



Water Division,
Commission for Regulation of Utilities,
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24.

12 April 2021

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Re: IW Addendum response to CRU/20/119 Irish Water Performance Assessment 2020 to 2024 Metric Review and Target Setting

Dear Sir/Madam,

On 20 November 2020, Irish Water (IW) submitted a detailed response to the Commission for Regulation of Utilities (CRU) public consultation *CRU/20/119 IW Performance Assessment 2020 to 2024 Metric Review and Target Setting*. The IW response provided commentary on each of the proposed Performance Assessment Framework (PAF) metrics under the six categories set out by the CRU in consultation paper (CRU/20/119).

Our submission acknowledges the importance of the CRU's PAF and its aim to establish 'a framework of metrics for a use as a means of assessing IW's performance, progress and efficiency over time'. The PAF is a key element of the CRU's Revenue Control 3 2020 – 2024 (RC3).

Across December and January there was further engagement between IW and CRU on the proposed PAF metrics and targets. The purpose of these meetings was to talk through our PAF response with the CRU and to resolve any queries on the part of the CRU in respect of our response.

The CRU requested IW to provide specific proposals around targets. The points and arguments set out in detail in our PAF consultation response and follow on workshops continue to remain valid. However, in order to respond to the CRU's request, IW has sought to propose targets for reported metrics that we will push to achieve over the course of RC3. These targets take account of important factors including the impact of COVID-19, future changes such as NDTFR, and the delay to SPU implementation - points which have been made previously to CRU in both our consultation response and subsequent engagement.

We are proposing targets across the majority of PAF metrics for the period 2021-2024 as described below.

In summary:

- We provide targets for 8 of the 9 Customer Service metrics. Our PAF response sets out in detail why we do not believe the introduction of the Unresolved complaints metric is appropriate.
- We provide leakage targets across Public and Private side savings that match our recent response to the CRU's consultation on *RC3 Financial Incentives for Non-Domestic billing and Leakage (CRU/20/143)*. We are still on track to publish the final National Water Resources Framework Plan by the end of 2021.
- We either agree with the CRU proposals and/or provide targets for all 9 Quality of Water Supply metrics.
- We agree with the CRU that the 3 Sewer Incident metrics are important in the overall PAF. We propose waiting until these metrics are available and reported on in 2022 before setting targets.
- We either agree with the CRU proposals and/or provide targets for 7 of the 8 Environmental Performance metrics. We believe that identification, categorisation and monitoring of one-off incidents during RC3 is important for setting targets during the RC4 period. Our understanding from recent discussions with the CRU is that the Agglomerations with no Wastewater Treatment metric will be re-introduced, which we support.
- We agree with the CRU's proposals and targets on both of the Energy and Emission metrics.

Yours sincerely,

Maurice Scully
Head Economic Regulation Water

Appendix: IW Proposed targets 2021-2024

Customer Service

CRU PA Framework Proposals for RC3 Oct 2020				IW Proposals April 2021
Proposed Metric Name	Proposed Metric Definition	CRU proposed RC3 update to metric	CRU proposed RC3 Target	Proposed Targets 2021-2024
Ease of telephone contact: Speed of telephone response	The CRU will monitor the number of calls picked up by an agent within 20 seconds in the queue divided by the total number of calls	No change	2020:84% 2024: 90%	80% each year.
Ease of telephone contact: Speed of telephone response (2)	N/A - Discontinue			IW agree with discontinuing.
Ease of telephone contact: Call abandonment rate	The CRU will monitor the percentage of calls that are abandoned while a caller is waiting in the queue to speak to an agent having been directed through the Interactive Voice Recognition system	No change	2020: 2.6% 2024: 1%	5% each year.
Ease of telephone contact: First call resolution	The CRU will monitor the percentage of calls dealt with within one call without requiring a call back to the customer from Irish Water	Change name from <i>First Contact Referral</i>	2020 to 2024 90%	1) Continue two lines: Operational & Non-Dom 2) Operational Calls 75% each year & Non-Dom Calls 70% each year.
Billing of metered customers	The CRU will monitor a) the number of bills based on a meter	No change	70%	70% each year, from 2022.

	reading as a percentage of bills issued to metered accounts			2021 performance discussion at presentation on 19 th April.
	b) the percentage of metered accounts billed during the year that received at least one bill based on a meter read carried out by Irish Water	b) N/A - not included in 2016 Decision	100%	As per IW PAF response, use CRU option A, propose not to use this target.
Response to billing contacts	The CRU will monitor the number of billing contacts answered and closed out within 5 working days as a percentage of billing contacts received	No change	99.90%	2021:90% By end 2024: 95%
Response to complaints	The CRU will monitor the number of complaints: a) responded to within 5 working days, either with a resolution or an outline plan of the proposed resolution	No change	100%	2021: 90% Dom & Non-Dom. By end 2024: 95% Dom & Non-Dom.
	b) to which a final decision is issued within 2 months	No change	100%	2021: 90% Dom & Non-Dom. By end 2024: 95% Dom & Non-Dom.
Unresolved complaints submitted to the CRU	The CRU will monitor the number of unresolved complaints submitted to the CRU Customer Care Team in the context of the CRU's role under Section 8 of Water Services Act 2014, including:	N/A - not included in 2016 Decision	Better than average across utilities & suppliers monitored by CRU CCT	As per IW PAF response we do not believe it is appropriate to introduce this metric and place targets.
	a) Unresolved complaints upheld by the CRU Customer Care Team			
	b) Unresolved complaints awarded Charter payments by the CRU Customer Care Team or Irish Water			

Customer Satisfaction Survey	The CRU will monitor Irish Water's performance in a survey conducted by an independent research company engaged by Irish Water	Change name from <i>Call Handling Survey</i> , conduct survey via method contact was made (telephone, email, etc.)	2020: 76% 2024: 85%	2021: 70% By end 2024: 80%
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Security of Water Supply

CRU PA Framework Proposals for RC3 Oct 2020				IW Proposals April 2021
Proposed Metric Name	Proposed Metric Definition	CRU proposed RC3 update to metric	CRU proposed RC3 Target	Proposed Targets 2021-2024
Security of Water Supply	The CRU will monitor an overall Security of Supply Index, <i>or</i>	Remove performance against target metric, determine most appropriate measure	Publish National Water Resources Plan by end 2021	Still on track to publish NWRP by end 2021. As per IW PAF response further engagement needed on 10-year capacity register IW proposal during Q2/Q3 2021.
	The CRU will monitor the number of water resource zones in deficit and the population served by those resource zones			
Leakage	The CRU will monitor the amount of water lost on the public network and the amount of water lost on customer supply pipes, separately	Clarify previous definition	Public: 161 MI/day	Ensure alignment with CRU Incentives decision. 118 MI/day with stretch target to 130 MI/day.

			Private: 15 MI/day	13 MI/day
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Quality of Water Supply

CRU PA Framework Proposals for RC3 Oct 2020				IW Proposals April 2021
Proposed Metric Name	Proposed Metric Definition	CRU proposed RC3 update to metric	CRU proposed RC3 Target	Proposed Targets 2021-2024
Unplanned Interruptions to Supply	The CRU will monitor number of properties experiencing unplanned interruptions to their supply in excess of 12 and 24 hours.	Replace >4 hours with a 'minutes lost' metric	>12: <0.15% properties	As per IW PAF response we do not agree with replacement of 4 hour metric at this point. 2021: 16% WPRNs By end 2024: 8% WPRNs *Exceptions to be discussed at the presentation on the 19 th .
			>24: 0.01% properties	2021: 6% WPRNs By end 2024: 3% WPRNs *Exceptions to be discussed at the presentation on the 19 th
Drinking Water Quality	• Percentage microbiological compliance		99.9%	Agree

	• Percentage <i>E. coli</i> compliance		99.9%	Agree
	• Percentage chemical compliance		99.9%	Agree
	• Percentage THM compliance		99.0%	Agree
	• Percentage lead compliance		99.48%	Agree
Boil Water Notices and Drinking Water Restriction Notices	The CRU will monitor: The number of public supplies and the population served on Boil Water Notices for greater than 30 days	Introduce 30-day timeframe	0	As per IW PAF response
	The number of public supplies and the population served on Drinking Water Restriction Notices for greater than 30 days	Introduce 30-day timeframe	0	As per IW PAF response

Sewer Incidents

CRU PA Framework Proposals for RC3 Oct 2020				IW Proposals April 2021
Proposed Metric Name	Proposed Metric Definition	CRU proposed RC3 update to metric	CRU proposed RC3 Target	Proposed Targets 2021-2024
Sewer Incidents (Overload)	The CRU will monitor the number of properties affected by incidents where wastewater enters a building due to the overload of a sewer.	No Change	<1 property per 10,000 connected households	As per IW PAF response wait until the metric is implemented before targets are set.

Sewer Incidents (Other Causes)	The CRU will monitor the number of properties affected by an incident where wastewater enters a building caused by equipment failure in a sewer, blockage or collapse of a sewer.	No Change	<2.5 properties per 10,000 connected households	As per IW PAF response wait until the metric is implemented before targets are set.
Sewer Incidents (At Risk)	The CRU will monitor 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.	No Change	To be reviewed	As per IW PAF response wait until the metric is implemented before targets are set.

Environmental Performance

CRU PA Framework Proposals for RC3 Oct 2020				IW Proposals April 2021
Proposed Metric Name	Proposed Metric Definition	CRU proposed RC3 update to metric	CRU proposed RC3 Target	Proposed Targets 2021-2024
Incidents Relating to Wastewater	The CRU will monitor the number of incidents resulting from wastewater collection and treatment activities	No change	By end 2024 <345 one-off	Identification, categorisation and monitoring of one-off incidents during RC3 with a view to targets in RC4.
			By end 2024 <98 recurring	By end 2024 237 recurring.
			0 incidents in Categories 3-5	As per IW PAF agree.

Wastewater Agglomerations Meeting Treatment Requirements: Agglomerations with no Wastewater Treatment	N/A	Discontinue from PAF – Investment Plan monitoring only	N/A	As per IW PAF response we would like metric re-introduced.
Compliance with the Emission Limit Values for Urban Wastewater Licences	• Overall compliance with the emission limit values for wastewater licences.	N/A - not included in 2016 Decision	Establish baseline performance	As per IW PAF response agree with establishment of baseline and report one figure rather than individual targets.
	• Compliance with BOD limit values for wastewater licences.			
	• Compliance with COD limit			
	• Compliance with Suspended Solids limit			
	• Compliance with Ortho Phosphate limit, where applicable.			
• Compliance with Ammonia limit, where applicable.				
Compliance with the treatment requirements of Urban Waste Water Treatment Directive	The CRU will monitor the total number of agglomerations meeting the treatment requirements of the UWWTD	Change name from <i>Agglomerations Not Meeting the UWWTD Standards.</i>	By end 2024 100%	By end 2024 96%
Sludge Reuse and Disposal	The CRU will monitor the a) percentage of drinking water that is disposed of in an unsatisfactory manner	Change name from <i>Sludge Disposal</i>	100%	As per IW PAF response agree.
	b) percentage of wastewater sludge that is disposed of in an unsatisfactory			As per IW PAF response agree.

Energy and Emissions

CRU PA Framework Proposals for RC3 Oct 2020				IW Proposals April 2021
Proposed Metric Name	Proposed Metric Definition	CRU proposed RC3 update to metric	CRU proposed RC3 Target	Proposed Targets 2021-2024
Energy Consumption	The CRU proposes to monitor Irish Water's total final consumption in GWh.	N/A - not included in 2016 Decision	>22 GWH reduction by end 2024	As per IW PAF response agree.
Green House Gas Emissions	The CRU proposes to monitor the energy-related CO2 emissions that arise from Irish Water's final energy consumption.	N/A - not included in 2016 Decision	TBD when scope of emissions target decided by SEAI	As per IW PAF response agree.