

## **Mr Bannon Draft Determination Response**

Paul,

The Utility Regulator's draft determination to NI Water's PC21 Business Plan will not help to revitalise Northern Ireland's economy which is in dire need of investment due to the ongoing pandemic.

The draft determination states that NI Water must address in PC21 and subsequent price controls the lack of capacity in sewerage networks and wastewater treatment works which has become a constraint on development and economic growth. Responsible economic development can only occur without compromising environmental standards which are determined by NIEA. This requires significant investment as detailed within NI Water's business plan.

Proposing an 11.9% reduction to NI Water's Capital investment will inevitably mean that there will be insufficient funds to improve capacity within all of the sewerage networks and wastewater treatment works proposed. This in turn will curtail future development and economic growth.

NI Water has been successful in reducing its efficiency gap by delivery of real and sustainable savings, emerging into PC21 as a Band B company rather than band E. Therefore I believe now is the time for the Utility Regulator to fully back NI Water's Business Plan.

Regards,

**Fergus Bannon**