



Department for
**Regional
Development**

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cc: see below

Dear Elena

Response to consultation on the NIAUR Forward Work Programme 1 April 2013- 31 March 2014

Please see attached our response to the draft Forward Work Programme.

Yours sincerely,

John Mills
Director, Water Policy Division

cc Jo Aston

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Introduction

1. This response to the consultation paper on the Utility Regulator's Forward Work Programme 2013-14 relates to water and sewerage services in Northern Ireland.

Forward Work Programme

- 2 This year's report is high level with water and sewerage objectives being listed on page 12. While the FWP is clear and succinct there could be more elaboration of objectives. Only 4 objectives out of 45 relate to water though it is a quarter of regulatory costs (or, there are twice as many gas objectives despite similar regulatory costs). This makes it difficult to assess the validity of costs listed on page 8. Most objectives concern the PC 15 process and associated issues. For example:

- There is no coverage of NIAUR's specific regulatory/enforcement role;
- There is no reference to ensuring that PC13 is implemented;
- Despite NIAUR's work around clarifying information and targets, there is no reference to this.

On other issues,

- If the review of benchmarking is pursuant to the Regulator's approach document for PC15, we look forward to clarity on this.

3. In terms of the budget, the Water Directorate is claiming £1,034,738 for the forthcoming financial year which is an increase in just under £12,000 on last years' draft figure of £1,022,954. The high level of the FWP makes it difficult to assess the rationale behind this given the modest number of water and sewerage related projects listed on page 12. In addition, we have reservations about the presentation of this information – which seems to us not to represent the real cost (or, if you prefer, total) of the Regulator to water and sewerage services. We would be grateful if you could provide us with this figure.