

[REDACTED]

From: [REDACTED]
Sent: 28 August 2014 16:58
Subject: Introduction of Water Charges - Consultation
Importance: High

[REDACTED]
Cork.

Thursday, 28 August 2014

*Commission for Energy Regulation,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.*

Re: Introduction of Water Charges - Consultation

To Whom It May Concern:

Water is a precious and vital resource and needs to be protected; therefore I am personally in favour of the introduction of a water charge and with the installation of water meters as long as the process is implemented in a fair, sensible and non rushed manner.

The process however appears to be very rushed with an extremely low sample size of installed meters being used to gain information which Irish Water appear to be using to base some of their decisions on. A sample size of approximately 1,600 water meters surely cannot be relied upon to provide realistic information for decision making when over 1 million water meters could be installed by the end of the installation process.

The ultimate aim of a water charge should be to both fund the cost of providing safe drinking water while also stopping the misuse or wastage of water by individuals who for example deliberately run taps all night in cold weather, use power hoses for long periods of time or who waste large volumes of water during hot weather spells by overwatering their gardens or cleaning their cars resulting in reservoirs operating at dangerously low levels.

As an alternative to immediately using Water meters only or operating inadequate free allowances, I would propose the following:

- Introduce a basic fixed charge system only for a three year period.
- Use the three year period to both install the maximum amount of Water meters possible, while also using the installed meters to provide information on what is the average level of water usage per household. This will help to set a realistic Initial Free Allowance of water for customers in the future.

- Ask customers to set up an online account with Irish Water, where they can give details of the number of occupants per household. In the future this can be used to set an individual Initial Free Allowance per household based on occupancy which is more realistic and fair than giving each household the same allowance. (Excluding allowance for under 18 year olds)
- Peoples ability to pay should be taken into account; The Revenue Commissioners hold the Income details for all households in the country; the initial fixed charge could be split into different categories based on Gross Income levels for the previous Income Tax year (not a full means test) ranging from €300 per annum for those on the highest Income levels to a charge of €50 per annum for those on the lowest levels if a waiver system is not provided for such people. Nobody however should be left in a situation whereby they are denied water due to a genuine inability to pay for water charges. A fixed charge system is not ideal, but it could be used as a temporary measure while information is gathered with the ultimate aim of introducing a long term fair and sensible system based on proper standing charge and metering in conjunction with a realistic Initial free allowance and fair unit charge per 1,000 litres of water.
- Water meters should be installed at all properties where feasible including Local Authority housing in order to facilitate extensive monitoring of water usage. Any possible decision to exempt Local Authority Housing from being subject to water metering will significantly negate the benefits of metering non Local Authority Housing.
- Once the initial three year period is reached, with all or the majority of water meters installed then a charging system based on a Standing charge together with usage of water with a realistic initial free allowance (based on information gathered over previous three years of fixed charge) can be introduced. If a reasonable free allowance is set, this should mean that customers should more or less be able to budget for a set bill for the year.

The system should be designed so that it only penalises those who waste large amounts of water, examples of which I have included above, not people who use reasonable amounts of water for basic daily requirements.

Yours sincerely,

