

1 April 2022

Ms Liz Livingstone  
Chief Executive Officer  
Independent Pricing and Regulatory Tribunal  
By email: [matthew\\_mansell@ipart.nsw.gov.au](mailto:matthew_mansell@ipart.nsw.gov.au)

Dear Ms. Livingstone

Further to my letter dated 21 March 2022 regarding the provision of IPART's model containing the underlying data required for IPART's Annual Review of WaterNSW's 2022-23 Murray Darling Basin (MDB) regulated charges, we are pleased to submit our application to the IPART Annual Review in accordance with the *Water Charge (Infrastructure) Rules 2010 Cth (WCIR)*.

This letter and its attachments supplement the information provided in our 21 March 2022 letter and includes:

- Proposed Regulated Charges for the 2022-23 financial year as requested under the WCIR;
- Any arguments required under rule 37(2) (where applicable) regarding whether or not prices should change from those set in the 2021 Determination, if it is reasonably necessary having regard to changes in the demand or consumption forecasts and price stability; and
- A declaration from the CEO certifying the accuracy of the information provided.

The criteria in the WCIR authorises IPART to consider whether or not it is reasonably necessary to make variations to the 2022-23 charges having regard to 1) *changes in demand or consumption forecast* and 2) *price stability*. The variations to be considered by IPART are mechanical and formulaic updates to the demand forecasts and regulatory inputs including the 20-year rolling average of actual water sales, entitlements volumes and the high security premium.

There are compelling reasons for (and against) the need to make variations to the 2022-23 MDB Bulk Water Charges IPART determined in its 2021 IPART Rural Valley Final Determination, having regard to changes in demand or consumption forecasts, including for:

- The effects of updating the 20-year rolling average of water sales incorporating 2020-21 data in 2022-23 in line with the recent IPART determination; and
- The effects of updating the entitlement forecast and the high security premium with the latest actual data.

For example, the most significant benefits include:

- **Long term price stability:** the rolling average is likely to decline significantly by the end of the 2021-25 regulatory period resulting in significant and or sudden increases in the usage charge at the next 2025 price review leading to potential price shocks for customers. Annual updates to the rolling average would allow the MDB usage charges to increase gradually over the 2021-25 regulatory period. This approach will avoid any sudden and untenable price shocks that would result from a significant variation to the 20-year rolling average at the next 2025 price review
- **More accurate demand forecasting:** Updating the rolling average is likely to produce a more accurate sales forecast, as the latest set of actual data is incorporated into the averaging calculation.

Notwithstanding these compelling arguments, and amid the economic uncertainty caused by the recent flooding rains, the raising cost pressures experienced by the regions (such as business input costs and inflation), and noting the recent pricing determination saw an average increase in customer bills of 30% across all valleys less than six months ago, WaterNSW considers that it is not reasonably necessary to update the MDB charges to account for changes in demand or consumption forecast.

At this time, WaterNSW's submits that there is a need to provide much needed price relief to the regions. As such, **WaterNSW considers that the MDB charges should be adjusted only for the March-to-March inflation factor specified in the 2021 IPART Determination.**

WaterNSW considers that there is merit in introducing a more formula-driven price adjustment in the MDB valleys that secures both sufficient revenue streams to WaterNSW whilst maintaining price stability for our customers. WaterNSW welcomes the preliminary findings of IPART's Economic Framework Review in which IPART is committed to exploring the benefits of implementing more flexible forms of price control, such as revenue caps. We look forward to working with IPART in the next price review on the introduction of potential pricing mechanisms that would provide WaterNSW with a reasonable opportunity to recover its prudent and efficient costs over the regulatory period.

Should you have any questions regarding this application, please do not hesitate to contact Michael Martinson, Manager Economic Regulation on [REDACTED].

Yours sincerely

[REDACTED]  
**Andrew George**  
**Chief Executive Officer**

#### Attachments

- Proposed Regulated Charges and estimated bill impacts for 2022-23 financial year
- Information on demand and consumption forecasts
- Statement on the expected voluntary telemetry take-up rate for 2022-23
- Signed Responsibility Statement
- Completed IPART *WaterNSW - Annual update model 2022-23*

## 2022-23 MDB Regulated Charges Updated by CPI

WaterNSW has calculated the 2022-23 MDB Regulated Charges by converting the charges presented in IPART's 2022-25 Rural Valley Bulk Water Determination from 2021-22 dollars into nominal dollars using IPART's estimate of the change in the CPI index from 2021-22 to 2022-23 of 3.2%.

The charges are presented in the tables below:

	2021-22	2022-23	% Variance
<b>Table 1 Entitlement charges for MDB Valleys (\$/ML or \$/unit share)</b>			
	nominal \$	nominal \$	
<b>High Security Charge</b>			
Border	6.58	6.79	3.2%
Gwydir	17.40	17.96	3.2%
Namoi	28.93	29.86	3.2%
Peel	61.36	63.32	3.2%
Lachlan	25.10	25.90	3.2%
Macquarie	20.18	20.83	3.2%
Murray	2.26	2.33	3.1%
Murrumbidgee	4.17	4.30	3.1%
<b>General Security Charge</b>			
Border	2.41	2.49	3.3%
Gwydir	4.04	4.17	3.2%
Namoi	10.10	10.42	3.2%
Peel	5.82	6.01	3.3%
Lachlan	3.71	3.83	3.2%
Macquarie	3.94	4.07	3.3%
Murray	0.99	1.02	3.0%
Murrumbidgee	1.43	1.48	3.5%
Lowbidgee	1.72	1.78	3.5%

	2021-22	2022-23	% Variance
<b>Table 2 Usage charges for MDB Valleys (excluding Lowbidgee) (\$/ML)</b>			
	nominal \$	nominal \$	
Border	7.03	7.25	3.1%
Gwydir	17.19	17.74	3.2%
Namoi	30.88	31.87	3.2%
Peel	24.51	25.29	3.2%
Lachlan	31.17	32.17	3.2%
Macquarie	21.64	22.33	3.2%
Murray	2.93	3.02	3.1%
Murrumbidgee	4.97	5.13	3.2%

	2021-22	2022-23	% Variance
<b>Table 3 MDBA/BRC entitlement charges (\$/ML of entitlement or \$/unit share)</b>			
	nominal \$	nominal \$	nominal \$
<b>High Security Licence (\$/ML of Entitlement or \$/unit share)</b>			
Border	4.84	4.99	3.1%
Murray	8.64	8.92	3.2%
Murrumbidgee	1.86	1.92	3.2%
<b>General Security Licence (\$/ML of Entitlement or \$/unit share)</b>			
Border	1.77	1.83	3.4%
Murray	3.80	3.92	3.2%
Murrumbidgee	0.64	0.66	3.1%

	2021-22	2022-23	% Variance
<b>Table 4 MDBA/BRC usage charges (\$/ML)</b>			
	nominal \$	nominal \$	nominal \$
Border	0.86	0.89	3.5%
Murray	1.85	1.91	3.2%
Murrumbidgee	0.37	0.38	2.7%

	2021-22	2022-23	% Variance
<b>Table 5 Irrigation corporations and districts discount (\$)</b>			
	nominal \$	nominal \$	
Murray Irrigation Limited	730,932.58	721,913.93	-1.2%
Western Murray Irrigation Limited	18,465.24	18,237.50	-1.2%
West Corrgan	36,552.12	36,101.42	-1.2%
Moira Irrigation Scheme	19,288.76	19,050.72	-1.2%
Eagle Creek Scheme	6,904.67	6,819.46	-1.2%
Murrumbidgee Irrigation Limited	625,285.01	612,972.91	-2.0%
Coleambally Irrigation Limited	267,976.74	262,699.73	-2.0%
Jemalong Irrigation Limited	56,068.42	58,153.20	3.7%

	2021-22	2022-23	% Variance
<b>Table 6 Entitlement charges for Coastal Valleys (\$/ML of entitlement or \$/unit share)</b>			
	nominal \$	nominal \$	nominal \$
<b>High Security Licence (\$/ML of Entitlement or \$/unit share)</b>			
North Coast	12.82	13.23	3.2%
Hunter	19.94	20.58	3.2%
South Coast	33.56	34.63	3.2%
<b>General Security Licence (\$/ML of Entitlement or \$/unit share)</b>			
North Coast	9.94	10.26	3.2%
Hunter	15.49	15.99	3.2%
South Coast	17.60	18.16	3.2%

	2021-22	2022-23	% Variance
<b>Table 7 Usage charges for Coastal Valleys (\$/ML)</b>			
	nominal \$	nominal \$	
North Coast	18.98	19.59	3.2%

Hunter	19.13	19.74	3.2%
South Coast	18.80	19.40	3.2%

	2021-22	2022-23	% Variance
<b>Table 8 Fish River Supply Scheme customers - bulk raw water (\$/kL)</b>			
	nominal \$	nominal \$	
<b>Access Charge</b>			
Major Customers (except Oberon Council)	0.49	0.51	4.1%
Oberon Council	0.42	0.43	2.4%
Minor Customers	0.49	0.51	4.1%
<b>First tier usage charge</b>			
Major Customers (except Oberon Council)	0.33	0.34	3.0%
Oberon Council	0.26	0.27	3.8%
Minor Customers	0.33	0.34	3.0%
<b>Second tier usage charge</b>			
Major Customers (except Oberon Council)	0.82	0.85	3.7%
Oberon Council	0.68	0.70	2.9%
Minor Customers	0.82	0.85	3.7%

	2021-22	2022-23	% Variance
<b>Table 9 Fish River Supply Scheme customers - bulk filtered water (\$/kL)</b>			
	nominal \$	nominal \$	nominal \$
<b>Access Charge</b>			
Major Customers	0.86	0.89	3.5%
Minor Customers	0.86	0.89	3.5%
<b>First tier usage charge</b>			
Major Customers	0.53	0.55	3.8%
Minor Customers	0.53	0.55	3.8%
<b>Second tier usage charge</b>			
Major Customers	1.39	1.43	2.9%
Minor Customers	1.39	1.43	2.9%

	2021-22	2022-23	% Variance
<b>Table 10 Meter service charges (\$ per meter)</b>			
	nominal \$	nominal \$	
50mm	481.16	496.56	3.2%
80mm	483.40	498.87	3.2%
100mm	483.39	498.86	3.2%
150mm	489.07	504.72	3.2%
200mm	491.88	507.62	3.2%
250mm	494.48	510.30	3.2%
300mm	501.20	517.24	3.2%
350mm	531.39	548.39	3.2%
400mm	549.37	566.95	3.2%
450mm	552.83	570.52	3.2%
500mm	567.56	585.72	3.2%
600mm	586.43	605.20	3.2%
700mm	608.85	628.33	3.2%
750mm	640.25	660.74	3.2%
800mm	661.47	682.64	3.2%
900mm	668.19	689.57	3.2%

1,000mm	680.60	702.38	3.2%
Channel	6,306.05	6,507.84	3.2%

	2021-22	2022-23	% Variance
<b>Table 11 Meter accuracy testing charges (\$ per meter)</b>			
	nominal \$	nominal \$	
Refundable meter accuracy deposit	1,750.00	1,750.00	0.0%
Total charge (if meter is found to be within accuracy standards)			
Verification and testing in situ	4,677.28	4,826.95	3.2%
Lab verification and testing	6,999.03	7,223.00	3.2%

	2021-22	2022-23	% Variance
<b>Table 12 Other Miscellaneous Charges (\$ per meter)</b>			
	nominal \$	nominal \$	nominal \$
Trade processing charge per application	49.92	51.52	3.2%
<b>Fish River Connection Charge</b>			
Low complexity connection	926.38	956.02	3.2%
Medium complexity connection	3,512.39	3,624.79	3.2%
High complexity connection	7,181.32	7,411.12	3.2%
Fish River Disconnection Charge	260.80	269.15	3.2%

	2021-22	2022-23	% Variance
<b>Table 13 Annual Scheme Management Charge</b>			
	nominal \$	nominal \$	
Proportion of voluntary telemetry uptake			
0% - 25%	73.26	75.60	3.2%
>25% - 50%	66.01	68.12	3.2%
>50% - 75%	58.75	60.63	3.2%
>75% - 100%	51.49	53.14	3.2%

	2021-22	2022-23	% Variance
<b>Table 14 Annual Government-Owned Meter service charges</b>			
	nominal \$	nominal \$	
Meter service charge - operating costs (\$ per Government-Owned Meter)	898.85	927.61	3.2%
Meter service charge for channel meters- operating costs (\$ per Government-Owned Meter)	6306.04	6,507.83	3.2%
Meter service charge - capital costs (\$ per Government-Owned Meter)	0	0.00	N/A

	2021-22	2022-23	% Variance
<b>Table 15 Annual telemetry service charge (\$ per meter)</b>			
	nominal \$	nominal \$	
Proportion of voluntary telemetry uptake			
0% - >25%	226.49	233.74	3.2%
25% - >50%	208.74	215.42	3.2%
50% - >75%	191.41	197.54	3.2%
75% or more	182.11	187.94	3.2%

	2021-22	2022-23	% Variance
<b>Table 16 Annual non-telemetry service charge (\$ per meter)</b>			
	nominal \$	nominal \$	
Proportion of voluntary telemetry uptake			
25% - >50%	218.57	225.56	3.2%
50% - >75%	218.57	225.56	3.2%
75% or more	218.57	225.56	3.2%

	2021-22	2022-23	% Variance
<b>Table 17 Exit fee (\$ per meter)</b>			
	nominal \$	nominal \$	
Average capital expenditure (\$ per meter)	0.00	0.00	N/A
Daily depreciation (\$ per meter)	0.00	0.00	N/A

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## Bill Impacts – Charges Updated by CPI

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WaterNSW has calculated the 2022-23 bill impacts as shown below:

<b>TABLE 18- INDICATIVE BILLS FOR HIGH SECURITY CUSTOMERS - WaterNSW CHARGES</b>			
	<b>2021-22 Bills</b>	<b>2022-23 Bills</b>	<b>% Variance</b>
	nominal \$	nominal \$	
<b>Small consumption customers</b>			
Border	1,361	1,404	3.2%
Gwydir	3,459	3,570	3.2%
Namoi	5,981	6,173	3.2%
Peel	8,587	8,861	3.2%
Lachlan	5,627	5,807	3.2%
Macquarie	4,182	4,316	3.2%
Murray	519	535	3.1%
Murrumbidgee	914	943	3.2%
Lowbidgee	0	0	N/A
<b>Medium consumption customers</b>			
Border	6,805	7,020	3.2%
Gwydir	17,295	17,850	3.2%
Namoi	29,905	30,865	3.2%
Peel	42,935	44,305	3.2%
Lachlan	28,135	29,035	3.2%
Macquarie	20,910	21,580	3.2%
Murray	2,595	2,675	3.1%
Murrumbidgee	4,570	4,715	3.2%
Lowbidgee	0	0	N/A
<b>Large consumption customers</b>			
Border	13,610	14,040	3.2%
Gwydir	34,590	35,700	3.2%
Namoi	59,810	61,730	3.2%
Peel	85,870	88,610	3.2%
Lachlan	56,270	58,070	3.2%
Macquarie	41,820	43,160	3.2%
Murray	5,190	5,350	3.1%
Murrumbidgee	9,140	9,430	3.2%
Lowbidgee	0	0	N/A
<i>Note: based on a 100% utilisation rate for High Security customers.</i>			



<b>TABLE 19 - INDICATIVE BILLS FOR GENERAL SECURITY CUSTOMERS - WaterNSW CHARGES</b>			
	<b>2021-22 Bills</b>	<b>2022-23 Bills</b>	<b>% Variance</b>
	nominal \$	nominal \$	
<b>Small consumption customers</b>			
Border	663	684	3.2%
Gwydir	1,435	1,481	3.2%
Namoi	2,863	2,954	3.2%
Peel	2,053	2,118	3.2%
Lachlan	2,241	2,313	3.2%
Macquarie	1,692	1,747	3.2%
Murray	275	283	3.1%
Murrumbidgee	441	456	3.3%
Lowbidgee*	172	178	3.5%
<b>Medium consumption customers</b>			
Border	3,314	3,420	3.2%
Gwydir	7,177	7,407	3.2%
Namoi	14,314	14,771	3.2%
Peel	10,263	10,592	3.2%
Lachlan	11,206	11,566	3.2%
Macquarie	8,462	8,734	3.2%
Murray	1,374	1,416	3.1%
Murrumbidgee	2,206	2,279	3.3%
Lowbidgee*	860	890	3.5%
<b>Large consumption customers</b>			
Border	6,628	6,840	3.2%
Gwydir	14,354	14,814	3.2%
Namoi	28,628	29,542	3.2%
Peel	20,526	21,184	3.2%
Lachlan	22,412	23,132	3.2%
Macquarie	16,924	17,468	3.2%
Murray	2,748	2,832	3.1%
Murrumbidgee	4,412	4,558	3.3%
Lowbidgee*	1,720	1,780	3.5%
* refers to supplementary licences holders in the Lowbidgee Note: based on a 60% utilisation rate for General Security customers.			

**TABLE 20 - INDICATIVE BILLS FOR HIGH SECURITY AND GENERAL SECURITY CUSTOMERS - MDBA/BRC CHARGES**

	<b>2021-22 Bills</b>	<b>2022-23 Bills</b>	<b>% Variance</b>
	nominal \$	nominal \$	
<b>HIGH SECURITY</b>			
<b>Small consumption customers</b>			
Border	570	588	3.2%
Murray	1,049	1,083	3.2%
Murrumbidgee	223	230	3.1%
<b>Medium consumption customers</b>			
Border	2,850	2,940	3.2%
Murray	5,245	5,415	3.2%
Murrumbidgee	1,115	1,150	3.1%
<b>Large consumption customers</b>			
Border	5,700	5,880	3.2%
Murray	10,490	10,830	3.2%
Murrumbidgee	2,230	2,300	3.1%
<b>GENERAL SECURITY</b>			
<b>Small consumption customers</b>			
Border	229	236	3.4%
Murray	491	507	3.2%
Murrumbidgee	86	89	3.0%
<b>Medium consumption customers</b>			
Border	1,143	1,182	3.4%
Murray	2,455	2,533	3.2%
Murrumbidgee	431	444	3.0%
<b>Large consumption customers</b>			
Border	2,286	2,364	3.4%
Murray	4,910	5,066	3.2%
Murrumbidgee	862	888	3.0%

**TABLE 21 - INDICATIVE BILLS FOR CUSTOMERS IN THE FRWS**

	<b>2021-22 Bills</b>	<b>2022-23 Bills</b>	<b>% Variance</b>
	nominal \$	nominal \$	
Energy Australia	4,597,921	4,779,412	3.9%
Raw water - minor customer	483.5	501.2	3.7%
Filtered water - minor customer	597	617	3.2%

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## Notification of the Proportion of Voluntary Telemetry Uptake

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Pursuant to clause 6 of Schedule 5 of the IPART Final Determination on WaterNSW Prices for Bulk Water Services from 1 October 2021 and clause 6 of schedule 6 of the IPART Final Determination on Water Administration Ministerial Corporation Maximum prices for water management services from 1 October 2021, WaterNSW hereby notifies IPART of the Proportion of Voluntary Telemetry Uptake for the 2022-23 financial year in accordance with the following calculation:

$$\frac{A}{B} = C$$

Where:

- A is 695 meters which represents WaterNSW's best estimate of the total number of voluntary telemetric meters that will operate in the 2022-23 financial year; and
- B is 6,712 meters which represents WaterNSW's best estimate of the total number of potential voluntary telemetric meters that will operate in the 2022-23 financial year.
- C is 10.35 per cent which represents the Proportion of Voluntary Telemetry Uptake for the 2022-23 financial year

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## Information on consumption forecasts

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### WaterNSW's forecast of demand for, or consumption of, infrastructure services for the 2022-23 financial year

The following information on WaterNSW's demand and consumption forecasts is disclosed for IPART's consideration in the event that IPART decides that it is reasonably necessary to make variations to the 2022-23 charges having regard to changes in demand or consumption forecasts related to:

- Updated 20 year rolling average of actual water usage
- Updated Entitlement volumes
- Updated High Security Premium

WaterNSW's forecast of 2022-23 expected demand is based on:

- the 20-year rolling average of actual water sales (with a two-year lag) from 2001-02 to 2020-21.
- Actual entitlement volumes in the 2020-21 financial year.

The results are shown below.

**Table 22: 2022-23 usage and entitlements forecast**

Valley	Usage (ML)	Entitlement volumes (ML)*
Border	133,342	266,359
Gwydir	209,345	536,885
Namoi	131,739	265,532
Peel	12,430	46,678
Lachlan	169,332	690,435
Macquarie	216,718	675,135
Murray	1,334,268	2,360,497
Murrumbidgee	1,516,647	2,705,470
Lowbidgee	N/A	747,000
<b>Total</b>	<b>3,723,819</b>	<b>8,293,991</b>

\* Entitlement volumes which are billable under the fixed charge. For example, excludes supplementary licences except for the Lowbidgee, where WaterNSW levies a fixed charge on supplementary water holders.

WaterNSW's forecast of expected demand in the Fish River Water Scheme (FRWS) for the 2022-23 financial year is based on:

- For Energy Australia: the 20-year rolling average of actual water sales (with a two-year lag) from 2001-02 to 2020-21, excluding past usage from the Wallerawang Power Plant.
- For minor customers: the 20-year rolling average of actual water sales (with a two-year lag) from 2001-02 to 2020-21,
- Minimum Annual Quantity (MAQ) levels as defined in WaterNSW's licence to operate the FRWS issued under the *Water Act 1912 NSW*.

The results are shown below:

**Table 23: 2022-23 usage and minimum annual quantity forecast FRWS**

Customer	Usage (ML)	Minimum Annual Quantity (ML)*
Fish River – Energy Australia	1,781	8,184.0
Fish River – Raw Water Minor customers	51	17.4
Fish River – Filtered Water Minor customers	100	46.6
<b>Total</b>	<b>1,933</b>	<b>8,248.0</b>

\* MAQ (Minimum Annual Quantity) for minor customers is 200KLs for each minor customer multiplied by the number of minor customers. For instance, 17.4 MAQ MLs is derived by multiplying 87 raw water customers by 200KLs per customer. 46.60 MAQ is derived by multiplying 233 filtered water customers by 200KLs per customer

WaterNSW's estimate of the updated high security premium is determined by multiplying the following factors:

- the reliability ratio – which is the ratio of the 1) 20-year rolling average of water allocation rates for high security licences and 2) the 20-year rolling average of water allocation rates for general security licences, with a two-year lag; and
- the conversion factor – which is a fixed factor set by IPART, using information sourced from each valley's water sharing plan. The factor represents the 'units' of general security water required to secure one 'unit' of high security water.

The updated high security premium is shown in the table below:

**Table 24: Calculation of updated HS premium**

Valley	Updated 20-year average of actual annual water allocations				Reliability Ratio		Conversion factor		High Security Premium
	HS Licences	/	GS Licences	=					
Border	100%	/	43%	=	2.31	X	1.25	=	2.89
Gwydir	100%	/	31%	=	3.25	X	1.40	=	4.55
Namoi	100%	/	39%	=	2.58	X	1.25	=	3.22
Peel	97%	/	55%	=	1.75	X	6.54	=	11.47
Lachlan	82%	/	26%	=	3.16	X	2.50	=	7.89
Macquarie	100%	/	30%	=	3.31	X	1.88	=	6.23
Murray	94%	/	51%	=	1.84	X	1.31	=	2.40
Murrumbidgee	97%	/	54%	=	1.79	X	1.69	=	3.03

### WaterNSW's estimate of demand or consumption for infrastructure services for the current, 2021-22 financial year

The WCIR requires WaterNSW to disclose its estimate on current year demand as part of the annual review process.

WaterNSW's forecast of expected demand for the 2021-22 financial year is equivalent to the forecast included in IPART's 2022 Determination. The recent severe rainfall and flood events in NSW has created significant uncertainty in 2021-22 demand. At this time, the Determination forecast is appropriate until the weather events are resolved, and more information is obtained.

As entitlements are typically stable, forecast entitlements are based on year-to-date figures.

These estimates are shown below:

**Table 25: 2021-22 usage and entitlements forecast**

<b>Valley</b>	<b>2021-22 Year End Usage (ML)</b>	<b>2021-22 YTD Entitlements (ML)*</b>
Border	139,453	266,359
Gwydir	220,489	536,885
Namoi	138,241	265,532
Peel	12,625	46,678
Lachlan	182,100	690,435
Macquarie	232,545	675,129
Murray	1,379,454	2,350,785
Murrumbidgee	1,531,632	2,705,467
Lowbidgee	N/A	747,000
<b>Total</b>	<b>3,836,539</b>	<b>8,284,270</b>

\* Entitlement volumes which are billable under the fixed charge. For example, excludes supplementary licences except for the Lowbidgee, where WaterNSW levies a fixed charge on supplementary water holders.

WaterNSW's forecast of expected demand in the FRWS is equivalent to the forecast included in IPART's 2022 Determination. The recent severe rainfall and flood events in NSW has created significant uncertainty in 2021-22 demand. At this time, the Determination forecast is appropriate until the weather events are resolved, and more information is obtained.

The estimates are shown below:

**Table 26: 2021-22 usage and minimum annual quantity forecast FRWS**

<b>Customer</b>	<b>Usage (ML)</b>	<b>Minimum Annual Quantity (ML)</b>
Fish River – Energy Australia	1,850	8,184.0
Fish River – Raw Water Minor customers	51	17.4
Fish River – Filtered Water Minor customers	103	46.6
<b>Total</b>	<b>2,004</b>	<b>8,248.0</b>