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Rachel Strong  
Utility Regulator  
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**BY EMAIL**

25 June 2024

Dear Rachel,

**Licence Modifications Consultation**

Thank you for providing us with the opportunity to comment on the proposed modifications to NI Water's Licence.

We note that the proposed modifications relate to three areas:

**New Licence Condition R**

The Utility Regulator has proposed a new Condition R, requiring NI Water to comply with the recently published Code of Practice for Consumers in Vulnerable Circumstances.

NI Water has worked closely with the Utility Regulator in support of its Best Practice Framework, which led to the development of this code of practice, and we welcome its incorporation into the Licence.

**Condition F1 Paragraph 5(1)**

The Utility Regulator proposes making changes with respect to NI Water's Procurement Plan.

NI Water previously requested that the Utility Regulator change the frequency of Procurement Plans. Therefore, modifying the licence to require submission of Procurement Plans at the same time as Business Plans is welcome.

**Condition F paragraph 8.1**

The Utility Regulator proposes amending the requirement for the preparation and submission of Current Cost Accounting Statements from an annual basis to an 'if requested...' basis.

Since NI Water's accounting statements are now produced on a historic, rather than current cost, accounting basis, we welcome this licence modification.

I trust that you find these comments helpful. Should you have any queries, please do not hesitate to contact me.

Yours sincerely,



**Ronan Larkin**  
Director of Finance and Regulation

cc Michael Mulholland