

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

**30 June 2025**

**Submission to:**

**Independent Pricing and Regulatory Tribunal Draft Determinations and  
Report on: Water Administration Ministerial Corporation water prices from  
1 October 2025**

**General Comments**

The Commission appreciates the opportunity to provide comments on the Tribunal's review of the Water Administration Ministerial Corporation's 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 the Water Administration Ministerial Corporation's pricing proposal, has not been given the appropriate consideration, despite the comprehensive information provided to support our proposed expenditure. While we appreciate IPART's need to undertake more scrutiny of proposed increases in the Water Administration Ministerial Corporation's pricing submission, the Commission should not be penalised after providing sound justification for 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.

Stantec's final report states:

*"The scope of BRC activities for WAMC is stable and reflects a long-term monitoring program. The BRC costs are also stable with modest increases proposed that reflect cost pressures facing most businesses in the economy. While there is no long-term contract in place with the agencies providing the services to the BRC, we consider this low risk and unlikely to be generating material inefficiencies. We consider a cost pass-through arrangement, where BRC bears cost risk, as reasonable provided ongoing controls are in place. However, a more formal contract-style arrangement that clearly sets out expectations and key processes (e.g., audit of actual costs) would assist governance, and a periodic review of the arrangement would ensure it remains fit-for-purpose (e.g., a contract end date and/or review schedule). We do not see the need to set an upper and lower range for WAMC-related BRC expenditure given its scale and nature. Our recommended expenditure for the next regulatory period is set out below, inclusive of a 1% cumulative efficiency target, consistent with WaterNSW's target for WAMC generally."*

IPART has not mentioned Stantec's recommendations in relation to the Border Rivers Commission 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.

Stantec have provided a clear and justified recommendation to IPART, and the Commission would like the Tribunal to address this directly and not include the Commission in statements that are clearly addressed directly to the MDBA.

We respectfully submit that our pricing submission should be assessed on its own merits, be considered fairly against Stantec's recommendations, and included.

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:

- IPART incorrectly attributed Sunwater CAPEX (Bulk Water Renewals and Enhancement) costs to WAMC costs in the 2021 determination. This would perpetuate the flawed methodology, meaning that unregulated river and groundwater customers would bear costs unrelated to them.

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.

IPART also commented that the Commission should undertake more comprehensive customer consultation. It is also important to note that the Commission's role in the water schemes is limited to ensuring that the water is shared equitably among the States. The Commission does not have a direct relationship with customers, as all customer engagement occurs through WaterNSW and the QLD Department, which act as system operators delivering services to customers.

Consequently, our consultation process appropriately reflects this structure. Engagement occurs through representative groups, peak industry bodies, and targeted stakeholder meetings with relevant entities, including WaterNSW, NSW DCCEEW and the QLD Department.

Given our limited scope, the independently supported review of our costs and the targeted nature of our stakeholder engagement, 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.

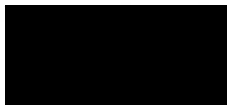
The Commission manages water at a wholesale supply level, i.e. our stakeholders are the States and not individual water users of either State. Subsequent revenue from water usage is collected and retained separately by each State.

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](http://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



**Shaun Cox**

**Chair**

**Dumaresq-Barwon Border Rivers Commission**