

Waterwise Response to UREGNI consultation on the PC13 draft determination

November 2012

Overview

Waterwise welcomes the draft determination. We recognise the particular challenges relating to both Northern Ireland water's hybrid ownership model, and the absence of charging of domestic customers. However, we recommend below ways in which the existing water efficiency activity by Northern Ireland Water can be built on, to address the challenges set out in the Social and Environmental Guidance as well as to help deliver the UR's duty to protect the interests of both future customers and today's. We look forward to seeing this progress during PC13 and PC15.

Waterwise comments

Drivers for water efficiency

The Social and Environmental Guidance (SEG) sets out, in paragraph 5.8, the following challenge:

Water is a precious resource, essential for life. Changes in population and household formation, urban development, and lifestyles will put increased pressure on our water resources and urban drainage. Climate change will also have an impact on the industry. In the future we are expected to experience rising temperatures, wetter winters, drier summers, more intense rainfall events and greater climate variability. Without action there are expected to be discrepancies between water demand and availability, more widespread water stress, more water quality problems in the natural environment and increased flood events from rivers and urban drainage systems. Long term planning through water resource management is needed to achieve this.

Northern Ireland Water's Water Resource Management Plan clearly shows a projected water deficit in two of the five resource zones in the next few years, and a third within 10 years.

And Northern Ireland has a relatively high daily per capita consumption (though unmeasured), at around 150/155.

However, the draft determination does not address the opportunity of increased water efficiency. Rather, the work programmes to address the growth and supply/demand balance and improve sustainability contain measures to address supply and wastewater capacity, renewable energy and energy efficiency, and the preparation of a drought plan. These measures are welcome, but a significant stepping-up of Northern Ireland Water's existing water efficiency programme (excellent, but currently focussed primarily on schools) to both domestic and non-domestic customers would reduce the need for new supply and wastewater capacity,

reduce energy use in pumping and treating, and reduce the energy bills of customers.

Wasting less hot water in homes, through showers and taps, would reduce household energy bills: heating water in homes currently accounts for 6% of total UK greenhouse gas emissions.

Water efficiency is also a key tool in tackling the impacts of climate change and population changes set out in the SEG. And it is a more flexible supply/demand measure than fixed assets such as reservoirs, the siting of which may not tie in with shifting demand patterns under climate change.

Proposed water efficiency measures

Waterwise proposes a partnership retrofitting programme during the 6 years of PC15, supported by data from a pilot project during PC13.

Waterwise's UK Evidence Base for Large-scale Water Efficiency shows water savings of up to 12% per household per day, with uptake rates of up to 60%. A pilot of several hundred or several thousand homes would provide a NI-specific evidence base with which to augment this. A retrofitting programme covering most if not all of Northern Ireland's 700,000 homes could then be undertaken during the six years of PC15. A water efficiency retrofit of taps, toilets and showers can be undertaken for £50 to £100 a house, and need only take around an hour – to maximise water savings, it is essential that it includes advice to the householder on using their new products as well as general water-using behaviour. Waterwise will soon be launching a dedicated training programme to address this. Anglian Water is retrofitting 84,000 homes for water efficiency during the current five-year price review period: a programme of similar or bigger scale could be designed for the 6 years of PC15.

Such a programme could most cost-effectively be carried out by piggybacking on existing home visit programmes – UK experience shows this reduces cost and increases uptake and water savings. For example, the Northern Ireland Housing Executive's boiler replacement scheme, and fuel poverty programmes, should also include a water efficiency retrofit and advice.

Other measures which could be undertaken include varying the infrastructure (connection) charge for more sustainable (water-efficient) new build, and water neutrality, requiring developers to retrofit schools, hospitals, businesses and potentially homes in the area of a new development, so that overall demand doesn't increase, post-build.

Customers

Waterwise led a groundbreaking water and energy efficiency retrofitting and behaviour change partnership in three areas of England, linking the local water company and social housing providers. *Tap into Savings* included 4,500 home visits (10,000 were targetted), and evaluation showed that saving money was not the main driver for customers accepting the offer of a free retrofit: customers who were not metered for water (currently 2/3 of household water customers in England) also accepted. However, a link with domestic customers via a water bill would help increase engagement with a water efficiency programme.

Research by the Consumer Council for Northern Ireland showed 28% of domestic customers placing water efficiency amongst the top three issues: the third most popular to be placed in the top three after water quality, interruptions and flooding. 56% gave it 10 out of 10 for importance. The research also showed an increasing trend of awareness and willingness to act on environmental issues across the board, but that customers wanted help on how to do this with water. A large-scale water efficiency programme would help deliver this.

A programme with non-domestic users of water would also help them reduce both their energy and water bills.

Conclusion

Waterwise urges the UR and Northern Ireland Water to seize the opportunity of PC13 to put in place a framework to significantly scale up the water efficiency activity in Northern Ireland. This can be undertaken cost-effectively, in partnership with other programmes. It is essential in the face of climate change and population changes.

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