and timely (less than 2 hours) communications of such issues, including where possible letting the customer know when the issue is likely to be resolved.

In SMS communications with customers Irish Water should identify themselves, providing that in the title bar will alert customers to a water or wastewater issue.

Code of Practice on Metering

An Fóram believes that the additional timeframes around meter installation is appropriate as they will facilitate more accurate metering of water usage and customer awareness of their usage.

Code of Practice on Billing

Changing from quarterly bills to annual bills would be more efficient considering the CRU decision on Excess Use charges. However, it is important that meters are read quarterly to monitor usage and identify potential leaks on the system.

An Fóram requests that IW consider issuing a quarterly 'Statement of usage' so that consumers are being informed of their water use. To facilitate customers to meaningfully engage in saving water this statement should ideally include a comparison between the

customer's daily usage and recommended daily use per person for the protection of water resources.

Additionally, bills should include information on how a customer can access their water use online, with clear instructions on what they need in order to do so and IW should take all steps to make this process easy for customers. Alternatively, the development of an App should be considered so that customers can monitor their use without having to check the IW website.

The proposed new requirements for customers who request recategorization of customer type, is considered appropriate as it provides clarity for the customer.

An Fóram agrees that information on IW bills should be complete, clear and transparent and should include details of water used, wastewater discharged, allowances, exemptions and charging arrangements reflective of the new situation regarding Excess Use charge.

An Fóram welcomes the increased flexibility offered to customers experiencing difficulties with payments and that all agreed payment plans will be communicated in writing to the consumer.

Code of Practice on Vulnerable customers

An Fóram agrees with the proposals to provide additional communication measures including a nominated third-party point of contact to vulnerable customers as this will provide support if issues were to arise. Vulnerable people should also be made aware that they can identify a nominee to represent them against any issue (as is the case with electricity and gas utilities), such a service is available at the Disability Federation.

An Fóram would also recommend that anyone over 65 years should be given the opportunity to nominate a third party to liaise on their behalf.

An Fóram encourages the CRU to continue to monitor and review IW supports and assistance to vulnerable customers to ensure that their needs are addressed and that further measures are applied as necessary.

Regarding vulnerable customers and low-income households An Fóram would like to remind the CRU of our previous submission in this regard:

'In terms of addressing the needs of low-income households who do not have budgetary buoyancy to carry out plumbing works in their home, it is recommended that a scheme be introduced to provide financial or technical assistance to such households so that they can address issues. Recognising that the primary aim is conservation, it is possible to align such assistance to current environment public schemes which grant aids the environmental

conservation processes. It is important that such households are not further impoverished by being billed for excess usage while not having the financial means of addressing the leakage problem.’ 12th April 2019

The adherence to GDPR guidelines is considered essential and the revised reporting arrangements to CRU seem appropriate as a means to provide checks to ensure good standards of service to vulnerable consumers.

Code of Practice on Network Operations

An Fóram notes that ‘water pressure’ has not been defined in the Customer Handbook and are of the opinion that a customer is entitled to know the specification of service being provided. This omission can lead to ambiguity and be open to interpretation therefore a specific minimum standard should be considered in the charter

Several local authorities have published guidance on mains water pressure. For example, Dublin City Council aims to maintain it between 10 and 15 meters head. This equates to between 1.0 and 1.5 Bar. Longford County Council by contrast reportedly aims to maintain a pressure of at least 1.2 Bar, but no more than 4.7 Bar. It is noted that the Charter of Rights and Responsibilities for Members of Group Water Schemes details a recommended pressure of 15 metres (22 p.s.i.) at the consumer stopcock¹.

Other utilities define water pressure within their Customer Charters for example:

Scottish Water Customer Charter defines and addresses water pressure thus:

"Water pressure

We aim to provide your water at a pressure of at least 1 bar at the boundary of your property. This level of pressure should allow you to fill a bucket with 10 litres of water in around one minute.

If you think your pressure is lower than 1 bar, please call our Customer Helpline on 0800 0778778."

(source: <http://www.scottishwater.co.uk/-/media/ScottishWater/Document-Hub/Factsheets-and-Leaflets/Leaflets/270718CustomerCharter.pdf>)

Scottish Water goes further and advises if water pressure drops below the specified amount (1 bar)

"We will investigate the pressure levels and get back to you within 5 working days. If we do not, you will automatically receive £30.

If your property is featured on our low pressure register, you will receive an annual letter with an automatic offer of a payment of your water charges as long as your property remains on the register."

¹ <https://nfgws.ie/charter-of-rights/>

England & Wales

"OFWAT", The economic regulator of the water sector in England and Wales, defines a supply pressure of "seven meters static head", (approx. 0.7 bar) and under their guaranteed minimum standards of service, mandates that water supply companies pay their customers, domestic and commercial, £25 in cases where water pressure has not met that required standard.

(source: <https://www.ofwat.gov.uk/households/supply-and-standards/standards-of-service/>)

An Fóram recognises that water mains pressure typically varies by location (due to gravity) and by time of day (high flow rates result in pressure drops). It may be that a national standard may not be applicable at this time owing to the legacy situation but An Fóram would recommend that such a standard should be an objective of the utility.

An Fóram welcomes the requirement on IW to provide information for customers on measures it will take in emergency situations such as an unexpected interruption to service. Providing different response timeframes from IW to internal and external asset flooding seems reasonable as internal flooding will need immediate attention whereas external flooding is less urgent. This will allow for prioritisation of IW resources to deal with the more urgent internal issues.

Code of Practice on Complaints

An Fóram agrees with the requirement on IW to provide greater clarity on complaint procedures and the escalation of unresolved complaints to the CRU as this gives the consumer an opportunity to monitor the progression of their complaint and provides a more efficient process for IW and CRU. Requiring IW to communicate progress on complaints with customers, within a specific timeframe, is also welcome.

Terms and Conditions

Making Terms and Conditions available online is sensible and updating them to reflect CRU Excess Use charge is appropriate. An Fóram would recommend that the Terms and Conditions should be available in other formats, if requested.

Conclusion

An Fóram welcomes the revision of the Customer Handbook by Irish Water and its review by the CRU. It is recognised that this revision is required owing to policy changes since 2014 and that all changes are reflected in this Handbook. The attempt to ensure transparency,

clarity and consistent language throughout is welcome and that the proposed practices and procedures are in line with International best practice.

We supports the CRU plans to review this booklet again at a later date when the utility is more established and that any such review will be based on learnings from customer experience, and that all attempts will be made to ensure that IW consumers have access to water and wastewater services, information and communications that are on par with best International practice.

An Fóram would like to thank the CRU for the opportunity to participate in this consultation and hopes that its views will be taken on board.

END

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