



SUBMISSION TO THE COMMISSION FOR REGULATION OF UTILITIES ON

Irish Water's Water and Wastewater Disconnection and Reconnection Policy

4th March 2022

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Introduction to An Fóram Uisce – The Water Forum

An Fóram Uisce - The Water Forum (hereafter The Water Forum) was established in June 2018 in accordance with the provisions of Part 5 of the Water Services Act 2017. The Water Forum is the national statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. The Water Forum consists of 26 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and public water consumers. Approximately 50 different organisations were involved in the nomination of members.

The Water Forum's main concern in relation to the provision of drinking water is that the citizens and businesses of Ireland should have access to safe, potable drinking water supplies and in relation to wastewater, that all services are provided and maintained in a manner that safeguards public health and environmental well-being. The cost of access to both services, and their on-going service provision, should be based on an economically reasonable, equitable, fair and transparent basis.

One of the functions of An Fóram Uisce – The Water Forum outlined in the Water Services Act 2017 is to **advise and provide observations to the Commission for Regulations of Utilities (CRU):**

- i. **in relation to the performance by Irish Water of its functions, and**
- ii. **when requested in writing in that behalf by the Commission, on any consultation document prepared by the Commission in respect of water services provided by Irish Water.**

Submission to CRU on Irish Water's Water and Wastewater Disconnection and Reconnection Policy

The Water Forum welcomes the CRU review of the Irish Water's proposed Policy for Water and Wastewater Disconnection and Reconnection charges for domestic and non-domestic customers. The Forum welcomes this proposed policy as it will end the inconsistent and differing billing methodologies and charges that are currently being applied by Local Authorities for disconnection and reconnection services. This policy will provide for equitable charges, methodologies and procedures to all water and wastewater customers across the network.

When the Connection Charging Policy was agreed in 2019, the CRU requested that IW submit a policy proposal for the disconnection and reconnection of domestic and non-domestic customers as IW is responsible for charging for the cost of connections to the public water and wastewater network under the Water Services Act 2013. The Water Forum supports the CRU's proposed charging principles of cost reflectivity; efficient use of assets; equity and non-discrimination; stability and simplicity.

The Water Forum believes that Irish Water's proposed criteria for temporary and permanent disconnections for both domestic and non-domestic customers from the water supply and wastewater networks seems fair and reasonable.

Question 1: Please state if you agree with the differing approach proposed by Irish Water for permanent and temporary disconnections?

Yes, it seems reasonable and is similar to approaches in other countries. Domestic customers cannot be disconnected from water or wastewater services which is in line with current legislation. Permanent disconnections if the property is to be demolished makes sense to secure the network. A permanent disconnection of an unoccupied property with an unauthorised connection would be important to prevent leakage and unaccounted for water loss. However, the Water Forum recommends that Irish Water makes a concerted effort to determine ownership prior to such action. It is reasonable that if there is a risk of contamination that the connection would be permanently disconnected.

Question 2: What are your views on Irish Water's proposal to carry out the permanent disconnection of a non-domestic property if it perceives there to be a contamination risk?

The Forum supports the permanent disconnection of a connection that could be a contamination risk. There is no indication in the consultation papers who will determine if there is a contamination risk. The Water Forum recommends that a second body is employed to authenticate the risk as this provides for transparency and greater trust in Irish Water.

The Forum would also recommend that there is engagement with the customer prior to such action and that *there is a swift, simple and clearly communicated appeals process in place* should a customer need to avail of such.

Question 3: Please state if you agree with Irish Water's proposal to carry out a permanent disconnection of a property previously temporarily disconnected, where the temporary disconnection has been in place for more than two years?

The Water Forum agrees with this in principle but with planning often taking quite some time, 2 years can be very little. The Water Forum recommends that Irish Water engage with the customer in writing and by telephone towards the end of the two years to determine their future needs and offer the opportunity for an immediate permanent disconnection or a longer temporary one. Irish Water should at this time make clear to the customer the implications of a permanent disconnection

Question 4: Please state if you agree with Irish Water's proposed criteria and approach to reconnections?

The approach to reconnections and the charge for same seems reasonable. The consistency across the country is welcomed by the Water Forum as it is more equitable and just. The charge for reconnections allows for cost recovery and should not prove a deterrent to customers requesting a disconnection. The Water Forum recommends that the reconnection fee should be waived for vulnerable and low-income customers. Irish Water needs to be proactive in their communications on the availability of this fee waiver for vulnerable customers.

Question 5: Please state if you agree with the CRU's proposal that Irish Water should establish a customer engagement process prior to permanently disconnecting: 1. a non-domestic property if a risk of contamination to the water supply is identified, and 2. a temporary disconnection which exceeds 2 years in duration?

Yes, as stated above and as recommended in the Irish Water Customer Handbooks for the engagement process undertaken with other issues such as non-payment communications. That includes a notice period for the disconnections that gives customers an opportunity to pursue an alternative course of action. Adequate notice in writing needs to be given, telephone communications need to be sought and each attempt should take place no less than 3 days apart. Ideally proof of confirmation with the customer should be retained by Irish Water. Irish Water needs to proactively make sure the customer is aware of the implications of a permanent disconnection.

Question 6: Please state if you think that domestic / non-domestic customers should be charged for a permanent disconnection from the water supply network? Please set out your rationale for why you think this.

The Water Forum believes it is fair that there is no charge for a permanent disconnection from the network as this will encourage such requests and result in a more secure network. However, there should be a comprehensive engagement process before a permanent disconnection is implemented. For a commercial user a permanent cut-off needs to last resort, as it could result in health & hygiene issues. Other measures should be considered such as periods of reduced pressures and/or dialogue strategies before cut-off. The customer should also be made aware of the implications of a permanent disconnection as stated earlier.

Question 7: Please state if you think it is appropriate to charge customers for temporary disconnection and reconnection? If so, do you think the proposed approach and charges set by Irish Water are fair, adequate? Please state if you think that the charges are in line with the CRU's charging principles? If not please give rationale and support your answer with evidence of an approach and charge that would be more appropriate in your view.

The charges seem reasonable as they are based on the average hourly rate charged by Local Authorities for 2 hours work which is required to carry out a standard disconnection and this is also benchmarked with other water providers and is cost reflective. As such they appear to be in line with the CRU's charging principles. Irish Water needs to take steps to encourage and make customers aware of the need to request temporary disconnections if it is required to reduce the risk of a customer doing the disconnection themselves. As stated earlier, The Water Forum recommends that there should be fee waivers for vulnerable customers also.

CONCLUSIONS

The Water Forum welcomes this policy proposal from Irish Water as it provides for charging equity across the country. It also provides for clear procedures, process and practice across the Irish Water network. However, the policy needs to be clearly communicated to consumers and proactive engagements need to take place prior to any temporary or permanent disconnections from the water or wastewater network. The Water Forum recommends that Irish Water waives disconnection and reconnection fees for vulnerable and low-income customers.

The Water Forum supports and encourages practice and measures that ensures better and more efficient water and wastewater management and more sustainable use of water resources.

We would like to thank the CRU for the opportunity to participate in this consultation and hope that our views will be taken on board and are happy to engage further should any clarifications be required.

END

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