



## KERRY COUNTY COUNCIL

### SUBMISSION TO COMMISSION FOR REGULATION OF UTILITIES RE PUBLIC CONSULTATION ON IRISH WATER'S NON-DOMESTIC CUSTOMER HANDBOOK

**1. Do you agree with the proposed overarching principles detailed in Section 1 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*The principles that have been included are fair and equitable.*

**2. Are there additional or alternative overarching principles that should be included? Please provide rationale for your answer.**

*The change over time from a prescriptive to a more principle-based approach is welcomed.*

**3. Do you agree with the proposal to introduce an 'Implementation Date' subsection to clearly identify the dates by which the new Handbook requirements will come into force?**

*Staggered implementation dates are advisable depending on the relative complexity that the changes will bring to the systems and methods of operation of Irish Water.*

**4. Do you agree with the CRU's proposed implementation timelines of 6 months for new non-IT dependent requirements and 12 months for new IT dependent requirements?**

*It is difficult to comment whether or not the two deadlines proposed are reasonable without the knowledge of the internal working systems of Irish Water, but any implementation dates should also take into consideration the impact it will have on LA ability to implement the change.*

**5. Do you agree with the proposed amendments detailed in Section 5.1 of the Irish Water Non-Domestic Customer Handbook? Please provide your rationale for answer.**

*New provisions set out in this section are appropriate.*

*It is important that the customers know where their responsibility starts and ends in relation to the pipework, especially for fixing any leaks so a diagrammatic representation will help. If the communication available to the customer is more easily understood in relation to billing process, tariff details, explanations of terms used, payment methods and arrears handling to customers, then it will be less confusing for the customer.*

**6. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook?**

*No.*

**7. Do you agree with the CRU proposed amendments detailed in Section 5.2 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*In 5.2.1 “regular up to date up-to-date information” LA’s update the Interruption template if the anticipated restoration date/time has changed or if the interruption is restored so we are assuming there will be no more onus on LA’s to provide extra information than this?*

*In 5.2.2 two days notice of planned interruptions won’t always be possible from an operational point of view. Issues may arise which may need to be fixed asap and giving greater than 48 hours notice removes the flexibility of completing the job when an appropriate opportunity arises. 24 hours notice is sufficient.*

*In 5.2.5, the deadline of two hours, given the required interactions between the Local Authorities, the Call Centre and Irish Water may be insufficient in some cases. A more realistic limit may be four hours.*

**8. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook?**

*Yes. In 5.2.4. it is recommended that “anticipated time of restoration” be changed to “estimated time of restoration”.*

*In 5.4.1 – under “agent working on behalf of IW” does this imply that IW can request that LA’s must deal with billing queries from the customer?*

**9. Do you agree with the proposed amendments detailed in Section 5.8 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*Yes these additional requirements at Customer sign-up appear reasonable.*

*Agreed, all workers should have ID cards on them when visiting customers. However, LA’s don’t have business address or phone numbers on their cards.*

**10. Are there additional or alternative requirements that should be included within or removed from this subsection of the Handbook? Please provide rationale for your answer.**

*No.*

**11. Do you agree with the proposed amendments detailed in Section 6.1 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*In 6.1.1 the removing of two weeks notice requirement to the customer for the installation of a meter is welcomed as 2 days notice is sufficient.*

*In 6.1.4, the inclusion of “to the extent reasonably practical” is welcomed as being fair.*

*In 6.1.5 it is agreed that a customer can request a meter installation as it gives them actual usage of water for billing purposes and also aids in leakage identification*

**12. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

6.1.5. should have some similar language regarding what efforts are reasonable in facilitating a meter at a particular premises. In many cases a meter is not fitted because it would require extensive rearrangement of pipe network.

**13. Do you agree with the proposed amendments detailed in Section 6.2 of the Irish Water Non-Domestic Customer Handbook? Please provide a rationale for your answer.**

*In 6.2.4 it's agreed that customers should be assisted with finding the location of a meter, however suggest adding the phrase "with reasonable efforts" after "shall engage".*

**14. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer**

No.

**15. Do you agree with the proposed amendments detailed in Section 7.1 of the Irish Water Non-Domestic Customer Handbook? Please provide a rationale for your answer.**

*Principles under 7.1.1 are laudable.*

*In 7.1.4 disagree that a customer should supply a meter read, the meters are currently read 4 times a year which gives adequate water consumption readings for billing purposes. If the customer tries to give a meter read it is highly likely that they will damage the meter interface unit (MIU) which will affect drive by readings and also damage the excess usage alarms.*

*In 7.1.14 agreed that Irish Water should alert a customer if Irish Water finds that a meter reading shows an unusual and significant increase, relative to previous meter reads. This will allow the customer to investigate the source of this unusual and significant increase quickly to see if there is a leak on their premises and rectify the issue. Actual meter reads should also be used where a meter exists instead of estimated reads because if a non-domestic customers get an estimated bills excessive usage/leakage won't become apparent to the customer until they get a bill with actual readings. Also recommended that the communication channel can include the next bill.*

**16. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

No.

**17. Do you agree with the proposed amendments detailed in Section 7.2 of the Irish Water Non-Domestic Customer Handbook? Please provide a rationale for your answer.**

*Should there be a note here on how a new customer is assigned an AQ? Would their first AQ be based on connection type?*

*Previous submission made under the CRU Public Consultation on Irish Water's Non-Domestic Tariff Framework Tariff Application Rules*

**18. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

No.

**19. Do you agree with the proposed amendments detailed in Section 7.6 of the Irish Water Non-Domestic Customer Handbook? Please provide a rationale for your answer.**

*In 7.6.4 Agreed, 30 days notice is adequate for informing Customers of upcoming changes that affect how customers are charged.*

*In 7.6.5 should there be a reciprocal duty on Customers to inform Irish Water of changes that affect their account such as the removal of a domestic allowance, a change in process that results in the discharge of an increased volume of waste water etc.?*

**20. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

*No.*

**21. Do you agree with the proposed amendments detailed in Section 7.7 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*In 7.7.3 Customer shouldn't be providing a meter read when closing an account as highlighted in 7.1.4 of Q15.*

*7.7.6 appears to be open-ended. The closing read by Irish Water should be definitive.*

**22. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

*No.*

**23. Do you agree with the proposed amendments detailed in Section 7.10 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*In 7.10.3 this person (who takes over the duty of paying bills on the departure of the Customer) should be identified at the time the Customer is being signed up in the first instance. Can this be provided for in 5.8?*

**24. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

*No.*

**25. Do you agree with the CRU's proposed amendment to remove all requirements relating to disconnection from the Billing Code of Practice and placing them into a new Code of Practice on Disconnection?**

*Yes. It is appropriate to have a dedicated Section on Disconnections.*

**26. Do you agree with the proposed amendments detailed in Section 8.1 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*Yes. Disconnection should be a last resort*

**27. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

No.

**28. Do you agree with the proposed amendments detailed in Section 8.2 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*Agreed, However, a representative for Irish Water billing department should also be present on the day of disconnection to try to persuade the customer to agree a payment plan one last time before disconnection occurs. It is unfair to send a LA crew out to deal with the customer on the day of the disconnection. If an IW representative isn't available then the LA crew should disconnect on the day without any consultation with the customer.*

**29. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

No.

**30. Do you agree with the proposed amendments detailed in Section 8.3 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*Can it be clarified whether in 8.3.1.d includes for the complaint deemed to be exhausted, whether the appeal to the CRU is included or not?*

**31. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

No.

**32. Do you agree with the proposed amendments detailed in Section 8.4 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*8.4.3 agreed, a phone call to the customer should be made at least 5 working days before disconnection, this should be actively pursued to try and speak to the customer prior to disconnection*

**33. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

No.

**33. Do you agree with the proposed amendments detailed in Section 9.5 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*Yes. Agreed, 4 hours response time to attempt to stop the flooding of a property from an IW asset is fair. However this is subject to it been possible to attempt to stop it as it some situations it may not be possible for various reasons. It's a welcome inclusion to have this exception included "extreme or severe weather events which cause reasonable design capacity of Irish Water assets to be exceeded".*

**34. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

*No.*

**34. Do you agree with the proposed amendments detailed in Section 9.6 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*Yes. Agreed that the reduced water pressure should be investigated but it may not always be possible to give advice within 10 working days as to how they intend to rectify the situation.*

**35. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

*No.*

**36. Do you agree with the proposed amendments detailed in Section 10.2 of the Irish Water Non-Domestic Customer Handbook? Please provide a rationale for your answer.**

*If a customer complaint is open longer than 10 working days, how does IW intend to update the customer on their complaint? Will this be through another WO and more work for the LA?*

**37. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

*No.*

**37. Do you agree that Irish Water should offer standard Terms and Conditions of Supply to its non-domestic customers? Please provide rationale for your answer.**

*Yes. Terms and conditions should provide correct expectations for customers and a reference point for them if they are considering a complaint. The services should be equal across all users, where possible also.*

**38. Do you agree with the proposed content and review of the Terms and Conditions of Supply set out in Section 11 of the Irish Water Non-Domestic Customer Handbook? Please provide rationale for your answer.**

*Yes.*

**39. Are there additional or alternative requirements that should be included within or removed from this section of the Handbook? Please provide rationale for your answer.**

*No.*