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Barbara Brown
Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

BY EMAIL

1 March 2024

Dear Barbara,

Draft Forward Work Plan 2024 – 2025

Thank you for providing us with the opportunity to comment on the Utility Regulator's draft Forward Work Plan 2024-25.

We agree with the Utility Regulator's prioritisation of projects to be undertaken in the coming year. In particular, we welcome the continued focus on the Consumer Protection Programme and Best Practice Framework. We are encouraged by the engagement to date on the aspects of the Consumer Protection Programme that are relevant and appropriate for our customers - in particular our vulnerable customers.

We note the inclusion in the forward work plan of a project to review cost and performance reporting. Whilst standardisation across different utilities may be beneficial, we encourage the Utility Regulator to be cognisant of the key differences between NI Water (a non-departmental public body, without domestic billing) and other regulated utilities.

Your plan highlights the commencement of the PC27 process. With this in mind, we are acutely aware that fundamental datasets underpinning the regulatory price control methodology must be supported by the systematic collection of such data throughout the price control period. You will be aware that the regulatory approach and comparative data used in the GB water sector continues to evolve. We welcome the opportunity to engage with the Utility Regulatory in reviewing our data submissions, such as the Annual Information Return, with a view to ensuring that they provide the most appropriate and robust data for PC27 and subsequent price controls.

In conclusion, as we start work on our own PC27 business planning process, we see significant challenges ahead for our industry which will require a joined-up approach. We look forward to working with the Utility Regulator and other stakeholders, to

secure the funding needed to ensure we are able to provide sustainable, reliable, water and sewerage services that meet customers needs in Northern Ireland.

I trust that you find these comments helpful. Should you have any queries, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Ronan Larkin'.

Ronan Larkin

Director of Finance, Regulation and Commercial

cc Michael Mulholland