

22 March 2024

Charles Barker
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Wellington Water
By email

Tēnā koe Charles

**Assurance of ongoing supply of a sufficient quantity of drinking water in the Wellington Region:
Further information**

On 15 March 2024, Taumata Arowai received the letter signed-off by the chief executives of Wellington Water Limited (**WWL**) and its council owners in the Wellington metropolitan area. That letter responded to Allan Prangnell's request on 21 February 2024 for a risk mitigation plan, which is required to ensure that there is not an imminent risk to the ongoing supply of a sufficient quantity of drinking water in Wellington metropolitan area over the 2024/25 summer.

As previously agreed by the various local authority chief executives, we will now work directly with WWL to resolve issues arising from that response.

The 15 March 2024 letter does not set out a plan that meets the expectations signalled in Allan's earlier letter. Instead, it indicates:

- (a) Further supply and demand modelling will be carried out ahead of the 2024/25 summer, starting earlier than would otherwise be the case. No timeframes or programme for this modelling is provided.
- (b) An independent review of the model will be carried out. No timeframes, programme or review parameters are provided.
- (c) The main supply-side improvement will be the commissioning of the dissolved air flotation (**DAF**) upgrade at the Te Marua Water Treatment Plant (**WTP**) by December 2024. This timeframe is noted to be at risk and the framing of the summary part of the letter suggests its operation (even at partial production capacity) ahead of the 2024/25 summer cannot be relied on. There is no discussion of the programme for these works, key milestones, or the particular factors that are putting completion and commissioning timeframes at risk.
- (d) Background ecological work is being carried out to enable an application to vary existing water take consents. Again, there is a comment that this cannot be relied on as a risk control for the 2024/25 summer, indicating that the process may not be concluded by that time or that there is a reasonable prospect a variation may not be approved. No timeframes, programme or discussion of the anticipated scope of the variation application are provided. The bare message that work is underway to enable an application to be lodged is substantially the same as the position WWL advised Taumata Arowai of in November 2023.
- (e) The current summer's media campaign will be replicated, but started slightly earlier. No specific timeframes or programme are set out for the 2024/25 summer.

- (f) Anticipated Opex and Capex spend increases on acute water loss activities for each relevant owner council are set out, with the caveat that these are subject to ongoing Long-term Plan (LTP) consultation processes. There is an indication that WWL has modelled the consequence of the proposed Opex funding changes on water loss reduction, but details of that modelling are not provided. Critically, there is no information about target leak reduction and renewal rates, plans, or programmes, against different funding scenarios, or what milestones might need to be achieved to substantially reduce water loss prior to the 2024/25 summer.

In essence, the information provided does not set out a robust, measurable plan that WWL and its owner councils can be held to account against in the way clearly envisaged by Allan's earlier letter.

To enable such a plan to be developed, Taumata Arowai would like to receive further information about certain matters as set out below. If satisfactory information is not forthcoming, Taumata Arowai will be required to consider whether more directive tools need to be used.

Further information

By **28 March 2024**, please provide Taumata Arowai with the following information:

- (1) The total estimated volume of water loss through leaks for each council area.
- (2) The total regional water loss targets (expressed in MLD) that are required to reduce the following risks to a negligible level before 31 December 2024:
 - (i) the risk of a Level 4 water restriction scenario;
 - (ii) the risk of a Level 3 water restriction scenario;along with the water loss targets apportioned to each council for each of these scenarios.
- (3) The total Opex each council has allocated to reduce water loss through to the end of 30 June 2024, and the further Opex of this nature each council has proposed through to 31 December 2024, with an assessment of the total MLD expected to be saved against the apportioned council water loss targets.
- (4) The activities that WWL expects to carry out to achieve apportioned MLD targets each month, broken down by council area, for the period until at least 31 December 2024 and ideally through to the end of February 2025.
- (5) Details of the methodology WWL uses to calculate water loss savings, including real time data collection methods.
- (6) A draft reporting dashboard that could be used to regularly updated Taumata Arowai on progress against apportioned targets for water loss reduction by council area.
- (7) Any information or assessment WWL has about industry capacity constraints if additional funding for water loss reduction work is approved, and any associated contingency plans (i.e. whether additional funding will be able to be converted into actual water loss reduction, and over what period(s)).

- (8) The anticipated start date of the revised supply and demand modelling, along with the time likely to be required to carry out the modelling exercise (or different phases of it).
- (9) Information about any monitoring and investigation activities that are being carried out or planned, to identify areas or causes of particularly high water loss.
- (10) Details about the key milestones and risks for the DAF construction and commissioning project, including the factors putting December 2024 commissioning in jeopardy.
- (11) Details about the proposed resource consent variation application, and any plans or timelines that have been prepared in relation to that activity.
- (12) A draft schedule for regular reporting to Taumata Arowai on the activities listed above.

I'm aware that this is a significant list, but much of this material is what Taumata Arowai expected WWL and its council owners to collate and provide in response to Allan's earlier letter. If there are any matters that require clarification, or that could usefully be adjusted to capture information that is more readily available to WWL, please don't hesitate to call.



Steve Taylor
Head of Regulatory