

Irish Water Performance Assessment Framework

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Water & Wastewater Services

EU Legal & Policy Framework

■ Legislative Framework

- Primary driver – achievement of environmental objectives (versus economic/competition)
- Article 9, Water Framework Directive
 - Cost recovery: polluter pays, economic analysis
 - Supports achievement of environmental objectives
- Review of Drinking Water Directive, Urban Waste Water Treatment Directive, Sewage Sludge Directive

■ Policy Framework

- Green Deal, Circular Economy Action Plan, Biodiversity Action Plan 2030, Bioeconomy Strategy, Farm to Fork Strategy, Chemical Strategy for Sustainability, 2030 Climate & Energy Framework, EU Climate Law (Proposed), Innovation Fund etc.

Environmental Compliance: Water & Wastewater

Overview

- Water Quality in Ireland Report 2013-2018 (*EPA, 2019)
 - 53% of surface water bodies have satisfactory water quality
 - 92% of groundwater bodies, 80% of coastal waters, 53% of rivers, 50% of lakes and 38% of estuaries are of satisfactory quality
 - Net decline of 5.5% in status of river water bodies (128 water bodies)
 - Continuing loss of the pristine ('best of the best') river water bodies: 20 pristine river sites down from over 500 sites in the late 1980s.
 - The number of seriously polluted river water bodies (the 'worst of the worst') has started to rise – from 6 to 9 – after many years of an improving trend.

(*EPA – Environmental Protection Agency)

Environmental Compliance: Water & Wastewater

Overview: Irish Water Activity & Impact

- **Drinking Water Quality – Public Supplies (EPA, 2019)**
 - High level of compliance with parameters
 - 67 Boil Water Notices, 59 greater than 30 days
 - 52 supplies 'at risk' (Remedial Action List)
 - Priority Issues: Lead, pesticides, trihalomethanes, source protection

- **Urban Wastewater Treatment (EPA, 2019)**
 - 35 areas continue to discharge raw sewage
 - 19 towns and cities where wastewater not treated to EU requirements:
 - Half of Ireland's sewage
 - 44% from one treatment plant

- **Abstractions**
 - Abstraction licensing - legislation in train, may have to limit current abstractions

Performance Assessment Framework

■ CRU

- Economic regulator of Irish Water (national public water & wastewater services utility)
- Approves:
 - Irish Water's allowed revenues (capital investment plans, opex, non-network investment plans)
 - Standards of customer service (Customer Handbooks) e.g. customer communications, complaints handling

■ Performance Assessment Framework for Irish Water

- Established 2016 - Based on original Ofwat Overall Performance Assessment, 1999 (OPA)
- Compare Irish Water's overall performance to water companies in England and Wales, Scotland, Northern Ireland

■ 5 Categories

Customer Service

Environmental Performance

Water Supply – Quality of Service

Security of Supply

Sewerage Service

■ PAF not yet fully established

- No targets
- Not all metrics reported on by Irish Water
 - 2018 = 11/19 & 2019 = 14/19

Performance Assessment Framework: CRU Review

Objectives & Process

- To ensure metrics appropriate
 - Economic regulators have moved away from original OPA
 - Irish policy & context – Irish Water’s priorities

- To set targets for Irish Water
 - Third ‘revenue control period’ (2020 - 2024 inclusive)
 - CRU approved allowed revenue: Capital Investment Plan, Non-network investment & Operational expenditure
 - Customer Handbooks (Domestic & Non-Domestic)

- Process
 - Consultation October 2020
 - Decision Q1 2021

CRU Consultation: Proposed Categories

PAF 2020-2024

1. Customer Service

- Response to contacts, response to complaints, customer satisfaction

2. Security of Water Supply

- Security of supply, leakage

3. Quality of Water Supply

- Unplanned interruptions, drinking water quality, BWN/DWRNs

4. Sewerage Service

- Sewer incidents

5. Environmental Performance

- Pollution incidents (wastewater), compliance with Urban Waste Water Treatment Directive

6. New: Energy & Emissions

- Energy consumption, GHG emissions

Summary of Proposals

Customer Service

Metric Name		Target 2024
Ease of telephone contact: Speed of telephone response		90%
Ease of telephone contact: Speed of telephone response (TSF2)		Discontinue
Ease of telephone contact: Call abandonment rate		1%
Ease of telephone contact: First call resolution		90%
Billing of metered customers	% Bills Based On Read	70%
	NEW: One Meter Read Per Year	100%
Response to billing contacts		99.9%
Response to complaints	5 days	100%
	2 months	100%
NEW: Unresolved complaints submitted to the CRU		<i>Better than average across utilities & suppliers monitored by CRU CCT</i>
Customer Satisfaction Survey		90%

Summary of Proposals

Security of Water Supply, Quality of Water Supply, Environmental Performance

Cat	Metric Name	Target 2024	
Security	Security of Water Supply	<i>Dependent on NWRP</i>	
	Leakage	Public side: 161 MI/day Private side: 15 MI/day	
Quality of Water Supply	Unplanned Interruptions to Supply	>4 hours	Replace with 'minutes lost'
		>12 hours	<0.15% of connected properties
		>24 hours	0
	Drinking Water Quality	Microbiological compliance	>98%
		E. Coli compliance	
		Chemical compliance	
		Lead compliance	
	Trihalomethane compliance		
Boil Water Notices and Water Restriction Notices >30 days		0	
Environmental	Pollution Incidents	<345 one-off <98 recurring 0 Category 3-5	
	Agglomerations with no Wastewater Treatment	Discontinue from PAF	

Summary of Proposals

Environmental Performance, Sewerage Service, Energy & Emissions

Cat	Metric Name	Target 2024	
Environmental Performance (ctd.)	Compliance with the treatment requirements of UWWTD	100%	
	NEW: Compliance with the Emission Limit Values for Urban Wastewater Licences	<ul style="list-style-type: none"> • Overall compliance with the emission limit values for wastewater licences. • Compliance with BOD limit values for wastewater licences. • Compliance with COD limit • Compliance with Suspended Solids limit • Compliance with Ortho Phosphate limit, where applicable. • Compliance with Ammonia limit, where applicable. 	Establish performance baseline
	Sludge Use and Disposal	Drinking Water Sludge Wastewater Sludge	100%
Sewerage Service	Sewer Incidents (Overload)	<1 property per 10,000 connected households	
	Sewer Incidents (Other Causes)	<2.5 properties per 10,000 connected households	
	Sewer Incidents (At Risk)	To be reviewed	
Energy & Emissions	NEW: Energy Consumption	Reduce by at least 22 GWh	
	NEW: GHG Emissions	22 GWh equivalent	

Environmental Performance

Environmental Impact of IW Activities

■ Pollution Incidents (Wastewater)

• Metrics

- Number of one-off incidents resulting from collection and treatment activities by category (1- 5, EPA)
- Recurring incidents – definition consistent with EPA

• Targets

- Based on IW capital investment plan and on targeting zero incidents resulting from operation of existing assets

■ Wastewater Agglomerations meeting Treatment Requirements

• Metrics

- Agglomerations with no treatment/primary treatment only – propose to remove, not enduring, CIP monitoring
- Agglomerations compliant with effluent & quality standards in UWWTD
- New (Proposed): Compliance with Emission Limit Values for Urban Wastewater Licences

• Targets

- 100% compliance with UWWTD by end 2024 (19 existing agglomerations non-compliant)
- New metric – set baseline

Environmental Performance

Environmental Impact of IW Activities

■ Sludge Use & Disposal

- Metrics

- Percentage of drinking water sludge reused and/or disposed of in a satisfactory manner
- Percentage of wastewater sludge reused and/or disposed of in a satisfactory manner

where

‘satisfactory manner’ defined as compliant with waste/environmental legislative requirements

- Targets

- 100%

Sewerage (Wastewater) Service

■ Sewer Incidents

• Metrics

- Sewer Incidents (Overload) : Number of properties impacted when wastewater enters a building due to sewer overload.
- Sewer Incidents (Other Causes): Number of properties impacted due to sewer failure (collapse, operational failure, blockages).
- Sewer Incidents (At Risk): Number of properties at risk of having wastewater entering a building more frequently than once every ten years.

• Targets

- Sewer Incidents (Overload): First reporting in 2021 – establish baseline in 2022, target maintenance and operations at incidents between 0 and 1 per 10,000 connected properties by end 2024 (in line with NI Water, Scottish Water), review post first report
- Sewer Incidents (Other Causes): Not yet reporting – establish baseline by end 2022, target ensuring incidents below 2.5 properties per 10,000 connected by end 2024 in line with other utilities, review post first report
- Sewer Incidents (At Risk): Not yet reporting – IW to report on this metric in next submission (2021 re 2020), CRU to engage with IW to better understand how it is mitigating this risk to inform target setting

Thank You

Reference

- [Irish Water Performance Assessment Framework: Metric Review & Target Setting](#)
[CRU/20/119, October 6th 2020](#)
- [Irish Water Performance Assessment: Framework of Reporting Metrics Decision Paper](#)
[CER/16/308, November 16th, 2016](#)