



SUBMISSION TO THE COMMISSION FOR REGULATION OF UTILITIES ON

Non-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.

A function of An Fóram outlined in the Water Services Act 2017 is to **advise and provide observations to the Commission for Regulation 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 Non-Domestic Handbook

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

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

- Non-Domestic Customer Handbook Review

Non-Domestic Customer Handbook Review

An Fóram Uisce welcomes that the CRU has approached this review with a view to ensuring that Non-Domestic Customer Handbooks are fit for purpose, appropriate and to ensure that customers of Irish Water receive a high quality of service.

An Fóram recognises that the Handbook requires updating to reflect changes in legislation and new policies implemented by Irish Water (Connection Charging Policy) and the planned Non-Domestic Tariff Framework to ensure that it is fit for purpose. An Fóram welcomes the CRU approach of using data from the CRU's Customer Care Team on consumer queries and complaints to help inform the review as well as the latest regulatory approaches from other jurisdictions to strengthen the standards of service provided to the customer.

An Fóram supports editorial changes that makes the handbook more accessible, relevant, up-to-date and useful to the customer.

An Fóram supports 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.

The timelines proposed by the CRU for the implementation of the new Handbook requirements by Irish Water seem appropriate.

Code of practice on customer communications

Clear information on billing arrangements is important to ensure the customer is fully informed of charging arrangements particularly considering the upcoming new tariff arrangements.

An Fóram supports the inclusion of diagrams to inform customers of their responsibilities regarding pipework as it provides a stronger message on customer responsibility around leakage and pipe maintenance.

The CRU proposal for enhanced and time-bound communications around planned and unplanned disruptions to service for customers and the provision of ongoing updates on repairs and projected timelines for return of service is welcomed. Such information is essential to enable the customer to manage the situation.

Providing information on billing frequency and payment options will assist customers in understanding charges and allow them to budget and plan accordingly. An Fóram would

also encourage Irish Water to make water conservation information available to customers and encourage good water stewardship practice.

Code of practice on metering

The proposed timelines around installation of meters seems appropriate as they will improve service efficiency and greater equity amongst customers. An Fóram would support the requirement to assist customers to locate meters and ensure that customers are able to read their meters as this will facilitate monitoring of water usage and wastewater discharge.

Code of practice on billing

An Fóram welcomes the new opportunity for metered customers to submit readings to IW rather than relying on estimated bills and we would recommend that estimated bills are kept to a minimum. This will ensure the customer is charged accurately for water used and/or wastewater discharged. The new obligation on IW to notify a customer if their meter reading spikes unusually is also welcome as this will help provide for the early detection of potential leaks.

All attempts to provide clarity around Annual Quantity calculations and tariff class assignments to customers and also the requirement to provide 'bill forecasts' to customers who may be changing tariff class so that the customer can prepare and avoid bill shocks is to be welcomed. The early notification to customers of changes in tariffs is prudent and gives customers time to budget and make planning decisions.

The introduction of a standardised approach to assignment to customer category type is welcome as it provides transparency and clarity to the customer and equity between customers.

An Fóram agrees with the CRU that requiring customers to apply for a derogation from the standard approach of 'water in equals water out' would provide for good regulatory practice and this addition is supported on the grounds that it provides for greater transparency and equity.

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.

An Fóram would encourage IW to consider a **Water Conservation Incentive Programme** whereby customers are ‘rewarded’ for the implementation of water conservation measures. An Fóram is currently collating information on innovative technologies and practices for water conservation with a view to informing policy that encourages the promotion of actions to protect of our water resources.

New code of practice on Disconnections

An Fóram agrees with the proposed circumstances for Irish Water to disconnect a non-domestic customer as this will discourage non-payment of bills. The requirement that in addition to the written advance notice of a disconnection that Irish Water should also attempt to telephone the customer at least once in advance of a disconnection is also welcomed.

Code of practice on Network operations

Providing specific response timeframes from IW to flooding caused by an Irish Water Asset seems reasonable as a rapid resolution is likely to result in minimal damage.

The proposed reduced timeframe for an Irish Water investigation into a query from a customer regarding pressure reduction is welcome as it will lead to a quicker identification of a potential problem and a more efficient resolution for the customer.

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.

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 also 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.

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

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."

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.

Code of practice on Complaints handling

An Fóram welcomes the fact that the CRU used the experience gained by their Customer Care Team to inform improvements to the Complaints Procedure process within IW. Making the process easy for customers to use when they are experiencing difficulties with their water/wastewater service supply and providing a step by step process for customers is important to relieve tensions and help deliver a positive outcome for both parties.

Providing information on IW's Code of Practice on Complaint Handling will help ensure complaints are not escalated to the CRU prematurely and additional clarifications on timelines for resolution and communications are welcome.

Terms and Conditions of Supply

Irish Water should supply Terms and Conditions of Supply to its Non-Domestic customers as doing so will provide clarity as to the responsibilities and obligations of both Irish Water (as the provider of water services) and the customer (as the recipient and consumer of such services).

Conclusion

An Fóram welcomes the revision of the Non-Domestic 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 welcomed and that the proposed practices and procedures are in line with International best practice.

We welcome the fact that the CRU uses audits, IW Reports and customer surveys to inform this review as this provides the opportunity to make sure the handbook addresses issues that have presented in the past. The use of best practice in other jurisdictions can also help 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 this opportunity to submit in relation to the Non-Domestic Customer Handbook Review and hopes that its views will be of assistance in finalising same and An Fóram is available to assist in any way it can in relation to this process.

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