

Submission from Cork County Council in Relation to the CRU Consultation Process on the Draft Irish Water Non-Domestic Customer Handbook – May 2020

Cork County Council has reviewed the draft revised Irish Water Non-Domestic Customer Handbook. We have engaged with other local authorities through the Water Committee of the CCMA and we support their submission which has been made on behalf of the sector.

In addition to this Cork County Council wishes to highlight two further areas of concern as follows:

Clause 6.2.3 is worded as follows:

The Customer may, if they so wish, open the meter box to read the meter or to isolate their water supply from the stop valve. Irish Water will be obliged to provide information to the Customer on how to access their meter as required, but will not permit a Customer to remove any Irish Water apparatus from the meter box.

This clause is largely unchanged from the previous version. However we believe that it should be amended to recognise the risks associated with a property owner opening a meter box in a public footpath or road or other shared space. Meter boxes may be in locations subject to traffic movements, confined spaces and other risks. We propose the following wording:

The Customer may, if they so wish, **and if it is safe to do so**, open the meter box to read the meter or to isolate their water supply from the stop valve. Irish Water will be obliged to provide information to the Customer on how to access their meter as required, but will not permit a Customer to remove any Irish Water apparatus from the meter box. **The customer shall consult the relevant Irish Water guidance on how to safely open the meter box and shall take all due precautions to ensure that it is correctly closed after reading. If the meter box is not in a safe location the customer should contact Irish Water for further advice.**

Ideally there should be a move toward equipping customers to access their meter readings online. Cork County Council is also of the view that future meter installations should be located within the bounds of the property, where possible, to ensure a safer environment for meter reading and maintenance. This would also mitigate the risk data protection issues arising where someone's meter can be accessed in a public space.

Clauses 7.10.2 and 7.10.3 deal with the problem of identifying a new customer when an existing customer closes an account.

However, this can be very difficult to establish in practice. Very few customers make contact when vacating a premises and a new customer may also neglect to make any contact regarding a change of customer details. A new customer may even pay bills addressed to a previous customer. This leads to considerable difficulties in administering accounts. It becomes very difficult to establish

when a change of occupancy took place and it is not unusual for a number of changes of occupancy to have occurred without the knowledge of the water authority.

Clauses 7.10.2 and 7.10.3 could be enhanced if a greater onus was placed on customers to contact IW when leaving a premises.