

**REVISED DRY SEASON PLAN
REQUIREMENTS**

FOR THE

**WATER AND SEWERAGE
AUTHORITY (WASA)**

November
2021

**Final
Decision**

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1.0 Introduction

1.1. Background

The Regulated Industries Commission (RIC) was established under the RIC Act as the economic regulator for the water/wastewater and the electricity sectors. As part of its remit, the RIC is empowered to do all things as may be necessary or expedient for the proper performance of its functions, which include, inter alia, establishing quality of service standards. The Act also mandates the RIC to consult with all interested parties it considers as having an interest in the matters before it. In 2021, the RIC published a document, **“Review of the Dry Season Plan Requirements for the Water and Sewerage Authority”**, and invited comments from key stakeholders. The Review document was intended to assess whether the RIC’s Dry Season Plan Requirements (2007)¹ remained fit for purpose and to address any shortcomings in the requirements with appropriate proposals.

The only respondent to the consultation was WASA, which provided written comments. These comments, which are included in the appendix, were reviewed and appropriate responses are provided in this document.

1.2. Purpose of this Document

The purpose of this document is to present the RIC’s final decisions on the Review of the Dry Season Plan Requirements for the WASA, which was issued for public consultation.

¹ The document, **“Submission of an Annual Water Preparedness Plan for the Dry Season by the Water and Sewerage Authority (WASA)”** which was published in 2007, was intended to ensure that WASA produced a plan to mitigate the impacts of the dry season on water resources. The document provided guidelines for the preparation of the annual dry season plans. In these plans, WASA is expected to assess the likely effect of the upcoming dry season and take steps to mitigate the impact on its ability to provide water supply to its customers.

1.3. Structure of this Document

The remainder of this document provides details on the consultation discussions, rationale and final decisions for proposed amendments to the RIC Dry Season Plan Requirements (2007).

2.0 Discussions and Outcome of the Consultation

The RIC Dry Season Plan Requirements (2007) document mandates WASA to provide its plans to mitigate the impacts of the dry season on its supply to customers and report on its compliance with these plans. The consultative document, Review of the Dry Season Plan Requirements for the Water and Sewerage Authority identified and discussed the shortcomings of that document and proposed amendments to the requirements. **Section 2.1** provides the responses of the RIC to WASA’s comments, and presents the final decision of the RIC in this regard.

2.1. Final Decision

2.1.1. Purpose and Authorizing Provisions

RIC’s Proposed Requirement	The background and context to WASA’s preparation of the annual dry season plan should be included within the plan, in order to inform the RIC how the plan fits within the long-term planning framework to address the issues associated with successive dry seasons.
Comments	WASA is in agreement with the RIC’s position.
Final Requirement	The dry season plan must include an extensive background to provide the context to the importance of the dry season plan.
RIC’s Proposed Requirement	The dry season plan should be part of a long-term approach to address the issues associated with the water supply system and the

relationship to the long-term strategy should be made clear within the plan itself.

Comments

WASA agreed with the proposed requirement and indicated that the dry season plan should include long-term plans to mitigate water availability issues. WASA further indicated that these would be specified in the Capital Programme in the Authority's Business Plan inclusive of scheduled supply with respect to sources of financing and implementation. WASA noted that the RIC will have a role as it relates to tariff structure. Given that the 1-year Implementation Plan in the dry season plan will be part of a 5 Year Capital Programme.

**RIC's Decision
and Rationale**

The RIC notes WASA's comments on long-term dry season plans and is pleased that WASA recognises the importance of long-term planning to reduce the impact of annual dry seasons. The RIC concurs that the dry season plan should fit within a wider long-term planning framework to address the water supply issues associated with successive dry seasons. The RIC's view is that there must be evidence within the 5 Year Capital Programme that WASA has given due consideration to the to its dry season plans. This will encourage WASA to take a more proactive approach to planning for the dry season.

**Final
Requirement**

The dry season plan requirements will stipulate that the dry season plan must be part of a long-term approach to address the issues associated with the water supply system. Further, the dry season plan must include elements of the long-term plans which the Authority intends to execute as appropriate.

2.1.2. Contents of Dry Season Preparedness Plan

RIC's Proposed Requirement The “emergency response programmes” should be part of an overall risk management approach with more emphasis on the use of proactive measures, for ensuring the availability of supply; and the section and references to “emergency response programmes” should be renamed “contingency programmes.”

Comments WASA is in agreement with the RIC’s position.

Final Requirement The dry season plan requirements will be amended to replace the requirement for “emergency response programmes” with the term “contingency programmes” and the section renamed appropriately and be inclusive of an overall risk management approach.

RIC's Proposed Requirement The “communications system and customer information system” should be renamed “customer communication system” and it should be specified that its purpose is to ensure that WASA has an effective system for communicating information about the dry season to its customers.

Comments WASA is in agreement with the RIC’s position.

Final Requirement The dry season plan requirements will be amended to replace the requirement for “communications system and customer information system” with “customer communication system”. The revised requirements will specify that plans must include full details of a communication system to inform customers about the dry season plan.

RIC's Proposed Requirement The requirements should specify a minimum level of water supply to customers during the dry season and include monitoring and reporting requirements on the level of supply that is actually received by customers during the dry season. However, the RIC also noted that it can be argued that the level of supply may not be easily measured by WASA, without the installation of additional equipment and appropriate systems. Hence, it may be more practical to require the service provider to report when the published schedules were not adhered to, and the reason for this, without specifying the need for a performance monitoring system.

Comments WASA indicated that in the short/medium term, the monitoring of level of supply would be a manual subjective system. This would transition to a monitoring and control system incorporating meters (bulk and universal) and SCADA² as per proposed 5 Year Capital Programme.

It suggested that the RIC should simply include a requirement for the service provider to report when the published schedules were not adhered to, and the reason for this, without specifying the need for a performance monitoring system.

RIC's Decision and Rationale The RIC notes WASA's comment and recognizes the financial and human resource constraints of the Authority which might impede the implementation of an automated monitoring and control system in the short/medium term. Hence, the RIC will revert to the practical solution outlined in the Consultative Document and is of the view that a manual reporting system can be utilised until

² SCADA is an acronym for Supervisory Control and Data Acquisition System. It is a computer-based system for gathering and analyzing real-time data to monitor and control equipment and processes in the water supply system.

WASA implements automated monitoring and control systems. Special focus must be placed, however, on the areas of the water distribution network where the supply is known to be affected the most during the dry season. Additionally, WASA must include information on the status of the implementation of the automated monitoring and control systems in its dry season plan.

**Final
Requirement**

The dry season plan requirements will include requirements for WASA to monitor and report on the level of supply provided to customers during the dry season, with specific reference to the published schedules. WASA will also be required to include information on the status of the implementation of an automated monitoring and control systems in its dry season plan.

2.1.3. Submission Date of Dry Season Preparedness Plan

RIC's Proposed Requirement WASA should submit a draft dry season plan to the RIC by September 1st of each year and a final plan by 1st November of each year.

Comments WASA did not agree with adjusting the deadline for submission of the dry season plan to allow for a draft to be submitted by September 1st. Further, WASA noted that to permit utilization of Rainfall Outlook data and reservoir projections which are critical inputs to the development of the dry season plan, the suggested timeframes should be adjusted to allow a draft plan to be submitted by October 31. Citing similar reasons, WASA also preferred to submit the final dry season plan by November 30 of every year.

RIC's Decision and Rationale The RIC notes that a lengthy duration between the submission dates and the beginning of the dry season is of concern to WASA, as rainfall projections may be less accurate. However, the purpose of the submission of a draft plan is to allow the RIC sufficient time to review WASA's dry season plan and provide feedback while also allowing WASA sufficient time to make any changes. In recognition of WASA's concern, the RIC will allow the draft plan to be submitted by October 1st of every year to allow WASA to consider more updated meteorological data in the preparation of the plan. Concomitantly, the RIC will allow WASA to submit the final plan by November 30th of every year.

Final Requirements WASA will be required to submit a draft dry season plan by October 1st of every year and the final dry season plan by November 30th of every year.

RIC's Proposed Requirement The requirements should be amended to include a public summary³ within the dry season plan itself. In addition, all of WASA's social media platforms, and not just its website, should be utilised to publicise the dry season plan. Furthermore, the current requirements do not specify a publication deadline. Thus, there is no onus on WASA to publish the plan at the start of the dry season, in which case stakeholders may not be able to examine the plan before the start of the dry season. Hence, the RIC proposes a deadline for online publication of the dry season plan of 15th December of each year.

The current requirements stipulate that WASA display a copy of the dry season plan at its offices and provide a printed copy, at a set fee, to customers upon request. The purpose of this is to facilitate more modes of access to WASA's plans in addition to the website. The RIC is of the view that this should continue. However, instead of displaying a copy of the plan, the public summary document, along with information on how the public can access a copy of the plan, should be displayed.

Comments WASA agreed to prepare a public summary for online publication but wished to do so by December 30th of each year. Further, WASA noted that it would publish the current and the previous year's dry season plan on the website and will provide information on how the public can access a copy.

RIC's Decision and Rationale The RIC has reviewed WASA's comment and notes that WASA's commitment to publish the current and past plan on its website is in keeping with the current dry season plan requirements. The RIC proposed requirements, as noted above, also included the

³ A summary to be published that can be accessed and easily understood by members of the public.

publication of a public summary as part of the dry season plan and the RIC continues to hold the view that this should be done as this is intended to provide customers with a snapshot of the utility's plans. The RIC is also of the view that moving the deadline for online publication to December 21st of every year will avert the possibility of delays which would result in the publication being completed in the following year. Further, it will not unduly disadvantage any stakeholder as the publication is provided for information only.

Final Decision

The dry season plan requirements will require WASA to publish its dry season plan not only on its website, but on its social media platforms. WASA must include a public summary within its plan and the utility must meet the deadline for online publication of the dry season plan of December 21st of every year. Further, WASA will be required to display the public summary document, along with information on how the public can access the full copy of the plan.

2.1.4. Compliance and Reporting

RIC's Proposed Requirement	While the current requirements include reporting and compliance mandates, the RIC does not consider the current system to be explicit in terms of some of the specific details required. The RIC therefore proposes that the performance monitoring system should require WASA to provide details on the status of ongoing projects (from preceding dry season plans) and specific performance data.
Comments	WASA is in agreement with the RIC's position. WASA also endorsed the current arrangements to submit bi-monthly reports.
Final Requirement	The dry season plan requirements will include the requirement for WASA to provide a report detailing the status of ongoing projects from preceding dry season plans and to submit performance data, such as the updated forecast of water resources, demand forecasts, improvements, and adherence to supply schedules.