

REF: CER/14/363

Domestic Water and Wastewater Charges

Q16. Do you agree with the proposal to set the single occupancy consumption and incremental consumption levels at 66,000 and 21,000 litres per annum respectively? If not, do you think there is a more appropriate way to set the annual incremental consumption?

Yes, however, this will need to be reviewed again once a more data is available from actual data received from meter readings and the household application data.

Q17. Do you agree with the proposal to change the child allowance from 38,000 litres to 21,000 litres a year?

Yes

Q18. Do you agree with the CER's proposals for the application of water allowances?

Yes. The collection of PPSN's for children should be collected and stored in a manner to ensure protection of this data.

Q19. Do you agree with CER's proposal that Irish Water provide water and wastewater services to customers where domestic tariffs are calculated on a national basis, with separate tariffs for water and waste calculated on a 50/50 cost basis? If not, please state why.

Yes.

Q20. Do you agree that flexibility to pay on a monthly basis should be provided for domestic customers?

Yes. Budget plan should be made available to allow customers to pay the same amount by direct debit from October to reduce the additional pressure of more bills.

Q21. Do you agree with CER's proposed unit rates for water and wastewater services? If not, please state why.

Yes once it includes VAT. Please clarify if these rates include VAT and what the VAT rate is.

Q22. Do you agree with CER's proposal for setting water and wastewater charges for unmetered customers?

Yes.

Q23. Do you agree with the proposal to apply a default tariff to customers that do not validate before the end of the campaign?

Yes.

Q24. Do you agree that, where a customer is late to validate, allowances should only be applied from the data that the customer validates and that the allowance prior to that date would not be available to the customer?

No. If the customer has a valid medical condition this should be taken into consideration. Full allowance should be applied for vulnerable customers who have submitted their data late.

Q25. Do you agree that the cap on customers' bills should be extended where a leak is identified?

Yes. However, it has come to my attention that IW do not currently store the meter installation date on their system. This would need to be rectified immediately in order for the capping and rebates to work correctly.

Q26. Do you think there should be a minimum unmetered period for customers to qualify for a rebate?

No.

Q27. Do you agree with either of the CER's proposals to operate the rebate? If so, please indicate a preference and if not, please provide detail of how you think rebates should be applied.

Yes, in a lump sum as a credit to the customer's account.

Q28. Do you agree that there should be no minimum amount due to qualify for a rebate?

Yes.

Q29. Do you agree with the proposal to apply a minimum charge for premises which are not permanently occupied? If not, what do you think would be a more suitable charge for metered and assessed customers and why?

No. The amount of €80 is too high. €50 per service per annum more affordable until such a time a meter is installed and IW have suitable data for unoccupied homes. The installation of water/wastewater has already been paid for when the property was built.

Q30. Do you agree with the CER's proposed definition of long term, i.e. 3 months?

Yes.

Q31. Do you agree with the CER's proposed discounts for water that is unfit for human consumption?

Yes.

Q32. Do you think that Irish Water's proposed definition for Force Majeure is appropriate?
Yes.

Q33. Do you agree with the CER's proposals and are there any other payment options you feel Irish Water should offer?

Yes. Additional payment options of a budget plan paid by direct debit should be made a priority to offer customers from October 2014.

Additional Comments:

- 1 . Customer should be able to view consumption data on an online IW account.
- 2 . E-Billing should be made a priority to reduce the costs of IW and the customer. Additional discount should be made available to encourage customers to opt in for e-billing.
- 3 . In-home water consumption monitors should be made available for customers to purchase (at a reasonable cost). These monitors (similar to the ones used for electricity) will allow the customer to see in real time what their daily usage is and will encourage households to reduce consumption where required. These monitors should use the AMR technology available on the water meter.