

[REDACTED]

From:

Sent:

[REDACTED]
04 May 2014 15:52

To:

watertariff

Subject:

Domestic Water Tariff Principles and Proposals - Comments on Irish water
Document ref CER14083

Dear Sirs,

I read through the proposals for water charges and assessments(CER14083) written by Irish Water and I would like to provide the following comments:-

1. The following comments are written on the basis that I am not against water charges but would like to see a fair and equitable system in place that protects both the consumers of water and the provider of the water.
2. I currently pay water charges in England on a rented property in [REDACTED] (Essex and Suffolk Water) and would therefore consider that I have some knowledge of the charging mechanisms used. In addition I have direct dealings with the Inspectors from Essex and Suffolk and their objectives through the company I work in.
3. The Irish Water Executive summary and the content of their submission appear to be in conflict in many places and therefore Irish water do not come across as a competent company for the implementation of an equitable Water/waste water charging system..
4. Irish water are in favour of a fixed charge accounting for 33% of their total revenue but fixed charges should not be based on a percentage of total revenue as this does not encourage Irish Water to cost save but is more a licence to ensure that the customer pays for Irish Water expenditure without a control. It should be based on the base infrastructure costs without running cost and not allowed increase without proven investment in infrastructure. On my Billing from Essex and Suffolk I pay £39.32 a year as a fixed charge regardless of the volume of water I use and hence in percentage terms it could be 10% or 80%.
5. As indicated previously Irish Water are tending to justify using the size of a property for basing their charges on in the absence of a meter however the architecture of a property will not dictate the volume of water used but would enable Irish Water to increase revenue without control. occupancy data could be obtained from Electoral register. Unfortunately it would appear that Irish Water have already taken decision to use architecture route;- [REDACTED] being an example; here a majority of the large Detached house have not been metered whereas a majority of smaller houses have. A situation of small houses either side of a large house having meters installed can be seen. A small house with 4 occupants will use more than a large house with 1-2 occupants but Irish Water will tariff large house with a larger demand. - Financially beneficial to Irish Water
6. Irish water are proposing that there should be a transition period for consumers who are metered where bills would be capped to allow consumers adjust their consumption or fix their leaks. No where in the document can I see where Irish water will fix leaks in the current infrastructure, a known fact, and how they would recompense consumers if they do not, again this is a system applied in the UK. In suggesting that consumers who are metered are given an opportunity to adjust their use, Irish water are not giving a commitment to those they have selected for Architectural size charging to be metered or how they will transition their costs. a slightly one sided approach when considering the fact that they will not meter every property.
7. What are the incentives for Irish Water to install meters and what penalties would they incur if they do not meet their deadline. This has yet to be dealt with effectively. Irish water are suggesting that the CER will deal with this. Surely Irish water were selected on the basis of their Experience of the Irish Market place and Consumer charging, can they not suggest what type of incentive they would be able to work with.

regards

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