

Water Resource and Supply Resilience Plan

Appendix 1 - Summary of the Consultation Responses Relevant to the WR & SR Plan

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WR & SR Plan consultation respondent	Issue	Northern Ireland Water response
Consumer Council of Northern Ireland	A number of UK and Northern Ireland Government strategies will be developed during the lifespan of this Plan that could impact on the achievement of its aim, for example Northern Ireland's energy strategy. These should be monitored to ensure that the Plan's implementation, and future planning processes, are mindful of the wider societal context it operates in.	Consideration will be given to future UK & NI Government strategies e.g. NI Energy Strategy and to linking water and energy efficiency through trials and feedback from other UK water companies.
Consumer Council of Northern Ireland	The Plan notes a significant drop in dry year average demand, from 677 MI/d in 2008/09 to 570 MI/d and that demand is not expected to increase significantly over the period – rising to 572 MI/d in 2042. Given this reduction, the projection of steady demand, the timeframes the Plan works over and the many sources of evidence, risk assessments and sensitivities contained within the Draft Plan, it would be sensible to see if assumptions have been realised before committing to investment. This would help ensure we are investing in the right areas on the right priorities to benefit consumers.	<p>The current plan has identified deficits in three zones under critical scenarios. The methodology used follows best practice and in each case, there is currently an identified deficit today. Thus, NI Water believes it cannot wait before committing investment as the customers within these zones are at risk of loss of supply in a critical period.</p> <p>It should be noted that in the case of the Southern Zone the deficit increases over time and the solution for this area will be phased over at least two PC periods. The initial phase will mitigate against the current deficit and the future predictions in supply demand will be reassessed in future Water Resource Plans and phase 2 will be actioned if and when required.</p>
Consumer Council of Northern Ireland	Under Drought Plan demand side considerations, the Draft Plan states that the receptiveness to appeals is likely to be greater in areas other than Northern Ireland. We would question this, as there is clear evidence from the Summer of 2018 of the positive reaction from consumers to requests to reduce consumption which demonstrates that there is both receptiveness and reaction	NI Water will recommend monitoring changes in UK Water Industry best practice, review UK evidence and establish a local evidence base including customer research, for the effectiveness of water saving measures. This will include engaging with CCNI in the development of communication plans targeting efficient water use.

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	<p>from consumers. A clear desire for education on water use came through strongly in the consumer research to inform PC15 and is again apparent in the work undertaken to inform PC21. Therefore, the question of consumer receptiveness and response largely falls to the effectiveness of NI Water's engagement and communication plans. We would be keen to work with NI Water to develop engagement and communication plans with improved messaging and methods for effective water use.</p>	
Consumer Council of Northern Ireland	<p>The Level of Service is set at providing customer reliability of 97.5%, the equivalent of accepting a supply failure for one year in 40. It is reassuring that at this level of service all water resource zones under dry year annual average conditions are not in deficit. We note that this Level of Service has been set by reference and comparison to other GB water companies. We have no evidence to show that consumers agree or disagree with this service level. For future plans consumer acceptance of this or a different level of service should be tested directly by NI Water.</p>	<p>NI Water will recommend monitoring changes in UK Water Industry best practice and review UK evidence. This will also involve engagement with CCNI to establish a local evidence base including customer research, to include assessment of acceptable customer levels of service.</p>
Consumer Council of Northern Ireland	<p>The Drought Plan should specify trigger points, and when and how these measures will be implemented and communicated to consumers. Supporting messages should also be developed.</p>	<p>NI Water will recommend monitoring changes in UK Water Industry best practice, review UK evidence and establish a local evidence base including customer research, for the effectiveness of water saving measures. This will include developing engagement and communication plans targeting efficient water use.</p>

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Consumer Council of Northern Ireland	<p>The removal of some of the demand management options would go against the stated Northern Ireland water sector's desire to increase the societal value placed on water. We would recommend retaining some options to be developed into trials and pilots to inform the debate on water value and water use.</p> <p>Opportunities of linking water efficiency trials with energy efficiency programmes should be explored.</p>	<p>Consideration will be given to linking water and energy efficiency through trials and feedback from other UK water companies.</p>
Consumer Council of Northern Ireland	<p>We would recommend testing the Draft Plan's assumption that for water efficiency options to be successful they should target all customers and not just those in deficit water resource zones.</p>	<p>This was based on the assumption that wider application of demand management and promoting good water conservation practice would be positive, while also being supportive of equality aspects and avoiding any public feeling that some areas are unfairly targeted. NI Water will continue to monitor UK Water Industry best practice in this regard.</p>
Utility Regulator	<p>As the Drought plan is based on the company's current infrastructure and asset base, we would expect it to be reviewed when any material changes occur as a consequence of ongoing investment to determine if it needs to be amended.</p>	<p>This is included in the Plan as a recommendation.</p>
Utility Regulator	<p>We acknowledge that the level of investment identified in the plan is based a target level of service of 1 in 40 years (i.e. supply will be available 97.5% of the time) and that this has been chosen on the basis that it compares favourably with levels of service adopted by comparative companies in Great Britain. This appears to be a reasonable approach in the absence of any better information, but we would encourage NI Water</p>	<p>NI Water will recommend monitoring changes in UK Water Industry best practice and review UK evidence. This will also involve engagement with CCNI to establish a local evidence base including customer research, to include assessment of acceptable customer levels of service.</p>

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	to engage with local consumers in future planning processes to assess whether this aligns with their expectations.	
Utility Regulator	We note the significant reduction in assessed demand since the last water resource plan and the reasonably flat demand profile over the planning period, resulting in none of the resource zones being in deficit under the dry year annual average planning scenario. Over 85% of the demand reduction since the last plan appears to have resulted from the revised dry year uplift assessment and reductions in non-household and household demand. This illustrates how planning assumptions can change rapidly over time and so we would encourage the company not to commit to any identified investment earlier than necessary in order to provide as much time as possible to see if assumptions are realised.	<p>The current plan has identified deficits in three zones under critical scenarios. The methodology used follows best practice and in each case, there is currently an identified deficit today. Thus, NI Water believes it cannot wait before committing investment as the customers within these zones are at risk of loss of supply in a critical period.</p> <p>It should be noted that in the case of the Southern Zone the deficit increases over time and the solution for this area is planned to be phased over at least two PC periods. The initial phase will mitigate against the current deficit and the future predictions in supply demand will be reassessed in future Water Resource Plans and phase 2 will be actioned if and when required.</p>
Utility Regulator	The Utility Regulator recognises that assessing the effectiveness of demand measures in Northern Ireland might be difficult in the absence of robust local data and the ability to easily apply comparative data in a local context. The approach adopted in the plan therefore seems reasonable in these circumstances. However, we would encourage NI Water to continue to consider opportunities for developing a local evidence base and for using any further evidence identified through a review of the outcome of approaches adopted in Great Britain.	NI Water will recommend monitoring changes in UK Water Industry best practice, review UK evidence and establish a local evidence base including customer research, to include assessment of demand management measures.

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Utility Regulator	We welcome the fact that NI Water considered an extensive range of demand management options in the planning process but note that only four options were deemed to be cost beneficial and that the associated water savings are small. Whilst this is assumed to be an appropriate output based on a robust assessment for the current plan, we would expect NI Water to continue to assess the full range of available demand management options on an economic basis in future plans. It should also consider opportunities to test potential approaches through investigations and pilot studies and to learn from the outcome of initiatives being undertaken in Great Britain.	NI Water will recommend monitoring changes in UK Water Industry best practice, review UK evidence and establish a local evidence base including customer research, for the effectiveness of water saving measures. This will include giving consideration to differing approaches on water efficiency optioneering.
Waterwise	We urge Northern Ireland Water to join Waterwise and the water sector in supporting and advocating for a mandatory water label on water-using products linked to minimum standards for new build and refurbishment.	NI Water will recommend monitoring changes in UK Water Industry best practice, review UK evidence and establish a local evidence base including customer research, for the effectiveness of water saving measures. This will include giving consideration to mandatory water labelling.
Waterwise	We do not agree with the assumption that all water efficiency measures have to be adopted everywhere.	This was based on the assumption that wider application of demand management and promoting good water conservation practice would be positive, while also being also supportive of equality aspects and avoiding any public feeling that some areas are unfairly targeted. NI Water will continue to monitor UK Water Industry best practice in this regard.
Waterwise	We do not agree with the statement that the impact of water efficiency measures is largely lost over time. Measures such as encouraging customers to choose	We agree that the water savings from options that include installation of water efficient devices can reasonably be sustained in the long term. Note that most efficiency options had a varying projected water saving depending on their type e.g. some have water savings ramping up over 5 years and then

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	and use water-efficient fittings in their home are not short lived.	continuing thereafter, others ramp up over 5 years then continue over a further 10 years and then ramp down over the next 5 years and a few ramp up over 5 years and then immediately ramp down over the next 5 years; - it all depended on the expected performance of the particular option. Hence the reference in the report to the benefits 'largely being lost over time'. As above, NI Water will continue to monitor UK Water Industry best practice in this regard.
Waterwise	We would like Northern Ireland Water to confirm whether the energy bill savings to householders from water efficiency options have been incorporated into the cost benefit analysis along with the benefit of reducing emissions.	We have not explicitly included any domestic heating cost savings resulting from reduced water demand because the preferred options in this Plan are for non-household use. Where domestic options are promoted, this saving would be considered.
Waterwise	We question the methodology behind developing the three water efficiency packages which means that sensible but very low-cost measures such as advocating for greater water efficiency in new build houses and social housing refurbishment are dropped because they sit in a package with a less cost beneficial option.	The options were categorised into three separate water efficiency packages as it was felt it would be not be efficient (or practical) to implement single options on their own. As the intention was to implement the most cost-effective water efficiency options first, the costing model was used to determine an approximate 'economic level of water efficiency' and the options were ranked in order of least cost and then grouped into three packages of increasing cost.
Waterwise	We recommend that Northern Ireland Water carries out segmented research with their customer base to further understand these motivations and link them to future campaigns and retrofits.	NI Water will recommend monitoring changes in UK Water Industry best practice, review UK evidence and establish a local evidence base including customer research, for the effectiveness of water saving measures.
Waterwise	Given its importance to the investment decisions made in the plan we feel that in future Northern Ireland Water should commission an independent consultant, who has experience	NI Water will consider the commissioning of an independent audit of their future Water Resource and Supply Resilience Plans, in line with UK Water Industry processes.

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	with similar investment plans prepared by other water companies, to undertake and publish an independent review of the costing process.	
Waterwise	It would seem that only water efficiency package 1 was subject to strategic environmental assessment. No other water efficiency packages or variants were assessed. We feel this is too narrow for a strategic scale assessment and that it must look at the positive and negative environmental impacts of a wider range of water efficiency measures.	Social and environmental factors have been considered for all water efficiency options at the initial assessment stage. A full SEA is completed for those options being considered for inclusion in the final Plan. In this case, these options were only those in Package 1.
Waterwise	We are disappointed that the approach taken to optioneering has resulted in nearly all public-facing water efficiency measures being removed. We feel this is a missed opportunity to engage with customers on water (and energy use) and is at odds with the approach being taken by regulators and companies in Wales and England. We believe this outcome is a consequence of the approach taken to optioneering.	NI Water will recommend monitoring changes in UK Water Industry best practice, review UK evidence and establish a local evidence base including customer research, for the effectiveness of water saving measures. This will include giving consideration to differing approaches on water efficiency optioneering.
Waterwise	We would like to see confirmation of the planned spend on water efficiency measures in the next 5 years as compared to supply side solutions. This is a question we ask all UK water companies.	NI Water will provide this information to Waterwise.
Waterwise	In future we would like to see the resilience assessment look at how the system would cope in an extreme drought of 1 in 500 return period. This is the approach recommended by the National	NI Water will recommend monitoring changes in UK Water Industry best practice, review UK evidence and establish a local evidence base including customer research, for the effectiveness of water saving measures. This

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	<p>Infrastructure Commission; being proposed by the National Water Resources Framework (in England); and being adopted by water companies in England and Wales. It should also look at how the system performs in terms of water availability with future climate change and population changes.</p>	<p>will include giving consideration to the impacts of extreme weather events.</p>
Waterwise	<p>The draft plan indicates that demand rose by over 20% during summer 2018 hot weather event. Despite this little consideration is given to how proactively reducing demand through messaging and initiatives such as home visits can improve resilience and help the company deal with similar events in the future. Only supply-side actions are discussed in any detail along with the creation of some reactive messaging for customers.</p>	<p>NI Water will recommend monitoring changes in UK Water Industry best practice, review UK evidence and establish a local evidence base including customer research, for the effectiveness of water saving measures. This will include developing engagement and communication plans targeting efficient water use.</p>