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From: [REDACTED]
Sent: 13 May 2014 10:33
To: Sarah Foley
Subject: [REDACTED] CER: Submission re Irish Water

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From: [REDACTED]
Sent: 11 May 2014 15:05
To: info Cer
Subject: [REDACTED] - CER: Submission re Irish Water

Domestic Tariff Design Principles and Proposals - Irish Water submission to the CER

I have read the above document and wish to submit the following comments/queries with regard to the assessment charges for unmetered properties.

- the research and methodology clearly show that there is no way to assess unmetered properties fairly and accurately, no matter how Irish water propose to do this. It's all based on unavailable or irrelevant data e.g. (Comparison with UK examples which are mostly based on property values). Irish Water's proposal is not based fairly on usage, therefore it is completely unacceptable to the consumer.

- I live in a small one-bathroomed rural house which is unlikely to be metered by 2016, if ever. There is only one adult occupant and one child. I understand there is to be a free allowance of 30,000 litres per household and an additional allowance to cover normal water consumption of children under 18 – effectively, water charges will not apply to children. This means that I would have free personal usage of at least 82 litres of water per day, which is more than adequate for my needs based on recent daily observations on my personal water usage over the past month. So in my view, I should not have to pay anything at all as I would only use water within the 30k litres of household allowance. Therefore, I find it completely preposterous that I should be asked to pay any charges wrongly assessed by Irish Water, and I will not. The CER guidelines clearly call for fairness and equity according to usage and Irish water's proposed method of assessment for unmetered properties seems neither fair, equitable or remotely accurate in terms of likely usage.

- Furthermore, in the paragraph where they refer to transition from unmetered to metered charges. They only mention the case that a householder's metered usage is shown to be higher than the assessed usage. What if a householder metered usage shows that their usage is actually a lot lower than Irish Water's assessment. Why does Irish water not clearly state how they will refund householders for having been inaccurately and unfairly overcharged for years of unmetered assessment?

- Regarding the household allowance of 30K litres per year, how is this to be applied in practice with regard to quarterly billing? Will the allowance be split into 4 quarters of 7,500 free litres per quarter and charges applied once they go over the 7,500 litres? What happens then, if you go away on holidays, or go to hospital for the next quarter and your usage is well below the allowance or nil - shouldn't you be allowed to carry over unused portions of the allowance from one quarter to another so that you can get the full benefit of the 30K litre annual allowance?

- My message to the regulator is this. It is not possible to regulate a Water System that is broken, leaking, incoherent, unmetered and without usage data. It is fundamentally ridiculous to ask consumers to pay for a usage-based service that doesn't have the means to assess the usage. I call on the Regulator to reject Irish Water's flawed and unjust proposal regarding assessment charges on unmetered properties. I believe I have a fundamental right to refuse to pay charges for an item or service that I do not request or use and I ask the Regulator to uphold the principles of basic fairness and justice in this regard.

I would appreciate if you can give me an answer to any of my queries above.

Yours sincerely



Galway