

Appendix A

**Table setting out statements made by Irish Water
with details as to how they were incorrect, misleading or
questionable**

Irish Water's statement	Status	Source/reference material
<p>(1) "a target of 20% is not achieved in any water utility in any part of Britain or Ireland, with the possible exception of Anglian Water which runs at just under 20%"</p>	<p>Irish Water's "Preliminary Options Appraisal Report" shows this to be incorrect.</p> <p>That report set out OFWAT data for leakage levels in the UK. It showed that, of the 22 major water suppliers in England and Wales, 13 of them (i.e. the majority) had leakage of 20% or below.</p>	<p>See page 22 of the transcript of the Joint Committee Meeting at Appendix B ("<i>the Transcript</i>"), to observe the statement made by Irish Water.</p> <p>See pages 1 and 2 of Appendix C for the relevant excerpts from Appendix H to Irish Water's 2015 "<i>Preliminary Options Appraisal Report</i>".</p>
<p>(2) [with reference to leakage levels in other European cities]:</p> <p>"some of them are down to 10% while one or two are lower than that"</p>	<p>This was incorrect: many cities in Europe have leakage below 10% - not just "one or two" – and, again, this can be observed from reports that were produced for the Shannon pipeline project itself.</p> <p>A report produced in 2010 by Dublin City Council (Irish Water's predecessor in this project) showed that the average <i>country-wide</i> leakage levels in Denmark, Holland and Germany were 6%, 6% and 7%, respectively. This tells you that many towns and cities in just those three countries alone had leakage below 10% - indeed some have reported leakage below 5%.</p>	<p>See page 14 of the Transcript to observe the statement made by Irish Water.</p> <p>See the relevant extracts from the 2010 report "<i>The Plan, Water Supply Project – Dublin Region</i>" at pages 3 to 6 of Appendix C.</p>
<p>(3) "It took 14 years of sustained investment to get London's leakage rate down from 946 million litres to 760 million litres. The city's leakage programme replaced 260km out of 19,000km"</p>	<p>The "<i>Thames Water Mains Replacement Programme Independent Review</i>" shows these statements to be varying incorrect and questionable.</p> <p>It shows that:</p> <p>(i) leakage was reduced from 946 million litres per day ("Mld") to 713Mld in just 4 years; and</p> <p>(ii) in just 5 years (from 2005/6 to 2009/10) the programme replaced 2074km of mains – in one year alone it replaced 631km.</p>	<p>See page 21 of the Transcript to observe the statement made by Irish Water.</p> <p>See the relevant excerpts from the 2 July 2012 "<i>Thames Water Mains Replacement Programme Independent Review</i>" at pages 7 and 8 of Appendix C.</p>

<p>(4) [with reference to savings from the First Fix scheme]: <i>“[water savings] on the customer meter amounted to 100 million litres of which 25 were in Dublin”</i></p>	<p>The statement that the First Fix scheme had saved 25 million litres on the meter in the Greater Dublin Water Supply Area was incorrect: it had saved at least 38 million litres.</p> <p>This can be observed in Irish Water’s Q1 2017 First Fix results report (which was the most recent published report at the time of the 25 April 2018 meeting). We say <i>“at least”</i> because the First Fix results reports, which are published quarterly, do not take full account of savings in the previous two quarters.</p>	<p>See page 34 of the Transcript to observe the statement made by Irish Water.</p> <p>See pages 9 to 13 of Appendix C for the relevant table of the First Fix results report (showing that 47 million litres had been saved in the “East and Midlands Region”, of which 80% was in the Dublin Water Supply Area, equating to 38 million litres of savings) and an extract from the “Final Options Appraisal Report” (stating that 80% of savings in the “East and Midlands Region” are attributable to the Dublin Water Supply Area).</p>
<p>(5) <i>“We have put in a very modest strategic provision which has been scaled back to 30 million litres a day” ... “...we scaled back the strategic provision. We originally thought it would involve about 100 million litres but we scaled it back to 30 million litres”.</i></p>	<p>Inconsistent with the published analysis for this project.</p> <p>Irish Water has published two reports containing projections of Dublin’s future water demand (one in 2015 and one in 2016). Both included what Irish Water terms a “strategic provision” or “strategic allowance”: a volume of water for potential future industrial needs <i>over and above</i> projected organic growth in existing industrial water demand. Both sets of analysis provided for 100Mld. Neither of them provided for a reduction in the strategic provision to 30Mld. A reduction in the strategic provision from 100Mld to 30Mld would be a very material change.</p>	<p>See pages 22 and 37 of the Transcript to observe the statements made by Irish Water.</p> <p>See pages 14 and 15 of Appendix C to observe the demand analysis contained in each of the 2015 Project Need Report and the 2016 Final Options Appraisal Report. You can observe that, in both reports, the “strategic allowance” was 100Mld.</p>
<p>(6) The data at slides 17 and 18 of Irish Water’s presentation.</p>	<p>Much of the data at pages 17 and 18 of the slides that Irish Water presented to the Joint Committee on 25 April 2018 was inconsistent with the published analysis for this project.</p>	<p>See pages 16 and 17 of Appendix C to observe pages 17 and 18 of the slides.</p> <p>See pages 14 and 15 of Appendix C to observe the published analysis, which differs considerably to the data in Irish Water’s slides.</p>

<p>(7) <i>“Non-domestic demand... is about half the projected rate of economic growth, which reflects the fact that we expect water use to be more efficient than overall economic growth would suggest”</i></p>	<p>Likely to be misleading.</p> <p>There is a reasonable chance that someone hearing this statement would infer that the data that Irish Water used for projected non-domestic demand took account of the fact that industrial intensity of water use is expected to decline: this was not the case. The data that Irish Water used was calculated using the “population growth” method: it assumed that non-domestic demand would grow in line with population growth. Indecon (Irish Water’s own economic adviser) was <i>highly critical</i> of this “population growth” method, deeming it particularly inappropriate for a city like Dublin. The method fails to take account of, among other things, the fact that industry is becoming more efficient with its water use.</p>	<p>See page 22 of the Transcript to observe the statement made by Irish Water.</p> <p>See page 18 of Appendix C to observe an excerpt from the “Kennedy Analysis Overview” relating to the non-domestic demand data used in Irish Water’s analysis.</p>
<p>(8) <i>“We have had more than 200 written submissions. We are treating every one of those as bona fide... In the detailed written responses to those submissions which we have provided we have tried to give factual clear answers to the best of our ability. There is no question we will not answer on this scheme. There is no detail we will not stand over.”</i></p>	<p>Likely to be misleading.</p> <p>There is a reasonable chance that someone hearing this statement would infer that Irish Water has addressed - or at least attempted to address - all of the issues raised in the submissions that it has received.</p> <p>On the contrary, Irish Water has not even attempted to address many of the concerns raised and questions asked in submissions made by Kennedy Analysis.</p>	<p>See pages 23 and 24 of the Transcript to observe the statement made by Irish Water.</p> <p>See pages 19 to 23 of Appendix C to observe excerpts from the “Kennedy Analysis Overview” which show many of the issues raised (in written submissions) that Irish Water has not even attempted to address.</p>