

From:
Sent:
Subject:

28 August 2014 21:54
Consultation -

Dear Sir,

I am writing to respond the Water Charge Consultation process to raised a number of observations.

- **Timing**

I consider that the consultation period should have been extended so that it did not all fall into holiday period to encourage fuller participation.

- **Second Home Minimum Cost**

I object to the €160 minimum charge for a second home for a number of reasons.

1. **Double Charging**

Firstly this could be a double water charge where the primary residence is not metered - as the second home would be charged the base amount and usage while the primary residence would be at the budgeted standard pricing and not reduced to reflect the reduction in water usage when an individual is in their second home.

In effect the annual usage of a primary residence and second home should in normal circumstances equate with the usage for a family with a primary only residence and unless all residences are metered the standard billing amounts will not treat owners of second properties fairly.

2. **Minimum Charge**

The minimum charge along with 4 weeks of usage for a single individual would have a charge of €186 which is above the amount that would be charged for a primary residence calculated by CER as €176.

The calculation is as follows:

	€
Minimum Charge	160
Usage $66,000/12/1000 * €4.88$	27
	<u>187</u>

As a result I consider the minimum charge overstated.

3. **Overseas Owners**

How will the system deal with owners from overseas - will their Irish holiday home be considered their only home and be billed like primary residence with an annual water allowance?

- **Home Allowance**

I understand that each home will have an allowance of 30,000 litres per annum. I consider that this is anti family and discriminatory. Each individual should have a usage allowance whether a child or otherwise.

- **Child Allowance**

I consider that the proposed 21,000 child allowance is understated based on restricted research rather than UK data which has been collated for many years.

The average incremental usage based on three to five member individuals per UK data is 30,000 litres per annum based on the following data:

UK Consumer Council for Water (www.ccwater.org.uk) - Annual Water Usage

Household	Annual Usage	Increment Usage
1	54,000	
2	101,000	
3	134,000	33,000
4	164,000	30,000
5	191,000	27,000

As a result I consider that 30,000 is the appropriate allowance for each child.

I trust that the above is in order and I look forward to reading the results of the consultation process in due course.

Yours Sincerely,

[Redacted Signature]