

17th May 2019

Irish Waters non-domestic Tariff Framework- proposed decision paper CRU/19/042

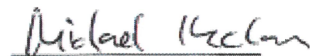
Dear Caroline,

We would like to make the following comments on the proposed decision.

1. The proposal means some of our properties will face increases of up to [REDACTED] which is an enormous increase for any utility to impose.
2. We welcome the proposal to limit the increases to 10% per year however this is then an ongoing increase for some of our properties for the next 6 years which we don't feel is reasonable. This is made all the more unreasonable with the current level of inflation.
3. The decision makes the assumption the current economic climate will prevail into perpetuity- if these substantial increases go ahead it will likely leave Irish businesses at a competitive disadvantage to other locations. It is very easy to increase these charges- we would imagine it will be very difficult to reduce them should the need arise. We would propose an examination of the cost structure of Irish Water to ensure efficiency.

It seems that businesses will have to bear the brunt of the increased costs for water and we would welcome an examination of the structure of Irish Water to ensure organisational efficiency and to ensure that the proposed increases are justified.

Kind Regards,



Michael McCann

Head of Ancillary Revenue