



Commission for Energy Regulation
An Coimisiún um Rialáil Fuinnimh

Irish Water Customer Information Note

Reference:	CER/17009	Date Published:	20/01/2017
------------	-----------	-----------------	------------

Regulating Water, Energy and Energy Safety in the Public Interest

The Exchange, Belgard Square North, Tallaght, Dublin 24, Ireland

+353 1 4000 800 | info@cer.ie | www.cer.ie

The CER, Irish Water's Economic Regulator

The CER

The Commission for Energy Regulation (CER) is Ireland's independent energy and water regulator. The CER was established in 1999 and has a wide range of economic, customer protection and safety responsibilities in energy.

In 2014, CER was appointed as the economic regulator of Irish Water, the national utility for the provision of public water and wastewater services. The CER's role is to protect the interests of water and wastewater customers, ensure water services are delivered in a safe, secure and sustainable manner and that Irish Water operates in an economic and efficient manner in the delivery of water and wastewater services to customers.

Purpose of this Information Note

The CER is publishing this note to provide helpful information to Irish Water customers on the following key areas:

- **Vulnerable Customers** – Explains what a vulnerable customer is and how one can register as a vulnerable customer of Irish Water.
- **Customer Service** – Details how the CER monitors Irish Water's customer service levels.
- **Complaints** – Looks at the complaints received by Irish Water and by the CER's Customer Care Team.
- **Monitoring Irish Water's Performance** – Explains how the CER monitors Irish Water's performance as a utility company.
- **Metered Consumption** – Provides information on metered water usage levels,
- **First Fix Free Scheme** – Explains the scheme, how it works, progress to date and how customers can avail of the scheme.

This is the CER's second Irish Water Customer Information Note. The CER's intends to publish such information notes from time to time, and will continue to develop our approach to reporting information we feel will benefit Irish Water customers.

The CER's Role

The CER's role with respect to Irish Water focuses on:

- Monitoring Irish Water's utility operations to ensure Ireland has safe, secure and sustainable public water supply and wastewater treatment service provision
- Approving Irish Water's codes of practice and ensuring Irish Water complies with these
- Regulating and approving Irish Water's proposed revenue allowances and tariff structures
- Reviewing Irish Water's underlying costs of provision of water and wastewater services
- Reviewing and approving Irish Water's proposed terms and conditions of service supply to domestic and non-domestic customers.

Further information on the CER's role and relevant legislation can be found on the CER's website at www.cer.ie

Are you a customer of Irish Water?

All customers connected to the public water main network or sewerage system are Irish Water customers. This means that if you receive water from the public main and/or your waste water enters the public sewerage system, you are a customer of Irish Water.

Domestic Water Charges

In June 2016 the Minister for the Environment, Community and Local Government announced the establishment of an Expert Commission on the funding of domestic public water services in Ireland. The Expert Commission was established to make recommendations on a sustainable long-term funding model for domestic water and wastewater services. In November 2016, the Expert Commission submitted its report to the Joint Committee on the Future Funding of Domestic Water Services. The Joint Committee, which was established in November 2016, will consider the report of the Expert Commission and will report with recommendations to both Houses of the Oireachtas. The Oireachtas is expected to vote on the committee's recommendations by end March 2017.

In July 2016 new legislation was enacted which suspended water charges for domestic water services until 31st March 2017. The 9-month period of suspension may be extended if the Oireachtas committee requests more time to complete its work or if the Government needs more time to consider the Oireachtas committee's recommendations. However, Irish Water still has the responsibility for the development and delivery of water and wastewater services to homes and businesses across the country.

Whether domestic charges are in place or suspended, any property that is connected to and supplied by the public water main for water supply and/or is connected to and uses the public sewer for wastewater removal is a customer of Irish Water and should therefore, expect a certain level of service.

Vulnerable Customers

A Vulnerable Customer in relation to water supply is defined in the CER Irish Water Customer Handbook¹ as someone who is either critically dependent on water for their medical needs, or for reasons such as advanced age, physical, sensory, intellectual or mental health reasons, requires additional support communicating with or receiving information from Irish Water.

Irish Water have two categories of vulnerable customer in relation to water supply which are detailed as follows:

- **Priority Service Customers** - customers who are critically dependent on water for their medical needs, or;
- **Special Service Customers** - customers who for reasons that may include advanced age or physical, sensory, intellectual or mental health reasons require additional support communicating with, or receiving services from, Irish Water.

Irish Water is required to establish and maintain both a Priority Service and Special Service register, and the CER requires Irish Water to report to the CER on its vulnerable customer register each quarter. Registering ensures, that in the event of an issue with regard to water supply that could affect a Vulnerable Customer; Irish

¹ [CER Irish Water Customer Handbook CER/15/010](#)

Water will contact a nominated carer/family member to provide information on the relevant issue and advise of/make available, alternative supply arrangements.

Irish Water, as at end September 2016 had registered a total of **33,246** vulnerable customers. This can be broken down to 13,558 Priority Service Customers, 30,724 Special Service Customers and 11,036 customers who fall into both categories (Priority Service and Special Service).

Table 1 below provides further information on Irish Waters Requirements for Vulnerable Customers during Supply Interruptions.

Table 1– Irish Water’s Requirements for Vulnerable Customers during Supply Interruptions.

	Priority Customers	Special Services
Planned Interruption of Water Supply	<ul style="list-style-type: none"> • IW (Irish Water) to contact customers 2 days in advance to highlight the anticipated duration of interruption. • IW to make an alternative supply available to customers, where possible, if this is required. 	
Unplanned Interruptions of Water Supply	<p>Greater than 4 hours:</p> <ul style="list-style-type: none"> • IW to contact customers directly to inform them of the interruption, to discuss any critical needs and how IW can help. • IW will continue to keep all registered Priority Customers directly informed as appropriate, and provide advice as to when restoration of supply is anticipated. 	<p>Greater than 12 hours and where an alternative supply is arranged:</p> <ul style="list-style-type: none"> • IW to contact these customers or a nominated contact directly and ask if they require assistance accessing alternative water supplies. IW will assist wherever possible in an efficient manner.
Notices that Declare Water Unfit for Human	Water Unfit for Human Consumption	<ul style="list-style-type: none"> • IW to contact these customers or a nominated contact

**Consumption /
Alternative
Supply
Arrangements in
Place**

- IW to contact customers directly to inform them that the water is unfit to drink and of any precautionary measures that need to be taken.
- Explain the reason why the water is unfit for consumption.
- Highlight the anticipated duration of the notice.
- Provide regular updates on progress to rectify the issue.
- IW to determine if the customer has additional requirements (relating to drinking water supply) and facilitate these requirements, where possible.

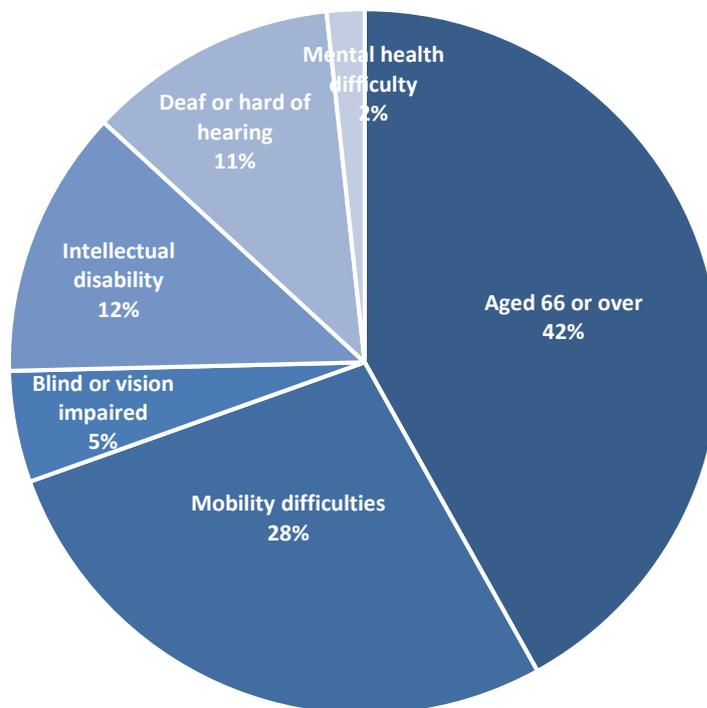
**Alternative Supply
Arrangements (Due to public
health and safety reasons, or
other emergency reasons)**

- Inform customers where IW will locate and facilitate alternative water supplies.
- Highlight the anticipated duration of the alternative supply.
- Provide regular updates on progress to rectify the issue.
- Ascertain what extra requirements they may have and facilitate these requirements where possible.

directly and ask if they require assistance to access alternative water supplies and to provide assistance wherever possible in an efficient manner.

A breakdown of Special Service Categories at the end of September 2016 is displayed in Graph 1 below.

Graph 1. Special Services Categories (Q3 2016)



Irish Water’s Domestic Vulnerable Customer Code of Practice can be found by clicking [here](#).

The CER encourage all those who, due to advancing age, disability or ill health are eligible to register as vulnerable, to do so as soon as possible. Special Service customers will be asked to state their vulnerability to Irish Water so that Irish Water can be mindful of a customer’s circumstances when Irish Water are providing services or communicating with them. For example a customer may require a braille bill. Priority customers will only have to declare that they are critically dependant on water due to a medical condition; Irish Water does not query the nature of a priority customer’s illness.

If you would like to register yourself or a family member/friend (having obtained his/her permission) as a vulnerable customer please click the following link to Irish Water’s website – [Vulnerable Customer Registration](#).

Customer Service

Irish Water Customer Handbook

In 2014 the CER developed and published the Irish Water Customer Handbook. The CER Customer Handbook places requirements on Irish Water in terms of the levels of customer service and customer protection measures Irish Water must implement. The Customer Handbook details Codes of Practice in areas such as Customer Communications, Metering, Billing, Customer Complaints, Vulnerable Customers and Network Operations as well as Irish Water's **Customer Charter** (discussed below).

The CER Customer Handbook contains 353 specific service requirements and the CER monitors Irish Water's implementation of same. To date, Irish water has made good progress with 91% of the Customer Handbook requirements now implemented, compared to 73% in September 2015. There are currently 31 requiring implementation, 22 of which relate to non-domestic customers (occupying a non-domestic premises i.e. businesses).

The CER continue to engage with Irish Water and monitor the company's implementation of the Customer Handbook and expect steady progress to continue until 100% implementation is achieved.

For more detailed information please see [Irish Water's Customer Handbook](#) on the CER's website.

The Domestic Customer Charter

In the Irish Water Customer Handbook the CER requires that Irish Water's Domestic Customer Charter include commitments in key areas of customer service that Irish Water must adhere to (listed on the following page in Table 2).

A penalty of €10 applies per breach by Irish Water of each Charter commitment.

In terms of Charter Payments awarded; Irish Water made 84 Charter Payments between the 1st January and 30th September 2016.

Table 2.

Irish Water's 9 Minimum Commitments Where Charter Payments Apply

1.	Irish Water Guarantees to respond to customer complaints within 5 working days with a resolution or a plan for the steps required to achieve a resolution, under normal conditions
2	Irish Water will issue accurate bills on a quarterly basis (Domestic billing currently suspended)
3	Irish Water will provide two weeks' notice, as well as meter installation information, before installing a meter at a customer's property
4	Irish Water will remedy any damage to a property which has occurred as a result of its employees/agents activities during meter installation. This will be done free of charge.
5	Irish Water will treat customers who are having difficulty in paying their bills sympathetically and will inform customers of the payment options currently available to them. (Domestic billing currently suspended)
6	Irish Water will apply the applicable discount/rebate to a customer's bill in relation to notices that declare water unfit for human consumption (Domestic billing currently suspended)
7	Where there is a planned supply interruption in an area, Irish Water guarantees to provide at least 2 days' notice to customers that Irish Water anticipate will be affected
8	Where there is a planned interruption in an area Irish Water guarantees to directly contact customers registered on the Priority Services Register at least 2 days in advance
9	Where there is an unplanned interruption that is anticipated to last more than 4 hours, Irish Water guarantees to directly contact customers registered on the Priority Services Register to discuss any critical needs they may have

Complaints

Complaints to Irish Water

If you have an issue with the service you receive from Irish Water, you the customer can log a complaint directly with Irish Water. Details on how to log a complaint with Irish Water and information on the complaints process in detail can be found on Irish Water’s website or by clicking the following link: [domestic customer complaints](#)

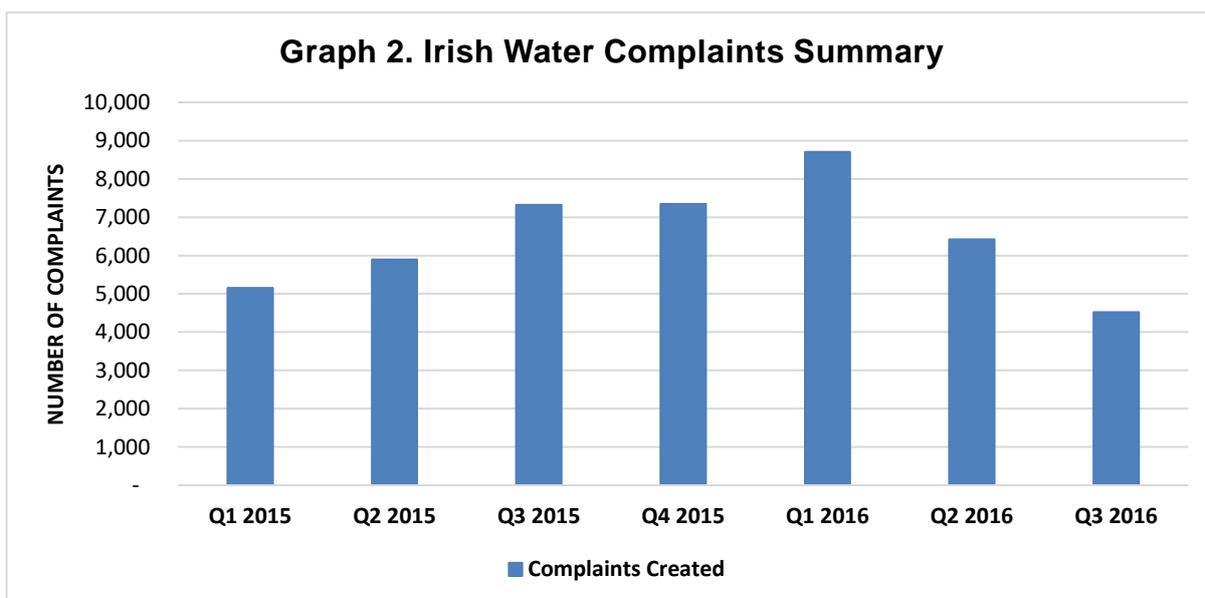
As per the CER’s Irish Water Customer Handbook, and referenced above, Irish Water is required to respond to a customer complaint within **5 working days** with a resolution to the complaint or a plan outlining the steps required to

achieve a resolution, under normal conditions.

Irish Water is required to regularly report to the CER on the number and type of complaints it receives. Table 3 details the top 5 complaints registered by Irish Water in Q3 2016 (July to September). These Top 5 complaints equated to 44% of the total number of complaints registered by Irish Water over the period.

Graph 2 below displays the volume of complaints recorded by Irish Water each quarter (decreasing as of late)

Table 3 - Top 5 Complaints Closed by Irish Water Q3 2016	% of Total Complaints
No Water	13%
Leak from Boundary Box	11%
Timeliness of Response	8%
Low Pressure	6%
Water Quality	6%



The CER's Customer Care Team

The CER has a legal obligation to provide an independent dispute resolution service to customers of Irish Water. This service is similar to the dispute resolution service which the CER offer to Electricity and Gas customers in Ireland.

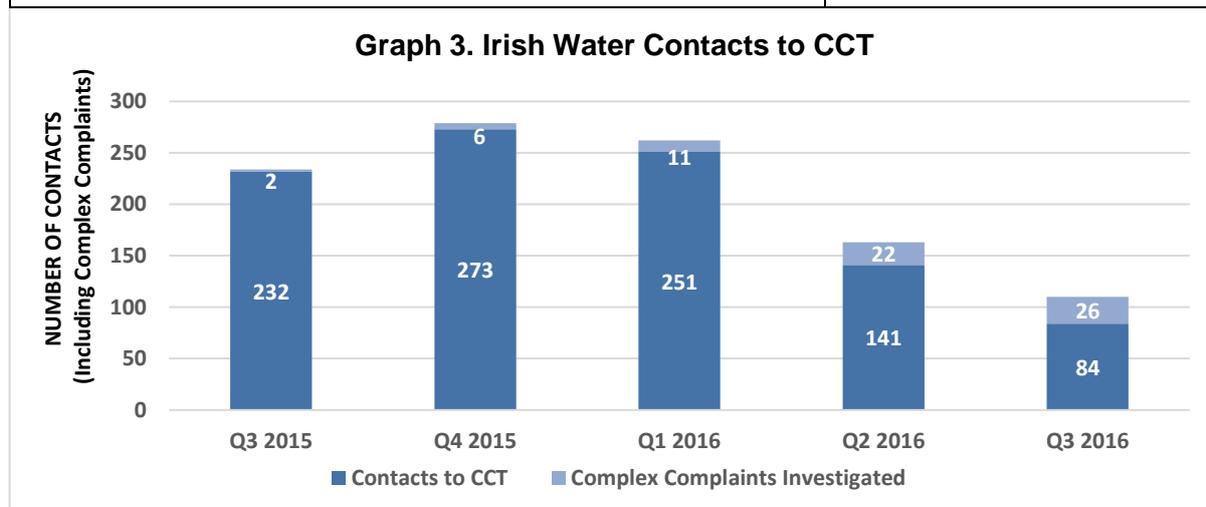
How does it work?

If having completed Irish Water's complaints process, you remain unsatisfied at how your complaint was handled, or the resolution offered, you can then refer your complaint to the CER's Customer Care Team. Following investigation the CER has the power to direct Irish Water to resolve the complaint in a set fashion if the complaint is upheld, and where appropriate, direct Irish Water to pay a refund or compensation.

The top 5 contacts for Q3 2016, which can include queries/information requests and complaints received by the CER's Customer Care Team (CCT) with regard to Irish Water are detailed in the Table 4 below. The most common contacts received referred to meter issues and account problems, with a notable absence in contacts regarding Irish Water billing which would have featured as a common contact type prior to the suspension of water charges.

Graph 3 below displays the total number of contacts received by the CER's Customer Care Team each quarter along with the total number of Complex Complaints (complaints requiring formal investigation) closed during each quarter.

Table 4 – Top 5 Irish Water Contacts to the CCT (Q3 2016)	% of Total Contacts
Meter Issues	21%
Account Problems	19%
Flow & Pressure Issues	12%
Leaks	12%
Connections	10%



You can contact the CER's dedicated customer complaints team by:

Calling: 1890 404 404	Emailing: customercare@cer.ie	Writing to: Customer Care Team Commission for Energy Regulation P.O. Box 11934 Dublin 24
---------------------------------	---	---

For more information on our complaints resolution service please click the following link which directs you to the customer complaints section of the CER website: [Customer Complaints](#)

Monitoring Irish Water's Performance

The CER, as independent economic regulator, sets the level of revenue Irish Water can earn in order to meet its responsibilities. The CER previously set the level of revenue for October 2014 – December 2016 (IRC1) and the next revenue control period covers the years 2017-2018 (IRC2) and is discussed below.

Irish Water's Revenue Allowance 2017 – 2018

The CER recently published its decision on the level of revenue which Irish Water can collect to cover its costs over the next two years. The CER has decided to allow €1,843m for the 2017-2018 period. This represents a reduction of €165m (or 8.2%) relative to Irish Water's revenue request. This includes an allowance for the day-to-day operating costs and an allowance for capital costs i.e. expenditure on physical assets. The total revenue figure also includes an adjustment for revenue relating to the two and a quarter years of the first revenue control period, October 2014 to December 2016.

Revenue Allowance	Irish Water's Request	CER Decision	Saving
Total revenue for 2017 to 2018	€2,008m	€1,843m	€165m

Operating Costs: The decision includes an allowance for day-to-day operating costs (€1,395m for the two-year period). This represents a reduction of €128m (or 8.4%) relative to Irish Water's request and means that Irish Water is now required by the CER to deliver cost reductions of approximately 20% within its controllable operating expenditure over the period from the start of 2015 to the end of 2018.

Capital Costs: The CER has decided on a cost reduction target of €132m in relation to the capital costs that Irish Water requested for the period. This means that the amount allowed by the CER for Irish Water's total capital expenditure for the two years is €1,152m. This is represented in the total revenue figure (€1,843) through a

mixture of depreciation over the IRC2 period and return that the utility can earn on efficiently incurred capital costs.

The CER is working on the basis that the revenue for 2017 and 2018 will be recovered through a mix of funding sources. In this context, the CER acknowledges the work recently completed by the Expert Commission following the publication of its report on domestic public water services. As discussed earlier in this document, the enduring funding model for Irish Water will be considered by the Joint Committee on the Future Funding of Domestic Water Services and is expected to be decided in the near future. For further information please refer to the CER's decision on this revenue control - [CER/16/342](#)

Irish Water's Performance Assessment

In order to ensure that Irish Water uses the revenue it receives in the best interests of customers, the CER, following public consultation, developed a performance assessment framework for monitoring Irish Water's performance, progress and efficiency across a wide range of customer centred metrics.

Following public consultation, the CER in November 2016, published its decision on the key performance indicators or metrics to be used in Irish Water's Performance Assessment. These metrics co-exist alongside other requirements, such as the CER Customer Handbook, to ensure Irish Water is providing appropriate service to customers.

The performance assessment will allow the CER to evaluate the utility's performance over time and also ensure that transparent (clear) data on the utility's performance becomes available to customers. The CER will publish this data at agreed intervals.

The individual metrics are grouped into the following categories:

Customer Service e.g. response to complaints, ease of telephone contact etc.

Environmental Performance e.g. pollution Incidents

Water Supply – Quality of Service e.g. supplies of Boil Water Notices

Security of Water Supply e.g. leakage on network

Sewerage Service e.g. sewer Incidents

Some of these metrics are currently reported by Irish Water to the CER, while others are new and will take time to develop and report. Once these metrics are in place and reported on, the CER will compare Irish Water's performance with other utilities in Ireland and in other countries, to ensure Irish Water offers the highest possible customer service. The CER will engage with Irish Water regarding target dates for provision, and then publication, of data on these metrics. It is envisaged that data will be published on an annual basis with more frequent publications where appropriate. Also, where data is not yet available on specific metrics, the CER intends to publish, on a six-monthly basis, a progress report regarding the collection of data on those metrics.

For more information on please click the following link [Irish Water's Performance Assessment](#) (CER/16/308) on the CER's website.

Monitoring Irish Water's Capital Investments

The CER will commence a project in 2017 to develop a framework for monitoring Irish Water's delivery of capital investments during the 2017-2018 period. This framework will include monitoring of Irish Water's delivery against defined targets which it has committed to for that period in its capital investment plan. These targets relate to matters such as the reduction of leakage and boil water notices and the provision of appropriate treatment of wastewater. The CER will require Irish Water to report on its progress against these targets and to update the CER on progression of large, strategic water and wastewater projects. Once the monitoring framework is in place, the CER will publish information regarding Irish Water's delivery of capital investments on a periodic basis. Further information regarding Irish Water's planned capital investments and associated targets for the 2017-2018 period can be found on the CER's website by clicking [here](#).

Metered Consumption

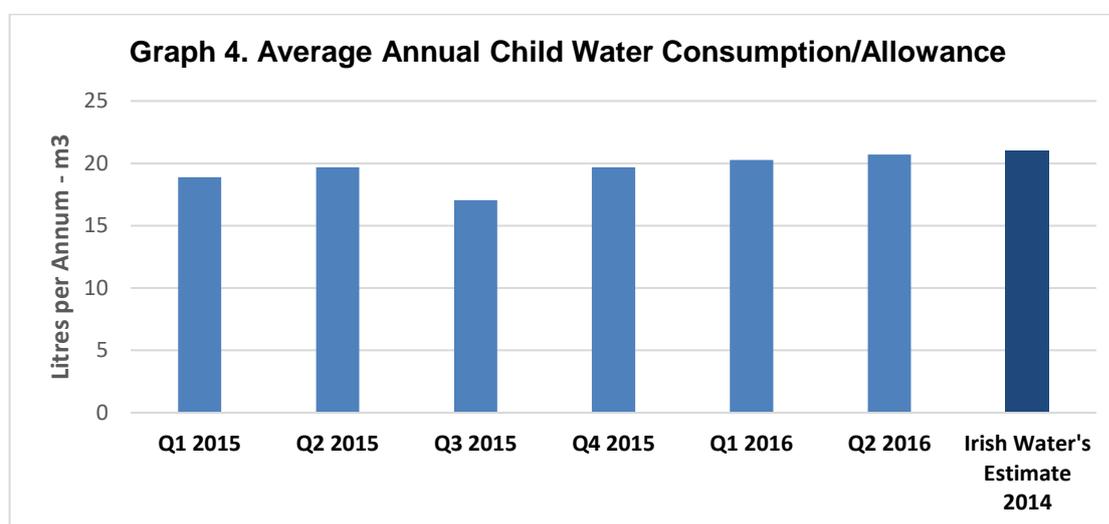
Irish Water provides the CER with quarterly domestic consumption reports, the purpose of which is to monitor quarterly trends in domestic consumption against the forecasts used by Irish Water in the tariff setting process.

In terms of metered usage the data provided for Q3 2016 shows that approximately 36% of metered customers would beat the price caps of €160 and €260 respectively. These price caps had been in place prior to the suspension of domestic water charges and amount to €160 for a single adult household, and €260 for a multi-adult household.

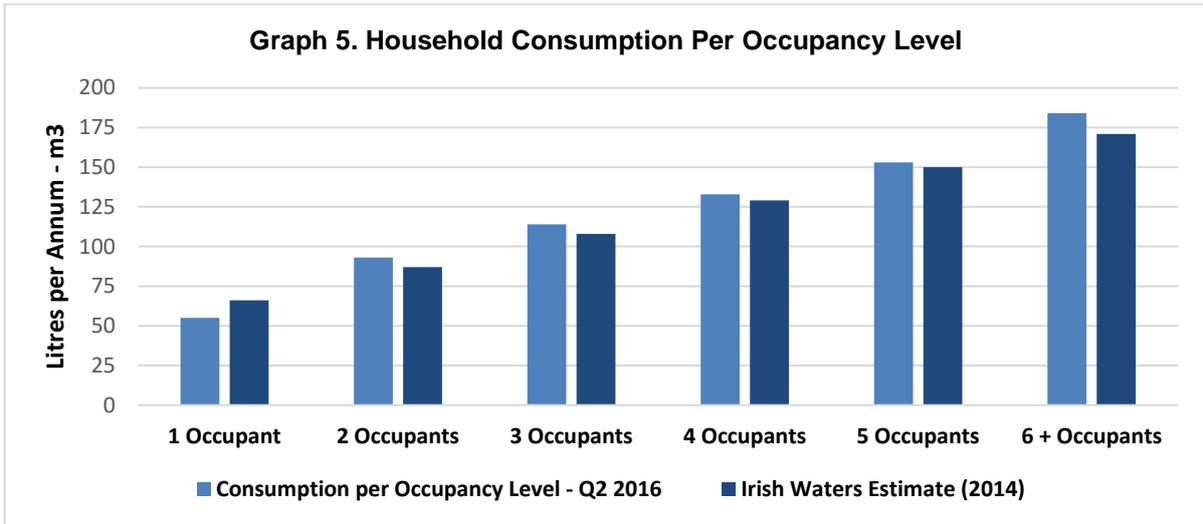
Irish Water provides a facility on its website which allows customers to log into their account and check their water usage. To access this facility please see Irish Water's website www.water.ie

In 2014, based on the data available at the time, a water consumption research project was conducted by Irish Water and estimated that the average annual child water consumption/allowance was approximately 21,000 litres per annum. The project also estimated that the first adult in each household consumed 66,000 litres per year, with each additional occupant consuming an additional 21,000 litres.

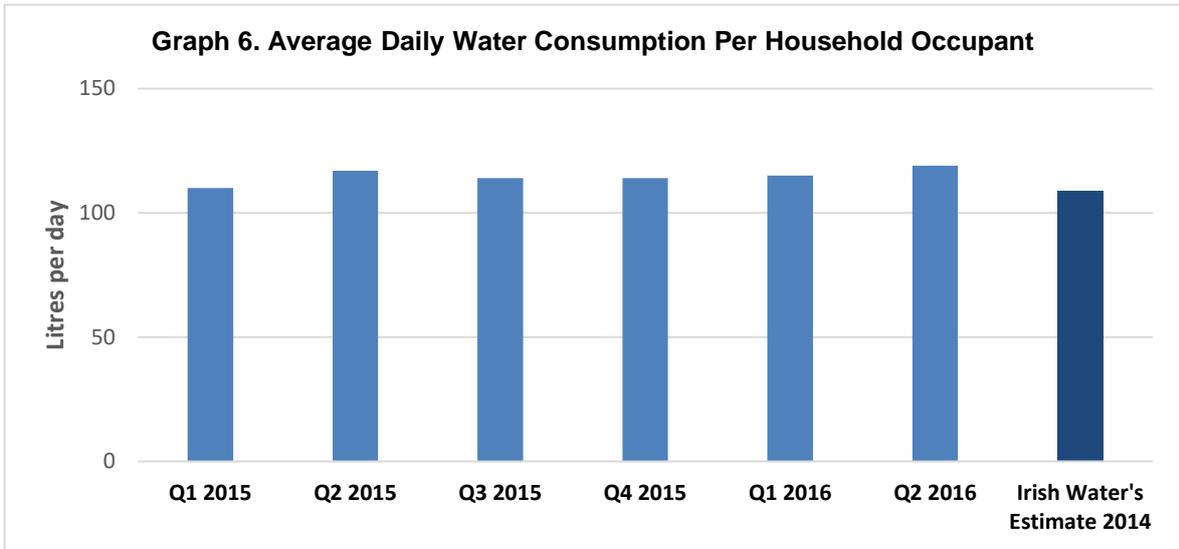
The data provided by Irish Water to date indicates that Irish Water's estimate in terms of Child Water Consumption was broadly accurate. See Graph 4 below:



Graphs 5 displays household consumption per occupancy level as at Q2 2016 (most up to date information received by the CER) and compares current consumption with that estimated by Irish Water in 2014.



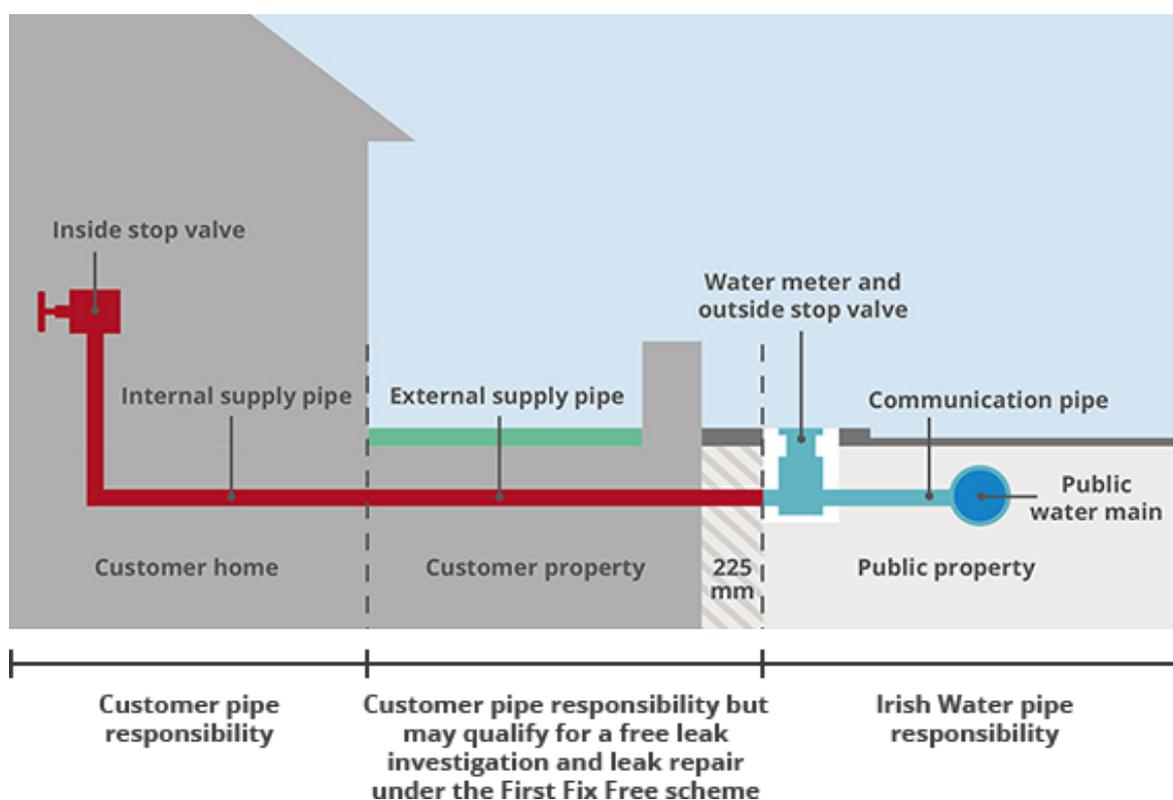
Graph 6 displays the average consumption per household occupant. Irish Water, in 2014, estimated that the daily usage per household occupant would equal 109 litres per day. It can be observed that consumption per household occupant varies from quarter to quarter and has been somewhat higher than Irish Water’s 2014 estimate. Consumption data will continue to be monitored by the CER in order for seasonal trends and patterns to be identified.



The CER has requested that Irish Water publish the Q2 Consumption Report on the Irish Water website. Please contact Irish Water directly to view this full report.

First Fix Free Scheme

In 2015 the CER approved Irish Water's First Fix Leak Repair Scheme and a budget of €51 million was set aside for same. Under this scheme, Irish Water assists customers by notifying them of a suspected leak occurring within the boundary of their property. Following investigation by Irish Water, leaks which are identified on the external supply pipe serving a property will be offered a free leak repair. (The First Fix Leak Repair scheme does not apply to leaks within a property). The image on the following page, taken from Irish Water's website, displays the location of the external supply pipe.



Progress to Date

Irish Water has now been fixing leaks under the scheme for over a year and has estimated savings of over 65 million litres of drinking water per day exceeding the target of 37 million litres/day to the end of 2016.

The water metering programme for domestic customers formed an integral part of the First Fix Leak Repair Scheme, given the fact that constant flow alarms (fitted on the meters) help Irish Water identify leaks more efficiently. The constant flow alarm is

activated when there is a constant flow of water of 6 litres per hour or more of water at a property throughout a 48 hour period. Irish Water will then notify the customer and offer them a free leak investigation.

Upon investigation, if there is a leak identified on the external supply pipe, Irish Water will offer to repair this leak free of charge, subject to the terms and conditions of the scheme. A total of 34,613 leak investigations had been undertaken by the end of Q2 2016. Irish Water continues to engage with customers issuing leak notification letters followed by 1st, 2nd and 3rd reminders to encourage customers to respond to the scheme. The CER will continue to monitor this scheme on a quarterly basis and will engage with Irish Water to ensure its continued promotion into 2017.

How can I avail of this First Fix Scheme?

You are eligible, subject to the terms and conditions of the scheme, for the First Fix Free if you are a domestic customer with:

- A confirmed leak on your external supply pipe
- A water meter installed on your property
- Are registered with Irish Water
- Have a working and accessible inside stop valve

For more information and to register for the scheme please click this link to Irish Water's Website: [Irish Water's First Fix Leak Repair Scheme](#)