

Date: 22nd March 2022

**Belcarra Group Water Schemes Submission on the Commission for Regulation of Utilities
Proposed Decision Paper for Irish Water's Non-Domestic Tariff Framework: Public Group Water
Schemes**

The Belcarra Group Water Schemes welcomes the opportunity to contribute to the proposed Non-Domestic Tariff Framework for Public Group Water Schemes (GWSs). Please find below our comments in relation to the consultation questions:

Question 1: Do you agree with the CRU's proposal to apply the harmonised national tariff rates under the Non-Domestic Tariff Framework to public Group Water Schemes? Please provide clear, detailed rationale for your answer, and if you disagree, please provide an alternative proposal that you consider better.

Yes we agree with this proposal.

Question 2: Do you agree with the CRU's proposal that bulk meter public Group Water Schemes be treated by Irish Water in the same manner as mixed-use connections? Please provide clear, detailed rationale for your answer, and if you disagree, please provide an alternative proposal that you consider better.

We disagree with this proposal.
In the past our Group Water Scheme was always allocated an annual water allowance for flushing/scouring of scheme and some allowance for leakage.
An annual water allowance must be allocated in order to maintain our Scheme to the Quality Assurance level required.
If an allowance is not allocated it will result in an extra costs to our non domestic members.

Question 3: Do you agree with the CRU's proposal that a domestic allowance of 213m3 per dwelling per annum be granted to public Group Water Schemes? Please provide clear, detailed rationale for your answer, and if you disagree, please provide an alternative proposal that you consider better.

Yes we agree. We will be able to run our Scheme more successfully and efficiently with the implementation of this allowance.

Question 4: Do you agree with the CRU's proposal to implement the new enduring charging arrangements for public Group Water Schemes on 1 October 2022, exactly one year after the implementation of the Non-Domestic Tariff Framework? Please provide clear, detailed rationale for your answer, and if you disagree, please provide an alternative proposal that you consider better.

Yes we agree provided the majority are in favour of this proposal and that the above Issues are addressed.

Question 5: Do you agree with the CRU's proposal to apply comparable transition rules to those in the Non-Domestic Tariff Framework to public Group Water Schemes, which would bring public Group Water Scheme fully under the Framework by 1 October 2024? Please provide clear, detailed rationale for your answer, and if you disagree, please provide an alternative proposal that you consider better.

We feel this is a good idea. The bills to be capped for next few years would create assurance for our members and Committee.

Question 6: Do you agree with the CRU's proposal to apply the tariff application rules for assigning connections to a tariff class to public Group Water Scheme connections? Please provide clear, detailed rationale for your answer, and if you disagree, please provide an alternative proposal that you consider better.

Yes we agree with this proposal to apply a tariff. We accept that band charges makes sense. It acknowledges that larger users are treated differently to non-domestic users.

Any other additional comments:

We feel we would work closer and more efficiently with Irish Water if a designated contact person were appointed to liaise with Group Schemes. It would be a vital asset for Group Schemes for the future.