SUBMISSION on THE COMMISSION FOR REGULATION OF UTILITIES Decision Paper on Irish Water charging arrangements for public Group Water Schemes

24th March 2022

Introduction to An Fóram Uisce – The Water Forum

An Fóram Uisce - The Water Forum (hereafter The Water Forum) was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. The Water Forum is the national statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. The Water Forum 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.

The Water Forum'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 wastewater, 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 strategic goal in the Water Forum's Strategic Plan 2022-2027 is to be a proactive and authoritative national statutory body, contributing to water policy, management and governance with an underlying objective to engage with the CRU in the delivery of water and wastewater services and have direct input into rural water policy and the development of rural water services. It is within this capacity the Forum would like to make the following observations in relation to the proposed new Irish Water tariff arrangements for Group Water Schemes (GWS).

Proposed new Irish Water tariff arrangements for Publicly Sourced Group Water Schemes

The Water Forum welcomes the CRU's decision to address charging arrangements for publicly sourced GWS accessing water from IW public schemes as this provides equity across the GWS sector and addresses the issue of differential charging rates applied within different Local Authority areas. The publicly sourced GWS sector was largely established to provide water services to areas where previously there was no public water supply. These schemes continue to provide a valuable public service to rural communities. The proposal appears to no longer recognise GWS as a particular type of Non-Domestic customer, but instead to include GWS as Mixed-Use Customers under the Non-Domestic Tariff Framework. Classifying publicly sourced GWS in the same way as mixed-use customers of IW does not recognise the unique nature of sector and may present some difficulties for some GWS.

As a result of ongoing legacy issues, it is understood some GWS have large volumes of unaccounted-for water. While the Water Forum supports measures that promote water conservation, it believes this may put an unfair burden on schemes yet to address these issues under the Multi-annual Rural Water Programme. Consideration should be given to an enhanced transition arrangement under the Non-Domestic Tariff Framework to group water schemes with proven volumes of unaccounted for water. Otherwise, an unfair tariff burden may be imposed on voluntary management committees, potentially resulting in more publicly sourced schemes becoming orphaned should they become financially unviable. This in turn would put the members of these schemes at further risk from a public health perspective.

To address this difficulty, the Water Forum recommends that arrangements are made by Irish Water and included within the CRU proposal to introduce an enhanced transition phase to the Non-Domestic Tariff Framework for publicly sourced Group Water Schemes where proven levels of unaccounted for water exist. Ideally, such schemes should be prioritised for capital funding to address these issues under the Multi-annual Rural Water Programme.

The Water Forum would like to ensure that all schemes and scheme members are treated in an equitable way. The Decision Paper proposes that schemes are either directly-billed or billed on a bulk-meter depending on how they have been charged by their local authority. The Forum recommends that all GWS are given the opportunity to select the charging mechanism that is most appropriate to their needs as this will ensure equity across all schemes.

To facilitate these recommendations, the Forum advises that Irish Water appoint a liaison person to engage directly with Group Water Schemes who wish to avail of transitional arrangement or different charging arrangements. The appointment of community liaison officers to engage at local level with customers is a recommendation made previously by the Water Forum to Irish Water as this will encourage greater transparency, build trust and allow for two-way communications with communities.

The Water Forum would be grateful if the CRU would give their recommendations due consideration and are happy to engage further with the CRU should any clarifications be required.

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