

DCC Comments on Drinking Water issues for Irish Water Performance Assessment 2020 to 2024

Date: 17-Nov-20

Section 2.2.5 Billing of Metered Customers

Question 9

Why is there no reference to billing of unmetered non-domestic customers (of which there are several thousand in DCC)?

To answer question 9, we believe that both options a and b should be tracked. However, as maintenance of metering stock is crucial to ensure that Irish Water meet this KPI – perhaps additional targets should be included, for example:

- % of functional commercial meters (compared to total no. of commercial meters in the ground). 2024 target should be 100%
- % of “matched/operational” meters (compared to total no. of commercial meters in the ground) 2024 target should be 100%

The document does not directly reference actions pertaining to customers which are currently unmetered. With the impending “property survey” rollout – the following KPI’s (or a combination of same) should be given consideration:

- % of all businesses in geographic area that are billed. Target 100% by 2024
- % of all businesses in geographic area that are metered and billed. Target 100% by 2024

Question 10

Target should increase gradually to ~90% by 2024

Question 11

Agree that target should be 100%

Section 2.3 – Security of Water Supply

Question 22 & 23:

IW should be required to assess/determine/track remaining life, operability, capacity etc. of ageing assets as part of this KPI.

A large proportion of the water-mains within the GDA are >100 years old. Whilst it is unreasonable to expect all of these to be replaced within the next investment period, proper engineering assessment should be carried out – perhaps prioritised by criticality/flow. Several of the most important trunk mains feeding the inner city of Dublin were laid in 1867! Failure of any one of these mains in certain locations could be deemed catastrophic.

Proactive liaison should be encouraged with various other Government Bodies to see if there are opportunities for network improvements (in conjunction with transport projects for example), whilst minimising disruption/cost to the general public.

Perhaps an appropriate KPI is as follows:

Engineering assessment of all mains > 60years old to be carried out between 2020 & 2024. Factors including main thickness, corrosion, capacity, operability, location, leakage, burst frequency etc. should all be considered. This should overlap with a focussed rehabilitation programme.

Section 2.3.2 Leakage:

Question 24:

Sustainability of savings from different leakage reduction measures should be weighted. For example, savings from Rehab and Pressure Management are long-lasting. Savings from Find and Fix are frequently short-lived (in areas where F&F practices are well established).

Question 25:

- Whilst nationally, Find and Fix (F&F) efforts to date are at different stages of evolution, such practices have been underway in the Greater Dublin Area for decades. It is felt by many experienced LA personnel in Water Operations that F&F should be classed as a continuous, necessary, Operational task, rather than a Capital investment with a defined completion date.

Finding and fixing leaks does not prevent their future occurrence. It can be very disruptive, costly, frustrating etc. and in many cases actually causes the occurrence of additional leaks.

More focus should be placed on data improvement e.g. DMA operability, investment in Commercial metering stock etc.

- There is not enough emphasis put on maintaining the functionality of Commercial, Domestic and DMA meters within the document. Perhaps KPI's should be included referencing such functionality as a % of total equipment in the ground.

- Is the €400m figure mentioned for Leakage Reduction separate from the €500m figure for Network Management works? The two disciplines should not be developed independently of each other. This could cause inefficient management of funds.
- Additional focus should be placed on the “supply smarter” ethos. Proactive engagement with customers, done properly, will reduce burst frequency and UFW. Such measures could include the regulation of inlet flow-rates to major customers via the introduction of flow-control or pressure sustaining valves. Encouraging certain customers to take water at off-peak times could increase network capacity significantly in some cases.

As a tracking mechanism perhaps the demand profile of all customers who are consuming more than say 150m³/day could be analysed over the coming investment period. The information from such a study would identify beneficial network improvement measures (on both public and private-sides).

- How has the target savings figure of 161m litres been derived?
- Focus should also be encouraged on the analysis of consumption across various demographics. For example, we have determined that private-side consumption in apartment blocks can up to 3 times higher (per apt) than average household consumption. A focused national residential complex metering project would improve data and reduce public-side UFW significantly.
- Whilst Find and Fix efforts are essential to maintain supply, the importance of investment to prevent such leaks must be stressed. Ireland is behind most first world countries in terms of water-main rehabilitation. It is a fact that the number of bursts per annum (and corresponding disruption, cost etc.) will increase per year until rehabilitation efforts catch up with international best practices.
- Innovation should be encouraged to test out new technologies with a view to reduce the intimidatingly high costs of water-main rehabilitation. Similarly, emerging leakage detection technologies should be continuously assessed to maximise efficiency of Find and Fix efforts.