

Quality of Service Standards (QSS) for Water and Wastewater Services

Further Consultation with the Water and Sewerage Authority (WASA) November 2020

Revised Final Decision

Table of Contents

Glossary of key terms and abbreviations1
EXECUTIVE SUMMARY
Moratorium Granted5
1. BACKGROUND
2. FURTHER CONSULTATION WITH WASA
3. DISCUSSIONS AND OUTCOME OF THE FURTHER CONSULTATION
3.1. Discussion of the Guaranteed Standards9
3.2. Discussion of the Overall Standards
APPENDIX

Glossary of key terms and abbreviations

Term	Meaning
Action Plan	A plan outlining the sequence of steps, including a timeline of the respective activities, that the service provider will take to bring the performance of the utility up to the relevant standard.
Critical institutions	Entities such as hospitals, schools and other institutions that require an exceptionally reliable water supply because of the nature of their operation and the high risk that the loss of supply could poses to public health, life and well being.
Guaranteed standard	A standard that specifies a performance level that the service provider must meet in serving an individual customer, failing which the service provider is required to make a prescribed payment to the customer.
Moratorium	A temporary suspension of a standard that has been proclaimed through publication in the Trinidad and Tobago Gazette.
MPU	Ministry of Public Utilities
Overall standard	A standard that covers an area of service where it is not appropriate or feasible to give an individual guarantee, but where the expectation is that the utility will provide a predetermined minimum level of service.
PSI	Pounds per square inch – a unit of measure of water pressure equivalent to approximately 0.7 metre head of water,
RIC	The Regulated Industries Commission (RIC) is the economic regulator of the water/wastewater sector.
WASA	The Water and Sewerage Authority of Trinidad and Tobago (WASA) is the sole water/wastewater public utility in Trinidad and Tobago.
WSC	Water service connection (WSC) is a water line connected to the distribution main for the purpose of supplying water to users.

EXECUTIVE SUMMARY

The RIC published the Final Decision document on the Quality of Service Standards in December 2017 and submitted the standard to the Ministry of Public Utilities (MPU) for publication in the Trinidad and Tobago Gazette, after engaging stakeholders through public consultation. While awaiting publication of the standards, the RIC was advised that WASA had concerns about its ability to implement some of the standards. The RIC agreed to engage in further consultation with WASA to address concerns raised by the service provider about its ability to comply with the standards. The exercise was conducted during the period June 2019 to October 2019, and involved extensive review of the standards to facilitate implementation and compliance by WASA. During the further consultation, the draft standards were refined through extensive discussion between the RIC and WASA, and the service provider's team signalled their agreement with the proposed draft Standards in March 2020. The team from WASA did not object to the concept and implementation of the proposed quality of service scheme. However, they indicated that the utility needed time and resources to bring its performance up to the level prescribed by the standards. Of the eighteen (18) standards proposed by the RIC, eleven (11) remained unchanged after the further consultation, while seven (7) were modified to facilitate compliance. These are shown in tables 1 and 2. A moratorium was either granted, or reconfirmed, for five (5) of the standards where it was deemed that the utility is unable to meet the stipulated performance requirements.

Standard	Summary of RIC's Final Decision (December 2017)	Changes after Further Consultation
GWS 1- Implementation of Water Schedules	WASA to provide a minimum supply of 48 hours aggregate per week at 5 psi, except for areas where a moratorium has been granted.	The standard remained as proposed.
GWS 2- Restoration of Supply after service interruption	Planned Interruptions As per published times but no later than 48 hours after start of interruption Unplanned Interruptions 72 hrs for trunk mains 48 hrs for strategic mains 24 hrs other interruptions	The standard remained as proposed.
GWS 7- Response to complaints	 Within 5 working days of receipt of complaint Within 30 working days of receipt of complaint 	The standard remained as proposed.

Table 1 – List of Standards that remained unchanged after Further Consultation

Standard	Summary of RIC's Final Decision (December 2017)	Changes after Further Consultation
GWS 8- Response to Poor Water Quality	 Service provider to respond, and conduct site visit where necessary, within 1 working day Solve problem within 3 working days of site visit Give an alternative for water supply where applicable 	The standard remained as proposed.
GWS 9- Compensatory payments for guaranteed standards	Within 60 working days of receipt of claim	The standard remained as proposed.
OWS 1- Notification with respect to planned supply interruptions	Service provider to notify affected customers at least 48 hours before supply interruption of more than 4 hours duration	The standard remained as proposed.
OWS 2- Water Pressure	<u>At point of Water Service Connection (WSC)</u> Minimum 14m head of pressure (20 psi) Maximum 70m head of pressure (100 psi)	The standard remained as proposed.
OWS 4- Drinking water quality	 Sampling according to an established schedule 100% compliance with WHO guidelines for bacteriological thresholds (water) 95% compliance with WHO guidelines for physical/chemical parameters (water) 	The standard remained as proposed.
OWS 5- Sewage effluent quality	Compliance with effluent discharge standard of water pollution rules or equivalent standard as set by the relevant authority having such jurisdiction	The standard remained as proposed.
OWS 6- Repair to sewers	 Clear choke in WASA sewer system within 18 hours of receipt of report of overflow. Repair collapse of WASA sewer system within 72 hours of receipt of report 	The standard remained as proposed.
OWS8- Claims for damage	 Reply within 5 working days of receipt of claim Complete investigation within 30 working days of receipt of claim 	The standard remained as proposed.
	 Determine liability and make payment, where applicable, within 60 working days of receipt of claim 	

Table 2 – List of Standards that were modified to facilitate compliance

Standard	Summary of RIC's Final Decision (December 2017)	Changes after Further Consultation
GWS 3- Provision of Truck borne supply if mains supply is interrupted	Planned InterruptionsTo be provided within 24 hours after the notified time for interruption has ended if pipe borne supply not yet availableUnplanned InterruptionsTo be provided from 48 hours after the start of the disruption and within the next 24 hours if pipe borne supply not yet available	The RIC agreed with WASA's proposal to specify a limit on the amount of water to be provided via a truck borne supply in each instance, depending on the customer class.
GWS 4- Time to repair to Water Service connections (WSC)	 Within 48 hrs of report by customer – for loss of supply to registered critical institutions (e.g. schools, hospitals) and for leaks resulting in damage to property. Within 3 working days – for leaks & loss of supply affecting supply to customer. 	The RIC agreed to allow WASA additional time to repair WSC, based on the service provider's ability to respond and the data provided.
GWS 5- Installation of new Water Service Connections (WSC)	 <u>*⁄*</u> WSC (domestic) and <u>1"-4" (single building)</u> 1. Determine feasibility and notify customer within 5 working days of application for domestic WSC, and 10 working days for multi-family dwelling units. 2. Install WSC within 7 working days of confirmation of feasibility <u>All other WSC</u> 1. Issue response to application for Outline Approval within 20 working days of receipt of payment. 2. Install WSC within 15 working days of receipt of payment. 3. Install WSC within 15 working days of receipt of payment. 4. Issue Completion Certificate in 7 working days. 	The RIC agreed to allow WASA additional time to install new WSC for the various categories of service connections based on data provided by WASA and the mapping out of the process involved.
GWS 6- Reconnection of supply after settling outstanding accounts or disconnection due to error	Within 24 hours of receipt of full payment or as per agreement with WASA or in determining of error made	The RIC agreed to change "24 hours" reconnection to one working day for installations with a curb valve, and to allow 2 working days for all other installations based on the data provided by WASA, and discussions about the ability of the service provider to meet the standard.

Standard	Summary of RIC's Final Decision (December 2017)	Changes after Further Consultation
OWS 3- Metering	 Read meter every 2 months for all categories of customers Issue bills within 10 working days of meter reading Repair defective water meters within 30 days of receipt of report 	The frequency of meter reading was changed from "every 2 months" to "every 2 billing cycles" to account for the fact that the length of the billing cycle varies by customer class.
OWS7- Road restoration after pipeline works	Temporary restoration of roads within 24 hours and permanent restoration within 7 days, in accordance with the road restoration guidelines issued by the Ministry of Works or equivalent entity	The RIC agreed that the period for permanent road restoration will be 7 working days, instead of 7 days, to allow WASA more time to make permanent restoration.
OWS9- Making and Keeping appointments	 Utility personnel to arrive within 30 minutes of scheduled time of appointment Customer should be notified no less than 24 hrs before appointment of inability to keep it 	The time for arrival of the utility personnel was changed from 30 minutes to 60 minutes to reflect what WASA was able to reasonably meet.

Moratorium Granted

The RIC granted a moratorium on five (5) of the standards based on data and other information provided by WASA, as well as indepth discussion with the service provider. Under the moratorium, the utility will be allowed a specified period to bring its system into compliance with the standard. For each of these standards, the utility is required to submit an action plan to the RIC detailing the steps and timeline that the utility will undertake to bring its performance up to the level required by the standard. The standards for which a moratorium is granted are shown in table 3.

Table 3: List of standards for which a moratorium is granted

Standard	Reason for the moratorium	Duration	Information to be submitted to the RIC by WASA
GWS 1 – Implementaion of Water Schedules	To allow WASA the time to carry out the necessary upgrade of the network to bring the performance level up to the standard for	24 months	WASA is required to identify the service areas where it cannot meet the standard, and submit an action plan detailing the steps that it will

Standard	Reason for the moratorium	Duration	Information to be submitted to the RIC by WASA
	service areas where the amount of water supplied is less than 48 hours per week.		take to bring the level of supply in these areas up to the standard.
GWS 5 - Installation of new Water Service Connections (WSC)	To allow WASA the time to clear off the backlog of applications for new service connections, and to bring the level of performance up to the standard.	12 months	WASA is required to submit an action plan detailing the steps that it will take to bring its performance up to the standard.
OWS 2 - Water Pressure	To allow WASA to acquire and install the requisite data loggers and other equipment to monitor pressure within the distribution network.	24 months	WASA is required to submit an action plan detailing the steps that it will take to acquire and install the requisite equipment to monitor and report performance under the standard.
OWS 7 - Road restoration after pipeline works	To allow WASA to reduce the backlog of road restoration works and improve the ability of the utility to meet the standard	24 months	WASA is required to submit an action plan detailing the steps that it will take to reduce the backlog and bring performance up to the standard.
OWS 9 - Making and Keeping appointments	To allow WASA the time to acquire the requisite equipment to implement the standard	12 months	WASA is required to submit an action plan detailing the steps that it will take to implement the standard.

1. BACKGROUND

The Regulated Industries Commission (RIC) was established under the RIC Act as the economic regulator for the water/wastewater sector. Part of the responsibility of the RIC is to prescribe and publish standards for services for the service providers under its purview. The RIC is also required to consult with stakeholders in the development of standards for services, as mandated under Section 6(2) of the Act. In August 2017, the RIC issued¹ the draft *Quality of Service Standards (QSS) for the* Supply and Distribution of Water and Wastewater Services in Trinidad and Tobago for public consultation. The RIC received comments from various stakeholders and held face-to-face meetings with the incumbent service provider, the Water and Sewerage Authority (WASA). All the comments were reviewed and the draft standards were finalised and approved by the RIC's Board of Commissioners in December 2017. The RIC published the Final Decision document, Quality of Service Standards for the Supply and Distribution of Water and Wastewater Services – Final Decision, on its website and submitted the draft Order to the Ministry of Public Utilities (MPU) for publication in the Trinidad and Tobago Gazette. While awaiting the publication of the standards by MPU, the RIC was informed that WASA had further concerns about its ability to implement the standards and meet the prescribed requirements. The RIC met with WASA in December 2018 to discuss the concerns and agreed to engage in further consultation with the service provider.

2. FURTHER CONSULTATION WITH WASA

A team from the RIC met with a team from WASA over the period June 2019 to October 2019, and engaged in an extensive review of the standards. The purpose was to revise the standards, where necessary, to facilitate implementation and compliance by WASA. The process consisted of the following steps:

- Detailed analysis of each standard to ensure a common understanding between the RIC and WASA, and to identify and resolve potential issues and challenges in implementation;
- Acquisition and analysis of baseline data for the standards, and any other relevant data from WASA;
- 3. Review of WASA's proposals and data based on item 2 above, by the RIC's team, and discussion of the next steps; and
- 4. Compilation of the decisions taken from the consultation for review and thereafter, sign-off by both teams.

¹ The RIC first issued the draft standards for public consultation in 2003. However, this activity did not result in the publication of the standards in the Trinidad and Tobago Gazette.

After concluding the discussion phase of the exercise, the RIC submitted further queries to WASA to clarify and finalise issues on specific standards. The RIC received the final response to the queries in January 2020. A summary of the outcome of the Further Consultation was compiled and circulated for review by RIC's internal team in January 2020. It was subsequently forwarded to WASA's team in February 2020 for their review. The RIC received feedback from WASA in March 2020.

3. DISCUSSIONS AND OUTCOME OF THE FURTHER CONSULTATION

The quality of service mechanism proposed by the RIC is a Guaranteed Standards Scheme². It consists of two sets of standards - the guaranteed and overall standards. The Guaranteed Standards establish performance levels that the service provider must meet in serving individual customers. These standards attract compensatory payments if the service provider fails to meet the prescribed performance level. The proposed guaranteed standards cover the main areas of concern of consumers in the water sector. The Overall Standards cover areas of service where it is not appropriate or feasible to give individual guarantees, but where the expectation is that the utility will provide pre-determined, minimum levels of service. The proposed overall standards, therefore, relate to the quality of service affecting a group of consumers. These standards do not carry compensatory payment. There was no objection by WASA to the concept and implementation of the proposed quality of service scheme. The RIC initially requested that WASA provide baseline data on each of the standards, and sought further clarification as the discussions progressed. Section 3.1 shows the salient details of the discussion between the RIC and WASA during the period June 2019 to October 2019, and the position reached on the guaranteed standards, along with the RIC's Final Decision in December 2017, and WASA's proposal in December 2018. Section 3.2 shows the corresponding information for the overall standards. Tables 4 and 5 in the Appendix provide a summary of RIC's position after further consultation with WASA on the guaranteed and overall standards, respectively.

² The aspects of water/wastewater service covered by the standards under the Guaranteed Standards Scheme were identified through customer complaints against WASA received by the RIC, surveys, newspaper articles and service characteristics covered under similar standards in other jurisdictions.

3.1. Discussion of the Guaranteed Standards

GWS 1 Implementation of Water Schedules

RIC's DecisionRIC 2017 Decision stated as follows: "WASA is required to provide a minimum
water supply of 48 hours aggregate per week at a minimum pressure of 3.5 metre
head (5 psi) in accordance with published water supply schedules. This guaranteed
standard is not applicable in the event of a supply interruption outside of the
control of the utility.

WASA shall publish water supply schedules at least once during the period January to June (Dry Season) and at least once during the period July to December (Rainy Season) of each year. These schedules shall specify an effective date and shall be published at least one month before they are due to become effective. They shall be published in at least one daily newspaper in wide circulation in Trinidad and Tobago, and on WASA's website.

In areas where the infrastructure cannot deliver this level of performance, WASA shall apply to the RIC to be considered for an exemption no later than six months after the publication of this standard. Where an exemption is granted, it shall be for a specified period of no more than 24 months to allow WASA to bring the level of service in the respective area up to the standard. In such instances, WASA shall provide a minimum supply of 24 hours aggregate at a minimum pressure of 3.5 metre head (5 psi) in accordance with published water supply schedules. The sum total of the number of customers within the areas approved for exemption from this standard shall not exceed ten (10) percent of the total number of customers serviced by WASA. Until such time that an exemption is granted, WASA is required to deliver service to the respective customer group under consideration in accordance with the standard."

WASA to provide a minimum water supply of 24 hours per week.

WASA's Proposal 2018

Further Consultation Discussion

WASA indicated that it is unable to meet the proposed requirement of the standard for all customers because there are service areas where WASA can only supply water one (1) day per week. This constraint is due to the limitations of the network and the location of some customers. However, data provided by WASA showed that 94% of customers receive a water supply of 48 hours or more per week. The RIC indicated that this is the most critical standard, as it specifies the minimum level of water supply customers should expect. The data confirmed that WASA could meet the requirement for most of its customers, and therefore it was agreed that the minimum supply should not be less than 48 hours per week. However, the RIC recognised that WASA is unable to meet the requirements in some sections of its distribution areas. Therefore, the RIC, in keeping with the 2017 decision, will grant a 24-month moratorium to WASA for those areas WASA is required to identify the specific areas where it cannot meet the standard, and submit an action plan to improve the supply to a minimum of 48 hours as required by the standard.

Conclusion The standard remained unchanged, and WASA will be granted a 24-month moratorium for the areas where the utility is unable to meet the standard.

RIC's Position WASA is required to provide a minimum supply of 48 hours aggregate per week at after Further five (5) psi, except in areas where a moratorium has been granted. WASA is Consultation required to publish water supply schedules at least once during the period January to June (Dry Season) and at least once during the period July to December (Rainy Season) of each year. These schedules shall specify an effective date and shall be published at least one month before they are due to become effective. They shall be published in at least one daily newspaper in wide circulation in Trinidad and Tobago, and on WASA's website. WASA will be granted a maximum of 24-months moratorium for service areas where the utility cannot meet the standard. For service areas where a moratorium is granted, WASA is required to provide a minimum supply of 24 hours per week. WASA is also required to identify these areas and submit an action plan³ detailing the steps and timeline to bring these areas up to the standard. This information must be provided no later than six months after the publication of the standard.

GWS 2 Restoration of Supply after Service Interruption

RIC's Decision WASA is required to restore water supply no later than 48 hours after the start of a planned interruption; and within 72 hours for trunk mains, 48 hours for strategic mains and 24 hours for other interruptions in the event of an unplanned interruption.

WASA's No change Proposal 2018

Further The title of the standard, the definition of the various types of mains (trunk, strategic and other) and the timeline for each component of the standard were discussed. WASA advised that its interpretation of the standard for the restoration of supply for unplanned interruptions was based on pipeline infrastructure (transmission/ distribution) because the required units referred to mains. The RIC indicated that the disruption may not necessarily be related to a pipeline issue. The standard was broken down by the size of WASA's mains to highlight the number of customers that would be impacted. The RIC and WASA discussed WASA's ability to meet the standard, and WASA indicated that the Authority is capable of meeting the proposed timelines for both planned and unplanned interruptions.

³ The purpose of the Action Plan is to provide details about the sequence of steps that WASA will take to bring the performance of the utility up to the standard, including a timeline of the respective activities.

Conclusion The RIC and WASA concluded that the standard should remain as per the RIC's 2017 Decision Document .

RIC's Positionafter FurtherConsultationWASA is required to restore water supply no later than 48 hours after the start ofa planned interruption; and within 72 hours for trunk mains, 48 hours for strategicmains and 24 hours for other interruptions in the event of an unplanned interruption.

GWS 3 Provision of Truck borne supply if mains supply is interrupted

- **RIC's Decision**WASA is required to provide a truck borne supply of water upon customer requestin 2017within 24 hours after the notified time for a planned interruption has ended if pipe-
borne supply is not yet available; and from 48 hours after the start of an unplanned
interruption and within 24 hours if pipe-borne supply is not yet available.
- WASA's WASA requested that the volume of water to be provided to customers be limited to a specified amount depending on the customer class, in addition to the timeframes specified. For planned interruptions, WASA proposed to provide a maximum of 400 gallons per class A customers and a maximum of 1,200 gallons per classes B, C and E at the customer's requests from 24 hours after the notified time for a planned interruption has ended if pipe-borne supply is not yet available. For Unplanned interruptions, the amount proposed is a maximum of 400 gallons per classes A customers and 1,200 gallons per classes B, C and E at the customer's requests from 24 hours after the customers' requests from 48 hours after the start of an unplanned interruption and within the next 24 hours if pipe-borne supply not yet available
- Further For planned interruptions, WASA proposed to maintain the 24 hour response Consultation period and the stipulated volume of water for sensitive customers but required 48 Discussion hours for all other customers. The performance data provided by WASA showed that the Authority was unable to meet the 24 hours standard. Consequently, it was agreed that the standard should be amended to "within 48 hours" with the proposed volumes by customer classes. In addition, the 24 hours for sensitive/ critical customers would not be included in the standard as this was a standard already practised by WASA. For unplanned interruptions, WASA advised that it was able to meet the "from 48 hours" timeline in keeping with the proposed volume of water for the different classes. However, similar to Planned interruptions, the Authority was unable to meet the "within 24 hours" timeline except for sensitive customers. The RIC confirmed with WASA that the utility could measure the amount of water that is provided to a customer through a truck-borne supply and therefore agreed with WASA's proposal to limit the amount of water supplied depending on the customer class.
- ConclusionWASA is to provide a truck borne supply within 48 hours as opposed to 24 hours if
mains are interrupted (planned and unplanned). In addition, in terms of quantity
WASA will provide a maximum of 400 gallons of water per class A, and a maximum
of 1,200 gallons to customers in classes B, C and E.

RIC's Position after Further Consultation For Planned interruptions, WASA is required to provide a maximum of 400 gallons of water per class A customers' requests, and a maximum of 1,200 gallons per classes B, C, D and E customers' request, within 48 hours after the notified time for interruption has ended, if pipe-borne supply is not yet available.

For **Unplanned interruptions**, WASA is required to provide a maximum of 400 gallons per class A customers' requests, and a maximum of 1200 gallons per classes B, C, D and E customers' request, from 48 hours after the start of the disruption and within the next 48 hours, if pipe-borne supply is not yet available.

GWS 4 Time to repair to Water Service Connections (WSC)

RIC's DecisionWASA is required to repair a Water Service Connection (WSC) within 48 hours of a
report by the customer for loss of supply to registered critical institutions and for
leaks resulting in property damage; and within 3 working days for leaks and loss of
supply affecting supply to customers.

WASA's Water Service Connection Repair

Proposal 2018

- Within 48 hours (2 working days) for loss of supply to critical institutions (e.g. Schools, hospitals) and for leaks resulting in damage to property.
- 2. Within 3 working days- for leaks affecting supply to customer.

Sewer Repair

- 1. Choke in WASA sewer system within 12 hours of receipt of report of overflow.
- 2. Collapse of WASA sewer system within 72 hours of receipt of report.
- Further WASA requested that the timeframe of "within 48 hours" for the repair to water Consultation service connection for loss of supply to critical institutions be amended to "two (2) working days" as WASA continues to operate on calendar days and working on a Discussion weekend or public holiday would result additional cost to the utility. Additionally, WASA requested that the utility be allowed five (5) working days to repair leaks affecting supply to customers instead of three (3) working days owing to the backlog of outstanding leak repairs. WASA provided data on their current compliance rate as requested by the RIC. The supporting performance data for the year 2016 to 2018 revealed that the average compliance rate for repair to WSC was 71% and 75%, for within three (3) working days and five (5) working days respectively. WASA advised that while the difference in performance level for the period was not significant, the compliance rate for 2019 had decreased to 21% due to resource constraints. In addition, WASA expects that there would be a high number of breaches if the standard was set at three (3) working days and this

would have a significant impact on WASA's finances. The RIC also indicated that "sewer repair" should not be included in this standard as it is addressed in OWS 6.

- **Conclusion** The RIC agreed to specify the time for the repair to water service connection for loss of supply to critical institutions as "two (2) working days" and change the time to repair leaks affecting supply to a customer from three (3) working days to five (5) working days, based on WASA's capacity to respond and the compliance data provided. The proposed standard is not applicable to sewerage connections and WASA's proposal in this regard was not relevant.
- **RIC's Position**WASA is required to repair a Water Service Connection (WSC) within two (2)**after Further**working days of a report by the customer for loss of supply to critical institutions**Consultation**and for leaks resulting in property damage; and within five (5) working days for
leaks and loss of supply affecting supply to customers.

GWS 5 Installation of new Water Service Connections (WSC)

- **RIC's Decision** in 2017 For domestic WSC, WASA is required to determine feasibility and notify customers within 5 working days of application, and install WSC within 7 working days of confirmation of feasibility. For multi-family dwelling units building WSC with a supply connection of up to 4 inches, WASA is required to determine feasibility and notify customers within 10 working days of application, and install WSC within 7 working days of confirmation of feasibility. For all other WSC, WASA is required:
 - 1. Issue response to application for Outline Approval within 20 working days of receipt of payment.
 - 2. Issue Final Approval within 20 days of receipt of acceptable engineering design.
 - 3. Install WSC within 15 working days of receipt of payment.
 - 4. Issue Completion Certificate in 7 working days.

WASA's	<u>¾" WSC (domestic) and 1"- 4" (single building)</u>
Proposal	
2018	1. Domestic
	 Single family dwelling units (3/4") - determine feasibility and notify
	customers within 5 working days of application.
	 Multiple family dwelling units (1"- 4") - determine feasibility and notify

- customer within 10 working days of application
- 2. Install WSC within 10 working days following payment of applicable rates.

All other WSC 1" and above WSC

Provide Outline Approval within 10 working days of completed initial water and wastewater site works.

- 1. Issue response to application within 20 working days of receipt of payment.
- 2. Issue Final Approval within 20 days of receipt of acceptable engineering design.
- 3. Install WSC within 15 working days of receipt of payment.

FurtherWASA indicated that there is a backlog in the request for new service connections,
and requested a moratorium to improve the system and clear off the backlog. The
RIC requested that WASA provide data, which should indicate the time it takes to
install the different types of new service connections, provide detailed steps on
the process for the installation of the new service connections, specify the
timeframe for completion of each step and the length of moratorium requested
with supporting data. The supporting data submitted by WASA for the period 2017
to 2019, showed an average compliance rate of 33% and an average of 115 days
to complete a WSC to Domestic and Multiple family dwelling units. WASA
submitted a revised proposal for WSC to Domestic and Multiple family dwelling
units of 10 working days for determining the feasibility and 15 working days for
installation of WSC.

Additionally, WASA provided the steps involved and timeframe for completion of all other WSC from Outline Approval to issuance of Completion Certificate and completion of interconnection. WASA's proposed timeframes were reviewed and where appropriate amended to ensure that the process was more efficient and achievable. Additionally, the RIC agreed to grant a moratorium of 12 months for WASA to reduce the backlog and improve its performance.

ConclusionThe RIC agreed to grant a 12-month moratorium to WASA to allow the utility to
clear off the backlog and improve its performance to comply with the standard.
The RIC also agreed to revise the standard to reflect the process for new service
connections as outlined by WASA.

RIC's Position For new water service connections WASA is required to adhere to the following: after Further Consultation

(¾") WSC (Domestic) and 1"- 4" (Multiple family dwelling units):

- 1. Determine feasibility and notify customer within 10 working days of application
- 2. Install WSC within 15 working days following payment of applicable rates.

1" and above - ALL other WSC:

- 1. Provide Outline Approval within 20 working days of completed initial water and wastewater site works.
- 2. Issue response to Design Approval within 20 working days of receipt of acceptable engineering design.
- 3. Issue Final Approval within 20 working days of receipt of inspection report.
- 4. Process and complete pressure testing works within 10 working days.
- 5. Generate Meter Accounts within 18 working days.

- 6. Complete interconnection within 15 working days of receipt of payment.
- 7. Notify customer and issue completion certificate with 7 working days.

The RIC agreed to grant WASA a 12-month moratorium to clear off the backlog of new service connections applications and to improve its performance to comply with the standard . WASA is required to submit an action plan detailing the steps to be taken and timeline of activities to bring its performance up to the level of the standard.

GWS 6 Reconnection of supply after settling outstanding accounts or disconnection due to error

RIC's DecisionWASA is required to reconnect a customer's supply after settlement of outstanding
accounts or disconnection due to error within 24 hours of receipt of full payment
or as agreed between WASA and customer, or in determination of error made by
WASA.

WASA's No change. Proposal 2018

- Further WASA advised that 90% of customers' connections do not have curb valves installed to effect an immediate disconnection. The Authority explained the challenges with reconnecting customers where a curb valve is not installed, the cost associated with disconnection, and the installation of a curb valve at the time of disconnection. WASA also indicated that 24 hours is too short a period in which to carry out a reconnection, taking into account the time in which payment is received as well as the process of mobilising resources, especially when there is no curb valve. WASA requested that the 24 hours be amended to one (1) working day for reconnections where curb valves are installed, after the conditions for reconnection have been met, as reconnections on a weekend and a public holiday would incur an additional cost, and two (2) working days be allowed for installations where a curb valve is not present.
- **Conclusion** The RIC reviewed the information provided by WASA and agreed to make changes to the standard as requested.

RIC's Position
 after Further
 Consultation
 Working day of receipt of full payment and reconnect the supply within one (1) working day of receipt of full payment and reconnection fee, or as per agreement between the customer and WASA or when it has been determined by WASA that an error was made. For all other installations (no curb valve), WASA is required to reconnect the supply within 2 working days.

GWS 7 Response to complaints

RIC's Decision in 2017	WASA is required to acknowledge complaints within 5 working days of receipt and communicate final position within 30 working days of receipt of complaint.
WASA's Proposal 2018	No change.
Further Consultation Discussion	WASA indicated that a Customer Complaint Management policy was being discussed internally. They also confirmed that responses to complaints are done through the same medium through which they are received and confirmed that the timeframes of 5 days for the acknowledgement of receipt and 30 days to communicate final position can be achieved.
Conclusion	WASA is able to meet the standard as proposed.
RIC's Position after Further Consultation	WASA is required to acknowledge complaints within 5 working days of receipt and communicate final position within 30 working days of receipt of the complaint.

GWS 8 Response to Poor Water Quality

RIC's Decision in 2017	WASA is required to respond to complaints of poor water quality and conduct a site visit, where necessary, within 1 working day; resolve problems discovered within 3 working days of site visit; and provide an alternative water supply where applicable.
WASA's Proposal 2018	No change.
Further Consultation Discussion	WASA concurred with the standard as proposed.
Conclusion	WASA can meet the standard as proposed.
RIC's Position after Further Consultation	WASA is required to respond to complaints of poor water quality and conduct a site visit, where necessary, within one (1) working day; resolve problems discovered within three (3) working days of site visit; and provide an alternative water supply where applicable.

GWS 9 Compensatory payments for guaranteed standards

RIC's Decision in 2017	WASA is required to credit compensatory payment for non-compliance with standards to the customer account within 60 working days of receipt of claim.
WASA's Proposal 2018	No change.
Further Consultation Discussion	WASA indicated there would be a challenge to make compensatory payments given their current situation. The RIC clarified that these payments are made as credits to customer's accounts, not cash reimbursements, and also these would not be automatic payments since the customer has to file a claim for breach of the standard. The RIC indicated that, based on experience with the QSS for the electricity sector, the number of claims made by customers is typically low.
Conclusion	WASA agreed to the standard as proposed.
RIC's Position after Further Consultation	WASA is required to credit compensatory payments for non-compliance with standards to the customer account within 60 working days of receipt of a valid claim.

3.2. Discussion of the Overall Standards

OWS 1 Notification with respect to planned supply interruptions

RIC's Decision in 2017	WASA is required to provide notification to customers 48 hours prior to a supply interruption with a duration of more than 4 hours.
WASA's Proposal 2018	No change.
Further Consultation Discussion	WASA is in agreement with the standard.
Conclusion	The standard remained as proposed by the RIC.
RIC's Position after Further Consultation	WASA is required to provide notification to customers 48 hours prior to a supply interruption with a duration of more than 4 hours.

OWS 2 Water Pressure

RIC's Decision in 2017	WASA is required to provide a minimum water supply pressure of 14 metre head (20 psi) and a maximum pressure of 70 metre head (100 psi) at the point of the customer's Water Service Connection (WSC).
WASA's Proposal 2018	To be implemented 24 months after publication of standard in the Gazette
Further Consultation Discussion	WASA requested a 24-month moratorium on this standard because of the inability of the utility to implement the standard at present. WASA indicated that district metered areas (DMAs) were mapped, but the data loggers used to collect pressure measurements have to be replaced. The RIC indicated that WASA would be required to submit an action plan with specified timelines as well as progress reports over the period of the moratorium by WASA.
Conclusion	The standard remained as proposed, and the RIC agreed to grant WASA a 24 – month moratorium to allow WASA to acquire and install the requisite equipment to monitor water pressure throughout the network.

RIC's PositionWASA is required to provide a minimum water supply pressure of 14 metre head
(20 psi) and a maximum pressure of 70 metre head (100 psi) at the point of the
customer's Water Service Connection (WSC).

WASA will be granted a 24-month moratorium on the standard. WASA is required to submit an action plan detailing the steps and activity timeline that the utility will follow to bring the system up to the standard.

OWS 3 Metering

RIC's DecisionWASA is required to read meters at least every two months, and issue bills within
10 working days of meter readings. Defective water meters are to be repaired
within 30 days of receipt of report.

WASA's Provide a measured bill every 2 months for all metered customers in classes C
 Proposal and D. Issue bills within 10 working days of meter reading. Repair defective water
 2018 meters within 30 days.

Further WASA indicated that the reason for its proposal to limit the standard to customers in the C and D classes is to focus on providing a measured bill to commercial customers who are metered, and focus less on metered residential customers because of constraints in the number of meter readers. The RIC indicated that the purpose of the standard is to ensure that no customer gets an estimated bill that spans a long period. The RIC advised that metered class C and D customers are billed monthly, whereas domestic are billed quarterly, therefore the standard from "every two months" to "every two billing cycles" for all metered customers. WASA agreed to the issuing of bills within 10 working days of meter reading, and the repair of defective water meters within 30 days of receipt of a report.

Conclusion The required frequency of meter reading was changed from "every two months" to "every two billing cycles." All other aspects of the proposed standard remained.

RIC's Position after Further	WASA is required to:
Consultation	1. Read meters at least every 2 billing cycles for all categories of customers.
	2. Issue bills within 10 working days of meter reading.

3. Repair defective water meters within 30 days of receipt of report.

OWS 4 Drinking water quality

RIC's Decision in 2017 WASA is required to meet the World Health Organization (WHO) guidelines for drinking water with 100% compliance for the bacteriological threshold and 95% compliance for physical and chemical parameters of the water. WASA is also required to collect water samples and carry out tests according to an established schedule.

WASA's No change. Proposal 2018

- Further Consultation Discussion The RIC and WASA discussed the requirement of the standard, and the RIC enquired about WASA's current water quality monitoring and sampling practices. WASA indicated that the utility currently monitors water quality as defined in the standard. The standard operating procedure (SOP) of WASA's Operations Division has the schedule, compliance measures and the points of sampling. WASA's Annual Performance report for the years 2017-2018 for bacteriological samples and chemical samples showed an average compliance rate of 98% and 71%, respectively. It was agreed that the standard would remain as proposed.
- **Conclusion** The standard remains unchanged.
- RIC's Position
 after Further
 Consultation
 WASA is required to meet the World Health Organization (WHO) guidelines for drinking water with 100% compliance for the bacteriological threshold and 95% compliance for physical and chemical parameters of potable water. WASA is also required to collect water samples and carry out tests according to an established schedule.

OWS 5 Sewage effluent quality

RIC's DecisionThe quality of the effluent discharged by WASA into the environment shall comply**in 2017**with the water pollution rules or equivalent standards as set by the relevant
authority having such jurisdiction.

WASA's	WASA did not provide a proposal.
Proposal	
2018	

FurtherThe RIC discussed the requirement of the standard with WASA. The serviceConsultationprovidersubmitted information on the compliance status of several wastewaterDiscussionfacilities, as well as on orphaned plants (NHA & Private) and the EMA's moratorium
to allow WASA to bring these plants into compliance with the water pollution rules.
The RIC agreed to confer with the EMA about the water pollution rules, and
confirmed that the TTBS standard is covered under the water pollution rules.

RIC and WASA agreed that the standard should remain as proposed to ensure that WASA will improve its compliance with the water pollution rules.

Conclusion The standard remained unchanged.

RIC's PositionThe quality of the effluent discharged by WASA into the environment shall comply**after Further**with the water pollution rules or equivalent standards as set by the relevant**Consultation**authority having such jurisdiction.

OWS 6 Repair to sewers

RIC's Decision in 2017	WASA is required to:	
	 Clear choke in WASA's sewer system within 18 hours of receipt of report of overflow. Repair collapse of WASA's sewer system within 72 hours of receipt of report. 	
WASA's Proposal 2018	 Choke in WASA sewer system - within 18 hours of receipt of report of overflow. Collapse of WASA sewer system - within 72 hours of receipt of report. Choke in WASA sewer system - within 18 hours of receipt of report of overflow. 	
Further Consultation Discussion	Both the RIC and WASA agreed that the third point in WASA's proposal is a duplication of the first point. WASA indicated that the utility can usually clear a choke in the sewer system within the required 18 hours, but that there are instances where this timeframe may be inadequate because of the time required to mobilise resources. The RIC indicated that the performance data provided by WASA shows that the utility has a good compliance rate for this standard. The RIC and WASA agreed to leave the standard as proposed.	
Conclusion	The standard remained unchanged.	
RIC's Position after Further Consultation	 WASA is required to: Clear choke in WASA's sewer system within 18 hours of receipt of report of overflow. Repair collapse of WASA's sewer system within 72 hours of receipt of report. 	

OWS 7 Road restoration after pipeline works

RIC's Decision in 2017	WASA is required to complete temporary road restorations within 24 hours and complete permanent restorations within 7 days. Restoration works shall be performed in accordance with the road restoration guidelines issued by the Ministry of Works or equivalent entity.
WASA's Proposal 2018	Primary Road (Major Repair) 24 hours for temporary road restoration and 7 days for permanent restoration
	<u>Secondary Road (Minor Repair)</u> 48 hours for temporary road restoration and 7 days for permanent restoration
Further Consultation Discussion	The RIC and WASA discussed the terms "primary" and "secondary" roads, "major" and "minor" repairs in the context of the WASA's definitions, and the classification by the Ministry of Works and Transport. It was agreed that the terms "temporary" and "permanent" repairs were sufficient for the purpose of the standard, and that these terms avoid unnecessary complication in the description. WASA also indicated that there is a backlog in excess of 15,000 road restoration jobs with a current compliance rate with the standard of 3% because of resource constraints. According to data provided by WASA, the average number of days to complete road restoration works was 132, 106 and 53 days in 2016, 2017 and 2018, respectively. WASA agreed that the timeframes proposed by the RIC were reasonable for the public but that they would need time to reduce the backlog and improve their ability to meet the standard. WASA requested that they be given a 24-month moratorium and that the number of days to effect permanent road restoration be changed to 7 working days.
Conclusion	The RIC agreed to change the time for permanent road restoration to 7 working days and to grant WASA a 24-month moratorium on the standard. WASA is required to submit an action plan outlining the steps and activity timeline that the utility will undertake to bring its performance up to the standard.
RIC's Position after Further Consultation	WASA is required to complete temporary road restorations within 24 hours and permanent restorations within 7 working days, in accordance with the road restoration guidelines issued by the Ministry of Works or equivalent entity
	The RIC agreed to grant WASA a moratorium for 24 months. WASA is required to submit an action plan for bringing the performance of the utility up to the standard. WASA is required to provide reports on the progress of the activities under the action plan and report compliance rates on the standard during the moratorium period.

OWS 8 Claims for damage

RIC's Decision WASA is required to reply within 5 working days of receipt of a claim for damage; complete investigations within 30 working days of receipt of the claim; and

determine liability and make payment where applicable within 60 working days of receipt of the claim.

WASA's No change. Proposal 2018

Further WASA expressed concerns about the ability of the utility to meet the 60-day requirement in cases where customers do not provide the requisite documents in a timely manner. The RIC indicated that there would be a caveat for instances where the customer fails to submit documents on time. Therefore, those periods will not be included in the measurement of the 60-day requirement. WASA indicated that they will seek to meet the requirement of the standard but recognise that there may be challenges because of funding constraints. The RIC acknowledged the concerns expressed by WASA. The RIC and WASA agreed that the standard should remain as proposed.

Conclusion The standard remained unchanged.

RIC's PositionWASA is required to reply within 5 working days of receipt of a claim for damages;**after Further**complete investigation within 30 working days of receipt of the claim; and
determine liability and make payment where applicable within 60 working days of
receipt of the claim.

OWS 9 Making and Keeping appointments

RIC's DecisionWASA's personnel is required to arrive for appointments within 30 minutes of the
scheduled appointment and to notify customers no less than 24 hours prior of their
inability to keep an appointment.

WASA's No change. Proposal 2018

Further The RIC and WASA explored the definition of an appointment, and WASA identified the services where an appointment is required. WASA indicated that there is no system in place for managing and tracking appointments, and that it would be a challenge to provide data to the RIC. WASA and the RIC discussed the system and procedures that WASA needs to put in place to implement the standard. WASA agreed that it would implement a system of job cards for recording and tracking appointments in the short term, and in the long term, incorporate relevant software, which will help to prevent human error. The arrival time of the utility personnel was also discussed, and it was agreed to change the requirement from 30 minutes to 60 minutes to reflect what WASA can reasonably meet, which can be affected by internal and external factors such as mobilisation, time and traffic

delays. Additionally, WASA proposed that the notification for cancellation of an appointment be changed from 24 hours to one (1) working day to take into account weekends and public holidays. Also, WASA requested a 12-month moratorium on the standard to put the appropriate system in place to implement the standard.

Conclusion The required arrival time for the utility personnel was changed to "within 60 minutes" and the RIC agreed to grant WASA a 12-month moratorium on the standard to put the requisite system in place.

RIC's PositionWASA's personnel is required to arrive for appointments within 60 minutes of the
scheduled time and notify customers no less than one (1) working day prior of their
inability to keep an appointment.

WASA will be granted a 12-month moratorium to put the requisite system in place.

APPENDIX

Guaranteed Standard	RIC's Position after Further Consultation	Compensation to customer for noncompliance (% of bill)
GWS 1-Implementation of Water Schedules	 WASA is required to provide a minimum supply of 48 hours aggregate per week at 5 psi (minimum), except in areas where a moratorium has been granted. WASA will be granted a 24-months moratorium for areas where the service provider cannot meet the standard. WASA is required to provide a minimum supply of 24 hours per week for areas under a moratorium. WASA is required to identify the areas where it cannot meet the standard, and submit an action plan detailing steps to bring these areas up to the standard within the moratorium period. 	15% - Classes A, C, D, E 3% - Class B
GWS 2- Restoration of Supply after service interruption	For Planned Interruptions: WASA is required to restore supply as per published times, but no later than 48 hours after start of interruption For Unplanned Interruptions: WASA to restore supply to customers within: 72 hrs for trunk mains 48 hrs for strategic mains 24 hrs other interruptions	15% - Classes A, C, D, E 3% - Class B <i>For an additional 12 hours:</i> 5% - Classes A, C, D, E 1% - Class B

Table 4: Summary of Guaranteed Standards – RIC's Position after Further Consultation with WASA

Guaranteed Standard	RIC's Position after Further Consultation	Compensation to customer for noncompliance (% of bill)
GWS 3- Provision of Truck borne supply if mains supply is interrupted	<u>For Planned interruptions:</u> WASA is required to provide a maximum of 400 gallons per class A customers' requests, and a maximum of 1200 gallons per classes B, C, D and E customers' request, within 48 hours after the notified time for interruption has ended if pipe borne supply is not yet available. <u>For Unplanned interruptions:</u> WASA is required to provide a maximum of 400 gallons per class A customers' requests, and a maximum of 1200 gallons per classes B, C, D and E customers' request, from 48 hours after the start of the disruption and within the next 48 hours if pipe borne supply is not yet available	15% - Classes A, C, D, E 3% - Class B <i>For an additional 24 hours:</i> 5% - Classes A, C, D, E 1% - Class B
GWS 4- Time to repair to Water Service connections (WSC)	 WASA is required to repair a water service connection (WSC): Within 48 hrs (2 working days) of report by customer – for loss of supply to registered critical institutions (e.g. schools, hospitals) and for leaks resulting in damage to property. Within 5 working days – for leaks & loss of supply affecting supply to customer. 	15% - Classes A, C, D, E 3% - Class B For every additional 12 hours up to a maximum of two periods: 5% - Classes A, C, D, E 1% - Class B
GWS 5- Installation of new Water Service Connections (WSC)	 WASA is required to complete the various stages for installation of a new water service connection within the specified time as follows: For (¾") WSC (Domestic) and 1"- 4" (Multiple family dwelling units) 1. Determine feasibility and notify customer within 10 working days of application 2. Install WSC within 15 working days following payment of applicable rates. 	15% - Classes A, C, D, E 3% - Class B <i>For an additional 24 hours:</i> 5% - Classes A, C, D, E 1% - Class B

Guaranteed Standard	RIC's Position after Further Consultation	Compensation to customer for noncompliance (% of bill)
	For 1" and above - ALL other WSC	
	1. Provide Outline Approval within 20 working days of completed initial water and wastewater site works.	
	2. Issue response to Design Approval within 20 working days of receipt of acceptable engineering design.	
	3. Issue Final Approval within 20 working days of receipt of inspection report.	
	4. Process and complete pressure testing works within 10 working days.	
	5. Generate Meter Accounts within 18 working days.	
	6. Complete interconnection within 15 working days of receipt of payment.	
	7. Notify customer and issue completion certificate with 7 working days.	
	WASA will be granted a moratorium for 12 months. WASA to submit an action plan detailing steps that will be taken and timelines to enable implementation of the standard.	
		15% - Classes A, C, D, E
		3% - Class B
GWS 6- Reconnection of	WASA is required to reconnect the water supply to a customer:	
supply after settling outstanding accounts or	 Within 1 working day of receipt of full payment and reconnection fee, or as per agreement with WASA for installations with a curb valve or in determining of error made Within 2 working days for all other installations 	For an additional 24 hours:
disconnection due to error		5% - Classes A, C, D, E
		1% - Class B
		3% - Class B
	WASA is required to respond to complaints as follows:	15% - Classes A, C, D, E
GWS 7- Response to complaints	 Acknowledge complaint within 5 working days of receipt of complaint Provide a substantive response within 30 working days of receipt of complaint 	3% - Class B

Guaranteed Standard	RIC's Position after Further Consultation	Compensation to customer for noncompliance (% of bill)
		For an additional 24 hours: 5% - Classes A, C, D, E 1% - Class B
GWS 8- Response to Poor Water Quality	 WASA is required to: 1. Respond, and conduct site visit where necessary, within 1 working day of being notified 2. Solve problem within 3 working days of site visit 3. Provide an alternative water supply where applicable 	15% - Classes A, C, D, E 3% - Class B
GWS 9- Compensatory payments for guaranteed standards	WASA is required to make compensatory payment to customer within 60 working days of receipt of claim	15% - Classes A, C, D, E 3% - Class B <i>For an additional 7 days:</i> 5% - Classes A, C, D, E
		5% - Classes A, C, D, E 1% - Class B

Table 5: Summary of Overall Standards – RIC's Position after Further Consultation with WASA

Overall Standard	Position after Further Consultation
OWS 1- Notification with respect to planned supply interruptions	WASA is required to notify customers that will be affected by a planned supply interruption at least 48 hours prior to the interruption if it is expected to last for more than 4 hours
OWS 2- Water Pressure	The water pressure provided by WASA at the Water Service Connection (WSC) point to customers (who are not on a schedule) must be: Minimum 14m head of pressure (20 psi) Maximum 70m head of pressure (100 psi) WASA will be granted a moratorium for 24 months. WASA to submit an action plan detailing steps that will be taken and timelines to enable implementation of the standard. WASA will submit progress reports during the moratorium and the RIC will monitor implementation progress of the action plan.
OWS 3- Metering	 WASA is required to: 1. Read meter at least every 2 billing cycles for all categories of customers 2. Issue bills within 10 working days of meter reading 3. Repair defective water meters within 30 days of receipt of report
OWS 4- Drinking water quality	 WASA is required to: Sample drinking water supply according to an established schedule Ensure 100% compliance with WHO guidelines for bacteriological thresholds (water); Ensure at least 95% compliance with WHO guidelines for physical/chemical parameters (water)
OWS 5- Sewage effluent quality	WASA is required to be in compliance with the effluent discharge standard of water pollution rules or equivalent standard as set by the relevant authority having such jurisdiction

Overall Standard	Position after Further Consultation
OWS 6- Repair to sewers	WASA is required to:Clear choke in WASA sewer system within 18 hours of receipt of report of overflow.Repair collapse of WASA sewer system within 72 hours of receipt of report
OWS7- Road restoration after pipeline works	After completion of pipeline works, WASA is required to carry out temporary restoration of roads within 24 hours and permanent restoration within 7 working days, in accordance with the road restoration guidelines issued by the Ministry of Works or equivalent entity.
	WASA will be granted a moratorium for 24 months. WASA to submit an action plan for bringing performance up to the standard, and to report performance data during the moratorium.
	WASA is required to:
OWS8- Claims for damage	1. Reply within 5 working days of receipt of claim
	2. Complete investigation within 30 working days of receipt of claim
	3. Determine liability and make payment, where applicable, within 60 working days of receipt of claim and required information
	WASA personnel is required to:
	1. Arrive within 60 minutes of scheduled time of appointment
OWS9- Making and Keeping appointments	2. Notified customer no less than 1 working day before appointment of inability to keep it
	WASA will be granted a moratorium for 12 months. WASA is required to submit an action plan detailing the steps that it will take to implement the standard.