



**Response to the
Commission for Energy Regulation
Water Charges Consultation Paper
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Age Action

30/31 Lower Camden Street

Dublin 2

01 4756989

www.ageaction.ie

Introduction

Age Action welcomes the opportunity to respond to the Commission for Energy Regulation's Water Charges Consultation Paper (ref CER/14/366). As a national charity, working to improve policies and services for older people, Age Action has made a number of submissions on this issue to the CER and the Department of the Environment, Community and Local Government (DECLG). Some of our concerns have been taken on board and addressed as a result.

For this reason, Age Action is confining its comments on this consultation paper to the section on domestic water and wastewater charges as follows:

Question 16:

We are concerned that an analysis of just over 1,600 homes provided the basis to calculate average water consumption levels of 66,000 litres annually for an adult living alone and 21,000 litres for a child. Once billing begins the CER will have access to a much larger data set. Age Action would like to see this used to establish an accurate picture of water consumption before the regulations are reviewed in 2016.

Question 18

Age Action supports the CER's proposal to allow allowances to carry over from one quarter to the next over the period of a year. This will enable older people to maximise the benefit of the allowance, by carrying over their allowance from periods of low consumption to times of the year when consumption may be greater.

Question 20

Age Action has previously expressed concern about Irish Water's proposals for quarterly billing. Given that other utilities such as gas and electricity are provided on a two-monthly basis, Irish Water's quarterly bills may make it harder for some low income households to budget for this new charge. In particular, we note the CER's comments that due to internal structures, the second bill may cover an even longer period. We welcome the CER's proposal that a flexible monthly payment option will be offered to people. This will help address this issue.

Question 22

Age Action has an issue about the calculation of the average water consumption which provides the basis for the unmetered charges (see answer 18). However, we support the model of charging on the basis of occupancy levels. We believe this provides the greatest support/protection to older people living alone.

Question 23 and 24

Age Action is concerned by proposals to apply a default tariff to customers who do not validate their details before the end of the campaign. While we accept the CER's position that there needs to be an incentive for people to validate their details in a timely manner, we are concerned that this proposal may penalise people who may have reduced mental capacity, reduced vision or literacy issues – all of which may mean that correspondence seeking validation of their details may go unanswered. In such circumstances, it would not be unjust to impose an unmetered payment of €424 per annum on these people. Age Action would urge the CER to require Irish Water to address this issue in their communications strategy, with helplines for those who need help to validate their details. There also needs to be an appeals/advocacy service provided so that those who validate late in these circumstances do not lose any of their allowances as a result. While it not Irish Water's intention to impact negatively on this vulnerable section of their customer base, mechanisms must be put in place to ensure they are protected from this unintended consequence.

Question 25

We agree that the cap on customers' bills should be extended where a leak is identified.

Question 26

We do not believe that there should be a minimum unmetered period for customers to qualify for a rebate. If a rebate is due, regardless of the time period involved, it should be refunded.

Question 27

Age Action believes that both of the refund options proposed by the CER are acceptable.

Question 28

We agree there should be no minimum amount due in order to qualify for a rebate.

Other issues

The consultation paper refers to the fact that Irish Water will include provision for customers with special medical conditions that require increased water consumption. Their bills will be capped at the relevant unmetered charge. It states that the DECLG is working with the Department of Health and the HSE to develop a list of medical conditions for which this arrangement would apply.

Age Action has not been consulted by these parties to date, but believes the mechanism must be sufficient to include all those with special medical conditions. Some people suffering from a variety of medical conditions may need to use large amounts of water for drinking, washing clothing and bedding, and bathing. These may be short term or long term needs according to the condition the person suffers from. Some conditions such as inflammatory bowel disease, or some skin conditions may fluctuate, with periods of remission where the person does not need to use large amounts of water.

It is better to use the term “condition” than “disease” as a variety of diseases may have the same effect, for example radiotherapy and eczema both cause weeping, peeling skin with high water use for washing bedding and clothing.

Conditions which may require high water use

The following list is non exhaustive:

1. Home renal dialysis/ renal failure
2. Skin conditions (a) those involving skin flaking (desquamative conditions)
(b) those involving skin weeping or discharging, for example skin
Ulcers, eczema, various genetic conditions.
3. Incontinence Due to bowel disease, Alzheimer’s, stroke, bladder disease
4. Inflammatory bowel disease : Ulcerative colitis, Crohn’s disease
5. Abdominal stoma, for example colostomy, ileostomy
6. Any other condition which may require large volumes of water, for example a person who has a problem with wound healing after surgery or radiotherapy, arthritis which is relieved by bathing in warm water.

1 Home renal dialysis

Although relatively few people use home dialysis, they need large amounts of clean water at reliable pressure. They also dispose of large amounts of water into the sewerage system. If they cannot obtain water at reasonable cost (cap on charges) they will have to travel to a dialysis centre at a hospital.

2 Skin conditions

Some skin conditions are described as desquamative; involving scaling and peeling of large amounts of skin. Psoriasis and some genetic conditions may cause desquamation. There will be high water use for washing clothing and bedding, as well as for bathing. The use of various creams may increase the need for washing clothing and bedding.

Some skin conditions may result in weeping of an exudate from the skin, or a discharge. The underlying cause may be something like eczema; or the aftermath of radiotherapy after cancer treatment; or a chronic leg ulcer. The condition may need dressings or topical creams and there may be higher need to wash clothing and bedding.

3 Incontinence

Incontinence of urine/ faeces may occur in a variety of conditions, either as a result of a problem in the bladder or bowel, or because of more generalised disease such as the neuropathy of diabetes, or after a stroke, or as a result of dementia. Radiation induced proctitis may result in episodes of faecal incontinence after treatment for cancer. A person suffering from severe arthritis may have episodes of incontinence because they are not mobile enough to reach the toilet in time. People with incontinence have higher than normal water use for personal bathing/showering and washing clothing and bedding as well as household cleaning.

4 Inflammatory bowel disease

Crohn's disease and ulcerative colitis both result in episodes of diarrhoea and sometimes incontinence of faeces. Sometimes this can be controlled with medication, sometimes there are flare ups of the condition with high use of water for washing and personal bathing/showering and frequent use of the toilet. Some people may require surgery for their condition, with colostomy or ileostomy formation.

5 Abdominal stomas

Most stomas are created after surgery for cancer, but some other conditions such as inflammatory bowel disease and trauma may necessitate stoma formation. The most common forms are colostomy, ileostomy (for the external drainage of bowel contents) nephrostomy and cystostomy (for the external drainage of urine). Stomas may be temporary or permanent. The person has higher than normal washing/bathing needs and will need to flush the waste products away.

6 Any other reason

Any other certified medical condition. Examples would include post-operative patients such as amputees, or those with arthritis who may find that warm baths soothe pain.

For further details please contact Eamon Timmins, Head of Advocacy and Communications, Age Action. 01-4756989.