



# **Fair Trading Commission**

## **ANALYSIS OF BARBADOS WATER AUTHORITY ANNUAL STANDARDS OF SERVICE REPORT**

**January 1, 2019 - December 31, 2019**

Date: December 15, 2020

## **INTRODUCTION**

The Fair Trading Commission (the Commission) is empowered under the Fair Trading Commission Act, CAP. 326B (FTCA) and the Utilities Regulation Act, CAP. 282 (URA) of the Laws of Barbados to determine, monitor and review Standards of Service (SOS) applicable to regulated utilities. The role of the Standards of Service programme is to ensure operational consistency and outline the minimum standards of quality, customer service and reliability that must be met by the Barbados Water Authority (BWA).

This report evaluates the performance of the BWA with respect to both Guaranteed and Overall Standards of Service for the period January 1, 2019 to December 31, 2019. The analysis of the BWA's performance is based on the Standards of Service Decision 2018 – 2020, which was issued by the Commission on May 31, 2017 and took effect from January 1, 2018.

There are two (2) Sections contained herein. Section 1 provides an assessment of the BWA's performance under the Guaranteed Standards of Service, which measure the regulated utility's provision of service to customers. The BWA is required to issue compensatory payments to individual customers affected by breaches of the Guaranteed Standards on the receipt of a claim. Section 2 assesses the utility's performance under the Overall Standards of Service, which measure BWA's efficiency in delivering service to its customers at the national level.

An integral part the Commission regulatory arsenal is the development and implementation of SOS. The main purpose is to ensure that customers are afforded a certain quality of service from the regulated entities. The Commission has noted that the BWA has consistently failed to provide its customers with this required standard. In light of this, the Commission will be transitioning to the imposition of a penalty regime.

The Commission is giving the BWA notice of its intent to develop and implement a penalty framework. This penalty framework will be utilized where significant breaches have occurred during the particular period under review.

This development should incentivize the regulated entity to improve its performance, thereby providing a consistent acceptable level of service to its captive customer base. More information will be forthcoming when the process is completed.

**SECTION 1 - GUARANTEED STANDARDS OF SERVICE**

The Guaranteed Standards of Service are outlined below. A summary of the BWA’s performance for the period January 1 to December 31, 2019, is presented in Table 1. During the period under review, the BWA was unable to provide data for GWS 8 - Scheduling of Field Appointments and GWS 9 - Reliability of Supply. The BWA advised that the system to be used to capture relevant information is still under development.

**Table 1: Guaranteed Standards of Service**

R = Residential Customers; C = Commercial Customers

STANDARD	TARGET	AVERAGE % COMPLIANCE			
		January 1, 2019 - December 31, 2019		January 1, 2018 - December 31, 2018	
		R	C	R	C
<b>GWS 1</b> <b>Installation of a Service</b> 1a. Time taken between application, payment for service, and the installation for a standard connection in a Zone other than a Zone 1 area.	Residential (R) - 14 days  Commercial (C) - 10 days	34.84	19.75	35.88	18.75
1b. Time taken to complete an investigation on receipt of an application for service, in a Zone 1 area.	Residential (R) - 14 days  Commercial (C) - 10 days	No applications received	No applications received	71.80	
1c. Installation time after the completion of the investigation and approval in Zone 1 area. <b>(Zones are as defined by the BWA)</b>	Residential (R) - 14 days  Commercial (C) - 10 days	Since there were no applications, there were no investigations		N/A	
<b>GWS 2</b> <b>Issuance of First Bill</b> The time elapsing between the installation of water service and the	Residential - No more than 30 days after installation of service  Commercial - No more than 30 days after installation of service	88.49	96.77	33.21	100.00

STANDARD	TARGET	AVERAGE % COMPLIANCE			
		January 1, 2019 – December 31, 2019		January 1, 2018 – December 31, 2018	
		R	C	R	C
issuance of the first water bill.  <b>(Interim bill to be issued if read bill cannot be generated)</b>					
<b>GWS 3 Response to Complaints</b>  The timeframe in which the BWA must acknowledge a customer's complaint about billings or other standards of service.	Acknowledgement provided within 7 days of receipt of complaint. (Billing)	83.58	93.15	92.01	78.51
	Acknowledgement provided within 7 days of receipt of complaint. (Service)	97.16	95.00		
	Investigation of complaint and findings provided within 20 days of receipt of complaint. <b>(Inclusive of acknowledgement time)</b> (Billing)	25.56	16.92	21.35	17.65
	Investigation of complaint and findings provided within 20 days of receipt of complaint. <b>(Inclusive of acknowledgement time)</b> (Service)	35.48	67.64		
<b>GWS 4 Wrongful Disconnections</b>  The loss of service where the customer has been disconnected in error.	Reconnected within 10 hours after notification of the error.  (Residential)	100.00	100.00	100.00	No complaints received of wrongful disconnection of commercial entities
<b>GWS 5 Meter Installation (Existing Service)</b>  The time frame in which the BWA will install a meter on the customer's	Meter to be installed within 45 days of receipt of request	100.00	100.00	100.00	100.00

STANDARD	TARGET	AVERAGE % COMPLIANCE			
		January 1, 2019 – December 31, 2019		January 1, 2018 – December 31, 2018	
		R	C	R	C
request. (Customer with a fixed rate requesting meter)					
<b>GWS 6 Repair/Replacement of Faulty Meter</b> The time taken, after the report of a fault, for the BWA to assess and repair/replace a faulty meter where applicable.	Assess and determine operational status of meter and report findings to the customer within 15 days	99.79	100.00	91.00	
	Replace/repair faulty meter within 30 days of confirmation of defect	100.00	100.00	99.29	
<b>GWS 7 Reconnection After Payment of Overdue Amount and Reconnection Fee</b> The timely reconnection of a customer's service after satisfactory settlement of overdue amounts and reconnection fee at the BWA's offices.	Maximum of 24 hours to restore supply	47.62	100.00	98.37	
<b>GWS 8 Scheduling of Appointments</b> Appointments scheduled by BWA representatives. Where the BWA is unable to keep an appointment with a customer, the BWA will contact the customer at least 24 hours before the scheduled appointment to cancel and notify of a new date. (Monday to Friday).	All scheduled appointments shall be honoured.  Appointments may be scheduled: Morning (8:00 a.m. to 12:00 noon) or afternoon (12:01 p.m. to 4:00 p.m.)	DNA <sup>1</sup>		DNA	

<sup>1</sup> DNA - Data Not Available

STANDARD	TARGET	AVERAGE % COMPLIANCE			
		January 1, 2019 – December 31, 2019		January 1, 2018 – December 31, 2018	
		R	C	R	C
The customer should be given a work order number as confirmation of a scheduled appointment.					
<b>GWS 9 Reliability of Supply</b> The provision of a minimum quantity of running water over a 30 day period (a billing period).	Customers shall be supplied with at least 8m <sup>3</sup> of running water over a 30 day period (a billing period)		DNA		DNA

### **GWS 1 - Installation of Service**

GWS 1 refers to the time taken to complete a connection. In a Zone other than a Zone 1 area, the time between application, payment for service and installation should not exceed fourteen (14) days for residential customers and ten (10) days for commercial customers (1a).

Applications received for a Zone 1 area have two components – investigation and installation. For residential and commercial customers, the same targets apply for the time it should take for an investigation to be completed following receipt of an application (1b); and the time it should take for installation after completion of the investigation and approval of the application (1c). Therefore, for Zone 1 areas, the total time that is allowed to elapse between receipt of an application and the installation of service, if approved, is twenty-eight (28) days for residential customers and twenty (20) days for commercial customers.

#### ***Residential Category***

For the period under review, the BWA reported three hundred and three (303) breaches, with an average compliance rate of 34.84%. This is a slight decline from the previous year's figure of 35.88% for GWS 1a. This represents a suboptimal performance.

The BWA reported that there were no applications for service in a Zone 1 area during the year 2019.

### ***Commercial Category***

There were sixty-five (65) breaches reported, which led to a compliance rate of 19.75% for installations in a zone other than a Zone 1 area. This was a marginal increase when compared to the previous year's result of 18.75%. This represents a suboptimal performance.

The BWA reported that there were no applications for service in a Zone 1 area during the period under review.

### **Comment**

The BWA reported that the unavailability of labour due to unstructured holiday leave, as well as the unavailability of materials and equipment, negatively impacted productivity, which resulted in the poor compliance scores.

Nonetheless, this performance is unsatisfactory and signals the need for considerable improvement.



## **GWS 2 - Issuance of First Bill**

This Standard specifies that the time between the installation of water service and the issuance of the first water bill should not exceed thirty (30) days.

### ***Residential Category***

The BWA reported eighty-one (81) breaches, with a compliance rate of 88.49%. This represents a significant improvement when compared to the previous year's result of 33.21%, which is commendable. Despite this improvement, performance under this category remains below par.

### ***Commercial Category***

One (1) breach was reported in this category, resulting in a compliance rate of 96.77%. This represents a marginal decline from the previous year's figure of 100%, but is however within an acceptable level.

### **Comment**

According to the BWA, occasional information technology related issues and delays in the transmission of information to the Commercial Department prevented the achievement of perfect compliance under this Standard.

## **GWS 3 - Response to Complaints**

This Standard requires the BWA to respond to a customer's complaint about a billing issue or other SOS matter within seven (7) days and complete the investigation within twenty (20) days.

### ***Residential Category***

The BWA reported the combined results for billing and service during the year 2018. However, these results have been separated for the year 2019. During the year under review, the BWA reported a compliance rate of 83.58% in providing an acknowledgment on receipt of billing complaints, with seventy-eight (78) breaches. Breaches under the category of service complaints totalled twenty (20), with a compliance rate of 97.16%. The

BWA achieved a compliance rate of 25.56% in completing billing complaint-related investigations and providing findings within the stipulated twenty (20) days, with 332 breaches. There were 420 breaches and a compliance rate of 35.48% for service complaints. This represents a significant performance deficit.

***Commercial Category***

There were five (5) breaches related to the BWA providing an acknowledgement within the stipulated time for billing complaints, resulting in a compliance rate of 93.15%. The BWA reported two (2) breaches in relation to acknowledging service complaints in the stipulated time with a compliance rate of 95%. With regard to the completion of investigation and the provision of findings, the BWA reported fifty-four (54) breaches, resulting in a compliance rate of 16.92% for billing complaints and eleven (11) breaches for service complaints, with a compliance rate of 67.64%. The BWA realised some improvement over the previous year’s result, however, the performance is suboptimal.

**Comment**

The BWA advised that there were several factors contributing to the poor performance of this particular Standard. The utility advised that priority is given to the billing functions. Additionally, there is limited staff and therefore the it reported that it was unable to respond to complaints in an expeditious manner. The BWA opined that the target time of twenty (20) days is unattainable in the circumstances and a 30-day period would be more adequate.

**GWS 4 - Wrongful Disconnections**

This Standard denotes the time in which the BWA must reconnect service to customers who were disconnected in error. The reconnection must be made within ten (10) hours of the BWA being notified of the error.

### ***Residential and Commercial Categories***

Compliance for this category was 100%, as there were no reported breaches of this Standard, as in the previous year. This is a commendable performance.

### **GWS 5 - Meter Installations (Existing Service)**

Under this Standard, the BWA must install a meter within forty-five (45) days of the customer's request.

#### ***Residential Category***

The BWA's performance was commendable, as a compliance rate of 100% was achieved, as in the previous year. Three (3) requests were received for meter installations, with no reported breaches.

#### ***Commercial Category***

Similar to the previous year's performance, the compliance rate was 100%, which is a commendable performance. Eight (8) requests were received by the BWA for the installation of meters, with no breaches reported.

### **GWS 6 - Repair/Replacement of Faulty Meter**

Under GWS 6, the BWA must assess and determine the operational status of the meter and report the findings to the customer within fifteen (15) days. In the event that the meter is faulty, it must be repaired or replaced within thirty (30) days of the confirmation of the defect.

#### ***Residential Category***

During the period under review, the BWA advised that there were three (3) breaches, resulting in a compliance rate of 99.79%. This represents an improvement over the previous year's figure of 91% (residential and commercial). This is a creditable performance.

#### ***Commercial Category***

In 100% of instances, the BWA assessed the operational status of the meter within fifteen (15) days. This compliance rate represents an improved and commendable performance.

### **GWS 7 - Reconnection after Payment of Overdue Amount and Reconnection Fee**

Under this Standard, the BWA must reconnect consumers in a timely manner after the settlement of the overdue amount and reconnection charges at the BWA's offices. The target time for reconnection is twenty-four (24) hours.

#### ***Residential Category***

For the period under review, there were twenty-one (21) disconnections, with eleven (11) not reconnected in the stipulated time. This resulted in a compliance rate of 47.62%. This performance is suboptimal.

The BWA indicated that the main reason for the poor performance under this category was that the lack of labour resources increased the lag time in effecting the reconnection in a timely manner. Additionally, the BWA advised that most customers use third-party agencies to make reconnection payments. This results in the delay of receipt of the payment and, by extension, the completion of the reconnection.

The Commission recognizes that third party agencies are used to make and receive payments, however, it is incumbent on the BWA to advise customers that the payment of overdue amounts should be made directly at the BWA in order to facilitate timely reconnection. This notice should also be printed on the monthly bills.

#### ***Commercial Category***

A perfect compliance rate of 100% was achieved for the period under review, which is creditable.

### **GWS 8 - Scheduling of Field Appointments**

This Standard requires the BWA to keep scheduled appointments and, in instances where the appointment must be rescheduled, the customer should be given twenty-four (24) hours' notice of cancellation and notified of a new date.

The BWA reported that data remains unavailable for an assessment of this Standard due to challenges associated with the absence of skills in the use of technology. The Commission will engage the BWA on the need to have the relevant programme and personnel in place to address the scheduling of Field appointments.

### **GWS 9 - Reliability of Supply**

This Standard requires the BWA to supply customers with at least 8m<sup>3</sup> of running water over a 30-day period. The BWA reported that data remains unavailable for an assessment of this Standard, as interdepartmental collaboration is required to achieve progression with this standard. However, thus far there has been no formal meeting to determine the best way to aggregate the data.

The Commission notes that the BWA failed to report on this Standard, which is unacceptable. During the year 2019, several communities experienced water shortages for prolonged periods of time. These communities are known to the BWA, as there are specific locations with perennial water deficits. Moreover, customers without running water for extended periods have been publicly advocating for a review of their water charges. The Commission reiterates that customers who have not received at least 8m<sup>3</sup> of running water over a 30-day period are entitled to redress. Domestic customers are entitled to a refund equivalent to the standard domestic minimum charge and commercial customers, double the standard domestic charge. It is incumbent on the BWA to address this as a matter of urgency. The Commission will enhance its efforts to realise the commencement of adequate reporting under this standard and the delivery of the minimum acceptable level of service to the BWA's entire customer base.

### **Customer Claim Compensation**

Customers are entitled to compensation where the BWA fails to provide redress within the time stipulated in the Standards. However, claims must be made manually, with customers required to submit claims to the BWA within three (3) months of the occurrence of the event that gave rise to the claim. The BWA reported that no claims were submitted for compensatory payments during the year 2019 and therefore no payments were made.

**Table 2: Customers Claims Summary**

<b>Category</b>	<b>No. of Customers</b>	<b>Compensation</b>
Number of customers eligible for compensation	1,386	\$30,221.00
Number of customer claims received	Nil	Nil
Number of customer claims paid	Nil	Nil

It must be noted that the figures indicated in the above table do not include breaches under GWS 8 and GWS 9, as this information was not submitted.

## **SECTION 2 - OVERALL STANDARDS OF SERVICE**

Overall Standards of Service assess the BWA’s countrywide performance in relation to its delivery of service. Overall Standards do not require compensation to be paid to individual consumers if targets are not met. However, where there are persistent breaches the Commission may, at its discretion, invoke Section 43 of the FTCA and Sections 31 and 38 of the URA, which refer to the imposition of fines and penalties.

The BWA’s performance under the Overall Standards of Service for the review period was generally unsatisfactory. A summary of the BWA’s performance for the period January 1 to December 31, 2019 is presented in Table 3 below.

**Table 3: Overall Standards of Service**

STANDARD	TARGET	AVERAGE % COMPLIANCE	
		January 1, 2019 - December 31, 2019	January 1, 2019 - December 31, 2018
<b>OWS 1 Meter Reading</b>	100% of accessible meters to be read monthly.	97.01	97.27
<b>OWS 2 Investigation of Water Quality</b>	In 95% of instances, preliminary reports are to be submitted within 72 hours and comprehensive reports are to be submitted within 2 weeks of receipt of complaint.	78.22	54.55
<b>OWS 3 Reinstatement of Service after Electrical Outages by Supplier of Electricity</b>	In 95% of instances, the water supply shall be reinstated within 8 hours of restoration of electrical supply.	78.99	86.77
<b>OWS 4 Reinstatement of Service after In-House Fault (Fault residing within the control of BWA)</b>	In 95% of instances the supply shall be reinstated within 8 hours of occurrence of fault.	63.58	53.68

<b>OWS 5 Reinstatement of Property</b>	In 95% of instances temporary reinstatement shall occur at the end of work each day.	89.03 <sup>2</sup>	70.87
	In 95% of instances permanent reinstatement shall occur within 20 working days <sup>3</sup> of completion of works.	16.61 <sup>4</sup>	30.33
<b>OWS 6 Minimum/Maximum Water Pressure</b>	A water pressure of between 25 to 80 pounds per square inch (psi) shall be maintained at all times.	DNA <sup>5</sup>	DNA
<b>OWS 7 Notify Public of Intention to Interrupt Supply</b>	In 95% of instances customers are to be notified not less than 48 hours before scheduled service interruption.	95.92	55.78
<b>OWS 8 Correction of Sewerage Problem</b>	95% of all sewerage problems shall be corrected within 48 hours of notification of the sewerage problem.	DNA <sup>6</sup>	100.00
<b>OWS 9 Wastewater Effluent Quality</b>	95% of samples shall conform to the Environmental Protection Department's (EPD's) wastewater discharge standards.	DNA <sup>7</sup>	27.36
<b>OWS 10 Potable Water Quality</b> 100% of samples taken shall be within the potable water quality limits established by the WHO.	Potable Water Quality (Sources) Chemistry	99.47	99.25
	Potable Water Quality (Sources) Bacteria	98.16	
	Distribution Potable Water Quality (Sources) Bacteria	98.17	
	Distribution Potable Water Quality (Sources) Chlorine	99.43	
<b>OWS 11 Repair of Ruptured Pipes</b>	90% of ruptured pipes shall be repaired within 5 days of notification of rupture.	42.22	46.67

<sup>2</sup>This average is based on three quarters as the BWA did not submit data for the third quarter.

<sup>3</sup>Working days refers to Mondays to Fridays (8:00 a.m. to 4:00 p.m.) only and exclude public holidays and weekends. In measuring the response time for targets expressed in terms of working days, the day the complaint is made is excluded.

<sup>4</sup>This average is based on three quarters as the BWA did not submit data for the third quarter.

<sup>5</sup>DNA - Data not available

<sup>6</sup>DNA - Data not available

<sup>7</sup>DNA - Data not available



<b>OWS 12 Repair of Ruptured Mains</b>	In 95% of instances mains repairs shall be effected within 24 hours of notification of rupture.	96.75	94.47
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**OWS 1 - Meter Reading**

Under this Standard, 100% of all accessible meters must be read every month. The BWA reported 97.01% compliance, which was on par with the previous year’s performance. Of the possible one million one hundred and eighty-seven thousand, eight hundred and sixty-two (1,187,862) meter readings, there were one million one hundred and fifty-two thousand, three hundred and thirty-nine (1,152,339) recorded meter readings. This represents a failure to attain the target.

**OWS 2 - Investigation of Water Quality**

This Standard requires the BWA, in 95% of instances, to investigate and submit a preliminary report to the Commission within seventy-two (72) hours after a complaint is received.

The BWA reported that of the one hundred and one (101) reports, seventy-nine (79) were investigated in the stipulated time for a compliance rate of 78.22%. Whilst this represents a failure to reach the compliance rate, it is an improvement over the previous years’ 54.55%. This is still unacceptable.

The BWA advised that a significant number of complaints about the water quality originated from the northern part the island and related to elevated salinity. The BWA informed that its efforts to address this include adjustments to the distribution system, and the movement of water from the extension of the desalination plant at Spring Garden (Ionics). There were other complaints of ‘white water’ which the BWA attributed to air trapped in the water when the water levels in the wells are low.

**Comment**

The BWA reported that issues related to understaffing was the primary reason for its failure to attain this Standard.

During the year 2019, Barbados was impacted by drought. The BWA indicated that this impacted on its' ability to supply water to some parts of the island, as there was significant stress on the wells. There was a reduction in pumping from the west coast wells and in some instance closure, to reduce the impact of saline intrusion. The BWA reported that there were challenges in blending the waters to reduce the impact on the customers in the areas affected by the saline intrusion. In order to mitigate the issue, the BWA reported that it expanded the contract with Ionics Freshwater Ltd for an increase supply of desalinated water.

### **OWS 3 - Reinstatement of Service after Electrical Outages by Supplier of Electricity**

Under OWS 3, service should be restored within eight (8) hours of restoration of the electricity supply. The compliance target for this Standard is 95%.

Out of the one hundred and thirty-eight (138) reported incidents of electrical outages arising from the supplier of electricity, service was reinstated in the stipulated time on one hundred and nine (109) instances. Representing a 78.99% compliance, a decline from the 2018 result of 86.77%. This again represents a failure to attain the target.

#### **Comment**

The BWA advised that the frequent power outages that affected the island during the last quarter of 2019 impacted the BWA's ability to supply water. The BWA indicated that in instances where there are power outages, the pumps in the pumping stations cease operation. After restoration of power, more than eight (8) hours is required to fully restore the system and move water through the distribution system. However, the BWA should endeavour to reduce the restoration time in order to minimise the disruptions to customers.

### **OWS 4 - Reinstatement of Service after In-House Fault (Fault residing within the control of BWA)**

Under OWS 4, in 95% of instances, water supply must be reinstated within eight (8) hours after an in-house fault.

There were one hundred and sixty-two (162) incidents of in-house faults but the BWA reported that it was only able to reinstate supply within the stipulated time in one hundred and three (103) occasions for a compliance rate of 63.58%. While this is an improvement when compared to the previous year's performance of 53.68%, it still represents a failure to reach the target.

### **Comment**

The BWA reported that after restoration of power, more than eight (8) hours is required to fully restore the system and have water moving through the distribution system. However, it should be noted that the attainment of this Standard's target rests solely on the BWA. The BWA must therefore take the action necessary to minimise internal disruptions by determining the most frequent causes and taking the required preventative action.

### **OWS 5 - Reinstatement of Property**

This Standard requires the BWA to, in 95% of instances, temporarily reinstate property at the end of the workday and permanently reinstate property within twenty (20) working days.

The BWA reported a compliance rate of 89.03% for temporary reinstatement in 2019. On six hundred and thirty-eight (638) instances, the BWA was able to reinstate service within the end of the working day on five hundred and sixty-eight (568) occasions. Whilst this represents a failure to attain the target, it is nonetheless an improvement over the previous year's performance of 70.87%. Conversely, there was a decline in the permanent reinstatement of property, as the BWA was only able to achieve a rate of 16.61%. In absolute numbers, BWA was only able to permanently reinstate property on 106 occasions. This is a deterioration as compared to the rate of 30.33% in 2018. This

represents an unsatisfactory performance and a major inconvenience to commuting public and property owners.

**Comment**

The BWA reported that the cessation of property restoration work was due to the expiration of the contracts with contractors to complete the work in June 2018. Intermittent issues related to the unavailability of materials and equipment also contributed to this poor performance.

**OWS 6 - Minimum/Maximum Water Pressure**

Under this Standard, the BWA must maintain water pressure between twenty-five (25) and eighty (80) pounds per square inch.

**Comment**

The BWA never reported on this Standard and maintained that it does not possess the appropriate equipment and instruments to facilitate the measurement.

The BWA has advised that there is an ongoing project to install Multi-Log LX GPRS meters. The BWA stated that the completion of the project should facilitate its ability to commence reporting on this standard.

As with all the other standards, this was developed in consultation with the BWA and is important as it impacts the availability of water in some districts and durability of consumer plumbing equipment.

**OWS 7 - Notify Public of Intention to Interrupt Supply**

Under this Standard, customers must be notified forty-eight (48) hours in advance of an interruption of service. The target for this Standard is 95%.

The compliance rate achieved overall was 95.92%, a significant improvement from the previous year's result of 55.78%. The BWA reported that out of the forty-nine (49) planned interruptions of service, the public was notified in advance on forty-seven (47) occasions. This is commendable, as the BWA was able to attain the target.

### **OWS 8 - Correction of Sewerage Problem**

Under OWS 8, the BWA is expected to correct sewerage issues within forty-eight (48) hours of being informed of a problem. The compliance target is 95%.

The BWA did not submit data for this Standard.

#### **Comment**

The BWA indicated that results for this Standard were not reported in 2019, as the BWA officer with responsibility for this area was made redundant in November 2018. Nevertheless, the lack of a report is unacceptable in light of the implications for the health of Barbadians, the sustainability of the environment and the viability of the tourism industry. It is incumbent on the BWA to make the necessary arrangements to one, ensure that the standard is being met and two, the necessary reporting is satisfied.

### **OWS 9 - Wastewater Effluent Quality**

For OWS 9, 95% of samples from the BWA's sewerage treatment plants should conform to the Environmental Protection Department (EPD) wastewater discharge guidelines.

The BWA did not submit data for this Standard.

#### **Comment**

The BWA indicated that results for this Standard were not reported in 2019, as the BWA officer with responsibility for this area was made redundant in November 2018. This is unacceptable given the attendant issues that can arise if wastewater is not treated and

disposed of in the appropriate manner. The absence of information relating to the effluent quality and the correction of sewerage problems reduces the assurance that the appropriate protocols relating to the same have been employed. In order to assure public safety, it is imperative that the guidelines are followed, with reports submitted as evidence.

### **OWS 10 - Potable Water Quality**

Under OWS 10, 100% of samples taken must be within the potable water quality limits established by the World Health Organization (WHO).

During the year under review, the BWA reported a compliance rate of 99.47% for Source chlorine and 98.16% for Source bacteria. As it relates to the distribution, there was a 98.17% compliance rate for chlorine and 99.43% for bacteria. This represents a marginal failure, however the BWA reported that there were extenuating circumstance which are outlined below. These results mirrors the average result for the previous year.

### **Comment**

As it relates to the distribution testing failures, the BWA reported that most of these cases were in St. Lucy where there were numerous breakages. As a result, the BWA informed that a parish-wide flushing program was undertaken, in addition, to an increase in the chlorination dosage at Alleyndale, St. Lucy. After this action, the BWA advised that repeat samples were negative for bacteria.

The BWA reported that there were instances of elevated levels of nitrates at the Belle and Ashton Hall, pumping stations during the first quarter, resulting in these stations being placed on an elevated monitoring program. However, the BWA advised that no well exceeded the World Health Organisation guideline of 10 mg ppm. There was an unusual case in Constant which exceeded the WHO limit of 10 ppm in January but the BWA advised that it was 6.3 ppm in February when retested and remained at the acceptable

level for the rest of the year. The BWA attributes the increase in January to agricultural practices.

### **OWS 11 - Repair of Ruptured Pipes**

OWS 11 requires that 90% of ruptured pipes be repaired within five (5) days of notification.

There were seventeen thousand, three hundred and ten (17,310) reports of ruptured pipes and the BWA advised that it was able to effect the repairs of seven thousand, three hundred and nine (7,309) in the stipulated time. The BWA reported a compliance rate of 42.22%, slightly below the performance in 2018 which was 46.67%; this represents a breach of the Standard. This inability to repair pipes in a timely manner continues to contribute significantly to Non-Revenue Water (NRW). NRW is defined as the difference between the amount of water produced for consumption and the amount of water for which customers are actually billed. It also offers an indication of the utility's lack of responsiveness and efficiency.

It is understood that there are many extenuating circumstances, as the BWA continues to operate with an aged, deteriorating infrastructure, with some of the mains having been in operation since the 1800s. As a result, the infrastructure is more susceptible to frequent ruptures and the BWA is unable to expeditiously effect repairs. The BWA cites the unavailability of materials, equipment and transportation as factors that continue to negatively impact its performance under this Standard. There is a need for significant improvement in this Standard, however, given the BWA's contention of continued financial challenges, short term solutions are restricted.

### **OWS 12 - Repair of Ruptured Mains**

For OWS 12, 95% of repairs should be effected within twenty-four (24) hours of notification.

The BWA advised that it received one thousand and forty-seven (1,047) reports of ruptured mains and it was able to effect the repairs in the required time one thousand and thirteen times (1,013). The BWA was able to maintain a compliance rate of 96.75%, a marginal improvement from the 94.47%; this represents an attainment of the Standard, which is commendable.



## SUMMARY

The BWA's Standards of Service performance for the year 2019 varied greatly. It is a performance characterised by improvements in some areas, with regression or repetition of the previous year's performance in others. However, whilst the BWA was able to attain the target in some instances, its performance under the majority of standards continued to be below the required criteria. In some instances, no assessment of the performance was possible due to the unavailability of data. This is quite concerning, especially given that it trades in a commodity that has the potential to have significant public health implications.

The BWA has advised that the reporting officer for OWS 8 - Correction of Sewerage problems was made redundant. This human resource deficit must be addressed as a matter of urgency, as the absence of reports raises serious questions as to how sewer line breaches are being addressed and the possible impact of prolonged breaches. The public health, environmental and economic implications are significant.

The BWA reported that it continues to be plagued by financial and operational issues which impact its ability to perform at an optimal level, and the availability of materials and equipment. The BWA indicated that this hampers its performances, especially with regard to Installation of Service (GWS 1), Reinstatement of Property (OWS 5), Repair of Ruptured Pipes (OWS 11) and Repair of Ruptured Mains (OWS 12), where the unavailability of materials negatively impacted the work process.

The BWA was only able to achieve the targets under the Guaranteed Standards of Service for Wrongful Disconnections (GWS 4), Meter Installation (GWS 5), Repair/Replacement of Faulty Meter (Commercial customers) (GWS 6) and Reconnection after Payment of Overdue Amount and Reconnection Fee (Commercial Customers) (GWS 7). The BWA also attained the compliance rate for Meter Reading (OWS 1), Notify Public of Intention to Interrupt Supply (OWS 7) and OWS 12.

The continual underperformance of the BWA could have significant implications for Barbados. Failure to reach and maintain standards related to Potable Water Quality

(OWS 10), the Correction of Sewerage Problems (OWS 8) and Wastewater Effluent Quality (OWS 9), in particular, could jeopardise the health of Barbadians, the sustainability of the environment and the viability of the tourism industry. Whilst the BWA reported that its challenges related to an aged infrastructure and limited finances, the level of its service delivery to customers could still be improved.

The BWA also continues to be impacted with high incidences of ruptures of its mains. As previously reported, these frequent system breakdowns result in the loss of water, a major contributor to NRW. NRW represents significant operational and maintenance expenditure for the BWA without a corresponding increase in revenue, contributing to the growing financial burden of the utility. In order to alleviate this in the interim, the BWA must repair all reported incidences of ruptures or breaks in a timely manner (OWS 11 - Repair of Ruptured Pipes) in order to minimise water wastage and expenditure.

The BWA has consistently blamed the lack of resources as the reason for failure to attain the criteria for a number of Standards. However it is noteworthy that BWA has not provided a report on GWS 8 - Schedule of Field Appointments, which requires little to no capital input and should be a simple matter of recording appointments. The BWA must at least attain the Standards that are within its control and do not require major capital outlays. It is important that the BWA identify and address such matters, while seeking to devise funding strategies that will enable it to treat to its more capital intensive requirements.

Given the generally poor performance of the BWA since the institution of the SOS and the dialogue between itself and the Commission on the same, which has not appeared to realise any material improvement, the Commission now deems it necessary to institute a penalties framework that will act as a further stimulant to move the utility along the desired trajectory.