Irish Water Performance Assessment:
CRU Commentary on Irish Water Report No. 2
February 2018

Commentary Paper

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Queries to: tobeirne@cru.ie
Executive Summary

The Commission for Regulation of Utilities (CRU) is the independent economic regulator of Irish Water, the provider of public water and wastewater services.

In November 2016, following a public consultation, the CRU published a framework, against which it would monitor Irish Water’s performance and progress over time.

The metrics cover the following key categories:

1. Customer service;
2. Environmental performance;
3. Quality of service for water supply;
4. Security of water supply; and
5. Sewerage service.

This commentary paper provides commentary to the second Irish Water Performance Assessment Report, published alongside this paper, and sets out the CRU’s observations on Irish Water’s progress and performance in the above categories to date. As the monitoring framework is at an early stage, the focus is currently on the collection of verifiable robust data, which will facilitate assessment of how the utility is performing over time.

Irish Water’s first Performance Assessment Report was published in August 2017, containing data relating to 2016. This second Irish Water Performance Assessment Report contains updates in respect of the first half of 2017 in relation to the customer service metrics and for 2016 in respect of the environmental metrics.

Within the above five categories, the framework requires that Irish Water report information on 19 key metrics in total. The table below sets out Irish Water’s current ability to report on these 19 metrics:

<table>
<thead>
<tr>
<th>Metrics for which data is available</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metrics for which data collection is in progress</td>
<td>9</td>
</tr>
<tr>
<td>Metrics for which data collection is not available</td>
<td>2</td>
</tr>
<tr>
<td>TOTAL</td>
<td>19</td>
</tr>
</tbody>
</table>
There has been no change in the status of the metrics from the first Performance Assessment Report. While the CRU acknowledges that the implementation of the systems and technologies necessary to report performance on these metrics will take time, the CRU notes that little progress has been demonstrated in Irish Water’s implementation of these metrics to date and that it will take a considerable period of time before all performance metrics can be reported upon.

The first Irish Water Performance Assessment Report set out that Irish Water would be in a position to report on the following metrics by Q4 2017:

- Response to Billing Contacts; and
- Response to Complaints.

However, this data was not available in time for the second report as preparation for this Performance Assessment Report commenced prior to the end of 2017, before this information became available. This data will be available in the next report.

On the metrics for which data is available, the CRU acknowledges the positive progress made, particularly in relation to the customer metrics. In particular, customer satisfaction has increased to 77% from 66% following Irish Water’s focus on improving call quality experience. This is despite the fact that this metric now covers three phone lines (domestic, non-domestic and operational) while it previously only covered two (domestic and operational). There has also been a slight increase in First Call Resolution from 78% for Q4 2016 to 79% for H1 2017 and call abandonment rates, at 3%, remain within Irish Water’s internal performance target criteria of < 5%.

In relation to Boil Water Notices and Water Restrictions, the report shows no improvement in 2016 in the number of public water supplies on Boil Water Notices (BWNs) for greater than 200 days compared with 2015. The CRU had expected there to be an improvement in that number during 2016. However, the CRU is aware that significant progress has been made in this regard during 2017 to greatly reduce the BWN number. This will be highlighted in later reports when the 2017 data is finalised.

For several metrics, Irish Water has outlined that it will take time before it will be able to report data. It is intended that this report will be published every six months and for some metrics, e.g. responses to complaints, Irish Water will be able to provide data in the next Performance Assessment report. Following this, data will then be provided for a number of metrics during 2019 while for one metric (the disposal of wastewater sludge), information will not be provided until Q4 2021.

The CRU accepts that it can take a significant length of time to establish a reporting framework on a wide range of metrics. At this point, the CRU notes the lack of
progress achieved in this regard. In order to better understand the reasons behind the timelines for reporting of progress and performance, the CRU welcomes Irish Water’s commitment to provide a full update on the status of all metrics in its next Performance Assessment report. The CRU will engage with Irish Water to define metrics, where this is required, and to ensure that data becomes available on the metrics as quickly as possible.

The CRU notes the Environmental Protection Agency’s (EPA) role as the environmental regulator of Irish Water, but considers that monitoring environmental metrics within the CRU’s performance assessment framework will further encourage Irish Water to work to ensure that wastewater is treated appropriately. In some cases there may be differences between the data provided by Irish Water (and repeated in this CRU paper) and information published by the EPA. In most cases the differences are relatively minor. However, the CRU will engage with the EPA, where possible, to ensure consistency of figures is achieved.
# Table of Contents

Executive Summary .................................................................................................................. 2

Table of Contents .................................................................................................................. 5

1. Introduction .......................................................................................................................... 6
   1.1 Structure of this paper ..................................................................................................... 7
   1.2 Background and Context ............................................................................................... 7

2. Current Status of Metrics .................................................................................................. 9

3. Data Report ......................................................................................................................... 11
   3.1 Customer Service ......................................................................................................... 11
   3.2 Environmental Performance ......................................................................................... 17
   3.3 Water Supply – Quality of Service .............................................................................. 22
   3.4 Security of Water Supply ............................................................................................ 26
   3.5 Sewerage Service ........................................................................................................ 28

4. Conclusion and Next Steps ............................................................................................... 30
1. Introduction

The Commission for Regulation of Utilities (CRU) is the independent economic regulator of Irish Water. As part of its role, the CRU sets appropriate revenue allowances which Irish Water can then recover in order to finance its regulated activities.

An important aspect of the CRU’s work is ensuring that Irish Water’s revenue is spent appropriately to improve services for customers. To facilitate this, in November 2016,¹ the CRU outlined a framework of 19 key performance metrics, following a public consultation, against which it would monitor Irish Water’s performance and progress over time. The metrics cover customer service, environmental performance, quality of service for water supply, security of water supply and sewerage service.

Monitoring Irish Water’s performance relative to these metrics will facilitate an evaluation by the CRU of the utility’s performance. This monitoring framework ensures that appropriate performance-related data becomes available over time. It also ensures that transparent data becomes available to customers through the publication of performance data. For this reason, the CRU is of the view that it is important that Irish Water regularly provide Performance Assessment Reports to the CRU and that these are published along with a CRU Commentary Paper.

Irish Water provided the CRU with the first Performance Assessment Report progress and performance setting out data, where available on these metrics in August 2017. This was published alongside a CRU Commentary Paper which provided a summary of and observations on Irish Water’s progress and performance in relation to the metrics. In that Commentary Paper, the CRU set out its intention to publish the next version of the Irish Water Performance Assessment and CRU document in approximately six months (i.e. during February 2018).

Irish Water has now submitted its second Performance Assessment Report to the CRU which is now being published alongside this paper. This Commentary Paper provides a summary of and observations on Irish Water’s progress and performance in relation to the metrics.

The CRU notes that Irish Water sets out its updates to the second Performance Assessment Report as follows:

¹ Irish Water Performance Assessment – Framework of reporting metrics
• an update on the customer metrics that were previously available in the first report to include up to the end of June 2017 (referred to in this report as ‘H1 2017’);

• in relation to the environmental performance metrics, data available up to the end of 2016;

For some metrics, Irish Water is still not in a position to provide data, in which case the timeline for reporting this has been set out by Irish Water. This is consistent with experience in other jurisdictions with recently-established utilities. The CRU accepts that it can take utilities a significant length of time to put in place the systems and processes needed to report on certain metrics.

Irish Water has stated that it is committed to providing an update on all metrics, including timelines for the amber and red metrics (i.e. those metrics which are not currently reported upon), in the next Performance Assessment Report and the CRU will engage with Irish Water to ensure that this is the case.

For further details on Irish Water’s timelines and plans towards full metric implementation, please refer to Irish Water’s report.

1.1 Structure of this paper

| Section 1 – Introduction and important points. |
| Section 2 – Table summarising Irish Water’s current ability to report on each of the 19 metrics. |
| Section 3 – Discusses and provides the CRU’s observations on each metric. |
| Section 4 – Conclusion and next steps. |

1.2 Background and Context

**Monitoring by the CRU** – The performance metrics outlined in this report are not the only way in which the CRU monitors Irish Water’s performance. Other examples include the CRU’s revenue control decision paper (which focuses on costs and what is delivered for those costs), a handbook developed by the CRU (which sets out customer service standards), and monitoring of Irish Water’s capital programme.

**Incentives and Targets** – When regulating energy utilities, the CRU in some cases sets targets which have led to, for example, substantial reductions in the number and duration of interruptions to customer’s electricity supply. Similar targets may be relevant for the metrics in this report, but the focus is currently on the collection of
verifiable robust data, which will facilitate assessment of how the utility is currently performing. A robust baseline would facilitate the setting of appropriate targets against which, in time, the CRU may apply financial penalties or rewards.

**Colour Coding** – This report, similar to Irish Water’s report, uses colour coding (green, amber or red) to reflect Irish Water’s progress towards collection and reporting of data on each metric. The colour does not indicate that the CRU is satisfied or otherwise with Irish Water’s performance levels or reporting timelines. Observations by the CRU are provided in the text below each metric.

**Irish Water’s Timelines** – The CRU has noted the timelines (regarding the provision of data) provided by Irish Water within its report. In the interest of transparency, the CRU decided to publish the information available in the first report. This did not mean that the CRU accepted the timelines put forward by Irish Water. The CRU notes that while the second Performance Assessment Report contains very little update in respect of these metrics, Irish Water has committed to providing a full update in the next Performance Assessment Report on these metrics. The CRU will therefore continue to engage with Irish Water in defining metrics, where required and challenge Irish Water to ensure that data becomes available as quickly as possible.

**Environmental Regulation** – Irish Water reports to the Environmental Protection Agency (EPA), its environmental regulator, on environmental matters. The CRU is Irish Water’s economic regulator who ensures Irish Water is delivering value for money for its customers. To reduce regulatory burden, where possible the environmental metrics outlined here are aligned with those required by the EPA. The CRU also meets with the EPA on a quarterly basis and a Memorandum of Understanding has been put in place between the two bodies.

**Why choose these metrics?** – These metrics were chosen following a public consultation process and may evolve over time. They are generally consistent with those measured by economic regulators of water and wastewater utilities in neighbouring jurisdictions to ensure utilities spend revenue appropriately to improve service.

**Next steps** – The CRU intends to publish a further version of the Irish Water report and CRU document in approximately six months. If interested, parties should provide comments to tobeirne@cru.ie and the CRU will endeavour to address those comments in the next version of this publication.
2. Current Status of Metrics

The report provided by Irish Water is the second data report under the CRU’s decision on the Irish Water Performance Assessment Framework which was published following a public consultation. The table below indicates the current status for each metric with regard to whether data is available (green – 8 in total), work to allow reporting of data is in progress (amber – 9 in total), or the data is not available and work to allow reporting of the data is pending (red – 2 in total).

The CRU notes that reporting of these metrics takes time to put in place. There has been no change in the status of the metrics since the previous report in August 2017. However, Irish Water has committed to providing a full update on all metrics in the next Performance Assessment Report and the CRU welcomes this. In addition, data will also be available for two further metrics, i.e. response to billing contacts and response to complaints.

The colour coding in the table overleaf is an indication of availability. It does not indicate that the CRU is satisfied or otherwise with Irish Water’s performance levels or reporting timelines. Observations in relation to specific metrics are set out in Section 3 of this report.
### Irish Water Performance Assessment metrics:

<table>
<thead>
<tr>
<th>Customer Service</th>
<th>Status</th>
<th>Available</th>
<th>In Progress</th>
<th>Not Available</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Response to billing contacts</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Response to complaints</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Billing of metered customers</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Ease of telephone contact: the call abandonment rate</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Ease of telephone contact: a customer call-back survey</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Ease of telephone contact: speed of telephone response</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Ease of telephone contact: first contact referral</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Environmental Performance</td>
<td>Status</td>
<td>Available</td>
<td>In Progress</td>
<td>Not Available</td>
</tr>
<tr>
<td>8. Pollution incidents relating to wastewater</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Sludge disposal</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. Wastewater treatment works meeting requirements</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water Supply Quality of Service</td>
<td>Status</td>
<td>Available</td>
<td>In Progress</td>
<td>Not Available</td>
</tr>
<tr>
<td>11. Properties subject to unplanned interruptions</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. Water quality</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13. Water supplies on boil water notices and/or water restrictions</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Security of Water Supply</td>
<td>Status</td>
<td>Available</td>
<td>In Progress</td>
<td>Not Available</td>
</tr>
<tr>
<td>14. Leakage</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15. Security of supply – Absolute performance</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16. Security of supply – Performance against target</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sewerage Service</td>
<td>Status</td>
<td>Available</td>
<td>In Progress</td>
<td>Not Available</td>
</tr>
<tr>
<td>17. Sewer incidents (overload)</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18. Sewer incidents (other causes)</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19. Sewer incidents (at risk)</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
3. Data Report

This section looks at the five categories covered by this performance assessment: customer service, environmental performance, quality of service for water supply, security of water supply and sewerage service. Each category is discussed in turn below.

3.1 Customer Service
3.1.1 Response to Billing Contacts

Definition and Objective:
*This metric is defined as the number of billing contacts answered and closed out within five working days as a percentage of total billing contacts received.*

Monitoring this metric will lead to improvements in customer satisfaction through faster response times for customers who contact Irish Water regarding billing.

<table>
<thead>
<tr>
<th>Metric 1</th>
<th>Status - Amber (In Progress)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Response to Billing Contacts</td>
<td>Report by Q4 2017</td>
</tr>
</tbody>
</table>

Key Observations/Progress Update

- The CRU notes that there has been no update in relation to reporting on this metric since the first Performance Assessment Report although reporting of this metric had been expected in respect of non-domestic customers by Q4 2017. The CRU notes that this data will not be available until the next report as preparation of the Performance Assessment Report commenced towards the end of 2017, prior to this information becoming available. The CRU will engage with Irish Water in 2018 to ensure that the data is available for the next report.

- Migration of all non-domestic customers from the Local Authorities’ systems to Irish Water’s systems was completed at the end of Q2 2017.

- It had originally been intended that this metric would also apply to domestic customers. However, given recent legislative changes to water charges for domestic use, no domestic customer will be charged during 2018. Therefore, it is likely that there will be little relevance of this metric for domestic customers during 2018. This metric will become relevant beyond 2018 for billing of domestic customers that face an excess usage charge. Billing is expected to commence for these customers in the second half of 2019.
3.1.2 Response to Complaints

Definition & Objective:
This metric is defined as
a) The number of complaints responded to within five working days with either a resolution or an outline plan for proposed resolution.
b) The number of complaints to which a final decision was issued within two months.

Monitoring this metric will encourage appropriate response times when customers contact Irish Water with a complaint.

<table>
<thead>
<tr>
<th>Metric 2</th>
<th>Status - Amber (In Progress)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Response to Complaints</td>
<td>a) Report by Q4 2017</td>
</tr>
<tr>
<td></td>
<td>b) Report by Q4 2017</td>
</tr>
</tbody>
</table>

Key Observations/Progress Update

- The CRU notes that there has been no update in relation to reporting on this metric since the first Performance Assessment Report although reporting of this metric had been expected in respect of non-domestic customers by Q4 2017. The CRU notes that this data will not be available until the next report as preparation of the Performance Assessment Report commenced towards the end of 2017, prior to this information becoming available. The CRU will engage with Irish Water in 2018 to ensure that the data is available for the next report.

- While the exact data as required by the metric is not yet available, Irish Water does submit complaints data to the CRU as part of its reporting requirements under the CRU Irish Water Customer Handbook.

- In Irish Water's Water Services Strategic Plan October 2015², under a heading entitled ‘Customer Complaint Handling’, Irish Water state that the utility aims to resolve (or have outlined steps taken towards resolving a complaint) 100% of complaints within five working days.

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² Irish Water's Water Services Strategic Plan - October 2015
3.1.3 Billing of Metered Customers

Definition and Objective:
The metric is defined as the number of bills based on a meter reading as a percentage of metered accounts\(^3\).

Monitoring this metric will encourage the utility to ensure, where a customer has a meter, that this meter is used to provide accurate bills (based on meter readings). This reduces the fluctuations that customers could be subject to if bills are based on estimated as opposed to actual metered consumption.

<table>
<thead>
<tr>
<th>Metric 3</th>
<th>Status - Amber (In Progress)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Billing of Metered Customers</td>
<td>Report by Q3 2018</td>
</tr>
</tbody>
</table>

Key Observations/Progress Update

- The CRU notes that there is no update in relation to the implementation of reporting on this metric since the first Performance Assessment Report, however, notes that Irish Water will provide an update on the timeline for reporting this metric in the next Performance Assessment Report.
- Irish Water expect to report on this metric for non-domestic customers from Q3 2018 onward, following migration of non-domestic customers from the Local Authorities’ systems to Irish Water’s systems (full migration completed during Q2 2017).
- Irish Water state that the one-year period between migration and reporting is required to develop a stable baseline of billing data to facilitate reliable reporting. The CRU notes the timeline for implementation of this metric set out above and will engage with Irish Water to determine if robust information can be provided at an earlier date.
- It had originally been intended that this metric would also apply to domestic customers. However, given recent legislative changes to water charges for domestic use, no domestic customer will be charged during 2018. Therefore, it is likely that there will be little relevance of this metric for domestic customers during 2018. This metric will become relevant beyond 2018 for billing of domestic customers that face an excess usage charge. Billing is expected to commence for these customers in the second half of 2019.

\(^3\) In other words, the total number of bills issued based on a meter reading (as opposed to an estimate) as a percentage of the total number of bills generated for customers who have a meter installed.
3.1.4 Ease of Telephone Contact - Call Abandonment Rate

Definition and Objective:
This metric is defined as the percentage of calls that are abandoned while a caller is waiting in the queue to speak to a customer service agent, having been directed through the IVR (Interactive Voice Recognition) system.

Monitoring this metric will enable the CRU to track Irish Water’s performance in serving customers that contact its call centre.

<table>
<thead>
<tr>
<th>Metric 4</th>
<th>Status – Green (Data Available)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Call Abandonment Rate</td>
<td>2015 - 13%</td>
</tr>
<tr>
<td></td>
<td>2016 - 1%</td>
</tr>
<tr>
<td></td>
<td>H1 2017 – 3%</td>
</tr>
</tbody>
</table>

Key Observations/Progress Update

- The data provided by Irish Water shows a slight increase in the call abandonment rate in H1 2017 to 3% from 1% in 2016. However, this is still within Irish Water’s criteria of < 5%. The CRU understands from Irish Water that call abandonment up to 5% is in line with best international practice as per the Call Centre Association (CCA) industry performance.
- The figure of 3% follows a reduction from 15% in 2015. However, that figure should be viewed in the context of large spikes in calls in 2015 coinciding with enquiries relating to the Irish Water registration campaign, water charging commencement and queries regarding the water conservation grant.
- In its business plan, Irish Water stated that it planned, by 2021, to be able to answer 80% of calls within 20 seconds and have an abandonment rate lower than 5%.
- To provide some context to Irish Water’s performance, the CRU placed a target of 5% on ESB Networks for an equivalent metric for 2011 to 2015.

3.1.5 Ease of Telephone Contact - Customer Call Handling Survey

Metric Definition and Objective
This metric is defined as Irish Water’s performance in a Customer Survey conducted by an independent research company engaged by Irish Water.

Monitoring this metric will give the CRU a clear view of customers’ opinions on how Irish Water operates its call centre. This will also encourage Irish Water to continue to improve its customer service levels.

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4 Irish Water Business Plan - Transforming Water Services in Ireland to 2021
Key Observations/Progress Update

- The CRU notes the increase in CSat scores for H1 2017 to 77% along with Irish Water’s reasoning for the increase stating it is *due to a focus on improving call quality experiences*. The CRU further notes that from January 2017, the CSAT score is based on three telephone lines Domestic and Non-Domestic billing along with the Operation lines as oppose to the Domestic billing and Operational lines only which was previously the case.

- The CRU would expect to see an increase in Irish Water’s CSat scores as the utility continues to mature. For example, Gas Networks Ireland (GNI) state that call back monitoring for 2014 yielded an overall satisfaction score of 92%\(^5\). The CRU notes that it could be argued that the difference between the types of calls handled by these two utilities (i.e. GNI does not issue customer bills and its score is based on operations calls only) would in itself lead to differences in the likely response to these surveys. However, when setting targets for ESB’s supply and distribution network businesses in 2006, the CRU did not set a different target to allow for differences between the type of calls dealt with by ESB’s supply and distribution network businesses\(^6\).

3.1.6 Ease of Telephone Contact - Speed of Telephone Response

Definition and Objective

The metric is defined in two parts as follows:

\[a) \quad TSF1 = \frac{\text{Total number of calls answered by an agent within 20 seconds of entering the queue to speak to an agent}}{\text{total number of calls that enter the queue to speak to an agent}}\]

\[b) \quad TSF2 = \frac{(\text{Total number of calls picked up by the IVR}^7 \text{ and do not progress to the queue} + \text{Calls answered by an agent within 20 seconds of entering the queue to speak to an agent})}{\text{total number of calls received}}\]

Monitoring these metrics will enable the CRU to track Irish Water’s performance in relation to the service it provides to customers that contact its call centre. This will help to ensure that calls that are in the queue are answered within an appropriate

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\(^5\) *Gas Network Ireland Transmission and Distribution System Performance Report* – 2014,

\(^6\) *Quality of Service Incentive Mechanisms during the 2006-2010 price control period for ESB PES & ESB DSO*, CRU/06/107, 2006

\(^7\) Interactive Voice Recognition system
length of time and that Irish Water continues to improve the quality of service in the IVR system.

<table>
<thead>
<tr>
<th>Metric 6</th>
<th>Status - Green <em>(Data Available)</em></th>
</tr>
</thead>
<tbody>
<tr>
<td>Speed of Telephone Response</td>
<td>TSF1: 2015 – 54% 2016 – 90% H1 2017 – 84%</td>
</tr>
<tr>
<td>(Two metrics)</td>
<td>TSF2: 2015 – 44% 2016 – 75% H1 2017 – 70%</td>
</tr>
</tbody>
</table>

Key Observations/Progress Update

- The data provided by Irish Water indicates a slight decrease in performance of these metrics in 2017 compared to those in 2016. However, the CRU notes that 84% in respect of TSF1 is above the 80% which Irish Water committed to in their Business Plan⁸ and Water Services Strategic Plan⁹.

- It is noted that during H1 2017, non-domestic billing migration to Irish Water from the Local Authorities was underway and resulted in an increase in inbound calls received by Irish Water. The figures appear to imply that an increase in calls may lead to a decrease in performance in these areas. However, the CRU understands that Irish Water monitors and forecasts the number of calls it expects to receive. If it foresees a surge in calls, it will plan and staff its call centre accordingly. This practice was followed in the case of the recent domestic customer refunds project. Where an unplanned event leads to a surge in calls, Irish Water respond to this by communicating with customers through other channels such as IVR, the Irish Water website or Twitter as done by other utilities in order to mitigate the impact of call surges on the utility.

- To provide context to Irish Water’s performance, the CRU placed a target of 83% (combined across both metrics) on ESB Networks for a broadly equivalent metric for 2011 to 2015, although it is worth noting that the target required from ESB Networks (for TSF1) allowed for a longer 30 second answering time for calls that are in the queue waiting to speak to an agent, rather than the more difficult 20 seconds for Irish Water.

3.1.7 Ease of Telephone Contact: First Contact Referral (FCR)

Definition and Objective

*The metric is defined as the percentage of phone calls that are dealt with in one phone call (without Irish Water needing to call the customer back).*

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⁸ Irish Water Business Plan - Transforming Water Services in Ireland to 2021
⁹ Irish Water’s Water Services Strategic Plan - October 2015
Monitoring this metric will encourage Irish Water to improve the service it provides to the customers by ensuring calls are, where appropriate, dealt with in one phone call. This would improve the customer experience and improve efficiency.

<table>
<thead>
<tr>
<th>Metric 7</th>
<th>Status – Green (Data available)</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Contact Referral</td>
<td>Q4 2016 – 78% First Call Resolution</td>
</tr>
<tr>
<td></td>
<td>H1 2017 – 79% First Call Resolution</td>
</tr>
</tbody>
</table>

Key Observations/Progress Update

- The exact metric detailed in the CRU’s decision paper is not currently in place in Irish Water; instead Irish Water have substituted a metric called ‘First Call Resolution’ or FCR\(^\text{10}\). The above figure means that 22% of customers called back a second time in 2016 decreasing slightly to 21% during H1 2017. The H1 2017 figure is based on domestic, non-domestic and operations lines following full migration of non-domestic customers to Irish Water’s systems.
- The metric is only in place a short time with data only available for Q4 2016 onwards.
- The CRU accepted this metric substitute for the first Performance Assessment Report and is also accepting it for this current report. The CRU will further consider whether it is an appropriate long term substitute.

3.2 Environmental Performance

3.2.1 Introduction

In some cases there may be differences between the data provided by Irish Water (and repeated in this CRU note) and information published by the EPA. In most cases the differences are relatively minor.

The CRU understands that this is for reasons such as:

- some reclassification of environmental incidents following consideration of the impact of those incidents,
- some reporting on assets where there is not complete agreement that the assets are under Irish Water’s responsibility, and,
- the methodology used to count/group individual boil water notices, etc.

\(^{10}\) Under FCR, for any given calendar month (based on a 30 day rolling lookback period) the first call from a given phone number (or account number if captured by the IVR system) is recorded as the initial call and all subsequent calls received from that phone number are classified as repeat calls.
For this reason, while the information provided here is useful for the purposes of monitoring trends in Irish Water’s performance, parties that are interested in individual environmental metrics should refer to the published EPA reports which cover these items.

Irish Water’s second Performance Assessment Report contains the data for 2016 as submitted to the EPA during 2017. The CRU understands that Irish Water reports environmental data to the EPA on an annual basis and therefore, the data for 2017 will not be available until after the publication of the EPA’s annual reports, during 2018.

3.2.1 Pollution Incidents relating to Wastewater

Definition and Objective
This metric is defined as:

\( a) \) The number of pollution incidents resulting from wastewater collection and treatment activities, broken down by category and,

\( b) \) The number of recurring incidents closed out within this metric

Monitoring these metrics will enable the CRU to track Irish Water’s performance in reducing the number of pollution incidents\(^{11}\) occurring/recurring over time.

<table>
<thead>
<tr>
<th>Metric 8</th>
<th>Status – Green (Data Available)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution Incidents relating to Wastewater</td>
<td></td>
</tr>
<tr>
<td>Metric a)</td>
<td></td>
</tr>
<tr>
<td>Incidents are categorised from 1-5 having regard to the potential impact to the receiving environment and/or human health</td>
<td></td>
</tr>
<tr>
<td>Category</td>
<td>Classification</td>
</tr>
<tr>
<td>1</td>
<td>Minor</td>
</tr>
<tr>
<td>2</td>
<td>Limited</td>
</tr>
<tr>
<td>3</td>
<td>Serious</td>
</tr>
<tr>
<td>4</td>
<td>Very Serious</td>
</tr>
<tr>
<td>5</td>
<td>Catastrophic</td>
</tr>
<tr>
<td>Total Number of Incidents</td>
<td>1,295</td>
</tr>
</tbody>
</table>

\(^{11}\) Pollution incidents are described as discharges that do not comply with the requirements of a wastewater discharge authorisation. They can also be any occurrence at a wastewater works with the potential either for environmental contamination or requiring an emergency response by Irish Water and/or relevant authorities.
Key Observations/Progress Update

- The data provided by Irish Water shows a continuation in the trend of an increase, albeit smaller in number, in minor incidents (Category 1) between 2014 and 2016. The number of serious (Category 3) incidents went up from 1 to 2 in 2016 while there was a decrease or continued non-occurrence in the other three incident classification categories.

- Following Irish Water stating that it had identified incident reporting as a key area of concern in 2014, the CRU notes an update in this regard insofar as Irish Water has developed and rolled out an Incidents Review Solution in 2016 which Irish Water notes has resolved the issue.

- Irish Water previously identified the provision of additional incident training and the development of an Irish Water incident management system as important requirements to enable incident reporting practices. Irish Water previously noted that it has taken action to address both and as a result the overall number of incidents reported to the EPA increased. This means that the increases between 2014 and 2016 are not necessarily an indication of a decrease in network performance; rather it could reflect Irish Water’s improved reporting practices.

- Information has been provided by Irish Water within its report on metric (b). However, the CRU understands that updated EPA reporting procedures, which impact how recurring issues are reported, were put in place during 2015. This change is not reflected within the 2015 figures provided to the CRU, but should be reflected for 2016 onwards. However the figures may still differ slightly. If interested parties use the data provided to compare figures, then it is important to be aware that these differences exist and the EPA’s published documents should be consulted.

- Irish Water stated that of the 1,454 incident events reported to the EPA in 2015, 1,081 were classified as recurring. At the end of the year, 1,140 incidents events were closed, including 849 of the recurring incidents.

- In 2016, Irish Water reported 1,453 incident events to the EPA. 625 of these were repeat incidents, 34 of which were reoccurrences that reoccurred during 2016 but were open prior to 2016. A total of 541 of the 2016 incidents were closed at the end of the year, including 82 of the recurring incidents.

- There may be differences between the data provided by Irish Water (and repeated in this CRU note) and information published by the EPA. Parties that are interested in individual environmental metrics should refer to the published EPA reports which cover these items.
3.2.2 Sludge Disposal

Definition and Objective:
*This metric measures the percentage of (a) drinking water and (b) wastewater sludge that is disposed of in an unsatisfactory manner.*

Monitoring this metric will encourage Irish Water to ensure that sludge produced during the treatment of water and wastewater is disposed of appropriately.

<table>
<thead>
<tr>
<th>Metric 9</th>
<th>Status - Amber (In Progress)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sludge Disposal</td>
<td>a) Report by Q2 2019 (drinking water sludge)</td>
</tr>
<tr>
<td></td>
<td>b) Report by Q4 2021 (wastewater sludge)</td>
</tr>
</tbody>
</table>

Key Observations/Progress Update
- Irish Water does not currently report on these metrics but is in the process of developing the capability to do so by Q2 2019 for drinking water sludge and Q4 2021 for wastewater sludge.
- The Irish Water report details work that will be carried out in the interim which is summarised below:
  - Drinking Water – This includes the carrying out of a review as to how Irish Water reports the amount of sludge produced at water treatment plants in order to develop a national standardised approach. This will enable Irish Water to report on this metric. In Q2 2017 a draft Water Treatment Plant Residual Strategy (WTPRS) was produced which highlighted deficiencies in data quality and water sludge treatment. The development of an implementation plan to address this began in Q3 2017 which is due to be completed in Q4 2018. Irish Water state that it should then be in a position to report on how the largest Water Treatment Plants manage their sludge.
  - Wastewater – In Q3 2017, Irish Water commenced annual audits of sludge management activities. Actions from this audit will be implemented between Q3 2017 and Q3 2018. An options review to identify and develop a Centralised Reporting System (CRS) for all wastewater sludge management data started in Q3 2017 with full implementation and roll out due by the end of Q2 2020. Once implemented, an independent audit will be carried out, following which Irish Water will then be in a position to report on this metric. Irish Water has also commenced a consultation seeking views on the location of Regional Biosolids Storage Facility for the greater Dublin area.
- The CRU notes the significant period of time outlined by Irish Water before it will be in a position to report on these metrics. The CRU will engage with Irish Water regarding this timeline to ensure that data is
provided within an appropriate timeframe. The CRU will also engage with Irish Water regarding the specifics of how this metric is to be defined.

- Irish Water currently report to the EPA on the amount of wastewater sludge produced by Irish Water activities, which amounted to 56,018 tonnes in 2016 compared to 58,387 tonnes in 2015.

### 3.2.3 Wastewater Treatment Works Meeting Requirements

**Definition and Objective**

This metric measures the following:

- **a)** Number of agglomerations\(^{12}\) with no wastewater treatment or preliminary treatment only.
- **b)** Number of agglomerations not meeting the Urban Wastewater Treatment Directive Standards.

The CRU notes the EPA’s role as the environmental regulator of Irish Water, but considers that monitoring this environmental metric within the CRU’s performance assessment will further encourage Irish Water to work to ensure that wastewater is treated appropriately.

<table>
<thead>
<tr>
<th>Metric 10</th>
<th>Irish Water Result – Green (Data Available)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wastewater Treatment Works Meeting Requirements</td>
<td>a) Agglomerations with no Wastewater Treatment or Preliminary Treatment only</td>
</tr>
<tr>
<td></td>
<td>Year</td>
</tr>
<tr>
<td></td>
<td>No.</td>
</tr>
<tr>
<td></td>
<td>b) Agglomerations not meeting the Urban Wastewater Treatment Directive(^{13})</td>
</tr>
<tr>
<td></td>
<td>Year</td>
</tr>
<tr>
<td></td>
<td>No.</td>
</tr>
</tbody>
</table>

---

\(^{12}\) Agglomeration - an agglomeration can be defined as an area where the population and/or economic activities are sufficiently concentrated for wastewater to be collected and conducted to a Waste Water Treatment Plant or final discharge point.

\(^{13}\) Irish Water has noted that the figures quoted in b) refer to agglomerations not meeting the Urban Wastewater Treatment Directive (UWWTD) (Council Directive 91/271/EEC). The utility noted that monitoring TSS (Total Suspended Solids) is optional under this directive while monitoring TSS is mandatory under Urban Wastewater Treatment Regulations (S.I No. 254/2001). The results for 2014, 2015 and 2016 if TSS is considered are 41, 39 and 48 respectively.

\(^{14}\) This has been calculated by Irish Water for 2014 by adding three agglomerations (Ennis North, Dundalk and Tralee) that failed to have more stringent treatment (i.e. tertiary treatment) to the 31 agglomerations that failed effluent quality standards.
Key Observations/Progress Update

- The data provided by Irish Water shows that the total number of agglomerations with no wastewater treatment or preliminary treatment only has reduced by two from 2013 to 2016. Within this, five locations were removed, but as a result of better information, three locations were added, giving a figure of 42 in 2016. The CRU understands that there are another three additional plants which will be included by Irish Water in the 2017 figures.
- The data also shows that the number of agglomerations not meeting the Urban Wastewater Treatment Directive has increased by 8 in 2016 to 40 from 32 in 2015. However, this coincides with an increase in the number of agglomerations falling under the UWWTD from 171 in 2015 to 185 in 2016. The CRU understands from Irish Water that the number of agglomerations varies on an annual basis.
- It is recognised that significant improvement is still required in this area.
- Further detail is provided in the Irish Water report, including reference to how the list and number of agglomerations subject to assessment vary from year to year. If comparing the above figures to other data/publications, please refer to the Irish Water report where the basis for these figures is explained further.
- In its report, Irish Water proposed focusing on the number of agglomerations that are compliant (and the associated population equivalent), rather than the number that are non-compliant. It notes that this would align with references within its Water Services Strategic Plan and its Capital Investment Plan. The CRU will consider this point going forward.
- The above parameters, alongside many others, are reported to and monitored by the EPA. There may be differences between the data provided by Irish Water (and repeated in this CRU note) and information published by the EPA. Parties that are interested in individual environmental metrics should refer to the published EPA reports which cover these items.

3.3 Water Supply – Quality of Service

3.3.1 Properties subject to unplanned interruptions

Metric Definition and Objective:
This metric measures the number of properties experiencing unplanned interruptions to their water supply in excess of 4, 12 and 24 hours.

Monitoring this metric will enable the CRU to track Irish Water’s performance in reducing the number (and duration) of interruptions to customer’s water supplies.
**Key Observations/Progress Update**

- Irish Water cannot currently report on this metric, but is developing systems, including procuring Geographic Information System (GIS) software, that will allow it to report on this metric by Q2 2019. The CRU does receive information on interruptions but not on the duration.
- The CRU notes that there is no update in relation to the reporting of this metric since the first Performance Assessment Report, however, the CRU notes Irish Water’s commitment to providing an update on all metrics, including timelines, in the next Performance Assessment Report. The CRU will engage with Irish Water over the coming period regarding this timeline to ensure that data is provided as early as possible, and that timelines are met or reached earlier, where possible.

### 3.3.2 Water Quality

**Definition and Objective:**

*Under this metric the CRU will monitor the level of water quality compliance (percentage) with regard to a) Microbiological b) Chemical c) Trihalomethane d) Lead and e) E.coli.*

The CRU notes the EPA’s role as the environmental regulator of Irish Water, but considers that monitoring this environmental metric within the CRU’s performance assessment will further encourage Irish Water to continue to work to ensure the water provided to customers is of appropriate quality.

<table>
<thead>
<tr>
<th>Metric 12</th>
<th>Summary</th>
<th>Status – Green (Data Available)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Quality</td>
<td></td>
<td>2014</td>
</tr>
<tr>
<td>a)</td>
<td>Microbiological compliance</td>
<td>99.91%</td>
</tr>
<tr>
<td>b)</td>
<td>Chemical compliance</td>
<td>99.35%</td>
</tr>
<tr>
<td>c)</td>
<td>Trihalomethane (THM) compliance</td>
<td>91.32%</td>
</tr>
<tr>
<td>d)</td>
<td>Lead compliance</td>
<td>97.68%</td>
</tr>
<tr>
<td>e)</td>
<td>E.coli Compliance</td>
<td>99.93%</td>
</tr>
</tbody>
</table>
Key Observations/Progress Update

- The CRU notes the addition of figures for 2016 included within the second Irish Water Performance Assessment Report.
- The data provided by Irish Water indicates that, compliance levels during 2016 have slightly increased in some areas, particularly those relating to Trihalomethane (THM) compliance and slightly decreased in others.
- THMs are a by-product of the water disinfection process. Irish Water previously recognised a slight decrease in this and are developing a THM Strategy to mitigate THM exceedances.
- In relation to lead compliance, the data provided by Irish Water indicates that there has been a slight decrease in compliance. However, the CRU understands that this is related to the method of sampling which is on a random basis and therefore some difference in compliance figures will be expected.
- In May 2017, Irish Water issued ‘The Lead in Water Mitigation Plan’ (Lead Plan). The CRU receives quarterly reports from Irish Water in order to monitor progress against the Plan and the Capital Investment Plan along with flagging and querying potential customer protection issues. The HSE, Department of Housing, Planning and Local Government and the EPA also receive reports on this. Irish Water have stated that it will review the lead compliance section prior to submitting the next Performance Assessment Report, in order to provide further information.
- The above parameters, alongside many others, are reported to and monitored by the EPA. As mentioned and explained in Section 3.2.1, in some cases there are differences between the data provided here and information published by the EPA. Parties that are interested in individual environmental metrics should refer to the published EPA reports which cover these items.

3.3.3 Boil Water Notices and Water Restrictions

Definition and Objective

Under this metric the CRU will monitor:

a) The number of public supplies on Boil Water Notices (BWNs) for greater than 200 days.

b) The number of public supplies on Water Restrictions (WRs) for greater than 200 days.

c) The population served by public supplies on BWNs and WRs, for greater than 200 days.
Monitoring this metric will encourage Irish Water to continue work to reduce the number of public water supplies and the total population impacted by these BWNs and WRs.

### Metric 13

<table>
<thead>
<tr>
<th>a) Number of public water supplies on BWNs for greater than 200 days</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population Served by a)</td>
<td>21,729</td>
<td>23,287</td>
<td>25,334</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>b) Number of public water supplies on WRs for greater than 200 days</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population served by b)</td>
</tr>
</tbody>
</table>

### Key Observations/Progress Update

- The above figures highlight the significant number of customers that were affected by long term Boil Water Notices (BWNs) and Water Restrictions (WRs) between 2014 and 2016. These metrics only refer to BWNs and WRs on the Irish Water network and do not refer to the customer side.
- In its Commentary Paper to the last Performance Assessment Report, the CRU expected the 2016 figures would reflect substantial improvements in this area, however this is not demonstrated in the table above. The CRU notes that during 2016, 18 BWNs were rescinded benefiting a population of 21,860, 11 of which had been in place for greater than 200 days, affecting a population of 5,108. Six of the rescinded BWNs had been inherited. Irish Water has subsequently provided information to the CRU demonstrating that at the end of 2017, only one inherited long term BWN remained in place affecting a population of 3.
- The number of WRs in place for greater than 200 days reduced to 7 during 2016 from 10 in 2015 affecting a population of 4,048 which demonstrates an improvement in this area. The majority (5) of the 7 WRs related to the presence of lead affecting a population of 4,036. The CRU notes that 2 WRs were lifted during 2016 benefiting a population of 143.

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15 Number of Boil Water Notices that were 200 days old (or over) at the start of the calendar year or reached their 200 day milestone at any point during the calendar year.
16 Number of Water Restriction Notices that were 200 days old (or over) at the start of the calendar year or reached their 200 day milestone at any point during the calendar year.
17 The figures provided by Irish Water only cover water restrictions relating to the public side of the network, not those relating to the customers’ side. The CRU will engage with Irish Water on this, as it may be appropriate to include all 200 day WRs in the next version of this report.
18 These metrics only refer to Boil Water Notices and Water Restrictions on the Irish Water network and do not refer to the customer side.
The CRU notes the reclassification of a number of Water Restrictions, following a review of the figures. In some cases the issues have moved from public side lead issues to a private side lead issues following the replacement of public side lead pipe but private side lead pipe remaining in place.

The CRU notes the number of Boil Water Notices that were rescinded and Water Restrictions lifted during 2016 but notes the significant number of people that continued to be affected by Boil Water Notices and Water Restrictions. Irish Water has subsequently stated that by the end of 2017, only one inherited long term BWN remains in place affecting a population of 3.

If comparing the above figures to other data/publications, please note that these figures are on a 200-day basis as outlined above. While it was important to initially focus on customers impacted by these long term notices, in the future, the CRU is likely, under this Performance Assessment, to monitor BWNs/WRs that are in place for a shorter period.

Further information is available in the Irish Water report17.

The EPA also monitors Boil Water Notices and Water Restrictions but does not apply the 200 day criteria. In the EPA’s published annual Drinking Water Report, the Boil Water Notices and Water Restriction numbers refer to Boil Water Notices and Water Restrictions that are the on the Irish Water network alone or both the Irish water network and the property owner’s side.

### 3.4 Security of Water Supply

#### 3.4.1 Leakage

**Definition and Objective:**

_This metric is defined as the leakage rate relating to the Irish Water Network._

Monitoring this metric will enable the CRU to track Irish Water’s performance in reducing leakage rates. This is important as a high leakage rate accounts for significant wastage of water as a resource, and can result in low water pressure for consumers.

<table>
<thead>
<tr>
<th>Metric 14</th>
<th>Status - Amber (In Progress)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leakage</td>
<td>To be completed in Q4 2018</td>
</tr>
</tbody>
</table>

**Key Observations/Progress Update**

- The CRU notes that there has been no update in relation to reporting on this metric since the last Performance Assessment Report was submitted to the
CRU, however, notes Irish Water’s commitment to provide an update on all metrics, including timelines, in the next Report.

- While previous estimates of leakage rates have been made available and published by Irish Water, these figures were based on limited data. A precise figure has not been reported by Irish Water for the purposes of this Performance Assessment. Irish Water intend to be in a position to provide this information by Q4 2018.

- Prior to Irish Water’s establishment, local authorities across the country used different methods of leakage calculation, with a heavy reliance on manual reporting. Irish Water is introducing a National Leakage Management System (LMS) which is due to be operational by Q4 2018. Irish Water has stated that at that point it will have greater capability to accurately report on leakage performance.

- As per the First Fix Free Leak Repair Scheme Report Q4 2016, leakage was estimated at approximately 45% (an improvement from 2014 where the leakage rate was estimated at 49%).

- Irish Water, in its business plan, committed to reducing the level of leakage to below 38% by 2021 with the overall goal of reaching a sustainable economic level of leakage by 2040.

- The CRU notes the length of the timeline set out by Irish Water to implement this metric. The CRU will engage with Irish Water regarding this timeline along with the specifics of how this metric is to be defined and reported.

### 3.4.2 Security of Supply

#### Definitions and Objectives:

These metrics are defined as:

- The overall Security of Supply Index (SoSI) and that changes in this SoSI over time (metric 15).
- How the SoSI compares against a target agreed by the CRU (metric 16).

Monitoring these metrics will enable the CRU to track Irish Water’s performance in improving the security of the supply provided to customers. The security of water supply metrics measure Irish Water’s ability to meet the water service (e.g. managing supply and demand of water) needs for all customers in both the short and long term.

19 First Fix Free Leak Repair Scheme – Q4 2016
20 Irish Water Business Plan – Transforming Water Services in Ireland to 2021
### Security of Supply

**Metric 15 - Report and Implementation** Q1 2019

**Metric 16 - TBC, Await implementation of metric 15**

### Key Observations/Progress Update

- Irish Water does not currently have a SoSI in place but is working to develop this metric.
- The CRU accepted, in its Commentary Paper to the first Performance Assessment Report, that this is one of the most complex metrics of the performance assessment and notes that this is not yet in place in some neighbouring jurisdictions due to data collation difficulties. Work to establish this metric in Ireland includes establishing Water Resource Zones across the country and completing headroom analysis for each zone. However, the CRU notes that there has been no update in relation to the implementation of reporting this metric since the last Performance Assessment Report was submitted to the CRU. The CRU does, however, note Irish Water’s commitment to provide an update on all metrics, including timelines, in the next Report and will continue to engage with Irish Water with regard to precisely defining metric 15, on the timeline outlined above and to seek regular updates from Irish Water on work to expedite data reporting.
- Once metric 15 has been developed, the CRU shall also engage with Irish Water with regard to establishing timelines against which metric 16 can be measured.

### 3.5 Sewerage Service

**Definitions and Objectives:**

These metrics are defined as:

- The number of properties affected by an incident whereby wastewater enters a building due to the overload of a sewer (metric 17).
- The number of properties affected by an incident whereby wastewater enters a building due other causes<sup>21</sup> (metric 18).
- The number of properties considered to be at risk of having wastewater enter their premises, caused by overload<sup>22</sup> (metric 19).

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<sup>21</sup> These include incidents caused by equipment failure, a blockage, or collapse of a sewer.

<sup>22</sup> Irish Water has stated that this should refer to the number of properties considered to be at risk of having wastewater enter their premises, caused by overload, more frequently than once in 10 years. Irish Water has stated that these properties should be defined as properties that have suffered or are likely to suffer incidents due to wastewater from public or combined sewers.
Monitoring these metrics will enable the CRU to track Irish Water’s performance in reducing the number of properties that are affected, or are at risk of being affected, by incidents where wastewater enters the premises.

<table>
<thead>
<tr>
<th>Metrics 17, 18 and 19</th>
<th>Status - Amber (In Progress)</th>
</tr>
</thead>
<tbody>
<tr>
<td>17. Sewer Incidents (Overload)</td>
<td>Report Q4 2019</td>
</tr>
<tr>
<td>18. Sewer Incidents (Other Causes)</td>
<td>Report Q4 2019</td>
</tr>
<tr>
<td>19. Sewer Incidents (At Risk)</td>
<td>Report Q4 2019</td>
</tr>
</tbody>
</table>

Key Observations/Progress Update

- Irish Water is not currently measuring the three metrics listed above and advises that its confidence in historical data with regard to flooding incidents (prior to Irish Water’s establishment) is low. Irish Water states that accurate measurement will involve further surveying of existing wastewater assets, significant data collation and the development of representative hydraulic models.
- The CRU recognises that it will take time to gather data regarding the sewer network and implement modelling systems in order to assess the metrics above.
- The CRU notes that there has been no update in relation to the reporting of this metric since the last Performance Assessment Report. The CRU will continue to engage with Irish Water regarding the timeline outlined above and the specifics of how this metric is to be defined and reported, in order to expedite the data reporting for this metric.
4. Conclusion and Next Steps

This CRU document provides observations on the second report provided by Irish Water on key metrics against which the CRU will monitor Irish Water’s performance. Monitoring these metrics will, in time, facilitate an evaluation by the CRU of the utility’s performance, and ensures that transparent data becomes available to customers through the publication of performance data.

Currently, the focus is on collection of data to develop robust baselines against which performance can be tracked. The CRU will continue to engage with Irish Water to define metrics, where required and to ensure that data becomes available as quickly as possible, where it is currently not available.

The CRU notes the inclusion of updates to some metrics including customer service for H1 2017 and the inclusion of 2016 figures for some environmental metrics. The CRU also notes that there has been no update in relation to the reporting of other metrics since the last Performance Assessment Report.

Irish Water have stated their commitment to providing an update on all metrics, including timelines, in the next Performance Assessment Report. The CRU will engage with Irish Water to ensure that this occurs.

The CRU sees value in publishing a second Performance Assessment Report and CRU Commentary Paper, at this time in line with the timeline set out in the CRU’s Commentary Paper to the first Performance Assessment Report, in order to embed regular reporting by Irish Water to the CRU on its performance and the CRU’s monitoring of Irish Water’s performance. Furthermore, the CRU is of the view that publication of these papers is of benefit to consumers in order for both Irish Water and the CRU to be transparent in carrying out its functions.

The CRU will now consider how best to engage with Irish Water on the implementation and reporting of metrics which are currently not being reported upon.

Next publication

The CRU will engage with Irish Water with the intention of publishing another report in approximately six months. At this point, the CRU expects that Irish Water will, in the next Performance Assessment Report, also be in a position to provide data for H2 2017 and H1 2018 for customer metrics which Irish Water currently report on.

Environmental metrics for 2017, which are reported on an annual basis by Irish Water to the EPA may also be available for the next Report. However, as this data will be submitted to the EPA in early 2018 in line with their annual reporting.
requirements, this data will not be available until after the publication of the EPA Reports during 2018.

The CRU further expects data to be available for the next Performance Assessment Report in respect of the following metrics:

- Response to Billing Contacts; and
- Response to Complaints.

In addition, the CRU expects that a status update will be available for all other metrics for which data is currently not yet available.

**Queries or comments**

If interested parties have any queries or comments regarding this CRU document or the Irish Water report published alongside it, please contact tobeirne@cru.ie

The CRU will endeavour to ensure that any queries or comments are addressed within the next version of this publication.

**Engagement on timelines for reporting and detail of outstanding metrics**

For the metrics where data is not yet available, the CRU has noted the timelines (regarding the provision of data) provided by Irish Water within its report. In the interest of transparency, the CRU is publishing the information available at this point. This does not mean that the CRU has accepted the timelines put forward by Irish Water and the CRU’s observations in relation to specific metrics have been set out in this Paper. The CRU will continue to engage with Irish Water to ensure that data becomes available as quickly as possible.

Where further specific definitions are required for any outstanding metrics, the CRU will engage with Irish Water to ensure that these are defined appropriately.