



2024 ANNUAL REPORT

REGULATORY & SUPERVISORY BUREAU FOR ELECTRICITY & WATER

Annual Report 2024

CHAIRMAN'S MESSAGE

It is with great pride and a sense of purpose that I present the 2024 Annual Report of the Regulatory and Supervisory Bureau (RSB). This past year has been more than a chapter of operational achievement—it has been a defining period in our mission to establish a regulatory model that not only responds to the present but actively shapes Dubai's energy future.

Since its establishment, the RSB has been guided by a clear mandate: to support Dubai's economic, social, and environmental objectives through the development of a fair, transparent, and independent regulatory regime. In 2024, this mission came into sharper focus as the Bureau expanded its reach and deepened its influence across the electricity, water, and district cooling sectors.

Our regulatory role has evolved from being a supervisory function into a strategic enabler of Dubai's clean energy transformation. We are proud to have supported the advancement of several landmark infrastructure projects—most notably in the clean energy sector—while embedding the principles of efficiency, transparency, and innovation across every level of the value chain.

At the heart of our strategy is a commitment to protecting the long-term interests of Dubai's residents, investors, and institutions. Through the introduction of forward-looking regulations—such as those guiding cooling load contracting, customer service standards, and sub-metering transparency—we are helping to drive down costs, reduce resource waste, and ensure that consumers receive fair, consistent, and high-quality service.

This year, we also made significant progress in expanding our enforcement capacity. The launch of a robust compliance framework, supported by legal mechanisms and a more formalized law enforcement function, signals the RSB's intent to uphold regulatory integrity through both proactive guidance and decisive action.

But regulation must also evolve. That is why we are investing in digital integration, data-sharing platforms, and real-time monitoring tools—ensuring that the regulatory environment keeps pace with technological advancements and remains responsive to emerging challenges.

Our journey is far from over. Dubai's ambitions for net-zero emissions, world-class infrastructure, and resilient public services require a regulator that is not only competent, but visionary. The RSB is committed to this role—anchored by its mission, empowered by strong partnerships, and driven by an unwavering belief in the power of good regulation to enable great outcomes.

I extend my deepest appreciation to our partners in government and industry for their continued collaboration. Together, we are not just regulating for today—we are shaping the foundation of a sustainable and competitive future for Dubai.

HE Qusai Mohammed Al Shared

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H.H Sheikh Mohammed bin Zayed Al Nahyan

President of the United Arab Emirates



H.H Sheikh Mohammed bin Rashid Al Maktoum

Vice President and Prime Minister of the United Arab Emirates and Ruler of Dubai Annual Report 2024 8 Annual Report 2024 9

ABOUT THE RSB

REVIEW OF 2024

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Our vision is to become a leading example of regulatory practice in the Gulf region. Our mission is to support Dubai's economic, social, and environmental objectives through the development of an effective, independent, and transparent regulatory regime for the Emirate's electricity, water, and district cooling sectors.

The RSB was established by the Executive Council Resolution Number 2 of 2010. We work under the auspices of the Dubai Supreme Council of Energy, developing regulatory frameworks to support Dubai's development through secure and affordable energy supply and efficient energy use, while meeting environmental and sustainability objectives.

Supporting the implementation of the Dubai Clean Energy Strategy 2050 is central to our role. By 2030 the aim is to improve energy efficiency by 30% and the electricity generation mix, historically dominated by gas, is to be transformed, particularly by the addition of renewables.

We licence and regulate independent power & water producers, ensuring new entrants to the sector deliver safe, reliable, and efficient services to the benefit of all in Dubai. Governed by Law Number 6 of 2011, private sector participation in electricity and water production brings technology, expertise and capital to the energy sector enabling further efficiency and sustainability towards ensuring security of supply.

In 2021, the RSB became the regulator of Dubai's district cooling sector following the promulgation of Executive Council Resolution 6 of 2021.

We develop and administer frameworks to encourage greater energy efficiency in buildings. Our energy service company (ESCO), energy auditor, and building energy manager (BEMAS) accreditation schemes are designed to build trust and make the process of contracting for energy services smoother for accredited entities and their clients.

The year 2024 marked a significant period of evolution for the Regulatory and Supervisory Bureau. Our work reflected a strong commitment to delivering a regulatory environment that balances innovation with accountability, technical rigor with service excellence, and economic growth with environmental stewardship.

EXECUTIVE DIRECTOR'S

At the core of our regulatory mission is the belief that effective oversight can catalyze progress. This year, we advanced this principle on multiple fronts. Dubai's energy landscape was reshaped by the full commercial commissioning of two flagship projects: **Noor Energy 1**, now contributing **950 MW** of solar capacity, and **Warsan Waste-to-Energy**, delivering **210 MW** of sustainable baseload generation. These milestones reinforce Dubai's global leadership in integrating clean energy at scale.

Our licensees played a pivotal role in Dubai's grid performance, contributing **13.9 TWh** of energy—**7.7 TWh** of which was clean, representing a **13% share** of total grid energy. This transition is not only quantitative but qualitative, as we continue to ensure that independent power and water producers deliver safe, efficient, and reliable services in accordance with Law Number 6 of 2011.

In the **district cooling sector**, the Bureau delivered an ambitious and coordinated regulatory agenda. We issued or updated **five key Regulatory Documents** (RD01, RD04d, RD05, RD08, RD09), each addressing specific sector challenges—ranging from excessive contracted loads to opaque billing arrangements. Our update to RD05 introduced a unified set of **customer service KPIs**, enabling the benchmarking of performance across all permit holders for the first time.

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A major emphasis was placed on **compliance and enforcement**.

We established a new **escalated regulatory action framework**, including legally backed procedures, penalty structures, and law enforcement. This marks a step change in our ability to protect consumers and ensure compliance, further supported by our planned integration with the **Dubai 360 digital governance platform.**

The energy services market continued its growth trajectory. Our ESCO accreditation scheme reached 21 accredited firms, while our relaunched Building Energy Management Accreditation Scheme (BEMAS) secured its first five accredited energy managers and delivered promising early results—33.9 million kWh in energy savings and 7.1 million IG in water savings across just 33 projects. The overall retrofit market achieved a record AED 192 million in new investment, bringing total cumulative investment to AED 1.6 billion since 2014.

Regulatory reforms also emphasized fairness and transparency for consumers. Our complaint management overhaul was completed, helping manage a **470% increase** in escalated cases. We continue to see this trend as a positive indicator of public awareness and trust in the regulatory framework.

On the demand side, DSM savings from efficient cooling reached 1,208 GWh, surpassing the 2024 target of 1,181GWh. Despite a slight dip in district cooling market share to 23.1%—due largely to villa growth using DX systems—efficiency gains remained strong. Average electrical efficiency of plants improved to 0.843 kWh/TRh, with 96% of output coming from plants compliant with RD03 energy thresholds. Water efficiency remained stable at 7.02 L/TRh, and recycled water use accounted for 5.4 million cubic meters, despite temporary supply constraints due to extreme weather in April.

Looking ahead, the inclusion of **Single Building Systems (SBS)** within the regulatory perimeter will be a major step forward in 2025. With the SBS billing and cooling systems permitting process now underway, we are on course to extend the benefits of fair pricing and oversight to a new class of consumers.

In closing, 2024 was a year defined by alignment—between policy and practice, innovation and enforcement, sector growth and consumer protection. The RSB remains committed to enabling Dubai's energy and water sectors to deliver world-class outcomes—efficient, sustainable, and equitable for all.

SUSTAINABLE ELECTRICITY GENERATION AND WATER DESALINATION

03

In 2024, Dubai continued to strengthen its position as a leader in sustainable energy initiatives. Noor Energy 1, the world's largest single-site hybrid photovoltaic (PV) and concentrated solar power (CSP) plant, successfully added 233 MW of production capacity. With this, it achieved full commercial operation and reached its peak production capacity of 950 MW, thus further enhancing Dubai's renewable energy capabilities. Furthermore, Warsan Waste Management Company (WWMC), the world's largest waste-to-energy plant, also achieved full commercial operation. It reached its peak licensed capacity of 210 MW and significantly contributed to both waste management and sustainable energy generation efforts in the Emirate.

Additionally, construction commenced on two groundbreaking projects:

- the latest solar photovoltaic (PV) project, and largest yet in Dubai, Shuaa Energy 4 with a total generation capacity of 1,800 MW, and
- a state-of-the-art seawater reverse osmosis (SWRO) desalination plant, Hassyan Water Company A with a total water desalination capacity of 180 MIGD.

These projects mark key steps toward achieving Dubai's long-term goals for clean and sustainable energy and water production.

Figure 1 illustrates the evolution of Dubai's electricity production capacity from 2018 to 2024, with a forecast extending to 2027 when all currently licensed capacity is expected to be fully commissioned.

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Figure 1: Evolution of Dubai's electricity generation capacity

In 2024, our licencees, both utility scale and captive generation, contributed more than 23% of the total grid energy requirement, feeding 13.9 TWh into the grid, of which 7.7 TWh was clean energy accounting for a 13% contribution (Figure 2).

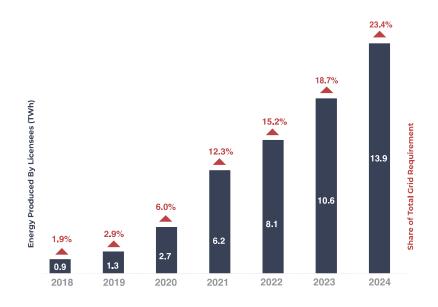


Figure 2: Licensees Energy Production 2018 - 2024

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In 2024, our licensees reported a total of 13.7 million man-hours, along with 110 near misses, one lost-time injury, and one fatality. In response, the RSB thoroughly reviewed investigation reports and mandated third-party audits to assess deficiencies and identify areas for enhancement within the health and safety systems of its licensees. These measures aim to ensure that serious incidents are effectively prevented in the future and foster a safe working environment.

		2022	2023	2024
Manhours Worked		32.8M	10.5M	13.7M
	Near Misses	197	122	110
ents	LTIs	3	0	1
Incidents	Serious Injuries	0	0	0
=	Fatalities	0	0	1

Table 1: Health and safety performance



ENERGY SERVICES MARKET



The RSB's Energy Service Companies (ESCO) accreditation scheme has emerged as a cornerstone for fostering market confidence for over a decade now, enlisting a total of 21 accredited companies - 15 fully accredited and 6 provisionally accredited. The program maintained its momentum in 2024 in terms of data reported by these accredited entities. Despite lapses in renewal among certain provisionally accredited ESCOs, the sustained volume of accreditations, particularly full ones, reflects a maturing and resilient sector. This offers invaluable insights into market dynamics, serving as a key input for Dubai's Demand Side Management (DSM) Strategy monitoring and refinement.

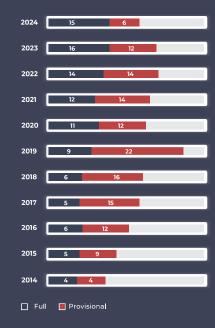


Figure 3: Number of accredited ESCOs since 2014

As of year-end, 10 energy auditors (EA) were on the register of accredited energy audit firms, recognized as key advocates for enabling building energy efficiency and sustainability.

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In early 2024, the RSB relaunched its Building Energy Management Accreditation Scheme (BEMAS). In partnership with the Real Estate Regulatory Agency (RERA), the RSB organized a workshop to advance energy and water efficiency within the built environment through the BEMAS initiative. The event highlighted the scheme's role in driving operational sustainability, achieving financial savings, and delivering environmental benefits by optimizing energy and water use in buildings. With over 100 stakeholders in attendance, the workshop focused on energy conservation, operational optimization, and resource efficiency to foster sustainability while increasing the investment value of real estate assets. By the end of the year, the scheme had registered five accredited, highly qualified building energy managers.

The year 2024 marked continued progress in the building retrofit market, reflecting its sustained momentum and impact. A total of 29 new projects were launched during the year, bringing the cumulative number of retrofit projects to 451. The investment for 2024 reached AED 192 million, pushing the sector's total investment to an impressive AED 1.6 billion since 2014. These efforts have resulted in retrofitting over 7,200 buildings to date.

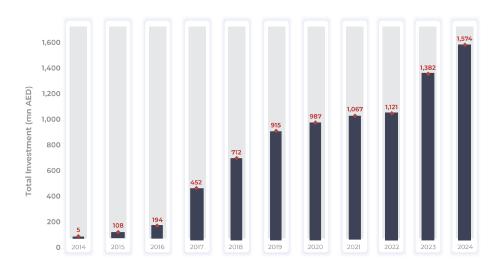


Figure 4: Investment growth from 2014 to 2024

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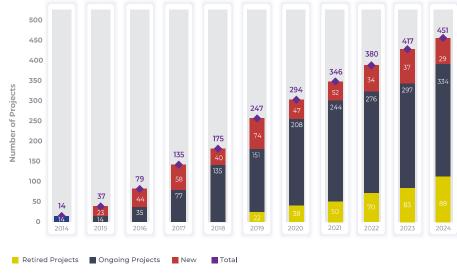


Figure 5: Project growth from 2014 to 2024



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Governmental building projects continued to attract substantial investments in 2024, maintaining their share as more than half of the total investments in the sector. The year reaffirmed the sector's commitment to energy and water efficiency, with ambitious targets of 792 GWh in energy savings and 626 MIG in water savings.

Actual results exceeded the targets, achieving 825 GWh of energy savings. However, water savings reached 460 MIG, which, while significant, did not show an increase compared to the previous year. These outcomes underscore the sector's ongoing efforts to enhance resource efficiency and sustainability.

Annual Energy Savings



Figure 6: Energy Savings

Annual Water Savings

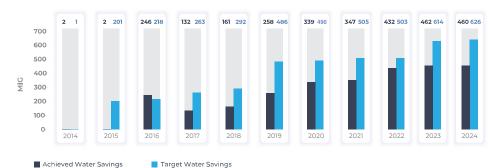


Figure 7: Water Savings

ESCOs continue to offer their Energy Savings Performance Contracts (ESPC) in at least two successful models:

- Guaranteed Savings or Client-Financed: Clients invest upfront, and ESCOs guarantee the energy savings.
- Shared Savings or ESCO-Financed: ESCOs invest in projects, sharing the savings with clients.

Of the total investment since 2014, 16% has gone into non-ESPC projects, a drop of 2% from 2023, which went into guaranteed savings projects. Around three quarters of energy and water savings continue to originate from guaranteed savings.

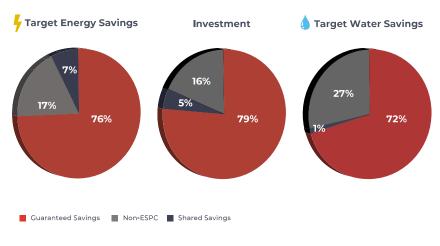


Figure 8: Breakdown by contractual arrangement

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The average payback period for retrofit projects has marginally risen to 3.8 years, up from 3.5 years in 2023. Despite this slight increase, the financial viability and appeal of investing in energy efficiency remain strong.

Cooling systems retrofits continue to attract the majority of investments, followed by lighting systems, underscoring the focus on these key areas in energy conservation initiatives.

In 2024, the Building Energy Management Accreditation Scheme (BEMAS) was re-launched as a key initiative to advance energy and water efficiency in buildings. In the first year of data collection, results showcased the scheme's high potential impact, with 3 accredited companies reporting a total of 33 projects. These projects achieved energy savings of over 33.9 million kWh and water savings exceeding 7.1 million imperial gallons. The resulting financial benefits included AED 18.4 million in energy cost savings and AED 282,000 in reduced water expenses. As BEMAS continues to grow, ongoing data collection and analysis will provide deeper insights into its effectiveness, helping refine best practices and drive sustainable building operations across the sector.

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EFFICIENT COOLING

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Developing Regulations

Revised RD01: Permits and Schedules. 2024 saw the formal extension of regulations to bring Single Building Systems under regulation. An updated version of RD01 was published in November, placing requirements on all existing permit holders to include in their permit schedules, services provided to Single Building Systems. We wrote to each permit holder drawing their attention to the extended scope of regulations. Whilst Billing Services for these systems can be permitted in accordance with the regulations, the permitting of Cooling Systems for Single Building Systems is planned for 2025.

When introducing the changes to RD01, we have taken the opportunity to clarify the documentation required prior to commencing billing services. These minimum requirements establish specific data that is required to be made available when sub-metering services are first commissioned, and whenever there is a change of Billing Service Provider. The minimum requirements have been incorporated into RD01 and all permitted entities are required to ensure that all data is made available prior to adding a building to its schedule. We again, reiterate that a permit is only valid for the buildings contained in schedule 2 of the permit.

Implemented RD09: Establishing the Contracted Load. This regulation aims to raise awareness among developers about the benefits of obtaining accurate estimates of building cooling load requirements. Many of Dubai's developers take a cautious approach when contracting load to ensure sufficient cooling. The reality is that many buildings in Dubai have excessive contracted cooling load which contributes to poor operating efficiency and high cost for building occupants. The regulations establish a process for the contracting cycle, and draw the developer's attention to useful reference material to inform his decision. The regulations also require district cooling providers to share anonymized information about similar buildings so the developer is fully informed when deciding how much cooling load is required.

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Finally, the regulations set a clear requirement that the Contracted Load should not exceed at anytime the Design Load approved by the relevant authority.

Implemented RD04d: Minimum requirements for Sub-metering Service Agreements (SSA). We have observed a number of escalated complaints which could have been avoided had there been better communication between the Billing Agent and the Building Manager. In response to this, we consulted on a new regulation adding minimum requirements to be included in Sub-metering Service Agreements – that is the agreement made between a Billing Agent and the Building Manager. In setting out clear responsibilities on each party for the supply of information to the other, many escalated complaints can be avoided. The consultation received broad support from the sector and was subsequently endorsed by the DSCE.

Revised RD05: Setting KPIs for Customer Service. When we introduced RD05, we commented that the regulation allowed companies to differentiate themselves from each other in the market. This proved to be the case and there has been a wide range in quality and detail of permit holders Customer Charters. We have observed some permit holders take ownership of their Customer Charters and frequently refer to them in communications with their customers and with the RSB. Considerable thought has gone into the definition of service standards and customer expectations have been set. However, there are some Customer Charters that appear to have been developed primarily for the purposes of regulatory compliance rather than committing to customer service.

Our update to RD05 sets a new suite of KPIs that all permit holders must include in their Customer Charters. The KPIs provide a benchmark against which we can compare the relative performance of permit holders. They are also designed to give the RSB new insights into the customer service performance of permit holders as perceived by Customers.

Revised RD08: HSE performance reporting to include refrigerant use. The cooling sector relies heavily on refrigerants and we seek to ensure that the refrigerants used have the lowest possible global warming potential. We will collect the first data sets in 2025 and establish baseline data over the next 2 reporting years.

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Revision of RD03: Energy Performance. We have postponed the reintroduction of the energy thresholds for air-cooled buildings.

Escalated Regulatory Action project: We developed a comprehensive enforcement framework internally, significantly enhancing the clarity, consistency, and efficiency of regulatory actions. This framework includes detailed enforcement procedures, legal escalation protocols, penalty structures, and safeguards to ensure consumer protection and service continuity. As part of this initiative, we formalized the appointment of new law enforcement officers to support the execution of regulatory decisions and reinforce the Bureau's authority.

Significant progress was also achieved through close collaboration with relevant government entities to prepare for escalated regulatory actions when necessary. Looking ahead to 2025, we will continue working with the Dubai Economy and Tourism department to establish clear procedures for taking action against non-compliant permit holders. Efforts are also underway to ensure that district cooling and billing service activities are properly reflected in trade licenses and restricted to entities duly permitted by RSB.

In parallel, RSB is advancing its digital integration initiatives by aligning enforcement and permitting processes with Dubai 360, ensuring real-time data sharing, regulatory transparency, and enhanced coordination with key government stakeholders.

All regulatory documents can be found on our website:

www.rsbdubai.gov.ae/regulating-efficient-cooling

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The Permitted Sector

We have continued to observe significant interest in companies wishing to enter the Billing Services market. This interest has continued despite the introduction of new policies reducing billing service fees. In our assessment of new applications, we scrutinize the applicants' ability to deliver excellent quality services to end users and we review their experience in this area to inform our decisions. There are currently 15 Billing Agents permitted by the RSB and we consider this to be ample to drive competition in the market.

The Billing Service is the key interface with customers of district cooling, so it is imperative that the service is well delivered. As such, we have not granted permits to those companies that cannot demonstrate a focus on consumer centric service performance.

With the inclusion of single building systems in district cooling regulations, we have received applications from single building system owners. We set out our approach to onboarding single building systems in our November Sector Briefing as follows:

- **Q4 2024**: Gather information on all single building systems currently served by Permitted Billing Agents
- Q1 2025: Permit Billing Services for single building systems and apply the Billing Service Tariff policies to those buildings.
- **Q3 2025:** Permit Single Building Systems and regulate the tariffs at which chilled water services are provided.

La Mer and City Walk Retail obtained permits for their DC Systems which were designated so earlier in 2024. This accounts for the rise in District

Cooling Permit holders. Whilst there are 20 permitted DC providers, these permits are ultimately under 9 brands, namely:

- Dubai Festival City
- Emaar District Cooling
- Emicool
- Empower
- Nakheel
- Tabreed
- South Energy
- Sobha Energy Services
- MEREX

At the end of the year the sector comprised:

DC Providers	Billing Agents	Contract Capacity (TR)
20	16	2.490K	
Cooling Plant	DC Systems	Building Schedules	Supplies
141	97	2967	226K

Figure 9: The Permitted Sector

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Cooling Degree Days

Cooling Degree Days (CDD) are a measure used to estimate the energy needs for air conditioning or refrigeration. They reflect the demand for energy to cool buildings and are particularly relevant in hot climates. Dubai International Airport (DXB) serves as a strong example for analyzing trends in CDD over the past two decades, given its location in a region with significant seasonal and annual fluctuations in temperature.

Working with a baseline of 22 °C, the year 2000 had a total of 2407 CDD, while by 2024, the figure had risen to 3064 CDD. This indicates a marked increase in the demand for cooling energy at DXB, reflective of the broader impacts of global warming, as well as potentially the urban heat island effect intensified by airport operations and expansion.

The early 2000s saw totals hover around the 2500 mark, but from 2010 onwards, there has been a clear shift towards higher totals, with three of the last four years being at record levels. This is indicative of the rising temperatures in the region.

Monthly data reveals that the months, from July to September, contribute the most to the annual CDD total. These months have consistently seen high CDD values throughout the two decades, reflecting the intense summer heat of the regional climate.

Focusing on 2024, the monthly CDD data shows July and August, which are typically the hottest months of the year, were slightly cooler than the same period in 2023. However, this is the only data which bucks the trend. Indeed CDDs for September through to November continue to be at or near record levels, suggesting that the warmer conditions are extending beyond the traditional summer months.

We previously noted the substantial CDD recorded in November as a proportion of the annual total CDD, a month that traditionally sees a decrease as the region transitions out of summer. The figure rose to 196 CDD in 2024 (182 CDD in 2023), further signifying a shift in seasonal patterns.

In summary, the CDD data from DXB from 2000 to 2024 exhibit a clear upward trend, which aligns with global patterns of increasing temperatures. This has significant implications for energy consumption and the need for sustainable energy solutions.

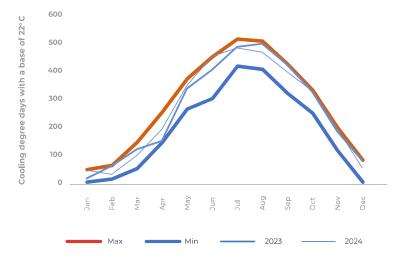


Figure 10: CDD Profiles

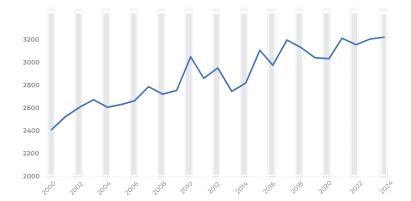


Figure 11: Annual CDDs at DXB

Output and Market share

Electrical demand for cooling is estimated at 26,338 GWh which accounted for 49% of total demand on DEWAs grid in 2024.

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DC Cooling output at 4,755 MTRh (4,246 MTRh in 2023) was up 11% and accounted for 23.1% of total cooling demand versus 23.5% in 2023.

As reported last year, the slight drop in market share is attributed to the significant growth in the number of villa's being completed and occupied. Villa's almost exclusively use DX technology for cooling. The lower cooling load density associated with lower rise developments means that district cooling is rarely the more energy efficient solution in these cases.

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DSM Savings

DSM savings continued to grow reaching 1,208 GWh (1,171 GWh in 2023) which remains well ahead of the 1,181 GWh target for 2024.

Total DSM Targets and Savings Per Year



Figure 12: DSM Savings

Electrical Efficiency

Improvements in district cooling plant efficiency continued albeit at a marginal rate in 2024. The average electrical efficiency of DC Plant in 2024 was 0.843 kWh/TRh down from 0.845 kWh/TRh in 2023 and just 0.02 kWh/TRh away from the 2030 target of 0.824 kWh. The best performing cooling plants in Dubai continue to be amongst the best in the world, indeed we are yet to find evidence of any plant that match the 4 best performing plant in Dubai which all operate at efficiencies below 0.7 kWh/TRh.

Whilst 96% of chilled water output came from plant compliant with RD03 Energy Efficiency Thresholds, 10 plant missed the regulatory requirement to achieve a minimum electrical efficiency of 0.98 kWh/TRh.

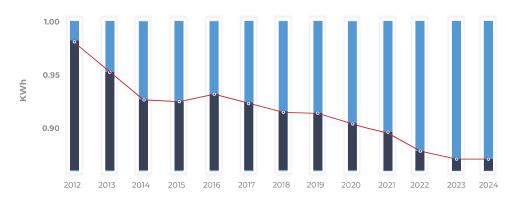


Figure 13: Electrical Efficiency

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Water Efficiency

Water efficiency has continued to remain stable between 7 and 7.5 litres per ton-hour. It has hovered around this area since 2018. There are still wide variations in the individual performance of water cooled plant. Only 2 plants were non-compliant with the water efficiency threshold set out in RD03 and 98% of production came from plants that met the standard.

8.0 7.5 7.0 6.5 6.0 5.5 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024

Water Effeciency Trend

Figure 14: Water efficiency

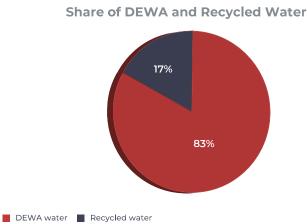


Figure 15: Share of DEWA and Recycled Water

Total Water Use

The sector used 31 MCMs (Million Cubic Meters) of water during 2024 which was practically unchanged from 2023. We continue to encourage use of recycled water wherever possible because relying on it, rather than high quality drinking water derived from cogeneration facilities, is more energy efficient. The increasing demand for recycled water has put increasing pressure on the drainage system and Dubai Municipality is working on ways to resolve this issue. For instance by accessing alternative sources of water such as shallow groundwater for DC applications.

Recycled Water Use

DEWA water use at 25.9 MCMs was up 11% on the prior year and Recycled Water at 5.4 MCMs was down 32.5%. The reduction in the available recycled water was the result of the April storm.

Increased use of recycled water eases pressure on DEWA's water desalination capacity and makes a significant contribution to reducing greenhouse gas emissions because less seawater is required to undergo thermal desalination. Companies are monitoring the quality of recycled water which is known to vary depending on location and time of year. Sufficient supplies of good quality recycled water is key to attaining broader energy efficiency goals.

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Escalated Complaints

As awareness of the regulatory regime increases, the number of complaints escalated to the RSB or DSCE also rises. In 2023, we continued to observe this trend, with complaints escalated to the RSB increasing by 470% on the prior year. Work to streamline the complaint management process was completed in 2024, allowing the RSB to manage this increase efficiently.



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