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

**Irish Water First Fix**

12<sup>th</sup> February 2021

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## 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 Uisce is the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram Uisce 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 Uisce'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 Uisce 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 Irish Water First Fix

An Fóram Uisce welcomes the CRU review of the Irish Water First Fix Scheme whereby Irish Water (IW) identifies and informs customers of a potential leak, and with the customers permission repairs leaks on external supply pipes for free. Since the introduction of the Scheme significant water savings have been achieved through IW fixes and domestic customer fixes 155ML/day from 2015-2019 at a cost of €45m (CRU Capital Investment Monitoring Report notes domestic water use as 556ML/day). While leakage and unaccounted-for-water remains too high (41% in Ireland compared to other EU countries average of 19%) this scheme has proven to be an important measure to reduce leakage and unaccounted-for-water losses on domestic supplies.

Providing free leak repairs enables positive engagement that has the potential to promote further water conservation behaviours. The review is considered very timely as it will give customers the opportunity to reconsider their water usage and to create greater awareness of domestic water usage in preparation for the introduction of Household Water Conservation (Excessive Use) Charges. It will also give an opportunity for Excessive Use customers to ensure they are not paying for leaked or unaccounted-for-water.

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## **Proposal 1: Unmetered Customers**

An Fóram Uisce supports IW's proposal to broaden eligibility for the First Fix scheme to those customers without meters. This has the potential to significantly reduce leakage and create awareness of water conservation measures but also to protect customers at risk of Excessive Use charges owing to leakages.

An Fóram Uisce would encourage IW to include in their 'Call to Action' letters information on water conservation measures that consumers can take to reduce their usage.

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## **Proposal 2: Prioritising leak investigations for potential excess use customers**

Continuing to prioritise fixes for the most significant leaks makes sense as it provides for greatest efficiency and maximum short-term results. Reducing the prioritisation level from 1000 litres per day to 584 litres per day to align with daily usage thresholds set under the Excess Use Charging policy will give access to the scheme for a greater number of customers. It will also target those at risk of Excess Use Charges which is fair and gives these customers an opportunity to fix leaks to minimise or even avoid charges.

An Fóram Uisce would recommend that all Excess Use customers including those that do not pay charges because of their circumstances are provided with information on water conservation measures that can be implemented in the home.

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## **Proposal 3: Mixed use customers now eligible for the First Fix scheme**

Expanding the First Fix Scheme availability to mixed-use customers, with relatively low levels of non-domestic use will potentially give access to the scheme for a further 57,000 customers. An Fóram welcomes the proposal that mixed use customers will not be required to pay any further 'leak bills' while waiting on a free fix repair. This measure has the potential to significantly reduce leakage and improve awareness of water conservation measures.

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## **Proposal 4: Customers no longer need to be registered**

Providing the First Fix Scheme to customers not registered with Irish Water will facilitate equity of provision to the customer base. With IW now having the capacity to identify leakages on non-registered properties it is prudent to offer repairs to these households as there is the potential to save water with subsequent cost reduction to IW but also to build relationships that could potentially result in new registrations.

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## **Proposal 5: Internal stop valve is no longer required**

Irish Water innovations in isolating and monitoring the water supply to customers without an Internal Stop Valve means that customers without ISV can now be included in the eligibility criteria. Previously these customers were not eligible and Irish Water reported that approximately 60,000 customers between 2015 and 2018 were excluded from the First Fix Scheme because of no working ISV. Enabling these customers participate in the First fix schemes is more equitable in that they are no longer being treated differently to other customers and it also has the potential to achieve considerable leakage savings.

An Fóram Uisce would also recommend that Irish Water provide information for its customers on where to find the Internal Stop Valve in their premises and why it is important that one is installed, when informing them of a potential leak issue. While this information is available on the website, providing a hard copy might encourage a greater response.

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## **Proposal 5: Customers with a shared service connection will now be eligible**

Providing free leak repairs to customers that live in a domestic premises that is serviced by a connection serving more than one premises is considered a very positive initiative as it provides more equitable access. However, it is disappointing to note that customers with a shared backyard connection will remain ineligible until Irish Water have completed the Mains Renewal Programme. An Fóram Uisce encourages Irish Water to expedite the Mains Renewal Programme to ensure that customers are aware of their water use and potential to participate in conservation measures.

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## **Proposal 6: Revised customer communications systems**

Irish Water's proposed additional communications is welcomed by An Fóram Uisce, including in-person letter drops, follow-up phone calls and engaging with customers on the ground which is likely to result in greater uptake of the First Fix Scheme. It could also prove beneficial to Irish Water as it provides an opportunity to gain feedback on customer requirements and understanding of water supply issues. Asking customers to encourage their neighbours to participate could also result in greater uptake and awareness of water conservation measures.

## CONCLUSIONS

An Fóram Uisce would like to compliment Irish Water and the CRU on the progress made on the First Fix Scheme and welcome the expanded eligibility criteria outlined in this consultation paper.

An Fóram Uisce supports any measures that ensures better and more efficient water management practice that results in more sustainable use of water resources leading to less demands on natural water resources. Additional benefits could potentially include a reduced need for capital investment as well as reduced treatment and distribution water services costs.

An Fóram Uisce would like to thank the CRU for the opportunity to participate in this consultation and hopes that its views will be taken on board and are happy to engage further should any clarifications be required.

**END**

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