



Public Water Forum Response to
CER16173 Consultation on the Irish Water
performance assessment

Customer Service

The metrics proposed regarding customer service seem reasonable. However, the PWF wishes to draw attention to the issue that many users of Irish Water do not see themselves as customers in the sense that this is understood as a contractual relationship between the provider of a good or service and the purchaser of this good or service. Some domestic consumers in particular are more likely to see the service which Irish water provides as a public service to which they are entitled as citizens, while recognising that as with all public services, this comes at a cost. In this sense they do not see themselves as 'customers'. Instead, where they perceive water as a public good and as a basic need for survival, issues of access and affordability assume a significance with water which is lacking in most other utilities. The construct of 'customer' presupposes a capacity to function in a competitive market place where access to resources is derived from factors other than citizen entitlement. In an earlier submission to Irish Water, the PWF suggested that the company 'needs to address the distinction between citizen and customer explicitly in shaping all of its strategies and plans, recognising therein that the experience with other utilities may not be entirely transferable to the issue of water.' (April, 2016).

It is also recognised by the Forum that commercial users have a different set of expectations and requirements than is the case with domestic users. Here, there is a clear contractual relationship upon which the ongoing viability of an enterprise may well depend. For this group in particular it is important to establish what communication a complainant receives on the status or outcome of the investigation of a complaint, and, in those cases where a complaint is upheld, what remedy if any is provided to the complainant and what if any restitution is offered.

Environmental Performance

The PWF notes that it was not provided with a formal opportunity to comment on the National Wastewater Sludge Management Plan referred to in this section of the Consultation document. While this Plan was open for general public consultation, the PWF has been specifically legislated for and has a defined status in the public arena concerning water.

The Forum recognises the critical importance of each of the three performance indicators referred to-pollution incidents relating to waste water, sludge disposal and waste water treatment plants not meeting requirements. It suggests, however, that the respective negative environmental impact of each of these may vary. Waste water treatment plants not meeting requirements most likely have a predictable, ongoing and quantifiable negative impact. Bringing such plants up to standard may, therefore, be more pressing as a priority than the elimination of possibly unforeseen or difficult to obviate risks associated with once-off incidents. The CER, therefore, might wish to look at the relative weighting of each of the three indicators referred to.

Finally, the Forum draws attention to the soon to be published River Basin Catchment Management Plans. Clearly, all activities by Irish water with regard to waste water treatment will need to align with these plans and the CER may wish to monitor the issue with regard to this context as a fourth metric.

Water Supply/Quality of Service

With regards to the wider water quality issue, the Forum draws attention to the absence of any focus in the Consultation document- other than with regards to THM's- on the processes involved in water treatment. The Forum considers that the public has inadequate information on the chemical and other processes involved in treating raw water for drinking purposes. It is concerned with the prevalence in Irish water on 'end of pipe' solutions to water treatment and considers that Irish Water should be required to approach the issue of providing quality drinking water with an emphasis on source protection and prevention of contamination and a correspondingly reduced emphasis on treatment. The PWF sees all users and in particular domestic users, playing their part as a 'public service' in source protection and the chances of success on this important factor are greatly enhanced when the whole community is part of the source protection strategy.

The Forum also considers that the metrics proposed regarding water quality should take account of the relative seriousness of different contamination risks. It takes the view for instance that lead in pipes is a particularly serious health risk especially for young children. The urgency of this issue needs to be reflected in the monitoring of Irish Water's plans to remove this hazard.

Security of Water Supply

The Forum notes the current leakage level (49%) of treated water and wishes to record its concern at the economic, commercial and environmental costs associated with such high leakage levels. It suggests that the CER seeks a plan from Irish Water for the ongoing and sustained reduction of leakage. This plan should be costed, subject to cost benefit analysis, have measurable time specific deliverables and be time bound. It should detail a pathway towards either the elimination of leaks or towards a point where the costs of leak repair/detection exceed the returns.

The Forum notes the concerns of the CER with headroom and considers that this is an important element of the overall discussion regarding security of supply. It proposes that the CER asks Irish Water to conduct a risk assessment exercise within the context of a range of particular scenarios to include adverse events such as breakdown of infrastructure, weather related catastrophic occurrences or attacks on the water supply. Having concluded and submitted this analysis, the Forum proposes that the CER requests a risk mitigation plan from Irish Water and monitors the implementation of this plan.

Finally in this regard, the Forum draws attention to the task of future proofing the security of supply objective with reference to the emerging trends in the wider landscape concerning demographic changes, regional economic development and infrastructural proposals. Clearly, all assumptions with regard to future developments in each of these domains are predicated on *a priori* assumptions of a secure and efficient water supply. Irish society as a whole, therefore, needs assurance with regards to the coherence of such planning generally and a specific assurance that the future investment plans of Irish Water- both with regard to drinking water and waste water- are cognisant of and aligned with the wider social and economic development project in a manner which is integrated, coherent and mutually reinforcing.

Sewerage Service

The Forum is in agreement with the metrics proposed here concerning issues of overload or other sewer incidents. It notes however the persistence of raw sewerage discharge and the need to address this issues in the 40 plus centres where it persists. It suggests that the CER request an investment plan from Irish Water to address this issue.

Conclusion

In conclusion, the Forum is concerned that there appears to be no mechanism envisaged in the Consultation Paper for information and feedback to the Irish public on the performance of Irish Water with regard to each or all of the metrics proposed. The Forum takes the view that the best way in which to hold any public service to account is through an informed and engaged citizenry and would ask the CER to consider a strategy to optimise such public engagement.

It also notes the proposals for the establishment of an External Advisory Group to monitor Irish Water. It is concerned that there should be no confusion in the public mind regarding the respective roles of the different agencies involved in this field.