

To: - Commission for Regulation of Utilities

Date: - 22nd March 2022

Ref: - Enduring Charging Arrangements for Public Group Water Schemes.

Dear Sir / Madam,

We are a public sourced group water scheme in rural South County Mayo – approximately 15 km from Claremorris situated on the Mayo / Galway border. The Scheme was established in the 1970's when a Group of locals connected to Water Mains to provide water to the houses and farms in the area. The members of the Group contributed financially and volunteered their time to establish the Group – to my knowledge no-one was ever paid for their time / work. The Group currently has 14 domestic connections and 38 members when you include agricultural connections. The scheme is currently managed by 3 members of the scheme on a voluntary basis.

There is a Bulk Meter to the connection at the main and we are charged on the usage from this meter by Irish Water. Similarly, Bills are issued to the users of the Group based on the usage from their meters. The members continuously

monitor water usage - leaks are repaired voluntarily by the members of the Group. Prior to the establishment of Irish Water we had a very good relationship with Mayo County Council. Assistance was given in relation to credit for leaks and the Bill was cleared every year.

The Group has tried to be proactive with improvements made as regards fitting of meters, extra valves to assist in leak detection over recent years and water testing to ensure quality. The Engineers at The Rural Water Section at Mayo County Council who provided both advice and financial assistance in providing fittings for improvements. Members of the Group contributed financially to have these improvements made. On a personal level I would like to that Miss Cathy Mellett and Mr Michael McDermott who are in the Rural Water Section of Mayo County Council who always available to assist the Scheme.

The following are points I would like to make on behalf of our Group in respect of you consultation for Irish Water's Non-Domestic Tarrif Framework: -

1. I agree with the CRU's proposal to harmonise national tarrif rates. In my view there can be no logical reason for charging different rates for the same service to same type of Customers in different areas.
2. I am strongly opposed to bulk meter public Group Water Schemes being charged the same as mixed use connections. As explained in the opening of my letter we are volunteers who are providing a non-profit essential public service to rural Ireland. Members of the scheme from time to time have contributed financially to carry out improvements to the scheme and volunteered time to operate / maintain the scheme. It should be noted authorities failed to provide this essential service to rural Ireland and local groups stepped in to provide this service. This is a core ethos of Group Water Schemes and needs to be reflected on the charging structure for use to survive.
3. I agree with the 213m cubed water allowance to domestic users – our Group currently passes on this full allowance to our members. This ensures rural households have free water and are treated somewhat equally to urban households. My personal view from having been involved in the Scheme is that Consumers should be charged for what water they use and that this should include ALL users - like any good you use – electricity, fuel,
4. From reviewing the figures at the presentation by the CRU to NFGWS it is my view that our costs for water are going to increase from what we are currently paying. I fully acknowledge that costs for all goods are increasing in the times we live in – however I would stress that any increases should be kept to a minimum. I have no difficulty as proposed that the transfer to the new pricing

structure taking place over a set period – this is beneficial in giving schemes time to adapt.

I wish to draw your attention to ongoing difficulties with Irish Water. It was interesting to hear at a NFGWS Conference that other Groups have encountered similar difficulties.

1. We cannot get credits for any leaks occurring on our line. You will be aware that substantial amounts of water can be lost in undetected leaks. Currently our Bill stands at over €--,- and the majority of this relates to leaks – some of which can be traced back directly to Irish Water carrying out repairs in Ballindine Village. We have rang, e-mailed, sent information via the Rural Water Section of Mayo County Council but they refuse to reply or engage with us. They have told us to stop reading the Bulk Meter which were doing to monitor water usage, sent us letters threatening legal action without even engaging with us. Local Politicians have advised us not to pay them! In your proposal they refer to treating us as commercial customers – surely no organisation treats its customers in this manner. A number of us have and are considering walking away from operating this scheme as a result of this treatment.
2. We receive no support from Irish Water unlike the relationship we had with Mayo County Council prior to the establishment of Irish Water. It should be noted that none of us have any qualification or experience in relation to running a scheme – this assistance / advice was always available from Mayo County Council. Irish Water Customer Service is non-existent to our Scheme. I have raised this matter with Mr Barry Deane from NFGWS on an ongoing basis over the last number of years - I am aware he has tried to assist but there has been no improvement even with his high-level contact. An attempt was made to give us a designated contact person and phone number – they never answered the supplied number or returned messages. As the majority of our members are old age pensioners it worries me to think what service they will get from Irish Water if they have a problem and we are not there to support them.

We are now at a crossroads for survival of Public Sourced Group Water Schemes and without your assistance I am sure we will not survive. It is my view that Irish Water do not want us to survive as they have treated us with nothing short of contempt.