



An Coimisiún
um Rialáil Fóntas
Commission for
Regulation of Utilities

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Uisce Éireann's Non-Domestic and Trade Effluent Tariff Framework

CRU Proposed Decision

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CRU Strategic Plan 2025-2027

Vision, Purpose, and Values



OUR VISION:

Resilient, efficient, sustainable, and safe energy and water services for Ireland.



OUR PURPOSE:

We actively serve the public interest by regulating the provision of energy and water to Irish homes and businesses, while supporting the transformation to net zero.



OUR VALUES:

• Integrity • Professionalism • Openness • Accountability

Executive Summary

Uisce Éireann charges non-domestic customers for supplying water to their premises and for removing wastewater (including trade effluent¹) from their premises. These charges are approved by the Commission for Regulation of Utilities (CRU) in the Water Charges Plan, which outlines the manner and method by which Uisce Éireann charges its customers.

This paper sets out Uisce Éireann's proposals for, and the CRU's proposed decision on, transition arrangements and Tariff Application Rules (TARs) to accompany the implementation of trade effluent charging arrangements on **01 October 2026**. The CRU is now seeking views from customers and interested parties on its proposed decision.

Responses to this paper can be submitted via the CRU's [consultation portal](#) by the close of business on 17 February 2026. The CRU aims to ensure a high level of engagement throughout the consultation process, so the customer's voice is placed at the heart of its decision-making.

The full details of Uisce Éireann's proposals are set out in its submission document, which is published alongside this paper:

- Uisce Éireann, *“Trade Effluent Transition Arrangements and Tariff Application Rules Proposals”*, Submission to the Commission for Regulation of Utilities, 20th October 2025 (CRU2025254)

Uisce Éireann's document should be read in conjunction with this Consultation paper.

UISCE ÉIREANN'S NON-DOMESTIC TARIFF FRAMEWORK

The Non-Domestic Tariff Framework was established in 2019 and created a national set of harmonised charging arrangements for the supply of water and wastewater services for non-domestic premises. It represented a significant milestone in water tariff policy reform in Ireland and created a more transparent, simple, and equitable system of charging for Uisce Éireann's non-domestic water and wastewater customers².

The Non-Domestic Tariff Framework ensured that non-domestic customers contribute in line with the costs they impose. While the Exchequer covers the cost of providing water and wastewater services for domestic customers, Uisce Éireann determines the respective shares of domestic and non-domestic costs through the approved cost allocation process to minimise cross-subsidisation between these two groups. This means that non-domestic customers are charged only for their share of the cost of providing water and wastewater services.

However, the Framework did not cover all trade effluent customers³. Trade effluent customers that had received their Local Authority's standard wastewater charges were moved onto harmonised framework rates, whereas those that faced specific charges set by their Local

¹ Trade effluent is a type of wastewater that can be more polluting than regular wastewater and can be more costly to treat and dispose of into the environment, thereby justifying an additional or separate charge.

² For clarity, the term 'customer' in this paper should be interpreted as a connection at a customer's premises to the public water or wastewater network.

³ Trade effluent customers are connections licensed to discharge trade effluent into Uisce Éireann's wastewater network.

Authorities were kept on the same rates that had been in force on 31 December 2013 until Uisce Éireann had collected sufficient data to develop an enduring charging policy.

In July 2024, the CRU issued a decision (CRU202460) on Uisce Éireann's proposals to update the Non-Domestic Tariff Framework, including harmonised trade effluent charging arrangements. The CRU determined that trade effluent customers carrying out commercial activities and low-volume industrial activities ('Category 1') would face Non-Domestic Tariff Framework rates, whereas other industrial customers ('Category 2' and 'Category 3') would face a 'Mogden' charging structure incorporating the strength of their discharge. All categories would also pay a trade effluent-specific 'Compliance and Licensing' fixed charge.

Implementation of harmonised trade effluent charging arrangements was set for 01 October 2026 – permitting a two-year 'grace period' to help customers prepare and budget for the tariff changes and put in place measures to mitigate future bill increases. The CRU decision included indicative trade effluent tariff rates to inform customers of the potential bill increases they may face when the trade effluent charging arrangements are implemented, as well as a requirement on Uisce Éireann to proactively engage with customers before implementation.

The implementation of the charging arrangements represents the last step towards the harmonisation of charging arrangements for all non-domestic customers. Once the implementation is complete, all of Uisce Éireann's non-domestic customers will be charged for water, wastewater, and trade effluent services on the same cost basis, using the same customer input data and the same cost allocation rules.

IMPLEMENTATION OF THE TRADE EFFLUENT TARIFFS ON 01 OCTOBER 2026

A core principle of the Non-Domestic Tariff Framework when it was introduced in 2021 was that customer bill volatility should be kept to a minimum given the significant reform (and harmonisation) in tariff charging arrangements facing customers at the time. The CRU therefore considered arrangements intended to mitigate the potential for business disruption associated with significant bill shocks as customers transitioned towards newly harmonised, cost-reflective tariff rates.

With the implementation date of the trade effluent charging arrangements now coming closer, the CRU has requested Uisce Éireann to consider the need for similar transition arrangements for trade effluent customers.

The majority (98%) of trade effluent 'Category 1' connections already pay Non-Domestic Tariff Framework rates (5,993 out of 6,127 at the latest count), so only await the addition of the 'Compliance and Licensing' fixed charge. The remaining 'Category 1' (134) and 'Category 2' and 'Category 3' (412) trade effluent connections are still paying 2013 Local Authority rates, which vary widely by structure and level. These charges often do not reflect the underlying cost of removal and treatment of trade effluent and have not kept pace with inflation and the increasing need for infrastructure upgrades.

Uisce Éireann has provided analysis of how trade effluent customers' bills could change from 01 October 2026 without any transition arrangements (based on allowed revenues consistent with Uisce Éireann's SFP 2025-26, which are not final). Among the 546 customers that Uisce Éireann predicts will move onto new tariff structures from 01 October 2026, around 16% are expected to see their bills decrease and 84% increase. The average increase, without capping,

would be +87%. A small number of customers could see their bills increase more than tenfold. In absolute terms, some very large industrial customers' bills are expected go up by more than €1m.

While these increases are large, it is important to note that new bills reflect the share of costs that customers should contribute according to the strength and volume of their discharge under a nationally harmonised tariff framework implementing the polluter-pays principle. The size of bill increases is a consequence of how far from cost-reflective levels some customers' current charges have become since they were set by Local Authorities before 31 December 2013.

The revenue that Uisce Éireann is allowed to recover from its customers during the 5-year Revenue Control 4 (RC4) period from January 2025 to December 2029 had not yet been determined at the time of writing. Therefore, Uisce Éireann has used cost figures from its Strategic Funding Plan 2025-2029 (SFP), which was approved by the Minister on 05 November 2024, as an indication of what its revenue allowance might be for the purpose of assessing the impact of its proposals (and for providing indicative tariff rates in Appendix B). However, customers should be aware that these tariffs are not based on approved allowed revenues.

CRU has recently published its draft determination on RC4 for public consultation (CRU2025134)⁴. A final determination on RC4 is planned for Q2 2026, after which Uisce Éireann will submit its finalised non-domestic and trade effluent tariffs for approval by CRU. Final tariffs for both non-domestic and trade effluent customers are expected to be published in early Q3 2026.

In addition to transition arrangements, Uisce Éireann has proposed to expand the set of TARs to accommodate trade effluent charging arrangements. TARs provide clear rules on how to treat customers in a consistent manner in certain situations – such as assigning connections to tariff classes.

OVERVIEW OF UISCE ÉIREANN'S PROPOSALS

Transition arrangements

Uisce Éireann's proposed transition arrangements are structured around four components: (1) eligibility and (2) threshold for transition, (3) the mechanism to cap bills and (4) the duration of the transition period.

Uisce Éireann has proposed that transition arrangements should take the following form:

- 1. Eligibility for transition:** Only trade effluent customers moving tariff structure would be eligible for transition (with respect to their bill for trade effluent services only), which will include:
 - Customers who will be categorised into Trade Effluent Category 1 and have not previously been charged the Framework's non-domestic wastewater standing and volumetric charge; and
 - Customers who will be categorised into Trade Effluent Category 2 and 3.

⁴ CRU Draft Determination: Revenue Control 4 (CRU2025134) – <https://consult.cru.ie/en/consultation/revenue-control-4-rc4>

2. **Threshold for transition:** Eligible customers who face an expected annual bill increase of €250 or more based on their previous year's consumption would qualify for transition.
3. **Transition mechanism:** The annual increase in a customer's bill would be capped by a percentage of the customer's previous annual bill. The percentage cap would rise in each year of the transition period as follows: 20% (2026/27), 30% (2027/28), 40% (2028/29), and 50% (2029/30), i.e., a 20% cap, applied to the 2025/26 bill, would limit the bill increase in the 2026/27 tariff year, with a 30% cap, applied to the 2026/27 bill in the 2027/28 tariff year, and so on.
4. **Duration of the transition period:** Transition arrangements would apply for a four-year period from 01 October 2026 to 30 September 2030. Transition arrangements would cease to apply in the fifth year, but the need for further arrangements could be considered.

Tariff application rules

Uisce Éireann has proposed to amend existing TARs relating to assigning customers to tariff classes to accommodate trade effluent customers and to introduce two new rules to govern situations specific to trade effluent customers, as follows:

- Existing TARs set out that non-domestic customers are classified into customer classes based on their annual consumption. Uisce Éireann is proposing to amend these TARs to accommodate trade effluent customers, which would be classified based on their annual consumption and business activity.
- As per the 2024 decision on the Non-Domestic and Trade Effluent Tariff Framework, trade effluent Category 2 and 3 customers are charged using the Mogden⁵ charging structure for the volume of effluent they discharge, which is based on sampling the pollutant profile of each customer. Uisce Éireann is proposing, that in the absence of sampling data, Mogden charges for Category 2 and 3 trade effluent customers should be calculated using values for COD and SS based on the customers' licence limits. 30% of the customer's Emission Limit Value (ELV) would be used to calculate estimates for COD and SS values, to be used in the Mogden formula for no more than one tariff year.
- Trade effluent customers typically discharge both sanitary wastewater and trade effluent. For some customers, the sanitary wastewater is discharged in a separate point and cannot be metered. Uisce Éireann is proposing to introduce a new TAR outlining that the industry-standard "litres per working day" principle should be applied to estimate the volume of sanitary wastewater for billing purposes when a metering solution cannot be found. The following allowances would be applied:
 - 25 litres per head⁶ per working day where there is no canteen on the premises serving hot meals; or

⁵ A Mogden charging structure is a method of charging based on the actual volume, strength and composition of trade effluent that is discharged from the customer's premises to the public sewer.

⁶ The allowance for sanitary wastewater is calculated based on the number of employees that the trade effluent customer has.

- 50 litres per head per working day where there is a canteen on the premises serving hot meals.

In addition, Uisce Éireann has evaluated whether a TAR is required for dealing with perverse incentives⁷, and concluded that perverse incentives do not exist in the trade effluent tariff structure, and a TAR is not required.

OBSERVATIONS ON UISCE ÉIREANN'S PROPOSALS

The CRU has reviewed Uisce Éireann's proposals, including the alternative options it considered (presented in Section 3).

The CRU's main observation is that Uisce Éireann's proposed transition **mechanism** would not achieve its intended purpose of transitioning all customers to their cost reflective bills swiftly and equitably. Uisce Éireann's proposed mechanism would mean very gradual bill increases for a significant number of customers who would then face large cliff-edge style jumps after the transition period ends. Uisce Éireann estimates that:

“At the end of the four-year transition period, c.150 trade effluent customers are expected to have not yet reached cost reflective, enduring tariffs. The average increase these customers will face in the year after the transition period ends is 90%; with c.25 customers facing increases of between 100% and 200%, and c.15 facing increases above 200%.”

The CRU is also concerned that the proposed **threshold** for transition is too low to be meaningful. €250 is less than the smallest possible Compliance and Licensing Charge (€383 per annum for Category 1 trade effluent customers) that Uisce Éireann will introduce for trade effluent customers from October 2026 and does not rule out a single customer.

THE CRU'S PROPOSED DECISION

Transition arrangements need to balance conflicting objectives. While all trade effluent customers have a reasonable expectation of charge stability, the present two-tier situation in which some customers pay nationally harmonised, cost-reflective charges while others remain on the rates set in 2013 by Local Authorities and Town Councils is clearly inequitable and needs to be phased out.

The CRU proposes that transition arrangements are put in place when harmonised trade effluent charges are implemented on 01 October 2026 to mitigate the potential for business disruption associated with significant bill shocks as customers transition towards newly harmonised, cost-reflective tariff rates. These transition arrangements encourage customers to take action on their sites, to innovate and improve the sustainability of their operations. By doing so, customers that take measures to control of the quality of their trade effluent discharge can reduce future bill increases throughout the transition period and beyond.

The CRU is minded to accept Uisce Éireann's proposal that **only customers moving tariff structure will be eligible for transition** (with respect to their bill for trade effluent services

⁷ Across the existing non-domestic tariff classes there are 'perverse incentives' to consume inefficiently for a small number of customers who are close to certain tariff boundaries. That is, at certain tariff boundaries, a small number of customers may be incentivised to either use more water or avoid reducing water use (or wastewater discharge for wastewater only customers) in order to avoid moving to a new tariff class the following tariff year which would be less beneficial financially.

only). This includes customers in Trade Effluent Categories 2 and 3; and customers in Trade Effluent Category 1 which have not previously been charged Framework non-domestic wastewater standing and volumetric charges.

However, the CRU considers Uisce Éireann's proposed €250 qualifying threshold to be too low to be meaningful. A €750 threshold, while still relatively low given the size of eligible customers, is a fairer option as it matches the threshold applied to non-domestic customers in 2024. That is, **eligible customers will qualify for transition arrangements with respect to annual bill increases of €750** or more.

The CRU is minded to accept Uisce Éireann's proposal that the **transition period will last for four years, from 01 October 2026 to 30 September 2030**. The CRU does not agree that it should consider further arrangements after the four year transition period ends. Transition design should result in all eligible customers paying bills approaching cost-reflective levels in the last year of the transition period, with no cliff-edge style jumps once cost-reflective charges apply universally from 01 October 2030.

The CRU considers Uisce Éireann's proposal that bill increases should be capped as a percentage of each customer's previous bill to be insufficient for completing the transition equitably and without cliff-edge jumps. Instead, the CRU's proposed decision is to **cap annual bill increases as a percentage of the cost-reflective bill**. That is, the maximum annual bill increase will be a percentage of the bill that would apply without any capping arrangements.

The CRU is considering a range of options with respect to the **profile of bill capping** across the four-year transition period. Capping annual bill increases at 20% of the cost-reflective bill should be sufficient to transition all customers to enduring levels by 01 October 2030 in a series of similar-sized steps. Alternatively, caps could be set lower in the initial years of the transition and higher towards the end – such as 10/15/20/25% of the cost-reflective bill. Ramping up in this way would mean that a greater number of customers benefit in the earlier years before sharper increases are experienced later on by the minority that have still not reached enduring levels.

The CRU believes that its proposed decision meets the two goals of promoting stability by smoothing bill increases predictably over time and ensuring equity by moving customers to cost-reflective tariffs by the end of the transition period. A level playing field between all non-domestic customers is achieved sooner than under Uisce Éireann's proposals, addressing the inequity present in current charges paid by competing businesses in similar industries.

The table below summarises the CRU's proposed decision on transition arrangements.

Table 0.1: The CRU proposed decision on transition arrangements

Element	CRU’s Proposed Decision
Eligibility	<p>Only trade effluent customers moving tariff structure would be eligible for transition (with respect to their bill for trade effluent services only). This includes:</p> <ul style="list-style-type: none"> • Customers who will be categorised into Trade Effluent Category 1 and have not previously been charged the Framework’s non-domestic wastewater standing and volumetric charges; and • Customers who will be categorised into Trade Effluent Category 2 and 3.
Threshold	Customers who face an expected annual bill increase greater than or equal to €750 would qualify for transition.
Duration	Transition arrangements should apply for four years, from 01 October 2026 to 30 September 2030.
Mechanism	During the transition period, customers that are eligible for and qualify for transition arrangements shall have their annual bills capped, such that they pay no more than their previous year’s bill plus x% of bill that they would pay under cost-reflective rates.
Profile	The CRU is still considering options with respect to the profile of bill capping across the four-year transition period – including straight-line (e.g. 20/20/20/20%) and ramping-up (e.g. 10/15/20/25%) cap values.

The CRU also agrees that Uisce Éireann’s proposals on extending the set of TARs to accommodate the implementation of the trade effluent charging arrangements are pragmatic and provide practical solutions to the situations they are intended to address. The CRU’s proposed decision is to **accept Uisce Éireann’s TAR proposals**.

In addition, the CRU intends to instruct Uisce Éireann to provide an expanded program of communication and supports directed towards trade effluent customers both in advance of the implementation of national harmonised trade effluent rates on 01 Oct 2026 and during the period of transition arrangements. These requirements are further discussed in Section 5, which also summarises support available for customers and upcoming updates to the Non-Domestic Customer Handbook and associated documents. In this consultation, the CRU also seeks customer views on any further communications from UÉ that would provide further clarity on trade effluent tariffs, customer bills or updated tariff rates.

The intention of these requirements on Uisce Éireann is to ensure customers are sufficiently informed of the upcoming changes to tariffs and aware of the available support. The CRU is mindful of the concerns about affordability and competitiveness that trade effluent customers might have and has taken this into account in its proposed decision on transition arrangements.

NEXT STEPS

The CRU is now seeking views from customers and interested parties on the proposed decision.

The areas on which the CRU is seeking views are discussed in Sections 3 and 4 on the transition arrangements and TARs, respectively. A complete list of consultation questions can also be found in Appendix A.

Further to the review of responses received to this consultation and engagement with customers and interested parties, the CRU intends to issue a decision in late Q1 on the transition arrangements and TARs to apply on 01 October 2026.

Final tariff rates will be published in early Q3 after the RC4 Final Determination is published in Q2 2026.

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Glossary of Terms and Abbreviations

Term or Abbreviation	Definition or Meaning
AQ	Annual Quantity (AQ), means the volume of water used (or wastewater discharged for wastewater only connections) by the connection over a 12-month period.
CRU	Commission for the Regulation of Utilities
COD	Chemical Oxygen Demand: Uisce Éireann defines the term as <i>“Concentration of oxygen equivalent to the amount of dichromate consumed when a water sample is treated under defined conditions. [One of the standard tests used to characterise water quality] It is commonly expressed in terms of milligrams of oxygen per litre of sample.”</i>
ELV	Emission Limit Value
EPA	Environmental Protection Agency
FOG	Fat, Oil and Grease
Mogden	A Mogden charging structure is a method of charging based on the volume, strength and composition of trade effluent that is discharged from the customer's premises to the public sewer.
ND	Non-domestic
UÉ	Uisce Éireann
OECD	Organisation for Economic Co-operation and Development
pGWS	Public Group Water Schemes
RC	Revenue Control
Sanitary wastewater	Uisce Éireann defines the term as <i>“Means wastewater of a composition and concentration (biological and chemical) which originates predominantly from the human metabolism or from day-to-day domestic type human activities, including washing and sanitation. Sanitary wastewater is generated by both domestic and non-domestic customer classes.”</i>
SFP	Strategic Funding Plan
SS	Suspended Solids: Uisce Éireann defines the term as <i>“Means small solid particles which remain in suspension in water. SS is an indicator of water quality.”</i>
TAR	Tariff Application Rule
TE	Trade effluent is a type of wastewater that can have a composition that can be more polluting than regular wastewater, which can be more costly to treat and dispose of into the environment thereby justifying an additional or separate charge for this type of effluent.
TEC	Trade Effluent Categorisation codes: Uisce Éireann defines the term as <i>“TEC codes provide a method of reviewing, informing and setting the relative risks of issues from experience of trade effluent discharges from various trade sectors.”</i>
WSPS	Water Services Policy Statement

Public Impact Statement

Uisce Éireann charges non-domestic customers for supplying water to and for removing wastewater (including trade effluent) from their premises. The charges customers pay are determined under Uisce Éireann's Non-Domestic and Trade Effluent Tariff Framework.

In July 2024, the CRU published a decision on Uisce Éireann's proposal to update the Framework. This update also set out the CRU's decision on Uisce Éireann's proposals for integrating new national harmonised trade effluent charging arrangements into the Non-Domestic Tariff Framework. These updates to the Non-Domestic Tariff Framework represent an important step towards achieving a full set of national harmonised system of charges for all non-domestic services provided by Uisce Éireann - water services, wastewater services and trade effluent services.

Implementation of the Effluent Tariffs

As part of the 2024 decision, the CRU decided to allow for a 'grace period' before the new trade effluent charging regime was implemented. The implementation date was set for 01 October 2026. The period between the decision on integrating trade effluent charging arrangements into the Non-Domestic Tariff Framework and applying the new tariffs was approved to allow customers to prepare for the upcoming changes and to put in place measures to mitigate bill increases. Many trade effluent customers will see significant changes to the structure and level of their tariffs. Because of this, the CRU has requested Uisce Éireann to consider the need for transition arrangements ahead of the implementation of the trade effluent charging arrangements.

Impact to Customers' Bills and Water Infrastructure

The implementation of the trade effluent charging arrangements represents the last step towards the harmonisation of charging arrangements for all non-domestic customers. Charges for all customers, including trade effluent customers, will be determined on the same national basis under the Non-Domestic and Trade Effluent Tariff Framework.

Some trade effluent customers have remained outside of the Framework, and as such, have not seen increases to their bills in recent years. Many of these customers are also on charging arrangements that have weak incentives to reduce the level of pollutants and volume of trade effluent, which is more polluting than regular wastewater. With the implementation of harmonised trade effluent tariffs, their bills will be updated to reflect inflation in recent years and the significant need for investment into water and wastewater infrastructure. The trade effluent charging arrangements align with the principles set out in the EU Water Framework Directive, including on cost recovery and the polluter pays principle⁸.

Investment in water and wastewater infrastructure is crucial for ensuring the reliability, efficiency and sustainability of Ireland's water supply, which is essential for economic growth, social welfare and environmental protection.

⁸ The polluter pays principle means that customers discharging high-strength trade effluent should pay higher charges than customers discharging low-strength effluent (for the same volume discharged).

1 Introduction

1.1 Purpose of This Paper

The purpose of this Proposed Decision Paper is to seek views from customers and interested parties on the CRU's proposed decision on transition arrangements and Tariff Application Rules (TARs) to apply on 01 October 2026, when the new trade effluent charging regime and charges are implemented.

This paper presents a summary of Uisce Éireann's proposal and the CRU's observations on each aspect of the proposal. Feedback from stakeholders will be taken into consideration by the CRU before making a final decision.

The full details of Uisce Éireann's charging proposal are set out in Uisce Éireann's submission document "*Trade Effluent Transition Arrangements and Tariff Application Rules Proposals*" (CRU2025254), which is published alongside this paper.

The accuracy of the information and analysis presented in Uisce Éireann's submission is the responsibility of Uisce Éireann. Uisce Éireann is also responsible for undertaking the necessary due diligence to ensure that the assumptions, costs and data underpinning Uisce Éireann's policy proposals are correct and accurate.

1.2 Regulatory Context and the CRU's Role

National Water Policy Framework

Guided by compliance with EU legislation (Water Framework Directive), the United Nations Sustainable Development Goals (SDG 6: clean water and sanitation), and the OECD Principles of Water Governance, the Water Services Policy Statement (WSPS) is prepared by the Minister⁹ in accordance with the Water Services Acts and serves as the high-level policy document setting out the priorities of Government regarding the provision of water services during the period of the Strategic Funding Plan (SFP).

The SFP prepared by Uisce Éireann sets out the necessary measures that Uisce Éireann will take to meet the policy objectives of the WSPS while detailing operational and capital costs for the regulatory period. The Plan sets out the limit of capital and operating costs expected to be incurred by Uisce Éireann over the revenue control (RC) period and how these costs are expected to be recovered through a combination of approaches including government subvention and non-domestic tariffs.

Further to Ministerial approval of the SFP for the regulatory period, Uisce Éireann submits its investment plan to the CRU, which details operating and capital costs. The CRU then starts its revenue control process, reviewing Uisce Éireann's investment plan and determining an allowed expenditure and allowed revenue for the revenue control period. This process is to provide the best possible value for customers in Ireland, to ensure efficient and cost-effective delivery of

⁹ The Minister in this Consultation Paper refers to the Minister for Housing, Local Government and Heritage unless otherwise stated.

services and investment, and to ensure that Uisce Éireann's expenditure remains within the SFP envelope.

CRU's Role in Regulating Uisce Éireann's Revenues and Non-Domestic Tariffs

The CRU is Ireland's independent energy and water regulator. The CRU has a wide range of economic, customer protection and safety responsibilities in energy and water. The work of the CRU impacts every Irish home and business by ensuring safe, secure, and sustainable energy and water supplies at a reasonable cost.

The CRU's role as the economic regulator of Uisce Éireann is to protect the interests of customers, ensure water services are delivered in a safe, secure and sustainable manner and that Uisce Éireann operates in an economic and efficient manner. As set out in the CRU's Strategic Plan for the 2025-2027 period, a key CRU objective is to enable efficient investment for secure, sustainable, and resilient water and wastewater infrastructure. In addition, under section 32 and 39 of the Water Services Act (No.2) 2013, the CRU has responsibility for ensuring that Uisce Éireann provides suitable information to its customers and performs its functions in an open and transparent manner.

Through the revenue control process, the CRU approves Uisce Éireann's allowed revenue at a level which allows Uisce Éireann to recover its efficiently incurred costs over the control period. The CRU may also set 'efficiency challenges' for Uisce Éireann to drive cost efficiencies and improve services provided to customers¹⁰. The CRU also sets targets and monitors the performance of Uisce Éireann in delivering services and investment in infrastructure in a cost-efficient manner.

Another important role for the CRU in regulating Uisce Éireann is to ensure that there is a fair and transparent system of charging for non-domestic customers, taking account of the cost recovery principle and the polluter pays principle in accordance with Article 9 of the EU Water Framework Directive¹¹. In accordance with section 22(8) the Water Services Act (No.2) 2013, the CRU has the responsibility of approving the charges applied by Uisce Éireann to its non-domestic customers for the provision of water and wastewater services (including trade effluent services) via approval of Uisce Éireann's Water Charges Plan. The non-domestic tariffs recover the portion of Uisce Éireann's allowed revenue that reflects the costs of providing water, wastewater and trade effluent services to non-domestic customers.

As part of the process to review the non-domestic tariffs applied to customers, Uisce Éireann submits its tariffing proposals to the CRU. The CRU publishes Uisce Éireann's submissions for public consultation to seek views from customers and interested parties on Uisce Éireann's proposals. The CRU reviews the submissions and carefully considers responses received during the consultation process, before deciding on the tariffs to apply to non-domestic customers. This practice may evolve into a simpler annual update in the future, when Uisce Éireann is not proposing any material changes to the Non-Domestic and Trade Effluent Tariff Framework. In those cases, the CRU may publish an Information Note with the final non-domestic tariff rates to ensure tariffs remain in line with the determination of the allowed revenues.

¹⁰ "Irish Water Revenue Control 3 (CRU/19/148)" - 05 December 2019 - available at the following [link](#).

¹¹ "Article 9 Recovery of costs for water services of the EU Water Framework Directive 2000/60/EC" - 23 October 2000 - available at the following [link](#).

The Environmental Protection Agency (EPA) also has a role in regulating trade effluent discharges. It is responsible for licensing trade effluent discharges from activities which are listed in the First Schedule of the Environment Protection Agency Act.¹²

1.3 Establishing Uisce Éireann's Non-Domestic Tariff Framework – 2019 to 2024

As part of the Government's reform of Ireland's water and wastewater services, Uisce Éireann has been responsible for charging non-domestic customers since 01 January 2014. As per the CRU's direction (CER/14/746)¹³ in 2014, Uisce Éireann continued to apply the existing non-domestic tariffs, which were in place on 31 December 2013 and levied by the Local Authorities and Town Councils, until Uisce Éireann had the necessary information to examine the structure and level of existing tariffs and develop proposals for a new tariffing regime. At that time, over 500 separate charges for the provision of water and wastewater services to non-domestic customers were in place across the country. These charges varied in level, structure and application.

In July 2019, after extensive consultation over 2018 and 2019, the CRU published its decision on a harmonised Non-Domestic Tariff Framework to ensure fair, transparent, and consistent charges nationwide, and resulting non-domestic tariff rates, for the provision of water and wastewater services (CRU/19/074).

The Non-Domestic Framework also ensured that both domestic and non-domestic customers contribute in line with the costs they impose. While the Exchequer covers the cost of providing water and wastewater services for domestic customers, Uisce Éireann determines the respective shares of domestic and non-domestic costs to minimise cross-subsidisation between these two groups. This means that non-domestic customers are charged only for their share of the cost of providing water and wastewater services.

The framework was set for implementation in May 2020 but was delayed until October 2021 due to COVID-19. The enduring non-domestic tariff levels were fixed for three years, to provide price certainty and stability to customers. The non-domestic enduring tariff levels remained unchanged throughout the three-year transition period. The three-year transition period expired on 30 September 2024.

However, certain areas, such as public Group Water Schemes (pGWS) and trade effluent services, were excluded from the initial decision due to data limitations.

The CRU published enduring charging proposals¹⁴ for the provision of water services by Uisce Éireann to pGWS connections in February 2022. In consideration of the responses received to the CRU's proposed decision paper and engagement with stakeholders, in June 2022 the CRU issued a decision¹⁵ on the enduring pGWS charging arrangements, which were implemented by

¹² Non-domestic customers requiring EPA licences are generally large-scale industrial businesses. However, businesses requiring EPA licences and the EPA themselves must consult with Uisce Éireann on any trade effluent discharge to the sewer network. More information can be found in Uisce Éireann's website – available at the following [link](#).

¹³ "Water Charges Plan Decision Paper (CER/14/746)" - 08 October 2014 - available at the following [link](#).

¹⁴ "Irish Water's Non-Domestic Tariff Framework Enduring Charging Arrangements for Public Group Water Schemes CRU Proposed Decision Paper (CRU/202208)" - 10th February 2022 - available at the following [link](#).

¹⁵ "Irish Water's Non-Domestic Tariff Framework Enduring Charging Arrangements for Public Group Water Schemes CRU Decision Paper (CRU/202245)" - 2nd June 2023 - available at the following [link](#).

Uisce Éireann on 01 October 2022. As part of this decision, the CRU directed Uisce Éireann to apply the harmonised national tariff rates under the Non-Domestic Tariff Framework to pGWS connections and provide two-year transition arrangements as necessary.

In 2023, the CRU asked Uisce Éireann to update the existing Framework for the purposes of generating a suite of tariffs to apply to non-domestic connections at the end of the three-year transition period, that is, on 01 October 2024. The CRU also asked Uisce Éireann to generate proposals for charging for trade effluent services and importantly integrate these proposals into the Non-Domestic Tariff Framework¹⁶.

In July 2024, following extensive public consultation and stakeholder engagement, the CRU published its decision on Uisce Éireann Non-Domestic and Trade Effluent Tariff Framework (CRU202460)¹⁷ and resulting non-domestic tariff rates that apply from 01 October 2024 to 30 September 2025 for the provision of water and wastewater services by Uisce Éireann. This ensures that Uisce Éireann's charges for providing water and wastewater, and trade effluent services for all of Uisce Éireann's customers, are based on the same cost basis, the same customer input data and the same cost allocation rules. This review also represents an important step towards achieving a national and harmonised set of charges for all non-domestic services provided by Uisce Éireann to its customers - water services, wastewater services and trade effluent services.

As part of the decision on the Non-Domestic and Trade Effluent Tariff Framework, the CRU decided to allow for a 'grace period' before the implementation of the new trade effluent charges to allow customers to prepare for the upcoming changes in the tariff structure. To facilitate this, the CRU published indicative trade effluent tariff rates. The grace period was also meant to allow Uisce Éireann to update its operational processes to enable it to set charges based on the new trade effluent tariff structure. The implementation date for the trade effluent charges was set for 01 October 2026.

Tariff Principles

It is important that the tariffs developed by Uisce Éireann are based on a clear set of principles. In 2016 the CRU issued Uisce Éireann with six tariff principles (set out below) and required that Uisce Éireann take these principles into account when establishing the Non-Domestic Tariff Framework. In 2022, the CRU required Uisce Éireann to take account of the same tariff principles when developing its non-domestic tariffs to apply to its non-domestic customers (on 01 October 2024) and new trade effluent charging arrangements.

The CRU is of the view that these principles remain relevant and should be followed by Uisce Éireann for consistency in the development of the tariff Framework.

The principles issued to Uisce Éireann are as follows:

- 1. Equity and no undue discrimination:** Tariffs should be equitable and not unduly discriminate between customers.

¹⁶ For clarity, Uisce Éireann refers to its new proposed trade effluent charging arrangements as a new Trade Effluent Tariff Framework. In practice, trade effluent charging arrangements will be integrated into the Non-Domestic Tariff Framework in respect of the charges for water, wastewater and trade effluent services.

¹⁷ Please note that pGWS connections are treated as non-domestic connections and are charged under the Non-Domestic and Trade Effluent Tariff Framework.

- 2. Efficiency in use of water services:** Tariffs should incentivise the efficient use of water services.
- 3. Cost reflectivity:** Tariffs should be reflective of the costs of providing water services.
- 4. Cost recovery:** Tariffs should allow for the recovery of efficiently incurred costs of providing water services.
- 5. Stability:** Tariffs should be designed to ensure customer bill volatility is kept to a minimum.
- 6. Simplicity:** Tariffs should be clear, transparent and easy to understand.

For clarity, the term ‘water services’ in the above principles should be interpreted as applying to both water and wastewater services (which includes trade effluent services).

In developing its proposals, it may be necessary for Uisce Éireann to consider conflicts or trade-offs between differing principles and strike an appropriate balance between the different principles.

1.4 Implementation of Trade Effluent Tariffs

In July 2024, the CRU decided to approve Uisce Éireann’s proposals for a two-year grace period before implementation of newly harmonised trade effluent charges on 01 October 2026 to allow customers to prepare for changes in how their tariffs are determined and for potential bill increases.

98% of “Category 1” trade effluent connections have already moved onto charges determined under the Non-Domestic Tariff Framework in 2021 (5993 out of 6127 at the latest count) and have since been charged non-domestic wastewater tariff rates. For these customers, a trade effluent “compliance and licensing” charge will be introduced from 01 October 2026.

A subset of customers remained outside the Framework, namely trade effluent connections who were charged a specific trade effluent charge determined by their Local Authority. These connections will move on to Framework tariffs on 01 October 2026. For some customers, this will result in significant changes to the way their charges are determined and structured, as well as the size of their bill.

With the implementation date now coming closer, the CRU has requested Uisce Éireann to consider the need for transition arrangements for trade effluent connections. Uisce Éireann has also proposed to amend its TARs to ensure that tariffs are applied consistently. This paper presents the CRU’s proposed decision on these proposals.

1.5 Note on Uisce Éireann’s allowed revenues

In assessing the case for transition arrangements for trade effluent customers, the CRU has considered how the general level of tariffs may evolve over the coming years – which is tied to the allowed revenues that Uisce Éireann will be permitted to recover. The CRU’s Draft Determination on Uisce Éireann’s allowed revenues over the 2025-2029 revenue control period (RC4) had only recently been published at the time of writing. Therefore, the analysis in this paper is based on allowed revenue assumptions consistent with cost figures from Uisce

Éireann’s Strategic Funding Plan 2025-2029 (SFP), which was approved by the Minister on 05 November 2024. The most notable difference between the two is that the SFP assumed a 20% increase in allowed revenues from 2025/26 to 2026/27, whereas the CRU’s RC4 Draft Determination proposes cost efficiency challenges to Uisce Éireann’s expenditure request and smoothing of the revenue profile resulting in appropriately 9% increase in the remaining RC4 period as detailed in Table 1.1.

Table 1.1: Comparison of annual uplifts to allowed revenues over the RC4 period implied by Uisce Éireann’s SFP vs CRU Draft Determinations

	'25-26	'26-27	'27-28	'28-29	'29-30
Uisce Éireann’s Strategic Funding Plan 2025-2029	9.8% ¹⁸	20.4%	5.3%	5.7%	5.7%
CRU Proposed Decision (RC4 Draft Determination paper)	9.8%	9.2%	8.9%	9.2%	8.7%

Appendix B provides indicative 2026/27 tariff rates consistent with Uisce Éireann’s SFP cost assumptions. Final tariff rates are planned to be determined based on the Final Determination of RC4 allowed revenues in Q2 2026. The publication of final tariff rates for 2026/27 is expected in Q3 2026.

1.6 Consultation Approach

The consultation phase commences on Wednesday 07 January 2026 with the CRU seeking stakeholders’ views on the CRU’s proposed decision on transition arrangements and TARs to apply on 01 October 2026.

Following the six-week consultation period of 07 January – 17 February 2026, and after full consideration of the points raised by respondents, the CRU plans to publish its decision in late Q1 2026.

The CRU procured the consultancy services of Cambridge Economic Policy Associates Ltd (CEPA) to provide specialist economic and policy advice to assist the CRU in further developing Uisce Éireann’s Non-Domestic and Trade Effluent Tariff Framework.

Responding to this consultation

All the responses to this Proposed Decision Paper can be submitted via the CRU’s [consultation portal](#) by the close of business on 17 February 2026.

Please note the CRU intends to publish all submissions received. Unless marked **confidential**, all responses may be published on the CRU’s website. Respondents can request that their response is kept confidential. The CRU will respect this request, subject to any obligations to disclose information. Respondents who wish to have their responses remain confidential should clearly mark the document to that effect and include the reason for confidentiality.

Responses from identifiable individuals will be anonymised prior to publication on the CRU website unless the respondent explicitly requests that their personal details be published. The

¹⁸ 9.8% in both rows for 2025-26 relates to the actual Non-Domestic tariff increase already implemented on 01 Oct 2025

CRU privacy notice outlines how privacy rights of individuals are protected. More information on CRU's privacy notice can be found: <https://www.cru.ie/privacy-notice/>.

1.7 Engaging with Stakeholders

In addition to publishing Uisce Éireann's submission documents and the CRU Consultation Paper, the CRU will put in place additional opportunities for stakeholders to provide their views on the proposals in this document, including:

1. Holding a briefing for the **CRU Non-Domestic Water User Group**: The CRU established a Non-Domestic Water User Group, which facilitates direct engagement with organisations and industry bodies that represent non-domestic water and wastewater customers of Uisce Éireann.
2. Engaging with **An Fóram Uisce (The Water Forum)**: The membership of the Water Forum includes domestic representatives as well as a number of sectoral representatives from the business community.

The CRU will host workshops with key stakeholders in January 2026 to support their engagement with the consultation. The details of these workshops will be shared through the CRU's Non-Domestic Water User Group.

1.8 Structure of this Paper

This rest of this paper is structured as follows:

- Section 2 - provides information on **trade effluent charging arrangements**, including customer categories and the tariff structure; and describes the changes that customers will see to their tariff structures.
- Section 3 - details Uisce Éireann's proposals and the CRU's proposed decision on **transition arrangements**.
- Section 4 - details Uisce Éireann's proposals and the CRU's proposed decision on **TARs**.
- Section 5 - provides information on the **support available** for non-domestic customers, including where customers can find further information on how they might be affected by the implementation of the trade effluent charging arrangements.
- Section 6 - outlines **next steps** in the consultation process.
- Appendix A provides a summary list of **consultation questions**.
- Appendix B provides **indicative tariff rates** to apply on 01 October 2026

1.9 Related Documents

To provide context to this Consultation Paper, the following list of documents contains previous CRU consultations or decisions made in relation to non-domestic water and wastewater tariffs applied to customers of Uisce Éireann:

- CRU Decision Paper – Irish Water’s Non-Domestic Tariff Framework (CRU/19/074)
- CRU Response Paper – Irish Water’s Non-Domestic Tariff Framework (CRU/19/075)
- CRU Decision Paper – Tariff Application Rules (CRU/20/072)
- CRU Decision Paper - Enduring Charging Arrangements for Public Group Water Schemes (CRU/202245)
- CRU Consultation Paper - Uisce Éireann’s Non-Domestic and Trade Effluent Tariff Framework (CRU/2023149)
- Uisce Éireann Non-Domestic Tariff Design Review and Alignment Proposals – submission to the CRU (CRU/2023150)
- Uisce Éireann Trade Effluent Tariff Design Review Proposals – submission to the CRU (CRU/2023151)
- CRU Decision Paper – Uisce Éireann’s Non-Domestic and Trade Effluent Tariff Framework (CRU/202460)
- CRU Responses Paper – Uisce Éireann’s Non-Domestic and Trade Effluent Tariff Framework (CRU/202461)
- Uisce Éireann Water Charges Plan – 23 September 2024 (CRU/2024113)
- CRU Proposed Decision Paper - Uisce Éireann’s Non-Domestic Tariff Framework (CRU/202511)
- CRU Decision Paper - Uisce Éireann’s Non-Domestic Tariff Framework (CRU/2025103)

Information on the CRU’s role and relevant legislation can be found on the CRU’s website:

www.cru.ie.

2 Trade Effluent Charging Arrangements

This section outlines how trade effluent tariffs are structured under the Non-Domestic and Trade Effluent Tariff Framework, and what this implies for individual customers in terms of the changes they will see in their tariffs.

More information on the Non-Domestic and Trade Effluent Tariff Framework, including detailed information on each component of the trade effluent tariffs is provided by Uisce Éireann in its submission *“Trade Effluent Transition Arrangements and Tariff Application Rules Proposals”*.

2.1 How tariff structures will change and who is affected

Out of Uisce Éireann’s total non-domestic customer base of approximately 180,000, only around 6,500 customers are licensed to discharge trade effluent. Trade effluent customers, as such, are a relatively small sub-set of non-domestic customers.

Trade effluent connections are currently either charged a non-domestic wastewater rate or remain on a specific charge determined by their Local Authority prior to January 1st 2014, when Uisce Éireann took responsibility for charging non-domestic customers. The majority of trade effluent connections (almost 6,000) belong in the former group and are already charged the non-domestic wastewater tariffs. These customers tend to discharge relatively low strength and volume trade effluent. Charges for the remaining customers (c. 500), who are not yet subject to the Framework rates, vary in level, structure and application.

The new trade effluent tariff structure will be implemented on 01 October 2026 and will end the differing arrangements still in place for the small number of trade effluent customers. All trade effluent customers will be charged the trade effluent tariff rates under the Framework, which are determined on a national basis and reflect the costs associated with serving different types of customers.

Trade effluent customers will also be categorised under trade effluent customer categories, which were introduced as part of the 2024 decision on the Non-Domestic and Trade Effluent Tariff Framework. The trade effluent customer categories, based on primary business activity and annual discharge volume, were defined as:

- **TE Category 1:**
 - Commercial activities, of any size; and
 - Industrial activities with annual consumption less than 1,000 m³
- **TE Category 2:** Industrial activities with annual consumption of between 1,000 m³ and 249,999 m³
- **TE Category 3:** Industrial activities with annual consumption equal to or greater than 250,000 m³

The tariffs that will apply to trade effluent customers vary by customer category. Table 2.1 below outlines the tariff structure that will apply to each category.

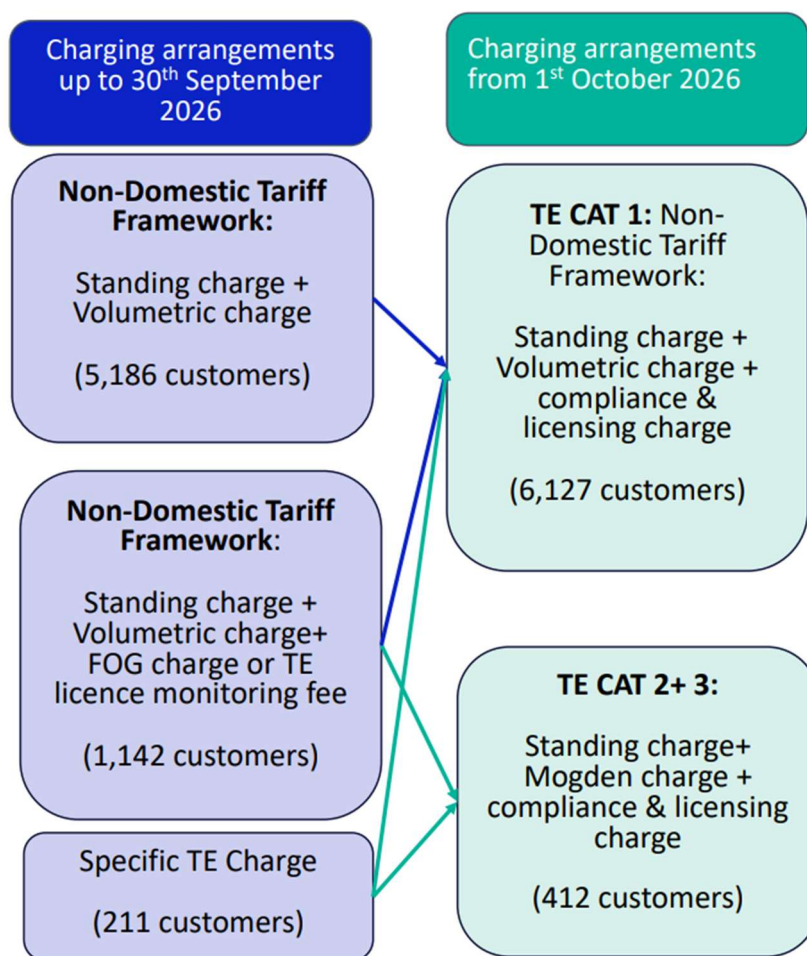
Due to the timing of the final determination for the RC4 period and Uisce Éireann having to use costs estimated for the SFP in developing its proposals, indicative tariff rates are provided in Appendix B. These are not the final tariff rates that will apply on 01 October 2026 and should be only interpreted as indicative of the expected level of tariffs.

Table 2.1: Trade effluent tariff structure

TE Category	Customer Class	Annual Volume (m ³)	Standing Charge (€/year)	Compliance & Licensing Charge (€/year)	Volumetric Charge (€/m ³)
TE Category 1	Band 1	Less than 1,000 m ³	Band 1 Wastewater Standing Charge	Fixed Charge per TE Category	Band 1 Wastewater Volumetric Charge
	Band 2	Between 1,000 m ³ and 19,999 m ³	Band 2 Wastewater Standing Charge		Band 2 Wastewater Volumetric Charge
	Band 3	Between 20,000 m ³ and 249,999 m ³	Band 3 Wastewater Standing Charge		Band 3 Wastewater Volumetric Charge
	Band 4	Equal to or greater than 250,000 m ³	Band 4 Wastewater Standing Charge		Band 4 Wastewater Volumetric Charge
TE Category 2	Band 2	Between 1,000 m ³ and 19,999 m ³	Band 2 Wastewater Standing Charge	Fixed Charge per TE Category	Mogden Charge per TE Category
	Band 3	Between 20,000 m ³ and 249,999 m ³	Band 3 Wastewater Standing Charge		
TE Category 3	Band 4	Equal to or greater than 250,000 m ³	Band 4 Wastewater Standing Charge	Fixed Charge per TE Category	Mogden Charge per TE Category

With the implementation of trade effluent arrangements, trade effluent customer categories will come into effect, and trade effluent customers will see a change in their classification. As part of preparing for this change, Uisce Éireann has reviewed how customer classification and charging structures will change, as illustrated below.

Figure 1: Changes to trade effluent charging arrangements



Source: Uisce Éireann’s “Trade Effluent Transition Arrangements and Tariff Application Rules Proposals” (CRU2025254)

The majority of the customers already charged the non-domestic wastewater standing and volumetric rates will be classified as Trade Effluent Category 1 customers. The only change that these customers will see is the new compliance and licence charge, which will apply to all trade effluent customers. For some customers, it replaces the currently applied FOG charges and trade effluent licence monitoring fee.

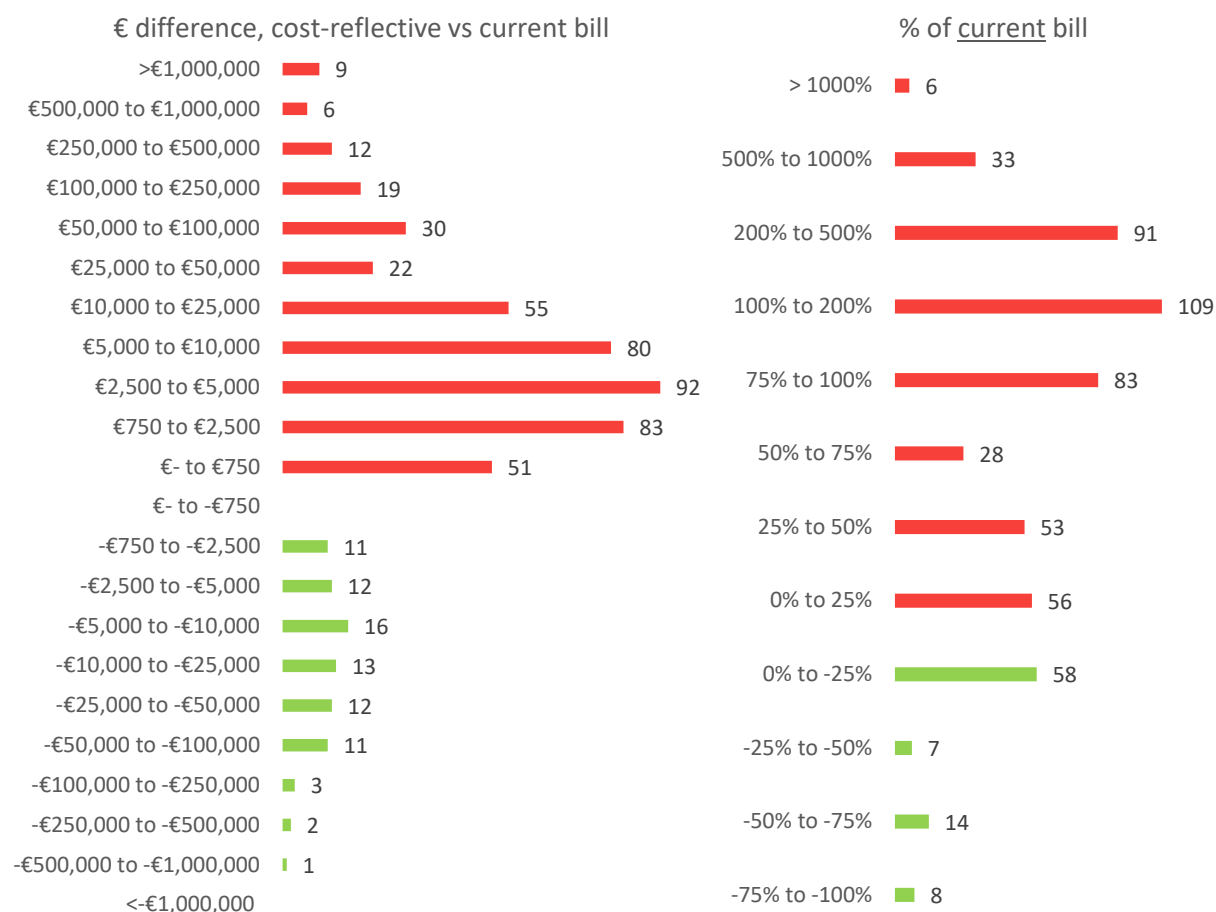
Those connections who are currently charged specific charges determined by Local Authorities will see larger changes to their tariff structure. A small number of customers who are currently on a specific TE charge will move to the Trade Effluent Category 1. Connections who will move to the Trade Effluent Categories 2 and 3 will be subject to a new volumetric charge determined by the Mogden formula, a standing charge (consistent with that applied to non-domestic wastewater customers), and the compliance and licensing charge.

In addition, a small number of customers who already receive non-domestic wastewater charges will be moved to Trade Effluent Categories 2 and 3 and so will face Mogden charges for the first time.

2.2 Comparing trade effluent customers' bills under current and cost-reflective charges

Uisce Éireann has provided analysis of how trade effluent customers' bills could change from 01 October 2026 without any transition arrangements (based on allowed revenues consistent with Uisce Éireann's SFP 2025-26, which are not final). Among the 546 customers that Uisce Éireann predicts will move onto new tariff structures from 01 October 2026, around 16% are expected to see their bills decrease and 84% increase. The average increase, without capping, would be +87% of bills from the previous year. A small number of customers could see their bills increase more than tenfold. In absolute terms, some very large industrial customers' bills are expected go up by over €1m. The figure below illustrates differences between current and cost-reflective bills for customers moving to new tariff structures in percentage and absolute terms.

Figure 2: Bill changes without transition arrangements for trade effluent customers moving tariff structures from 01 October 2026



Nationally harmonised trade effluent charges will mean large bill increases for some customers. It is important to note that new bills will reflect the fair share that those customers should contribute according to the strength and volume of their discharge to recover costs they impose on the wastewater network. The following section describes Uisce Éireann's proposals to mitigate business disruption associated with very large bill shocks by phasing them in over a multi-year "transition" period.

3 Trade Effluent Transition Arrangements

This section outlines the recent precedent for transitioning non-domestic customers to harmonised, cost-reflective bills over several years (3.1); sets out Uisce Éireann's proposals on transition arrangements for trade effluent customers to apply from 01 October 2026, including the CRU's observations on those proposals (3.2); and introduces the CRU's proposed decision and questions for consultation (3.3).

The CRU's proposed decision on transition arrangements is outlined at the end of the section, along with consultation questions.

3.1 Precedent for transition arrangements

A core principle of the Non-Domestic Tariff Framework when it was introduced in 2021 was that customer bill volatility should be kept to a minimum given the significant reform (and harmonisation) in tariff charging arrangements facing customers at the time. The CRU therefore considered arrangements to mitigate the potential for business disruption associated with significant bill shocks as customers transitioned towards newly harmonised, cost-reflective tariff rates.

At the time, the CRU decided to apply a two-track approach to transition arrangements. All customers facing an increase in their annual bill of €250 or greater were transitioned to their enduring tariffs over three years, while customers who faced an increase of €750 or greater also benefitted from a cap on the year-to-year increase in their annual bills equal to 10% of their previous bill.

Because of the 10% cap, some connections did not reach their enduring bill levels by the end of the initial three year transition period – requiring the CRU to consider the need for further transition arrangements thereafter. In 2024, the CRU decided to retain a cap on annual bill increases for two further years – which applied to increases greater than €750 and which represented at least a 75% increase on their previous annual bill. These transition arrangements are due to conclude on 30 September 2026.

Given the recent precedent for transition arrangements, and the significant changes trade effluent customers will see in their tariff structure, the CRU has requested Uisce Éireann to consider the need for transition arrangements to apply from 01 October 2026.

Uisce Éireann's proposal on the design and duration of transition arrangements are presented in the following section.

3.2 Uisce Éireann's Proposal

Uisce Éireann's proposal for transition arrangements to apply from 01 October 2026 consists of four elements: (1) eligibility for transition, (2) a qualification threshold for transition, (3) the transition mechanism and (4) the duration of the transition period.

Uisce Éireann's proposal for transition arrangements is summarised in the box below.

Uisce Éireann's Proposal:

Eligibility for transition: only trade effluent customers who are moving tariff structure would be eligible for transition arrangements (with respect to their bill for trade effluent services only). This includes:

- Customers who will be categorised into Trade Effluent Category 1 and have not previously been charged the Framework non-domestic wastewater standing and volumetric charges; and
- Customers who will be categorised into Trade Effluent Category 2 and 3.

Threshold for transition: eligible trade effluent customers who face an expected annual bill increase greater than or equal to €250, based on their previous year's consumption, would qualify for transition.

Transition mechanism: The annual increase in a customer's bill would be limited by a percentage cap applied to the customer's previous annual bill. The percentage cap will increase in each year of the transition period as follows: 20% (2026/27), 30% (2027/28), 40% (2028/29), and 50% (2029/30). i.e., a 20% cap, applied to the 2025/26 bill, would limit the bill increase in the 2026/27 tariff year, with a 30% cap, applied to the 2026/27 bill in the 2027/28 tariff year, and so on.

Duration of the transition period: trade effluent transition arrangements would apply for a four-year period from 01 October 2026 to 30 September 2030. Before the conclusion of the transition period, the need for further transition arrangements should be reviewed.

The following subsections will provide more detail on each element of Uisce Éireann's proposal, including the alternatives considered and reasoning provided by Uisce Éireann. In its assessment of its proposal and alternatives against the tariff principles, Uisce Éireann has given the 'stability' principle the greatest weight, given the importance of ensuring that customers do not face unacceptably high annual increases to their bills.

3.2.1 Eligibility for Transition

Uisce Éireann proposes only customers who are moving tariff structure on 01 October 2026 would be eligible for transition arrangements, as described in Figure 1.

Uisce Éireann explains that many of those customers who are moving to Trade Effluent Category 1 and are already charged non-domestic wastewater rates, have already benefitted from transition arrangements put in place in 2021 and will only see the addition of the compliance and licensing charge to their bill. Uisce Éireann notes that the compliance and license charge *"is set at a relatively low level, representing just 9.2% of a Trade Effluent Category 1 customers' bill"*. Where this is expected to replace existing FOG charges or licence monitoring fees, the impact on the customer's bill will be a relatively small increase or decrease.

Uisce Éireann's Proposal:

Eligibility for transition: only trade effluent customers who are moving tariff structure would be eligible for transition arrangements (with respect to their bill for trade effluent services only). This includes:

- Customers who will be categorised into Trade Effluent Category 1 and have not previously been charged the Framework non-domestic wastewater standing and volumetric charges; and
- Customers who will be categorised into Trade Effluent Category 2 and 3.

CRU observations

The CRU considers Uisce Éireann's proposal to be reasonable in that it limits eligibility for transition to only those customers who see significant changes to their tariff structure. The use of the Mogden formula for the volumetric charge is more complex than the specific tariff structures currently in place for some trade effluent customers. The transition period will allow these customers to understand how the composition of their effluent is reflected in their bill and to consider what mitigation measures they can implement to achieve reductions in their bill.

It is also prudent to not extend transition arrangements for those Category 1 customers who are already on non-domestic wastewater rates and have already benefitted from non-domestic transition arrangements in recent years. The addition of the licencing and compliance charge represents a relatively small increase to the bill for most of these customers. Uisce Éireann's proposal in this respect ensures equity between non-domestic customers and trade effluent customers and moves a large number of trade effluent customers to their cost-reflective tariffs, which itself is a key aim of the Non-Domestic and Trade Effluent Tariff Framework.

Therefore, the CRU proposes to accept Uisce Éireann's proposal that only trade effluent customers who are moving tariff structure would be eligible for transition arrangements.

3.2.2 Threshold for Transition

Uisce Éireann has considered three options for the threshold to qualify for transition:

- **Option 1:** No transition i.e., all trade effluent customers move immediately to cost-reflective tariff levels from October 2026.
- **Option 2:** Trade effluent customers who face an expected annual bill increase of €250 or more based on their previous year's consumption (and sampling data where appropriate) would qualify for a transition. An estimated 459 (or 7.0% of) trade effluent connections would qualify.
- **Option 3:** Trade effluent customers who face an expected annual bill increase of €500 or more based on their previous year's consumption (and sampling data where appropriate) would qualify for a transition. An estimated 446 (or 6.8% of) trade effluent connections would qualify.

Uisce Éireann's assessment of the options against the tariff principles (see Section 0) concludes that Option 1 performs poorly against the 'stability' principle given the resulting immediate bill increases for customers. While noting that Option 1 performs well against the principles of 'efficient use', 'cost reflectivity', 'cost recovery' and 'simplicity', Options 2 and 3 are preferred as the 'stability' principle should in this context be given more weight, and Options 2 and 3 protect customers against bill volatility.

Uisce Éireann notes that Option 3 performs better than Option 2 against the principles of 'efficient use', 'cost reflectivity' and 'cost recovery'. Uisce Éireann, however, considers that Option 2 overall performs best as *"it is consistent with the qualification threshold applied to non-domestic water and wastewater customers following tariff harmonisation in 2021"* and results in a higher number of qualifying customers, thus aligning with the principle of equity and no undue discrimination. More specifically, Uisce Éireann notes that all customers who would be eligible for transition are expected to see a bill increase greater than €250.

Uisce Éireann's Proposal:

Threshold for transition: eligible trade effluent customers who face an expected annual bill increase greater than or equal to €250, based on their previous year's consumption, would qualify for transition.

CRU observations

The CRU agrees that the 'Option 1' of having no transition arrangements for trade effluent customers would not deliver on the principle of 'stability'. The purpose of transition arrangements is to mitigate the potential shock to businesses from facing cost-reflective trade effluent charges by spreading large bill increases over several years. On the other hand, the CRU does not wish to delay the introduction of nationally harmonised cost-reflective trade effluent charges unnecessarily, such as when bill increases are small relative to the volume and strength of the business' discharge and so would not represent a significant shock to that business. It is therefore important that the mechanism, duration and threshold for transition arrangements are defined proportionately.

The importance of a € threshold is linked to how the transition mechanism is defined. In previous years, bill capping has been applied as a proportion of each customer's bill from the previous year. A € threshold was used to prevent bill capping from applying when a bill increase was large in percentage terms but small in absolute terms (which was common when a customer's existing bill started at a very low level). Section 3.2.3 sets out the CRU's concerns with repeating this mechanism, and argues instead for capping bill increases as a proportion of each customer's cost-reflective bill (i.e. the bill they are moving to rather than the one they are coming from). Under this alternative approach, a € threshold would become less important. Bill increases that are small in absolute terms would typically also be small as a percentage of the cost-reflective bill.

Nevertheless, the CRU agrees that it would be prudent to retain the precedent of a € threshold, as used in 2019 and 2024 Non-Domestic Tariff Framework transition decisions, to remove the obligation for intervention in the case of small bill increases.

However, the CRU does not agree with Uisce Éireann's proposal that the threshold should be set at €250 (Option 2). As noted by Uisce Éireann, this threshold would not rule out a single customer. It is too low to be meaningful. To emphasise how low a €250 threshold is, it is less than the compliance and licensing charge applied to Category 1 customers (€383), which is considered by Uisce Éireann to be small enough that Category 1 customers already on Non-Domestic Tariff Framework rates should not be eligible for transition. Setting a threshold of €250 would result in a situation in which the same bill increase is considered appropriate for some customers, but not for others of the same type.

In considering what level to adopt instead, the CRU proposes to adhere to the precedent set in its 2024 decision of a €750 threshold. In that year, non-domestic customers and the majority of trade effluent Category 1 customers that began transitioning to Non-Domestic Tariff Framework rates experienced an average bill increase of 34% (following the end of a three year freeze to the enduring tariff rates). Customers only qualified for continued transition arrangements for bill increases which were above €750 and more than 75% of their existing bill. It would therefore be inequitable to set a lower € threshold for trade effluent customers from October 2026.

Uisce Éireann has provided analysis of the number of trade effluent customers that would be eligible for transition arrangements, but which would be disqualified under alternative € thresholds (using 2023 volume data and SFP cost assumptions). Under this analysis, approximately 38 customers face bill increases below a €750 threshold and so would no longer qualify for bill capping (depending on the percentage cap levels that the € threshold is combined with). However, 31 of those customers fall into this bracket because they have been assigned the same assumed volumes – so may not be affected in practice. Of the remaining seven, two already pay cost-reflective water charges worth tens of thousands of euros, so a bill increase of less than €750 should not represent a significant increase for these customers when considering their total bill. The remaining five include three Service Stations, a Slaughtering business, and a Waste business. Each would face a bill increase in October 2026 of €400-500, from an average of around €1,300 to €1,750. Many similar trade effluent customers that have already transitioned to Non-Domestic Tariff Framework rates will face similar bill increases from October 2026, but do not meet Uisce Éireann's proposed eligibility criteria.

Therefore, the CRU is of the view that a €750 threshold would follow recent precedent, would treat similar customers on a similar basis, and would not unduly disqualify any customers facing excessive year-to-year bill increases.

3.2.3 Design of the Transition Mechanism

Uisce Éireann considers two options for the transition mechanism in its proposal. Option 2 was suggested by the CRU as an alternative to Uisce Éireann's proposal (Option 1). Both options are assessed by Uisce Éireann in its submission:

1. Option 1: Annual percentage cap
2. Option 2: Increase commensurate with proportion of future bill

Option 1: Annual percentage cap

Uisce Éireann proposes that a percentage cap would be applied to a customer's bill each year of the transition. The cap would limit the increase in the bill in each year to a specific proportion

of the bill in the previous tariff year. Customers’ bills during the transition would be calculated using the following formula:

$$\text{Bill cap for tariff year } y = \text{bill for tariff year } y-1 + X\% \text{ of bill for tariff year } y-1$$

Uisce Éireann recognises that many trade effluent customers are facing a significant bill increase, and that there is a need to minimise large step changes but also ensure that there is a reasonable path to cost reflectivity. Uisce Éireann therefore proposes that the percentage cap would increase annually to “provide customers with a glide path and help customers to reach their enduring tariff over the medium term while mitigating bill shock at both the start and the end of the transition period”.

The annual percentage cap (i.e., X in the formula above) would increase during Uisce Éireann’s proposed four-year transition period as show in the table below.

Tariff year	2026/27	2027/28	2028/29	2029/30
Annual cap relative to previous year’s bill	20%	30%	40%	50%

Option 2: Increase commensurate with proportion of future bill

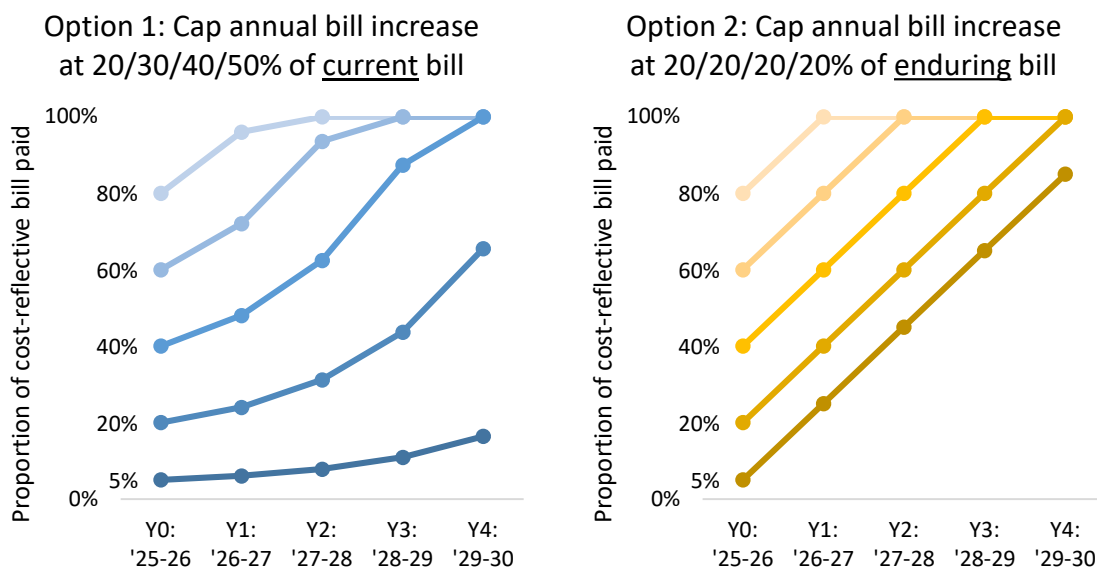
Under Option 2 the annual bill increase is capped at a percentage of the cost-reflective bill (i.e., the bill the customer would face in the absence of a transition). Customers’ bills during the transition would be calculated using the following formula:

$$\text{Bill cap for tariff year } y = \text{bill for tariff year } y-1 + X\% \text{ of cost-reflective annual bill for tariff year } y$$

The cost-reflective bill for the upcoming tariff year would be calculated based on the previous year’s consumption and discharge strength.

The figure below illustrates design Options 1 and 2 for the bills of five hypothetical customers, expressed as a proportion of their cost-reflective levels. This comparison demonstrates that Option 1 means slower increases for those currently paying the least relative to their fair share, who would face a large cliff-edge style jump if capping is not extended beyond four years.

Figure 3: Comparison of transition mechanism options



Uisce Éireann’s assessment of the options

Uisce Éireann explains how, under Option 1, customers would see relatively modest percentage increases at the start of the transition period followed by larger increases in later years. Under Option 2, the impact would be reversed, with higher increases at the start of the transition period in percentage terms. In absolute terms, Uisce Éireann’s examples show how the monetary amount added to the bill increases each year under Option 1, while under Option 2, the amount added to the bill is stable across transition years.

Uisce Éireann notes that both options lead to some shortfall in revenue recovery, with a larger shortfall in each year of the transition under option 1.

Uisce Éireann’s submission contains further detail on their assessment of the two options, including numerical examples using hypothetical bills.

Uisce Éireann assesses the two options against the tariff principles. Option 1 is considered by Uisce Éireann to perform better against the principle of ‘stability’ on the grounds that the bill increases are lower at the start of the transition period, providing customers time to adjust business practices or invest in onsite treatment to mitigate bill increases in later years. Moreover, Uisce Éireann argues that *“Option 2 does not align with the purpose of the transition mechanism, which is to help customers mitigate the impact of very large year on year bill increases”*.

Uisce Éireann also notes that under Option 2 customers might not know the exact bill increases they will see ahead of time, as the cost-reflective bill, which the percentage increase is based on, can change each year as the CRU updates tariffs.

On the other tariff principles, Uisce Éireann assesses that Option 2 performs better against the principle of ‘equity and undue discrimination’, ‘cost-reflectivity’ and ‘cost recovery’ as those qualifying for transition move to their cost-reflective bills faster. Uisce Éireann notes however, that Option 1 performs better against the principle of ‘efficient use’ by allowing customers time to

improve their practices to reduce their use of wastewater services. Lastly, Uisce Éireann considers that Option 1 is the simpler approach, based on a mechanism that is relatively easy for customers to understand.

Uisce Éireann concludes that Option 1, applying a percentage cap based on the customer's bill from the previous year, with the percentage cap increasing each year, is its proposed transition mechanism.

Uisce Éireann's Proposal:

Transition mechanism: The annual increase in a customer's bill would be limited by a percentage cap applied to the customer's previous annual bill. The percentage cap will increase in each year of the transition period as follows: 20% (2026/27), 30% (2027/28), 40% (2028/29), and 50% (2029/30). I.e., a 20% cap, applied to the 2025/26 bill, would limit the bill increase in the 2026/27 tariff year, with a 30% cap, applied to the 2026/27 bill in the 2027/28 tariff year, and so on.

CRU observations:

The CRU's main observation on Uisce Éireann's proposed transition mechanism is that it would not achieve its intended purpose of transitioning all customers to their cost-reflective charges swiftly and equitably.

The subset of customers that is still subject to trade effluent charges set by Local Authorities prior to 2014 includes many with current bills very far below cost-reflective levels. Because Uisce Éireann's proposal is to apply the cap as a proportion of the current bill, the low starting level of many customers' bills means they would take a very long time to reach cost-reflective levels even with very high percentage caps.

Uisce Éireann acknowledges this issue in its discussion of the transition duration (covered in the following section):

“At the end of a four-year transition period, c.139 customers are not expected to have reached cost reflective, enduring tariff levels. -- the average impact these customers will face at the end of the proposed four-year transition period is estimated at 90%; with c.25 customers facing increases of between 100%, and 200%, and c.15 facing increases of more than 200%.”

The CRU is of the view that the transition mechanism proposed by Uisce Éireann does not accomplish its intended aim. It would mean very gradual bill increases for a significant number of customers that are currently far from their cost-reflective bills who would then face large cliff-edge style jumps if bill capping is not extended further. During this period, the differences in bills paid by similar customers for similar discharge would be exacerbated rather than reduced and could disrupt competition between businesses within the same industry.

The CRU notes Uisce Éireann's concern that bill increases in the first year of transition under Option 2 will seem large relative to current bills for customers that are furthest from cost-

reflective levels. However, the CRU is equally concerned that these are exactly the cases where transition is most urgently required.

The CRU does not place weight on the observation that under Option 2 customers will not know their exact bill increases they will see ahead of time. The same is true of all customers already on cost-reflective tariff rates, which change over time with movements in allowed revenue and other inputs to Uisce Éireann's tariff model suite.

Therefore, the CRU proposes to reject Uisce Éireann's proposal that bill increases should be capped as a percentage of each customer's previous bill (Option 1). Instead, the CRU proposes that caps on bill increases should be calculated as a proportion of each customer's cost-reflective bill (Option 2) – ensuring that all customers reach enduring levels by the end of the transition period without large cliff-edge jumps.

3.2.4 Duration of the Transition Period

Uisce Éireann argues that to decide on the optimum length of the transition, two factors need to be considered: equity between customers subject to the transition and non-eligible customers; and appropriately moderating the size of the bill increases of the eligible customers. The former consideration points to a shorter transition to ensure all customers reach their cost-reflective tariffs sooner; while the latter supports the case for a longer transition period, allowing for smaller increases in each year of the transition.

Uisce Éireann puts forward two options for the transition duration in its proposal – a three-year transition ending on 30 September 2029 or a four-year transition ending on 30 September 2030.

In its assessment against the tariff principles, Uisce Éireann considers that a four-year transition performs better against the principle of 'stability', considering the magnitude of bill increases many trade effluent customers are facing. Of the customers that would qualify under Uisce Éireann's proposals, 54% would face an annual increase between €1,000 and €10,000 and 33% would face an increase greater than €10,000 in the absence of transition arrangements when the trade effluent arrangements are implemented.¹⁹

Uisce Éireann also notes that the transitions applied to eligible non-domestic customers in 2021 and 2024 were five years altogether for those with the largest bill increases, and therefore, on an equity basis, the four-year transition performs better.

Although a three-year transition would move eligible customers on to their cost-reflective tariffs sooner, and thus performs better against the principles of 'efficient use', 'cost reflectivity' and 'cost recovery', Uisce Éireann concludes that Option 2 (four years) is the best option and also allows customers sufficient time to adopt treatment at source measures where viable.

Uisce Éireann has acknowledged that its proposed capping mechanism means that a large number of eligible customers will remain far from cost-reflective bills at the end of the four-year transition period, and so has suggested that further transition arrangements may still be needed after the four-year period ends:

¹⁹ Based on SFP figures

“UÉ therefore proposes that the CRU reassess the need for further transition arrangements before the end of the four-year transition period.”

Uisce Éireann points to the precedent from Non-Domestic Tariff Framework when the CRU extended transition arrangements in 2024 to mitigate the large bill increases some non-domestic customers faced after the end of the initial three-year transition period.

Uisce Éireann’s Proposal:

Duration of the transition period: trade effluent transition arrangements should apply for a four-year period from 01 October 2026 to 30 September 2030. Before the conclusion of the transition period, the need for further transition arrangements should be reviewed.

CRU observations:

The CRU agrees that there are conflicting factors that need to be balanced when considering the duration of the transition period. On the one hand, the present two-tier situation in which some customers pay nationally harmonised, cost-reflective charges while others remain on the rates set in 2013 by Local Authorities and Town Councils is clearly inequitable and needs to be phased out. On the other hand, trade effluent customers have a reasonable expectation that they will benefit from similar protections against very large year-to-year bill increases afforded to non-domestic customers previously.

On the balance of interests, the CRU is minded to accept Uisce Éireann’s proposal for a four-year transition period from 01 October 2026 to 30 September 2030.

However, the CRU does not accept the suggestion that further transition arrangements should be considered after this time. A well-designed transition should result in all customers reaching cost-reflective levels by the end of the transition period without large cliff-edge jumps.

It is true that the CRU approved an extension to the initial three-year Non-Domestic Tariff Framework transition period in 2024 due to some non-domestic customers remaining far from their enduring bills at the end of the transition period. However, in its decision paper (CRU202460) the CRU noted that *“prolonged bill-capping arrangements create an inherent inequity across the customer base”* and that *“the existing caps, while initially helpful, now result in inequitable cost distributions among customers, with some paying significantly less than the actual cost of services”*. The CRU has therefore been clear that the situation leading it to extend transition arrangements for outlier customers should be avoided in future, and is not a precedent to be followed.

The most effective way to avoid this situation recurring is to adopt a transition mechanism that ensures all customers will be paying bills close to cost-reflective levels by the end of the transition period.

3.3 CRU Proposed Decision

The implementation of nationally harmonised trade effluent charges will achieve the important objective of aligning charging arrangements across all non-domestic customers in Ireland. It will

ensure that all customers are paying cost-reflective tariffs, based on the costs they impose on the water and wastewater system. Although this means that some customers will see their bills increase more significantly than others, the changes are necessary to ensure that customers are treated in an equitable manner.

The CRU proposes that transition arrangements are put in place when harmonised trade effluent charges are implemented on 01 October 2026 to mitigate the potential for business disruption associated with significant bill shocks.

The CRU is minded to accept Uisce Éireann's proposal that **only customers moving tariff structure will be eligible for transition** (with respect to their bill for trade effluent services only). This includes customers in Trade Effluent Categories 2 and 3; and customers in Trade Effluent Category 1 which have not previously been charged Framework non-domestic wastewater standing and volumetric charges.

However, the CRU considers Uisce Éireann's proposed €250 qualifying threshold to be too low to be meaningful. A €750 threshold, while still relatively low given the size of eligible customers, is a fairer option as it matches the threshold applied to non-domestic customers in 2024. That is, **eligible customers will qualify for transition arrangements with respect to an annual bill increases of €750** or more.

The CRU is minded to accept Uisce Éireann's proposal that the **transition period will last for four years, from 01 October 2026 to 30 September 2030**. The CRU does not agree that it should consider further arrangements after the four year transition period ends. Transition design should result in all eligible customers paying bills close to cost-reflective levels in the last year of the transition period, with no cliff-edge style jumps once cost-reflective charges apply universally from 01 October 2030.

The CRU considers Uisce Éireann's proposal that bill increases should be capped as a percentage of each customer's previous bill to be insufficient for completing transition swiftly, equitably and without cliff-edge jumps. Instead, the CRU's proposed decision is to **cap annual bill increases as a percentage of the cost-reflective bill**. That is, the maximum annual bill increase will be a percentage of the bill that would apply without any capping arrangements, as expressed in the following formula:

Bill cap for tariff year y = bill for tariff year $y-1$ + $x\%$ of cost-reflective annual bill for tariff year y

The CRU is considering a range of options with respect to the **profile of bill capping** across the four-year transition period. Capping annual bill increases at 20% of the cost-reflective bill should be sufficient to transition all customers to enduring levels by 01 October 2030 in a series of similar-sized steps. Alternatively, caps could be set lower in the initial years of the transition and higher towards the end – such as 10/15/20/25% of the cost-reflective bill. Ramping up in this way would mean that a greater number of customers benefit in the earlier years before sharper increases are experienced later on by the minority that have still not reached enduring levels.

To illustrate the difference that cap profiles can make, the figure below shows the estimated revenue recovered from eligible trade effluent customers (left); the number of customers benefitting from bill caps (middle); and the total shortfall from capping arrangements over the transition period (right) under the Uisce Éireann and CRU proposals – including a straight-line and slow-ramp version.

Figure 4: Comparison of Uisce Éireann’s proposals and the CRU’s proposed decision on transition arrangements for trade effluent customers not already on Non-Domestic Tariff Framework rates



Table 3.1 below summarises the CRU's proposed decision.

Table 3.1: The CRU proposed decision

Element	CRU's Proposed Decision
Eligibility	<p>Only trade effluent customers moving tariff structure would be eligible for transition (with respect to their bill for trade effluent services only). This includes:</p> <ul style="list-style-type: none"> • Customers who will be categorised into Trade Effluent Category 1 and have not previously been charged the Framework's non-domestic wastewater standing and volumetric charges; and • Customers who will be categorised into Trade Effluent Category 2 and 3.
Threshold	<p>Customers who face an expected annual bill increase greater than or equal to €750 would qualify for transition.</p>
Duration	<p>Transition arrangements should apply for four years, from 01 October 2026 to 30 September 2030.</p>
Mechanism	<p>During the transition period, customers that are eligible for and qualify for transition arrangements shall have their annual bills capped, such that they pay no more than their previous year's bill plus x% of bill that they would pay under cost-reflective rates.</p>
Profile	<p>The CRU is still considering options with respect to the profile of bill capping across the four-year transition period – including straight-line (e.g. 20/20/20/20%) and ramping-up (e.g. 10/15/20/25%) cap values.</p>

The CRU believes that its proposed decision meets the two goals of mitigating potential business disruption by smoothing bill increases over time and ensuring equity by moving customers to cost-reflective tariffs by the end of the transition period. A level playing field between all non-domestic customers is achieved sooner than under Uisce Éireann's proposals, addressing the inequity present in current charges paid by competing businesses in similar industries.

The CRU is now seeking stakeholders' views on its proposed decision on transition arrangements.

CRU Consultation Questions

Q1. *Eligibility*. Do you agree with the CRU's proposed decision to limit eligibility for transition arrangements to those trade effluent customers that are moving tariff structure? Please state your reasons why.

Q2. *Threshold*. Do you agree with the CRU's proposed decision to set a monetary threshold of €750 to determine whether a customer qualifies for the transition arrangement? Please state your reasons why.

Q3. *Duration*. Do you agree with the CRU's proposed decision to transition all trade effluent customers to cost-reflective bills by 1st October 2030? Please state your reasons why.

Q4. *Design*. Do you agree with the CRU's proposed decision to cap annual bill increases as a percentage of the cost-reflective bill? Please state your reasons why.

Q5. *Profile*. What profile of caps to annual bill increases do you consider best meets the CRU's tariff principles? Please state your reasons why.

4 Tariff Application Rules

This section outlines Uisce Éireann's proposal on TARs to apply on 01 October 2026, including Uisce Éireann's assessment of alternative options and the CRU's observations.

In the end of the section, the CRU's proposed decision is outlined along with consultation questions.

4.1 Introduction to TARs

TARs are operational rules which ensure that all non-domestic customers are treated in a consistent manner in specific situations, for example, when assigning into a tariff class. TARs were initially set in the CRU's Tariff Application Rules Decision paper (CRU/20/072)²⁰ and amended as part of the decision on the Non-Domestic and Trade Effluent Tariff Framework (Ref/footnote).

With the upcoming implementation of the Trade Effluent Framework, Uisce Éireann has considered the need for amending some of the existing set of TARs to incorporate trade effluent customers and the need for any new TARs to guide situations specific to trade effluent customers.

4.2 Uisce Éireann's Proposal

Uisce Éireann has considered the need for amending or adding a new TAR for the following situations:

1. Classification of trade effluent customers in the situation where they face perverse incentives, that is, when customers are incentivised to either use more water or avoid reducing water use
2. Updating existing TARs related to assigning a tariff class to accommodate trade effluent connections.
3. Calculating the Mogden charge for trade effluent customers for which sampling data is not yet available.
4. Calculating a non-domestic wastewater charge for sanitary wastewater discharged by trade effluent customers in the absence of metering.

Uisce Éireann's proposals relating to the above situations are summarised in the box below.

²⁰ "Irish Water's Non-Domestic Tariff Framework Tariff Application Rules CRU Decision Paper (CRU/20/072)" - 13th July 2020 - available at the following [link](#).

Uisce Éireann's Proposal:

1. As perverse incentives do not exist for trade effluent customers, TARs do not need to be modified to incorporate a rule on perverse incentives specific to trade effluent customers.
2. Existing TARs related to assigning a tariff class should be amended to accommodate trade effluent customers.
3. Mogden charges for Category 2 and 3 trade effluent customers in the absence of sampling data should be calculated by using values for COD and SS based on the customers' licence limits. 30% of the customer's ELV is used to calculate estimates for COD and SS values to be used in the Mogden formula for no more than one tariff year.
4. When the sanitary wastewater discharged by a trade effluent customer cannot be measured, the industry-standard "litres per working day" principle should be applied to estimate the volume of sanitary wastewater. The following allowances should be applied:
 - 25 litres per head per working day where there is no canteen on the premises serving hot meals; or
 - 50 litres per head per working day where there is a canteen on the premises serving hot meals.

The following subsections will provide more detail on each element of Uisce Éireann's proposal, including the alternatives considered and reasoning provided by Uisce Éireann. The sections also include the CRU's observations on Uisce Éireann's proposal.

4.2.1 Perverse Incentives

Uisce Éireann has considered the need for a TAR relating to perverse incentives based on whether there are perverse incentives at tariff boundaries for trade effluent customers. Perverse incentives refer to a situation in which a customer is close to a certain tariff boundary and is incentivised to use water inefficiently (i.e. use more water or avoid reducing water use) to avoid moving to a new tariff class in the following tariff year, which would be less beneficial financially.

Perverse incentives exist across the non-domestic water and wastewater tariff classes at certain tariff boundaries, and customers can request to retain their current tariff class for the next year, which removes the incentive to consume inefficiently.

Uisce Éireann is not proposing to have a TAR relating to perverse incentives based on its assessments that perverse incentives do not exist for trade effluent customers. The trade effluent charges are structured so that moving to a higher/lower tariff class always results in a bill increase/decrease, respectively.

Uisce Éireann’s Proposal:

1. As perverse incentives do not exist for trade effluent customers, TARs do not need to be modified to incorporate a rule on perverse incentives specific to trade effluent customers.

CRU observations:

The CRU agrees that the structure of the trade effluent charges (including the additional compliance and licensing charge which non-domestic customers are not subject to) and the level of the standing and the compliance and licensing charge ensure that trade effluent customers are always incentivised to be efficient in their consumption.

That is, if a customer is close to a tariff boundary, the additional cost of a higher standing and compliance and licensing charge outweighs any decrease in the volumetric or Mogden rate in the higher tariff category. As such, there is no incentive to increase consumption to benefit from a lower bill. Similarly, customers are incentivised to reduce their consumption, as moving to a lower tariff category results in a decrease in the bill.

Although the CRU agrees with Uisce Éireann’s proposal, it would like to note that any changes to the trade effluent tariff structure in the future would result in needing to reconsider whether a TAR on perverse incentives is required.

4.2.2 TARs Related to Assigning Customers to a Tariff Class

There are existing TARs related to assigning non-domestic water and wastewater connections to a tariff class or band. Uisce Éireann proposes that these rules are updated to accommodate trade effluent connections.

Other non-domestic customers are assigned to tariff classes or bands based on their annual consumption. For trade effluent connections, primary business activity is also taken into account.

The changes to the existing TARs concerning how customers are assigned to a tariff class are highlighted in bold in the table below.

Item	Rule
1	Annual Quantity (AQ) (and activity-based categorisation in the case of a trade effluent connection) is the only basis for assigning a connection to a tariff class (with some limited exceptions). All connections should pay the tariff rates associated with their assigned tariff class as a general rule.
2	Any connections may challenge their AQ (and/or activity-based categorisation in the case of a trade effluent connection) and tariff class assigned to their connection, for the next tariff year but must provide supporting evidence that the assigned AQ (and/or activity-based categorisation in the case of a trade effluent connection) is not reflective of the connection’s: <ul style="list-style-type: none"> • expected water usage, or

- wastewater discharge for wastewater only connections, and/or
- **primary activity in the case of a trade effluent connection,**

in the next tariff year and must be open to site visits by Uisce Éireann.

- 3** If Uisce Éireann denies a connection's request to change tariff class or **activity-based categorisation**, it will provide written reasoning to the connection to explain its decision. Where a customer and Uisce Éireann cannot agree on the customer's disputed assigned AQ (**and/or activity-based categorisation in the case of a trade effluent connection**), the customer can raise a complaint regarding the dispute to the CRU under the CRU's non-domestic complaints process.
- 4** Uisce Éireann will inform customers that they have the right to challenge their AQ (**and/or activity-based categorisation in the case of a trade effluent connection**), their assigned tariff class and categorisation and will provide a reasonable timeframe for customers to submit a challenge.

Uisce Éireann's Proposal:

2. Existing TARs related to assigning a tariff class should be amended to accommodate trade effluent customers.

CRU observations

The CRU agrees with the approach of extending the existing TARs to trade effluent customers. The approach is simple and results in all non-domestic customers being treated in a consistent manner.

4.2.3 Calculating Mogden Charge in the Absence of Sampling Data

Calculating the volumetric component of charges for Category 2 and 3 customers is based on the Mogden formula, which results in a charge that reflects the individual pollutant profile of each customer. For this, Uisce Éireann requires sampling data on the strength of the wastewater discharged by customers.

Sampling data is not always available, for example, for new trade effluent connections or connections moving to Category 2 or 3 from Category 1. Uisce Éireann is proposing to introduce a new TAR to deal with situations in which sampling data is not available and has considered two options for estimating the strength of wastewater discharged in the absence of sampling data:

- **Option 1:** estimate the COD and SS parameters of the Mogden formula based on historical sample data for other customers carrying out the same business activity.
- **Option 2:** estimate the COD and SS parameters of the Mogden formula based on a percentage of a customer's trade effluent licensed COD and SS ELV.

Uisce Éireann proposes that the selected approach would apply for a billing period not exceeding 12 months, during which Uisce Éireann can gather sampling data for the customer.

Uisce Éireann proposes that under option 1, an estimate would be based on historical average values of the COD and SS parameters measured from samples taken from other trade effluent connections carrying out the same business activity²¹.

All trade effluent customers are licensed to discharge certain pollutants, and the ELV is a limit for a specific pollutant that a customer is permitted to release. Uisce Éireann proposes that under Option 2 a percentage of a customer's ELV for COD and SS could be used as a proxy for the expected pollution load, and in the Mogden formula.

Uisce Éireann assessed the two options against the tariff principles. Uisce Éireann concluded that Option 2 performs better against the principles of 'equity and no undue discrimination', 'efficient use', 'cost reflectivity', 'cost recovery', 'stability' and 'simplicity'. Advantages of Option 2 outlined by Uisce Éireann include that it reflects the unique circumstances of each customer, including any pre-treatment facilities they might have on site, thus also encouraging efficient use of wastewater services. Uisce Éireann notes that charges based on Option 2 are also more predictable and easily understandable from the customer's perspective.

ELV percentage to be used for COD and SS

Uisce Éireann also provides options for the percentages of the ELV that would be used under Option 2:

- **Option 1:** 50% of the customer's licensed ELV for COD and 30% of the customer's licensed ELV for SS.
- **Option 2:** 30% of the customer's licensed ELV for both COD and SS.

The percentages put forward under Option 1 are based on averages of COD and SS values from sampling data from customers with TEC codes in the food and drink sector, which Uisce Éireann has rounded.²² The food and drink sector represents the largest sector for which Uisce Éireann has sampling data, making up close 30% of all sampling results.

Under Option 2, the proportions of ELV would be based on sampling data averaged across customers from all TEC codes.

These options are assessed by Uisce Éireann against the tariff principles. They perform similarly against many of the principles, but Uisce Éireann argues that Option 2 promotes 'efficient use' better as it is based on a broader range of industries and therefore more representative of the costs associated with the COD and SS elements of the Mogden formula. Uisce Éireann argues that Option 2 might also result in more stable proportions of ELV for COD and SS over time, given that it is based on a larger dataset, thus performing well against the 'stability' principle.

²¹ Uisce Éireann uses Trade Effluent Categorisation (TEC) codes to define business activity and defines the term as "TEC codes provide a method of reviewing, informing and setting the relative risks of issues from experience of trade effluent discharges from various trade sectors."

²² The average proportions of ELV for COD and SS are 46% and 33%, respectively, in Uisce Éireann's analysis of sampling data from customers with TEC codes in the food and drink sector.

Uisce Éireann therefore proposes that the proportion of ELV for both COD and SS should be 30%. The box below summarises Uisce Éireann's full proposal on the calculation of the Mogden charge in the absence of sampling data.

Uisce Éireann's Proposal:

3. Mogden charges for Category 2 and 3 trade effluent customers in the absence of sampling data should be calculated by using values for COD and SS based on the customers' licence limits. 30% of the customer's ELV is used to calculate estimates for COD and SS values to be used in the Mogden formula for no more than one tariff year.

CRU observations:

The CRU agrees with Uisce Éireann's proposed approach on the grounds that it is easy to administer and reflects both the customer's unique circumstances and the average strength of trade effluent across all customers for which Uisce Éireann has sample data. The CRU also agrees that the approach should not apply for longer than 12 months, to ensure that charges for all customers are determined on the same basis in the long-term. The proposed approach balances cost-reflectivity and simplicity, which in this case are opposing considerations, and results in treating customers in an equitable manner.

4.2.4 Calculating a Non-Domestic Wastewater Charge for a Trade Effluent Customer in the Absence of a Metering Solution

Trade effluent customers also produce sanitary wastewater²³, in addition to the trade effluent resulting from their business operations. In some cases, Uisce Éireann is required to distinguish the volumes associated with each type of wastewater.

If sanitary wastewater and trade effluent are discharged from a combined discharge point, which is metered and sampled by Uisce Éireann, the sanitary wastewater will be reflected in the Mogden charge. However, if sanitary wastewater and trade effluent are discharged at separate points, the sanitary wastewater discharged may not be metered. In the latter case, a separate charge is required for the sanitary volumes discharged by the customer.

Determining the volume of sanitary wastewater discharged, which should attract a separate charge, can be complicated. Trade effluent customers can use a significant proportion of the water supplied to them in their business activities, in which case the volume of water supplied to the premise cannot be deemed equal to the volume of wastewater removed from the premise.²⁴ However, it may not be possible to measure the volume of sanitary wastewater discharged, which is why Uisce Éireann is proposing a TAR to standardise the approach to charging trade effluent customers for their sanitary wastewater when it cannot be metered.

²³ Sanitary wastewater is wastewater of a composition and concentration (biological and chemical) which originates predominantly from the human metabolism or from day-to-day domestic type human activities, including washing and sanitation. Sanitary wastewater is generated by both domestic and non-domestic customer classes.

²⁴ [Section 22\(9\) of the Water Services \(No. 2\) Act 2013](#) provides that "For the purposes of calculating a charge...the amount of wastewater discharged from a premises is deemed to be equal to the amount of water supplied to that premises, unless Uisce Éireann and the customer agree otherwise".

Uisce Éireann is proposing to use the “litres per working day” assumption to estimate the volume of sanitary wastewater discharged by trade effluent customers. This approach is adopted by many utilities in the UK. See Uisce Éireann’s submission for examples of other utilities and their approaches.

Under the “litres per working day” method, a daily allowance of sanitary wastewater, based on the number of employees, is deducted from the total measured volume of the customer. The allowance volumes are charged the non-domestic wastewater volumetric rate associated with the customer’s tariff band and the remaining volume is charged based on the Mogden formula. Two options are considered by Uisce Éireann for the allowance:

- **Option 1:** 25 litres per head per working day.
- **Option 2:** 25 litres per head per working day or 50 litres per head per working day, when the site has a canteen serving hot food.

Uisce Éireann assessed both options against the tariff principles, finding that Option 2 performs better overall. Uisce Éireann concluded that Option 2 recognises differences in the sanitary wastewater volumes discharged by customers, making it score better on the principles of ‘equity and no undue discrimination’, ‘cost reflectivity’ and ‘efficient use’. Both options score similarly on ‘cost recovery’, ‘simplicity’ and ‘stability’

Therefore, Uisce Éireann proposes to use Option 2 to establish a new TAR to govern the calculation of a non-domestic wastewater charge in the absence of a metering solution.

Uisce Éireann’s Proposal:

4. When the sanitary wastewater discharged by a trade effluent customer cannot be measured, the industry-standard “litres per working day” principle should be applied to estimate the volume of sanitary wastewater. The following allowances should be applied:
 - 25 litres per head per working day where there is no canteen on the premises serving hot meals; or
 - 50 litres per head per working day where there is a canteen on the premises serving hot meals.

CRU observations:

The CRU supports Uisce Éireann’s proposed option. As explained by Uisce Éireann, the method is straightforward and easy to understand, while acknowledging differences in the volumes customers discharge to the extent it is possible while keeping the approach simple. Basing the approach on a precedence on approaches used in the industry ensures that the method is viable in practice.

4.3 CRU Proposed Decision

The CRU is of the view that Uisce Éireann’s proposals on extending the set of TARs to accommodate the implementation of the trade effluent charging arrangements are pragmatic and provide practical solutions to the situations they are intended to address.

Uisce Éireann’s proposals also balance the different tariff principles, and in particular, ensure that the ‘equity and no undue discrimination’ and ‘simplicity’ principles are respected. These two are perhaps the most relevant principles to guide the setting of TARs, which are meant to provide clear rules on how to treat customers in a consistent manner.

The CRU’s proposed decision is to approve Uisce Éireann’s proposals, which are summarised in Table 4.1 below.

Table 4.1: Summary of Uisce Éireann’s proposal and the CRU proposed decision

	Uisce Éireann’s Proposal	CRU’s Proposed Decision
1	As perverse incentives do not exist for trade effluent customers, TARs do not need to be modified to incorporate a rule on perverse incentives specific to trade effluent customers.	Accept
2	Existing TARs related to assigning a tariff class should be amended to accommodate trade effluent customers.	Accept
3	Mogden charge for Category 2 and 3 trade effluent customers in the absence of sampling data should be calculated by using values for COD and SS based on the customers’ licence limits. 30% of the customer’s ELV is used to calculate estimates for COD and SS values to be used in the Mogden formula for no more than one tariff year.	Accept
4	When the sanitary wastewater discharged by a trade effluent customer cannot be separately measured, the industry-standard “litres per working day” principle should be applied to estimate the volume of sanitary wastewater. The following allowances should be applied: <ul style="list-style-type: none"> • 25 litres per head per working day where there is no canteen on the premises serving hot meals; or • 50 litres per head per working day where there is a canteen on the premises serving hot meals. 	Accept

The CRU is now seeking stakeholder's views on its proposed decision on the TARs.

CRU Consultation Questions

Q6. *Perverse incentives*: Do you agree with CRU's proposed decision to accept Uisce Éireann's proposal to not have a TAR related to perverse incentives?

Q7. *Assigning customers to a tariff class*: Do you agree with CRU's proposed decision to accept Uisce Éireann's proposal to amend existing TARs to accommodate trade effluent customers?

Q8. *Mogden charge in the absence of sampling*: Do you agree with the CRU's proposed decision to accept Uisce Éireann's proposed approach to calculating the COD and SS values in the absence of sampling?

Q9. *Mogden charge in the absence of sampling*: Are there alternative methods to determine the COD and SS values that should be considered?

Q10. *Non-domestic wastewater charge in the absence of a metering solution*: Do you agree with the CRU's proposed decision to accept Uisce Éireann's proposed approach to use the "litres per working day" principle to estimate the volume of sanitary wastewater?

Q11. *Non-domestic wastewater charge in the absence of a metering solution*: Are there alternative methods to determine the volume of sanitary wastewater that should be considered?

5 Support available for customers

Under section 32 and 39 the Water Services Act (No.2) 2013, the CRU has responsibility for ensuring that Uisce Éireann provides suitable information to its customers and performs its functions in an open and transparent manner. Under these roles, and while recognising the potential impact on customers of new tariff rates, the CRU as part of its 2024 decision on the Non-Domestic and Trade Effluent Tariff Framework (CRU/202460), allowed a further two-year grace period before implementation of the trade effluent charging arrangements. This was intended to allow customers to prepare for the upcoming changes, and as such the CRU requested Uisce Éireann to proactively engage with customers during the grace period. With the implementation date coming closer, Uisce Éireann must undertake the necessary communication to inform customers and support them in transitioning to trade effluent charges and mitigating bill impacts.

The CRU intends to instruct Uisce Éireann to provide an increased program of support directed towards trade effluent customers both in advance of the implementation of national harmonised trade effluent rates on 01 Oct 2026 and during the period of transition arrangements outlined in Section 3. A summary of these requirements are outlined below followed by information on existing customer supports and upcoming updates to the Non Domestic Customer Handbook and associated documents to provide additional clarity.

Customer Communications

Uisce Éireann will be required to use a number of communication channels to help customers understand how they may be individually impacted by Uisce Éireann's proposals, including writing directly to impacted customers, via Uisce Éireann's contact centre, Uisce Éireann's website, key account management support²⁵ (available to non-domestic customers with annual consumption equal to or greater than 20,000 m³) and directly engaging with business customer representative groups and other stakeholders:

- **Uisce Éireann's Guidance to Customers** – Uisce Éireann will be required to publish sectoral guidance documents in Q1 2026 and additional support documents for trade effluent customers, including a charging booklet and a customer information paper following the CRU's decision on the final tariff rates for 2026. These will provide further information on the trade effluent charging arrangements and the CRU's decision on the transition arrangements and TARs.
- **Uisce Éireann's Online Trade Effluent Tariff Calculator** - To help customers understand how they might be individually impacted by Uisce Éireann's new tariff proposals, Uisce Éireann will be required to provide an online "Trade Effluent Tariff Calculator" on its website by February 2026. This will allow customers to see how their individual bill would change with the implementation of the trade effluent charging arrangements.²⁶

²⁵ Uisce Éireann's key account management team typically provides dedicated account management services to Band 3 and Band 4 customer accounts.

²⁶ It should be noted that, as Uisce Éireann will provide the tariff calculator during the consultation period, it will not be based on the final tariff rates that will be implemented on 01 October 2026.

- **Uisce Éireann’s Contact Centre** - Customers can also contact Uisce Éireann directly to understand how they might be impacted, and Uisce Éireann trained representatives will provide information to trade effluent customers on the upcoming changes. Uisce Éireann’s contact centre number is 0818 778 778 / International +353 1 707 2827.
- **Uisce Éireann’s Engagement with Business Representative Groups** – Uisce Éireann will be required to engage with business representative groups and other stakeholders throughout the CRU’s consultation process on matters related to trade effluent implementation. This engagement will also be required to continue post consultation and shall be an important aspect of Uisce Éireann’s communication strategy in advance of the implementation of the trade effluent tariffs.
- **Uisce Éireann Trade Effluent Tariff Update Letters**
 - Uisce Éireann will be required to write to all of its trade effluent customers in Q1/Q2 2026 informing them of the Trade Effluent Tariff Framework and providing information on the upcoming tariff changes.
 - Uisce Éireann will also be required to provide tariff determination letters to customers, which will include information on the trade effluent tariff category that applies to the customer, if a transition arrangement will apply and the benefits of it to the customer, as well as a confirmation of the 2026/27 tariff rates. These will be sent by Uisce Éireann after final tariffs are approved in Q3 2026.

Uisce Éireann has already launched a new **Advanced Water Stewardship programme**, which educates customers on best practices and ways to reduce trade effluent bills. This complements Uisce Éireann’s existing Water Stewardship Programme that supports businesses in reducing their water usage, and the CRU recommends that Uisce Éireann continue to provide this program to support its customers further. Over 150 customers have already completed the new programme. For more information on both programmes, see Uisce Éireann’s website: <https://www.water.ie/conservation/business/water-stewardship>.

Uisce Éireann will also be required to continue to communicate with and support customers after the implementation of the trade effluent tariffs on 01 Oct 2026, and throughout the four-year transition period. This will include engagement with stakeholder groups, providing guidance on Uisce Éireann’s website, and other means of supporting customers, such as annual tariff update letters, and access to payment plans.

The CRU would like to emphasise that it requires Uisce Éireann to undertake the additional communication and support described in this section to ensure that customers are sufficiently informed before the trade effluent tariffs are implemented. The CRU would also welcome customer views on any further communications from UÉ that would provide further clarity on trade effluent tariffs, customer bills or updated tariff rates.

CRU Consultation Question

Q12. *Customer communication*: Are there any other specific measures that Uisce Éireann could take in order to better communicate with customers about trade effluent tariffs, customer bills or updated tariff rates?

Customer Support

The CRU is mindful of non-domestic customers' concerns about affordability and competitiveness and has engaged with Uisce Éireann to ensure that there are measures in place when engaging with customers with financial difficulties. For customers in financial difficulty, the CRU urges any customer that is having difficulty with their bills to engage with Uisce Éireann and seek help with putting in place a payment plan. For customers who want to discuss their options with Uisce Éireann about payment plans, please see Section 7.8 (Arrears & Arrangements for identifying and dealing with customers in financial difficulty) and 7.9 (Payment plans) in the CRU's Non-Domestic Customer Handbook²⁷, which set out the minimum required levels of customer service and customer protection measures that Uisce Éireann must provide to its non-domestic customers. Please note that these requirements are also reflected in Section 2.0 Billing Code of Practice of Irish Water Business Customer Codes of Practice²⁸. Uisce Éireann is required to assist customers in making a payment plan to help those experiencing financial difficulties in paying their bills. Uisce Éireann must take account of an individual customer's ability to pay when agreeing on any repayment arrangement, by credit or other method and confirm with account holders that arrangements are manageable.

The CRU's Customer Care Team provides a free complaint resolution service to registered Uisce Éireann customers who have an unresolved dispute with Uisce Éireann (<https://www.cru.ie/make-a-complaint/>).

Please see Uisce Éireann's "*Trade Effluent Transition Arrangements and Tariff Application Rules Proposals*" submission document (CRU2025254) and Uisce Éireann's website for a more detailed discussion by Uisce Éireann of its communication approaches during the consultation period and after a decision has been made on the transition arrangements, as well as final tariffs.

Non-Domestic Customer Handbook Update

Uisce Éireann has reviewed the Non-Domestic Customer Handbook with the intention to ensure it reflects new trade effluent charging arrangements and provides answers to questions that trade effluent customers may have.

Uisce Éireann has discovered an unintended ambiguity in the handbook relating to disconnecting a trade effluent customer due to non-payment. Section 8.3 on '*Instances where Irish Water cannot initiate disconnection of supply to a non-domestic premises*' includes the following paragraph: '*f. For failure to pay a bill which is not related to the supply of water or wastewater services; for example, site works charges or Section 16 licensing;*'. Uisce Éireann

²⁷ "*Uisce Éireann Non-Domestic Customer Handbook (CRU/2024112)*" – 23 September 2024 - available at the following [link](#).

²⁸ "*Uisce Éireann Business Customer Codes of Practice*" - available at the following [link](#).

notes that this paragraph should refer to the Section 16 Licencing Application fee, but the wording is not sufficiently clear to avoid possible misinterpretation. Uisce Éireann has proposed to update the paragraph as follows: *‘f. For failure to pay a bill which is not related to the provision of water or wastewater services; for example, site works charges or an application fee payable when applying for a licence under Section 16 of the Local Government (Water Pollution) Act 1977 (as revised);’*.

In addition, Uisce Éireann will be suggesting other minor updates to the definitions of water and wastewater services in several documents (Water Charges Plan, Disconnection Policy, Non-Domestic Customer Handbook etc.) to ensure that trade effluent is accounted by the definitions where appropriate. These updates will be made by Uisce Éireann and the CRU (where appropriate) in 2026 before the implementation of the trade effluent charging arrangements. The updated definitions should improve the clarity of the documents for customers. In conjunction with these updates, the CRU will also be considering the inclusion of additional mandatory communication requirements by Uisce Éireann to its customers in relation to tariffs, applicable transition arrangements or related customer supports.

These updates to the Non-Domestic Customer Handbook and other documents are included in the CRU’s proposed decision.

CRU Consultation Question

Q13. *Non-Domestic Customer Handbook Update*: Do you agree with the proposed update to the Non-Domestic Customer Handbook? Please state your reasons why.

6 Next Steps

Following careful consideration of responses received to this Proposed Decision Paper and engagement with customers and interested parties, the CRU intends to issue a decision in late Q1 2026 on the transition arrangements and TARs to apply on 01 October 2026.

Final tariff rates will be published in early Q3 after the RC4 Final Determination is published in Q2 2026.

A. Summary of Consultation Questions

Section	Consultation Question
3.3 CRU Proposed Decision (Transition Arrangements)	Q1. <i>Eligibility</i> . Do you agree with the CRU’s proposed decision to limit eligibility for transition arrangements to those trade effluent customers that are moving tariff structure? Please state your reasons why.
	Q2. <i>Threshold</i> . Do you agree with the CRU’s proposed decision to set a monetary threshold of €750 to determine whether a customer qualifies for the transition arrangement? Please state your reasons why.
	Q3. <i>Duration</i> . Do you agree with the CRU’s proposed decision to transition all trade effluent customers to cost-reflective bills by 1st October 2030? Please state your reasons why.
	Q4. <i>Design</i> . Do you agree with the CRU’s proposed decision to cap annual bill increases as a percentage of the cost-reflective bill? Please state your reasons why.
	Q5. <i>Profile</i> . What profile of caps to annual bill increases do you consider best meets the CRU’s tariff principles? Please state your reasons why.
4.3 CRU Proposed Decision (TARs)	Q6. <i>Perverse incentives</i> : Do you agree with CRU’s proposed decision to accept Uisce Éireann’s proposal to not have a TAR related to perverse incentives?
	Q7. <i>Assigning customers to a tariff class</i> : Do you agree with CRU’s proposed decision to accept Uisce Éireann’s proposal to amend existing TARs to accommodate trade effluent customers?
	Q8. <i>Mogden charge in the absence of sampling</i> : Do you agree with the CRU’s proposed decision to accept Uisce Éireann’s proposed approach to calculating the COD and SS values in the absence of sampling?
	Q9. <i>Mogden charge in the absence of sampling</i> : Are there alternative methods to determine the COD and SS values that should be considered?
	Q10. <i>Non-domestic wastewater charge in the absence of a metering solution</i> : Do you agree with the CRU’s proposed decision to accept Uisce Éireann’s proposed approach to use the “litres per working day” principle to estimate the volume of sanitary wastewater?
	Q11. <i>Non-domestic wastewater charge in the absence of a metering solution</i> : Are there alternative methods to determine the volume of sanitary wastewater that should be considered?
5. Customer Support	Q12. <i>Customer communication</i> : Are there any other specific measures that Uisce Éireann could take in order to better communicate with customers about trade effluent tariffs, customer bills or updated tariff rates?
	Q13. <i>Non-Domestic Customer Handbook Update</i> : Do you agree with the proposed update to the Non-Domestic Customer Handbook? Please state your reasons why.

B. Indicative Trade Effluent Tariff Rates

The tables below provide indicative trade effluent tariff rates, which are based on indicative revenues from UÉ’s Strategic Funding Plan, and will be updated following CRU’s final decision on Revenue Control 4 and UÉ’s subsequent submission of final ND and TE rates to apply on 01 October 2026 that reflect those CRU approved revenues.

Uisce Éireann’s Strategic Funding Plan, which was approved by the Minister on 05 November 2024, assumed a 20% increase in allowed revenues from 2025/26 to 2026/27. This is lower than the 9% increase proposed by the CRU in the Draft Determination on Uisce Éireann’s allowed revenues over the 2025-2029 revenue control period (RC4), which had only recently been published at the time of writing.

More information on the CRU’s proposed profile of revenue increases can be found in the Draft Determination (CRU2025134) currently open for public consultation until 27 Jan 2026.²⁹

Metered TE Tariff Rates

TE Category	Customer Class	Standing Charge (€/year)	Compliance & licensing charge (€/year)	Volumetric Charge (€/m ³)	Mogden Charge (€/m ³)			
					R	V	B	S
TE Category 1	Band 1	109.63	383.00	2.50				
	Band 2	452.51		2.49				
	Band 3	4,492.96		2.48				
	Band 4	88,458.60		2.47				
TE Category 2	Band 2	452.51	3,367.84		0.47	1.30	0.67	0.56
	Band 3	4,492.96						
TE Category 3	Band 4	88,458.60	8,740.34		0.43	1.30	0.67	0.56

Unmetered TE Tariff Rates

TE Category	Customer Class	Flat Charge (€/year)	Compliance & licensing charge (€/year)
TE Category 1	Unmetered Band 1	435.15	383.00
	Unmetered Band 2	2,742.29	

²⁹ CRU Draft Determination: Revenue Control 4 (CRU2025134) - <https://consult.cru.ie/en/consultation/revenue-control-4-rc4>