



Dumaresq-Barwon Border Rivers Commission
Level 5, 1 William Street, Brisbane Q 4000
ABN: 327 186 703 36

30 May 2025

Submission to:

**Independent Pricing and Regulatory Tribunal Draft Determinations and
Report on: WaterNSW rural bulk water prices from 1 July 2025**

General Comments

The Commission appreciates the opportunity to provide comments on the Tribunal's review of the WaterNSW rural bulk water prices. The Commission takes its responsibility to provide cost-efficient and prudent services seriously.

We would like to express our disappointment that the Commission's submission, as part of WaterNSW's Bulk Water pricing proposal, has not been appropriately considered, despite the comprehensive information provided to support our proposed expenditure. While we appreciate IPART's need to undertake more scrutiny of WaterNSW's Bulk Water pricing submission, the Commission should not be penalised after providing sound justification on its proposed costs.

The Commission is concerned that our submission is being held back despite the transparency and quality of information provided by the Commission through the IPART process. We believe this is reflected in Stantec's recommendation report, which found our proposed costs to be reasonable.

IPART has not mentioned Stantec's recommendation and why it was not accepted. Nor has the Tribunal justified its decision not to accept the Commission's pricing proposal costs, nor why they are deemed not prudent and efficient.

We respectfully submit that our pricing submission should be assessed on its own merits and be considered to be included along with the other essential elements that the Tribunal have earmarked to be included over and above the CPI increase, for example, Dam Safety.

A CPI increase on the prior determinations is based on decisions that the Commission believes should not continue as they have been rectified and there is no basis to continue them, for example:

- Some Commission costs were not covered during the 2021 period because no contract was in place between the Commission and Sunwater. The Commission now has a contract with Sunwater, and Stantec reviewed those costs.
- IPART incorrectly attributed Sunwater CAPEX (Bulk Water Renewals and Enhancement) costs to WAMC costs in the 2021 determination. This would continue the flawed methodology, meaning unregulated river and groundwater customers would pay costs not related to them.
- Adjustments relating to invoices issued by WaterNSW to the Commission. This issue has been rectified, and invoices have been correctly supplied by WaterNSW in the current determination period.

The Commission's operational costs will be required to be recovered from the Queensland Department of Local Government, Volunteers and Water and the New South Wales Department of Climate Change, Energy, the Environment and Water (DCCEEW). The Tribunal's proposal to delay a determination by three years will have a significant impact on NSW DCCEEW, as it is required to fund our ongoing call-up requirements.

As NSW DCCEEW are required to fund our requests, this may adversely impact other services that they are required to undertake if they need to divert funds.

Given our limited scope and the independently supported review of our costs, we respectfully request that our submission be progressed as a whole.

Background

The Dumaresq-Barwon Border Rivers Commission operates in the upper Murray Darling Basin. The Commission came into existence by a legislative agreement between the States of New South Wales (NSW) and Queensland (Qld) in 1946-1947.

The Commission is a joint operation, with each State retaining 50% shareholding control. Commission expenses incurred are funded 50:50 by each State. Each State has 50% ownership of the Commission's \$253 million bulk water infrastructure asset portfolio.

The Commission determines, enables, and monitors each State's eligible share of water that crosses or passes into and along the NSW and Qld border. It has certain investigative functions to identify and report potential improvements for water-sharing equity.

The Commission manages water at a wholesale supply level, i.e. our stakeholders are the States and not individual water users of either State. Subsequent revenue from water usage is collected and retained separately by each State.

The States jointly fund the Commission's expenses each financial year. All works and services are undertaken by or procured through a government entity of either State. The Commission, in turn, pays those entities for their services. Further detail is available online in the Commission's annual report at www.brc.gov.au.

We look forward to working together through this process.

Should you have any queries regarding this matter, please do not hesitate to contact the Commission's CEO, Donna Hodgson, on [REDACTED]

Yours sincerely

[REDACTED]

Shaun Cox

Chair

Dumaresq-Barwon Border Rivers Commission