



475 Antrim Road
Belfast
BT153DA

T: 02890370222
F: 02890371231
E: info@ufuhq.com
W: www.ufuni.org

28/08/2014

FROM THE DEPUTY PRESIDENT

Utility Regulator
Belfast
BT2 8GB

Dear Tanya,

CONSULTATION ON WATER AND SEWERAGE SERVICES PRICE CONTROL 2015-21

Thank you for the opportunity to respond to the above consultation. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing nearly 12,000 farming families. The UFU represents farmers from all areas of Northern Ireland and across all sectors.

The UFU welcome the reduction in prices for metered customers: especially given that they show a significant reduction both on the actual figures for 2014-15 and on what is proposed by the NI Water Business Plan submission. As regards the increase for unmetered customers, the UFU have long called for the metering of all properties in Northern Ireland and hope that the increase in bills for these customers, who make up only 11% of paying customers will see a move to metering on all properties.

The UFU have been calling for water charges to be brought in for domestic users of water as well. We believe that this will result in much greater efficiency and in a more responsible attitude towards water use. We would welcome the measures made to ensure efficiency by PC15 and hope that ultimately, the low cost of water achieved will ease the transition to reasonable water charges.

We also very much welcome the inclusion of "improvements in levels of service" as a key benefit of the Price Control and the new consumer satisfaction survey to provide "actionable data" to improve services. It is important that NI Water have a standard of consumer satisfaction which they must aim to achieve. We would like NI Water to make a commitment that no paying customer will receive a bill for water used any more than one year after the use of the water. As it stands, NI Water can backdate charges up to six years and often do so in a consolidated bill for those years. Taking your determined figure of £2785 as a typical bill for a large metered property and multiplying it by six, this could leave businesses with a bill of £16710, which would be very difficult for a business to absorb. Even a consolidated bill for a small metered business comes to £2016, which many small businesses may struggle to pay off a bill of this magnitude in one payment. There is no good reason why NI Water cannot have a bill with each customer within a year of the usage of water and we would like them to make a commitment that no-one will be faced with such an unreasonable bill.

With regard to the goal of reductions in leakage surpassing 159mld, we would like this focus to rest on unmetered and unbilled consumers, for whom there is no incentive to be proactive in preventing and

stopping leaks. The UFU has encouraged efficient use of water in keeping with the Water Framework Directive by asking for metering to be brought in for all users. We hope that the potential rise in the cost for unmetered users and the goal of reducing the leakage that this will result in a noticeable reduction in the amount of water wasted through leaks.

I trust our comments will be given full consideration but should you wish to query any comments raised please do not hesitate to get in touch.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Barclay Bell', written in a cursive style. The signature is positioned to the left of a vertical line that extends downwards.

BARCLAY BELL