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Sent:
Subject:

24 August 2014 22:25
CER14261 - Response

Response to CER14261

Foreword

In fairness to CER and all of the other correspondents who addressed the issues, it must be clearly stated that Irish Water has failed miserably to consider all relevant factors and situations, despite having expended over €150M on experts and consultants, whilst at the same time availing of the free advice being tendered through the CER process.

Whether it was my inability or not, I could not access the other 121 replies, despite speaking with a member of CER staff. However, whether one agrees or disagrees with CER's Decisions, CER appears (having been unable to access all of the submissions) to have summarised the comments very effectively.

Removal of the terms "transparency" and "clarity" is good and signifies an acceptance by Irish Water that they will not fulfil these criteria; "quality" is much reduced in usage and "consistency" has disappeared completely.

I wish to congratulate you on your decision to extend the general allowance(s) over a full year.

I also wish to acknowledge your assertion on p22 that water hardness has a major positive impact on the prevention of heart disease.

To conclude this section, when I submitted my Response to CER14082, I was unaware that there were two types of meters, namely Irish Waters and others, since then I have discovered that mine is in the "other" (public supply, not Group water) category; it is not clear in your document whether I am in the Meter segment or the non-meter segment (cf p19) of Irish Water's consumers.

Water unfit for Human Consumption

I must reluctantly return to this subject:-

I remain of the belief that whilst the 50% proposal being put by you is a reasonable start, there is no time limit to it and given the extra burden of costs on the house-holder, I believe that the 50% reduction should become 100% after 6 months, otherwise there is no onus on Irish Water to fix the problem, and it will just go on-and-on like what is happening in Boyle and similarly in Galway.

Given the time that it takes to analyse "unfit water" and/or to have the effects medically verified, I believe that the 50% reduction should be back dated 5 days before it is "deemed" unsuitable", otherwise there will an incentive to delay deeming it to be unsuitable.

Also it is not clear whether the 50% will be counted within a "bill year" or as you put it "no units will be carried over into the next 12 month period", or if it will be a full calendar year, which would be much fairer.

There also appears to be an acceptance that water unfit for human consumption will not be consumed, what about water from a bath that enters a child's mouth, the parent/grandparent that has dementia and fills a glass of water? Irish Water has failed to consider these possibilities. To conclude for the present on this issue, what research is proposed to be carried-out on what effect the "unfit" water has on general consumption in regard to bathing, showering, clothes-washing etc?

Annual Allowance for a Child

Document CER states that the Child Allowance will be 38,000 litres (which is repeated on p23), yet the press spoke about 21,000 litres, which is it? Especially given the very poor scientific (and secret) basis for Irish Water's assertion.

CER's Regulatory (legal) Competency

I remain unconvinced and very concerned by Irish Water's failure to voluntarily cede to CER the same authority that CER has in regard to gas and electricity.

Item 2.2

The emphasis is on quality of service, whereas it should be on quality of supply; and on transparency of functions but not on the more important aspect of transparency of supply.

Water Quality

Subscript "8" states that the WFD "sets the necessary standards for the protection and improvement of the quality of water resources in EU member states".

First of all there is nothing in the main text on quality parameters, unlike in energy regulation.

Secondly the WFD refers to the WHO parameters, which are quite acceptable. (Contrary to page 21 "EU standards", there aren't any per se, they are WHO standards). But where will an Irish consumer be able to access these parameters in regard to their water supply? How will an Irish consumer be able to check whether or not their water supply is within WHO standards? Quite frankly standards are of no use if they cannot be verified.

Later (p19) reference is made to "clean drinking water", but there is neither a description nor a definition of "clean drinking water" and in particular no mention of the maximum hazen units which will be permitted.

Irish Water Revenue Generation

I humbly and reluctantly disagree with your comments (p16-17) in regard to Irish Water's Revenue Generation revenue targets, because:- (a) the primary objective is WATER CONSERVATION, and anything that subverts that should not be allowed, and (b) the volatility of prices in the energy sector is due to costs outside of their control e.g. gas prices from

Russia, coal from Poland or nuclear clean-up costs from the U.K., no such foreign cost volatility applies to Irish Water.

3.2.2 CER's Decision

There is no clarity and very little transparency on how one will be able to judge the commitment to the effect that "the average bill per household . . . will not exceed €240 annually . ..". What substantive data will the public have access to, to examine whether or not this commitment has been met?

Effect of "impaired" water on Septic Tanks (p20-24?)

With respect, the negative effects of impaired water on septic tanks has not been addressed and in particular the absolute conflict of interest that the EPA will have in this regard. It has a triple role, actually five-fold is probably closer to the mark i.e. it is a paid advisor to CER, it is a paid advisor to Irish Water, it can declare water to be "unfit", it supervises Local Authorities in regard to water and it can prosecute in regard to the disposal of unfit and impaired water to the sewage system and/or septic tank failures, failures that could very well be due to the unfit and impaired water in the first place. This is potentially a very serious and possibly catastrophic conflict of interests.

Apartments and Restriction of Water Supply

Irish Water say that they cannot meter some apartments. They also say that in the event of non-payment for water, they will restrict / reduce supply. If they cannot meter the input (of water) how are they going to restrict the supply? On page 39 CER is quite adamant in regard to the "principles of equity and non-discrimination", so Irish Water will either have to restrict supply to everyone in that block of apartments - there's no equity in that, or do nothing and discriminate in favour of the non-payee!!!

Respectfully Submitted,

