



Albion Water

Statement on draft drought plan

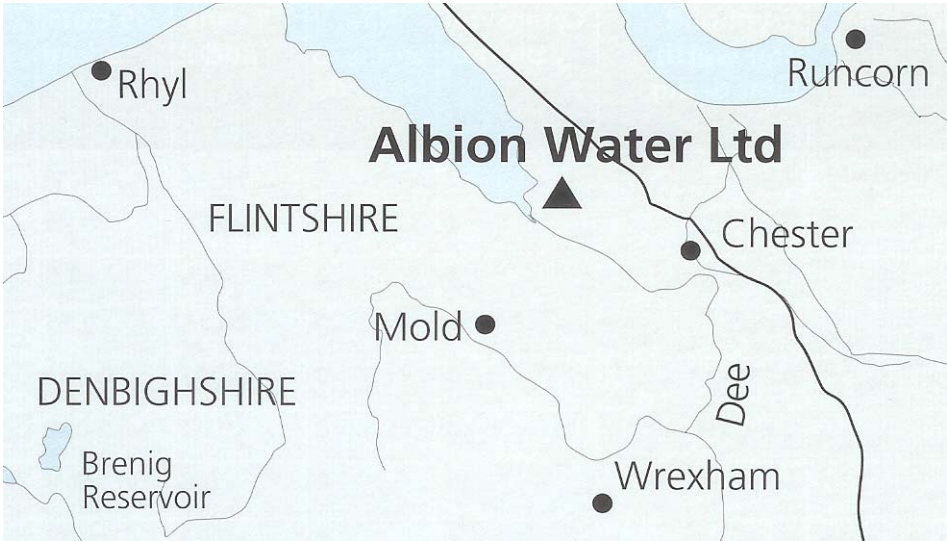
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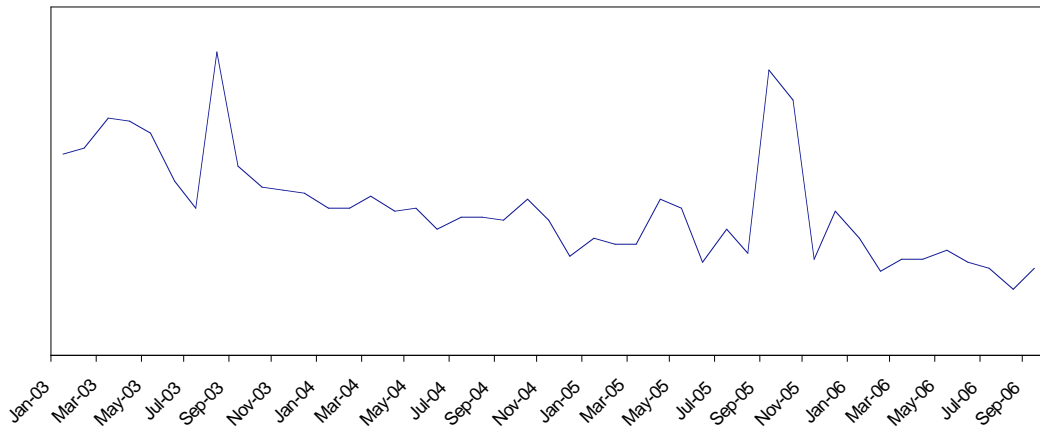
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1 Preamble

Albion Water is unique amongst water undertakers in providing a significant technical presence on site to support and work in partnership with the customer to deliver water efficiency and compliance projects. Significant progress has been made in driving down water usage and Albion believes that the extent to which further domestic potable savings can be achieved is limited (there being few non essential uses that could be targeted during drought conditions). Figure 1 is illustrative of the domestic potable water efficiency benefits that Albion has been able to achieve at Shotton Paper (peaks in demand include losses that were rapidly identified and controlled). Albion is aware of no other water undertaker who could demonstrate this declining pattern of potable domestic water usage.

Figure 1 Monthly Domestic Potable Usage



Albion believes that its responses to consultee representations are proportionate and reasonable given the unique supply circumstances that exist and the regulatory ambition to limit drought permits and orders for wholesome water provision. Additionally Albion notes that the vast bulk of its water supply (industrial processes accounting for 99%+ of total water delivered) is closely monitored and challenged by IPPC legislation and CSR policy.

2 Response to Representations

Albion's responses to representations have been grouped into categories and then set out in sequence to identify the representation received; consideration given; change planned and reasons for amending text or leaving it unchanged.

2.1 Management and Communication

2.1.1 Whether Albion consulted Shotton Paper

<i>Consideration</i>	N/A
<i>Change to draft drought plan</i>	None
<i>Reason</i>	Albion's partnership approach to service provision at Shotton Paper is widely recognised and received positive comment, along with our approach to water efficiency services, by the Competition Appeal Tribunal in their recent judgment (case 1046/2/4/04)

2.1.2 Publish water conservation information alongside draft drought plan on website

<i>Consideration</i>	Beneficial impact on wider market/public
<i>Change to draft drought plan</i>	None
<i>Reason</i>	Albion plans to update its website with water conservation information but this is not part of the drought plan process

2.1.3 Roles of Area Manager and Technical Director

<i>Consideration</i>	Team dynamics
<i>Change to draft drought plan</i>	Add text to section 5 – "Albion's Area Manager will be responsible for on the ground advice to the customer whilst the Technical Director will communicate actions and issues arising with the Board and will co-ordinate action with its water supplier."
<i>Reason</i>	To clarify responsibilities during periods of drought

2.1.4 Dwr Cymru's and Albion's communication on River Dee status

<i>Consideration</i>	The River Dee Regulation System and Dee Consultation Committee manage operations in both normal and drought conditions. Dwr Cymru operates its assets in accordance with identified rules. If necessary, Albion would be happy to sit on any relevant drought committee in which case it would
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	not be reliant on information passed on by Dwr Cymru. If this was not considered proportionate then Albion would expect to be informed by its supplier, Dwr Cymru, of developing drought conditions.
<i>Change to draft drought plan</i>	Add text to section 5 – “Dwr Cymru’s contact during drought conditions is Ms Gail Davies, Water Resources Manager (01403 452859).”
<i>Reason</i>	Contact details clarified.

2.1.5 Whether Albion’s regular presence on site will be escalated during drought

<i>Consideration</i>	Review of current level of site provision carried out.
<i>Change to draft drought plan</i>	None
<i>Reason</i>	Albion’s presence will respond to the needs of site and will take a view on the benefits of attending site versus the environmental impact of additional journeys.

2.2 Scenarios and Triggers

2.2.1 Development of Scenarios and Triggers

<i>Consideration</i>	Assessment of legislation, guidance, current supply arrangements, the applicability of scenario setting to these arrangements, alternative sources and Dwr Cymru’s draft drought plan undertaking
<i>Change to draft drought plan</i>	See 2.3.4
<i>Reason</i>	Albion water considers that its draft drought plan adequately addresses triggers (section 4) and scenarios are limited by the nature of the essential facility and service provided (e.g. setting service standards in which domestic hosepipe bans are 1 in 5, 1 in 10 or 1 in 20 years is not relevant, see also 2.3.4 below and 3.4.2 in draft drought plan). Should Dwr Cymru be unable to meet Albion’s demand (despite its draft drought plan and contractual commitment) or should demand exceed contracted obligations and these cannot be met, then, in the absence of an alternative supply, production could be impacted at Shotton Paper. Wholesome water provision for domestic potable consumption is almost entirely dependent on there being production on site.

2.3 Demand and Supply

2.3.1 Confirm that Albion Water is unable to apply for drought permits/orders

<i>Consideration</i>	Review of legislation
<i>Change to draft drought plan</i>	None
<i>Reason</i>	Already covered by draft drought plan (section 2.5)

2.3.2 Albion should take responsibility for its own supply to avoid delays in its drought actions

<i>Consideration</i>	Review the risk of delay in implementing drought actions
<i>Change to draft drought plan</i>	None
<i>Reason</i>	Given that the scope for domestic potable savings is limited (see draft drought plan section 3.4.2), Albion is not aware of a significant consequence arising from a short duration 'risk of delay' in implementing its drought actions. Albion alone in the water industry has a dedicated weekly site presence and, in partnership with the customer, continually strives for water use efficiency. Albion considers it neither proportionate nor practicable to set up a separate monitoring programme that runs in parallel to existing River Dee drought procedures.

2.3.3 What actions would be taken to facilitate water conservation during drought

<i>Consideration</i>	Review existing draft drought plans and issues of commercial sensitivity (given that Albion's customer is readily identifiable)
<i>Change to draft drought plan</i>	None
<i>Reason</i>	Already addressed in sections 3.4.2 and 4 of the draft drought plan

2.3.4 Identify additional drought measures (i.e. alternative sources of supply)

<i>Consideration</i>	Potential alternative sources of supply have been discussed at length prior to and during the Competition Appeal Tribunal case 1046/2/4/04
<i>Change to draft drought plan</i>	Add following text to section 4 – "In the event that drought led to restrictions in water supplied to Albion by Dwr Cymru and notwithstanding the fact that this supply is considered an essential facility, Albion would consider the following options:

	<p>a) obtain authorisations and provide suitable treatment and infrastructure to run down local holding lagoons in order to meet shortfall (providing between 2 and 10 days use)</p> <p>b) obtain authorisations and provide suitable treatment and infrastructure to take borehole water (insufficient to provide a standalone supply and the subject of current EA investigations into sustainable yield)</p> <p>c) switch to alternative Dwr Cymru source (although this would be within the same resource zone)</p> <p>d) switch to an alternative United Utilities supply</p> <p>e) increased recycling within site with the provision of suitable treatment and infrastructure</p> <p>Most of these options would require agreement with third parties and the implementation of major infrastructure projects that would escalate process water input costs significantly and would therefore only be actioned if ongoing economic production was possible on site.”</p>
<i>Reason</i>	To emphasise that alternative supply scenarios have been considered but that none of these offer sustainable or economical alternatives for current supply requirements

2.3.5 Details of the water efficient messages and measures during drought

<i>Consideration</i>	Albion considered the existing situation (one of tightly controlled domestic potable use – see figure 1) and regulations to determine what details would be proportionate.
<i>Change to draft drought plan</i>	Water efficiency messages – None Water efficiency measures – add following text to section 3.4.2 – “Albion will also introduce a regular water group meeting with representatives from production, utilities and Albion Water, tasked to identify water use efficiency measures.”
<i>Reason</i>	Water efficiency message - It is likely that water efficiency communications will reflect local events that arise during a drought for which standard text is not appropriate Water efficiency measures – text change for clarification

2.3.6 Potential demand savings

<i>Consideration</i>	The potential to reduce domestic potable demand during times of drought is limited due to the absence of profligate use associated with residential domestic usage patterns.
<i>Change to draft drought plan</i>	Add following to text at section 4 – “Albion estimates that measures implemented at Dee stages 1, 2 and 3 will deliver potable water savings of 2, 5 and 6 m ³ /d respectively.”
<i>Reason</i>	To provide an estimated scale of water savings for planning purposes during drought.

2.3.7 Whether water audit during drought would include leak detection and pipe repair service

<i>Consideration</i>	Contractual and financial arrangements considered alongside existing statutory responsibilities
<i>Change to draft drought plan</i>	Adding following text to section 3.4.2 (Domestic) - "Albion's existing monitoring of water use for both domestic and process streams will continue during drought periods and any unexpected patterns of use will be reviewed. Should significant leakage be suspected Albion would arrange a detection survey and, following a review of the results, could arrange for leaking pipes to be repaired or replaced."
<i>Reason</i>	Leakage from pipe bursts during drought not specifically included in the draft drought plan

2.4 Miscellaneous

2.4.1 Abstraction from the River Dee

<i>Consideration</i>	Erroneous belief that Albion's supply is abstracted by Dwr Cymru from the River Dee
<i>Change to draft drought plan</i>	Add following text to section 2.2 – "Raw water is supplied to Dwr Cymru via a United Utilities abstraction from the River Dee."
<i>Reason</i>	To provide clarification following error in representation

3 Statement

Albion Water is grateful to have received the views of the following consultees:

Environment Agency

Countryside Council for Wales

Water Services Regulation Authority

Consumer Council for Water (Wales)

These representations proved helpful in Albion's further consideration of its draft drought plan document and, where necessary, amendments have been drafted that are proportionate to Albion's specific and unique position in the water industry.

Albion anticipates that the final drought plan will be published in spring 2007 following any further representation, inquiry or guidance from the Welsh Assembly or Secretary of State.