

# *Peel Valley Water Users Association Inc*

*The only organisation that represents the Irrigation Industry in the Peel Valley*

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Mr John Madden  
Director, Water Pricing  
Independent Pricing And Regulatory Tribunal  
PO Box K35  
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NSW 1240

By Electronic mail to: [NowReview.Mailbox@ipart.nsw.gov.au](mailto:NowReview.Mailbox@ipart.nsw.gov.au)

7<sup>th</sup> October 2015

Dear Mr Madden

Re: IPART review of the pricing submission from DPI Water

Thank you for the opportunity to lodge a submission on behalf of irrigators and businesses in the Tamworth region, who are members of this Association and are affected by the proposed pricing that is being sought by DPI Water, effective from 1 July 2016 to 30<sup>th</sup> June 2020.

We have submitted comments for each water category in the Peel Valley – groundwater, unregulated river water, and regulated river water. However, most of the focus in our submission is on regulated river water, because it is this category of water in the Peel Valley that is subjected to the greatest inequity in the proposed pricing by DPI Water.

Because the impacts of water pricing are becoming so great in the Peel Valley, it has reached the stage that the irrigation industry has become uncompetitive with other irrigation districts in NSW – as the direct result of inequitable pricing policies by Government-owned monopolies. We again seek the regulator's intervention to prevent DPI Water from imposing the proposed prices for regulated river water in the Peel Valley, as they are discriminatory against the Peel Valley and grossly inequitable when compared to charges paid by other valleys.

We trust that you will give this submission genuine consideration, and we look forward to the opportunity to provide any additional information that you may require.

Yours sincerely

Jannine Miles  
Joint President

Tom Woolaston  
Joint President

Cc The Hon. Niall Blair, MLC, The Hon Troy Grant MP, Kevin Anderson MP, The Hon Barnaby Joyce, MP, Member for New England, Tamworth Regional Council

Submission to IPART from the Peel Valley Water Users Association  
On the water charges proposed by DPI Water 2016/17 to 2020/21

Introduction

The Peel Valley Water Users Association welcomes the opportunity to comment on the water charges that have been proposed by DPI Water for the next four financial years.

IPART will be aware that this Association, which represents irrigators and businesses in the wider Tamworth region, has for many years been arguing the case for a more equitable water pricing method from both DPI Water and Water NSW across the whole of NSW. In this submission, we again highlight the inequity of the proposed water prices in the Peel Valley, particularly in the case of regulated river water charges.

This Association has also previously questioned the need for the existence of two State Government owned monopolies that both separately impose charges on water. The fact that water users are compelled to pay the overheads on two separate Government organisations is an abomination, and we maintain the view that this model of charging for water is in urgent need of an overhaul.

From our previous submissions, IPART will also be aware that in our response to previous submissions by DPI Water's predecessors, this Association has criticised the focus by DPI Water which has been exclusively on generating revenue to cover costs. We again point out that we believe that the regulator should require DPI Water to place much greater emphasis on cost cutting and budgetary control of costs, so that the water users who are obliged to pay the never-ending price increases are not priced out of business by uncontrolled expenditure in Government-owned monopolies.

We would also like to draw the attention of IPART to the confused pricing principles that are involved with the three categories of water sources that have been adopted by DPI Water – in the case of groundwater, the Peel Valley is included in the "Inland" category; for unregulated river water, the Peel Valley is included in the "North West" category; and for regulated river water, the Peel Valley is treated as a separate valley in isolation. We again submit that there is a need for a more simplified and equitable method of water pricing across the state of NSW in all categories of water sources.

We have not commented on the chapter titled "Water Take Measurement Services", as it is our understanding that the Peel Valley will not be supplied with Government-owned water meters. Also, customers of DPI Water have not been advised of the date of commencement of any new metering requirements in the Peel Valley for groundwater, or for unregulated river water, or for regulated river water. Therefore, it is inappropriate for us to comment on charges that will apparently not be levied on the Peel Valley within the period of IPART's current pricing review.

## 1 Comments on Groundwater proposed prices

- 1.1 The Peel Valley is part of the “Inland” water source category for groundwater pricing purposes. The proposed prices are significantly higher in this category than the proposed prices in the other two categories – namely “Murrumbidgee” and “Coastal”.

We cannot understand why there is a need for three pricing categories for groundwater across NSW.

In the case of groundwater, the “valley based pricing” philosophy does not apply. Clearly DPI Water does not incur significantly different costs for the administration of groundwater in one part of the state compared to other parts of the state.

Therefore, on what basis can IPART justify the existence of three separate water charging categories for groundwater across NSW?

In the absence of such justification, it is simply inequitable and unjust to levy different charges for groundwater across NSW.

We believe that there is a compelling case for groundwater to be priced at the same figure across the entire state of NSW.

## 2 Comments on Unregulated river proposed prices

- 2.1 The Peel Valley is part of the “North West” water source category for unregulated river pricing purposes.

The proposed prices in this category are reasonable in comparison with the proposed prices in the other categories in the state.

Whilst the proposed prices in the North West are not the lowest in the state, neither are they the highest, and whilst some other pricing categories will benefit from a greater reduction in charges than the North West, this Association accepts the unregulated river proposed prices for the North West that have been submitted by DPI Water.

- 2.2 Notwithstanding the previous comment, we believe that there is a compelling case for unregulated river water to be priced at the same figure across the entire state of NSW.

In the case of unregulated river prices, the “valley based pricing” philosophy does not apply. Clearly DPI Water does not incur significantly different costs for the administration of unregulated river water in one part of the state compared to other parts of the state.

Therefore, on what basis can IPART justify the proposed range of unregulated river water charges across NSW?

We believe that there is a compelling case for unregulated river water to be priced at the same figure across the entire state of NSW.

### 3 Comments on Regulated river proposed prices

3.1 The Peel Valley is treated as a separate valley for regulated river water pricing purposes, and it is this category of water source pricing that has caused the members of this Association the most grief for many years. This Association has long argued that a much more equitable pricing method should apply to regulated river water, because no other product is permitted to have such a wide range of prices charged by a Government-owned monopoly, and approved by the regulator.

We believe that if IPART should actually approve the pricing that has been proposed by DPI Water - which is grossly inequitable and discriminatory against the Peel Valley - it would represent a failure by the regulator to ensure that the Government-owned monopoly applies a consistent, fair and equitable pricing policy across its customer base.

3.2 Not only is the Peel Valley currently paying amongst the highest water charges in the state of NSW for regulated river water, DPI Water is now proposing that the Peel Valley should also incur amongst the highest increases in water charges in the state during the period of review.

DPI Water has proposed this excessive price increase in the Peel Valley on top of an already high base price, while in other valleys - which already have an existing low base price - DPI Water has now proposed a price reduction.

We believe this proposed pricing structure is totally unfair, inequitable and unacceptable.

3.3 The following table shows the regulated river water prices that have been proposed by DPI Water in the Murray-Darling Basin.

River/Valley	High and General Security Entitlement Charge	Usage ('Water Take') Charge	Total charge Proposed by DPI Water For regulated River water
Peel	\$3.64	\$6.56	\$10.20
Namoi	\$2.83	\$1.89	\$4.72
Border	\$2.38	\$1.86	\$4.24
Lachlan	\$1.57	\$2.10	\$3.67
Macquarie	\$1.74	\$1.88	\$3.62
Gwydir	\$1.78	\$1.53	\$3.31
Murray	\$1.62	\$1.15	\$2.77
Murrumbidgee	\$1.53	\$0.99	\$2.52

The Australian Government recognises the whole of the Basin as one complete water course, and therefore it is un-interrupted by lines which are artificially drawn on a map. The Australian Government has already spent more than \$12 billion of Australian taxpayers' money on the Murray Darling Basin Plan, and the ongoing annual budget for the MDBA is in excess of \$47 million a year – funded by taxpayers.

Given that fact, IPART now needs to justify the basis on which DPI Water can be allowed to impose such grossly different regulated river water charges throughout the one Basin.

Either the Murray-Darling Basin is one continuous water course, or it isn't. It is quite illogical and wholly unacceptable for one Government to treat the Basin as one valley for environmental purposes, and another Government to treat the same Basin as a multitude of different separate components for pricing purposes, and then propose to impose such grossly unfair and inequitable water charges on one valley within the Basin – in this case the Peel Valley.

3.4 DPI Water and IPART are both well aware of the wide range of water charges that are imposed in a separate pricing and regulatory process across the state of NSW, which is conducted by WaterNSW and the ACCC. We have summarised the cumulative impact of the charges imposed by these two Government-owned monopolies in Appendix 1.

We believe that IPART cannot review the water charges that have been proposed by DPI Water without also considering the impact of water charges that are imposed by WaterNSW.

It is the same water. And it is patently absurd that two separate Government-owned monopolies both individually charge fees for exactly the same water. The regulator for DPI Water must not ignore the total cost that users currently pay for water across NSW.

It is our contention that it is the responsibility of the regulator of Government owned monopolies to ensure that the prices charged by those monopolies are fair and equitable for all customers across the state of NSW.

We invite IPART to publicly justify the cumulative water charges in the Peel Valley that are shown in Appendix 1 - on the basis of fairness and equity - compared to the water charges that are payable by irrigators in other valleys in NSW.

It is our contention that if the wide range in pricing of water in NSW is caused by DPI Water and WaterNSW properly applying the existing rules, then clearly the rules are defective. We also believe that it is the responsibility of the regulator of Government-owned monopolies to highlight any constraints – such as defective rules – that prevent them from over-ruling the gross inequity in charges that are proposed by the monopoly that they are regulating.

3.5 We have previously pointed out that whilst “valley based pricing” is fine in theory, it does not work in practice. It should now be abandoned in favour of a more equitable pricing system. Some of the reasons that “valley based pricing” does not work in practice are:

- (a) The combined water usage by the two main categories of water users in the Peel Valley (Tamworth Regional Council and the irrigation industry) accounts for just under 5% of the long term annual average end of stream flow from the Peel River. The vast majority of water in the Peel River – that is, 95% - flows into the Namoi River.

However, water users in the Peel Valley are required to pay 100% of the costs of the Peel Valley for just 5% of the benefit.

This is a gross injustice which is a direct result of the “valley based pricing” philosophy.

If “valley based pricing” was implemented fairly, the Peel Valley water users would only be required to pay 5% of the Peel Valley costs – equivalent to the benefit that they derive.

- (b) The Peel Water Sharing Plan allows irrigators to access an average maximum total of 6,100ML of water from the Peel River annually, out of a total general security entitlement of 31,000ML.

However, following the completion of the augmentation of Chaffey Dam in 2016 (just a few months away), the Peel Water Sharing Plan allows the environment to access 5,000ML of water from the Peel River annually.

We do not believe that there is any other regulated valley in NSW where the environment can access anywhere near 82% of the entitlement that is available to irrigators, as is the case in the Peel Valley following completion of the augmentation of Chaffey Dam.

The fact that the environment can access such a high proportion of water, coupled with the fact that the irrigators (and the Council) have to pay all of the costs on this high proportion of environmental water, is a travesty of justice.

But on top of that injustice, the fact is that the whole volume of 5,000ML of “environmental water” is only treated as “environmental water” whilst it remains in the Peel Valley. Once it flows into the Namoi River it is freely available for access by the Namoi Valley irrigators.

Therefore, the Peel Valley irrigators pay the full costs on 5,000ML of “environmental water” annually - which they can never access - and which is generously but most unwillingly “donated” by the Peel Valley to the Namoi Valley.

This injustice is not taken into consideration in the “valley based pricing” philosophy. The time is long overdue that this grossly unjust pricing philosophy is abandoned in favour of a more equitable pricing policy.

And as a postscript, the Commonwealth Environmental Water Holder has acquired an additional 1,257ML of “environmental water” from the Peel River – bringing the total for “environmental water” in the Peel Valley to 6,257ML – that is 103% of the total that the irrigators can access. However, at least at this stage, the CEWH is responsible for payment of fees on that holding of water (using funds that are provided by taxpayers across Australia).

3.6 The Commonwealth Water Act, states that - *‘The water charging objectives are to ..... (e) `avoid perverse or unintended pricing outcomes.’*

This Association maintains that the water prices in Table 1 on page 4 of this submission, and separately in Appendix 1 of this submission are perverse, and therefore DPI Water is in breach of the Commonwealth Water Act.

Representatives from this Association have sought a definition of precisely what is meant by a *“perverse pricing outcome”* in the Act. Although a request has been submitted separately to WaterNSW, the ACCC, and the Expert Panel which reviewed the Commonwealth Water Act, not one of these entities has been willing to provide a definition.

We now invite IPART to provide a definition of exactly what the term *‘perverse pricing outcome’* means.

In the absence of a definition, how can the regulator possibly allow DPI Water to levy charges that appear to be in clear breach of the Water Act?

Either DPI Water is in breach of the Commonwealth Water Act or it isn't. But that depends entirely on the definition of the term *‘perverse pricing outcome’*, and the Act is deficient without

the inclusion of the definition of this vital term. When representatives from this Association attended the Expert Panel's hearing into the recent review of the Water Act, we were advised that it was not necessary to define the term in the Act.

Whilst this Association believes that DPI Water (and WaterNSW) both remain in breach of the Water Act by charging perverse prices in the Peel Valley, it is also our contention that a rigorous and comprehensive revision of the water charging principles employed by DPI Water is urgently required. Such a revision would result in the elimination of the current perverse water charges, and thereby eliminate the current inequitable and perverse water pricing problem.

- 3.7 IPART needs to take into consideration that in 2020/21, the effective entitlement charge in the Peel Valley will be approximately \$18.50 per ML, not the \$3.64 that DPI Water has proposed.

That is because DPI Water collects a fixed charge of \$3.64 per ML on the whole 31,000 ML of entitlement in the Peel Valley – a total of around \$112,840.

But under the Peel Water Sharing Plan, irrigators can only access 6,100 ML of general security water annually, so the amount of \$112,840 divided by the 6,100 ML of accessible water equates to an effective fixed entitlement charge of \$18.50 per ML in the Peel Valley.

This fact has been highlighted in our previous submissions to IPART, and we believe that IPART should take this into consideration. We are not aware of any other valley in NSW where there is such a wide divergence between the proposed entitlement charge and the actual effective entitlement charge.

- 3.8 The fact that a Government monopoly is permitted to apply a premium price to one specific valley (ie the Peel Valley) implies that the relevant valley (ie the Peel Valley) is entitled to a premium level of service, or service delivery.

However, the converse is the fact in the Peel Valley – the Peel Valley pays the highest prices for water, yet receives probably the lowest access to water in NSW.

In the Peel Valley the current water year (2014/15) the AWD (allocation) is 17%; last year it was 0 %; and in the previous year it was 45%.

A pricing policy that determines that the valley that receives the lowest reliability of access to water should pay the highest charges for usage is completely irrational and inappropriate.

3.9 The foundation of legal judgements in the British legal system is the ‘reasonable person test’.

Applying the ‘reasonable person test’ to the regulated river water charges would ask the question ‘what would a reasonable person consider is fair’?

We believe that the pricing structure that is proposed by DPI Water for regulated river water would not pass the ‘reasonable person test’, because the prices are totally unfair on the Peel Valley water users.

The range of charges which has been proposed by DPI Water on the same commodity, across the same state by a Government-owned monopoly, and which will probably be approved unchanged by IPART, simply beggars belief.

We believe that if the regulated river water charges that have been proposed DPI Water are approved unchanged by IPART, it could be alleged that the regulator granted approval to prices which are unjust, inequitable, and discriminatory. Thereby, the regulator would be denying irrigators in the Peel Valley the basic right to justice, to which they should reasonably be entitled, from the regulator of a Government-owned monopoly.

3.10 The following table shows the actual water usage in the 2013-2014 water year, and it is included to demonstrate a clear ‘perverse environmental outcome’ as a direct result of the proposed regulated river water pricing by DPI Water.

<b>Valley</b>	<b>Actual water usage 2013-14</b>
Murray	2,056,031
Murrumbidgee	1,782,634
Gwydir	407,295
Namoi	270,507
Macquarie	268,934
Lachlan	242,067
Border	197,437
Peel	17,307
<b>Total usage</b>	<b>5,242,211</b>

It is important to note that the valleys with the highest water usage – and therefore the highest ‘environmental impact’ – are the valleys that pay the lowest charges for their regulated river water.

The Peel Valley, which has the lowest usage, and therefore the lowest ‘environmental footprint’, pays the highest regulated river water charges in NSW.

This is a clear ‘perverse environmental pricing’ outcome.



4      CONCLUSION

The Peel Valley Water Users Association has presented several issues in this submission to IPART for consideration.

All we are seeking is that the irrigators in the Peel Valley are given a 'fair go' on regulated river water prices compared to the water prices in other valleys in NSW. We do not believe that the water prices that have been proposed by DPI Water would result in a 'fair go' for the irrigation industry in the Peel Valley.

The frustration that we now experience is that much of the material in this submission is not new – it has been presented to IPART previously and summarily dismissed.

We believe that it is now time that the Members of the Tribunal should give genuine and independent consideration to the facts in this submission.

We invite the Members of the Tribunal to walk in our shoes, and honestly consider their own reaction if they were charged water prices that are more than double the next highest valley, nearly eight times higher than the lowest valley, and three times the average charge of all other valleys in the Murray-Darling Basin. Would the Members of the Tribunal consider that they have been fairly treated by a regulator that approves such inequitable water charges? We think not.

It beggars belief that the Tribunal which is supposed to prevent unfair monopolistic pricing by a State-owned monopoly would actually endorse such inequitable pricing.

In conclusion, we believe that it is outrageous behaviour for a Government-owned monopoly to take clear financial advantage of one valley by continually charging higher and higher prices for water at each successive pricing review, and not levying the same level of charges on other valleys in NSW at the same time.

We believe that it is equally, or even possibly greater outrageous behaviour for an 'independent' regulator to permit this inequitable monopolistic pricing to continue any longer.

APPENDIX 1 – (a) Projected total regulated river water charges in the Murray-Darling Basin

<b>Projected Total Regulated River prices for 2020/21 year in the Murray-Darling Basin</b> (all prices are in \$ per Megalitre)							
Prices determined by ACCC for WaterNSW 2015/16 year				Prices proposed by DPI Water in 2020/21		Total High Security Prices	Total General Security Prices (Irrigators)
River/Valley	High Security Entitlement charge	General Security Entitlement charge	Usage Charge	High and General Security Entitlement charge	Usage 'Water Take' charge		
	(a)	(b)	(c)	(d)	(e)	(a)+ (c) + (d) + (e)	(b) + (c) + (d) + (e)
Peel	\$31.65	\$3.48	\$52.27	\$3.64	\$6.56	\$94.12	\$65.95
Namoi	\$16.81	\$7.99	\$19.80	\$2.83	\$1.89	\$41.33	\$32.51
Lachlan	\$14.84	\$3.24	\$19.33	\$1.57	\$2.10	\$37.84	\$26.24
Macquarie	\$14.35	\$3.51	\$15.89	\$1.74	\$1.88	\$33.86	\$23.02
Gwydir	\$14.00	\$3.44	\$11.89	\$1.78	\$1.53	\$29.20	\$18.64
Border	\$11.20	\$3.90	\$10.18	\$2.38	\$1.86	\$25.62	\$18.32
Murray	\$4.79	\$2.66	\$6.40	\$1.62	\$1.15	\$13.96	\$11.83
Murrumbidgee	\$3.63	\$1.53	\$4.28	\$1.53	\$0.99	\$10.43	\$8.33

Notes

1. It is a known fact that the WaterNSW charges for the Peel Valley will be increased by a minimum of 10% plus CPI in the 2016/17 year, but otherwise the prices that will be charged by WaterNSW in 2020/21 are unknown at this stage – these figures are presented to demonstrate the impact of DPI Water’s proposed prices on the total water charges. Clearly the total impact will be much greater than that shown once WaterNSW’s figures for 2020/21 become available.
2. DPI Water cannot ignore the impact of its proposed grossly inequitable prices on the Peel Valley. The regulator should not permit such grossly unfair prices to be charged by a Government monopoly.

APPENDIX 1 – (b) Projected total regulated river water charges in the State of NSW

Projected Total Regulated River prices for 2020/21 year for the whole of NSW (all prices are in \$ per Megalitre)							
Prices determined by ACCC for WaterNSW 2015/16 year				Prices proposed by DPI Water in 2020/21		Total High Security Prices	Total General Security Prices (Irrigators)
River/Valley	High Security Entitlement	General Security Entitlement	Usage	High and General Security Entitlement	Usage 'Water Take'		
	(a)	(b)	(c)	(d)	(e)	(a)+ (c) + (d) + (e)	(b) + (c) + (d) + (e)
Border	\$11.20	\$3.90	\$10.18	\$2.38	\$1.86	\$25.62	\$18.32
Gwydir	\$14.00	\$3.44	\$11.89	\$1.78	\$1.53	\$29.20	\$18.64
Namoi	\$16.81	\$7.99	\$19.80	\$2.83	\$1.89	\$41.33	\$32.51
Peel	\$31.65	\$3.48	\$52.27	\$3.64	\$6.56	\$94.12	\$65.95
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Murrumbidgee	\$3.63	\$1.53	\$4.28	\$1.53	\$0.99	\$10.43	\$8.33
<i>Prices determined by IPART for Water NSW</i>							
North Coast	\$9.54	\$7.25	\$45.04	\$4.48	\$6.64	\$65.70	\$63.41
Hunter	\$26.03	\$8.86	\$14.77	\$3.62	\$2.51	\$46.93	\$29.76
South Coast	\$21.12	\$10.09	\$40.38	\$5.34	\$8.54	\$75.38	\$64.35

**Notes**

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2. This table is presented to demonstrate the impact on the Peel Valley – other valleys can obviously make their own representations to IPART.

APPENDIX 1 – (c) Projected total regulated river water charges in the State of NSW – Ranked by General Security charges

Projected Total Regulated River prices for 2020/21 year for the whole of NSW(all prices are in \$ per Megalitre)							
Prices determined by ACCC for WaterNSW 2015/16 year				Prices proposed by DPI Water in 2020/21		Total High Security Prices	Total General Security Prices (Irrigators)
River/Valley	High Security Entitlement	General Security Entitlement	Usage	High and General Security Entitlement	Usage 'Water Take'		
	(a)	(b)	(c)	(d)	(e)	(a)+ (c) + (d) + (e)	(b) + (c) + (d) + (e)
Peel	\$31.65	\$3.48	\$52.27	\$3.64	\$6.56	\$94.12	\$65.95
South Coast	\$21.12	\$10.09	\$40.38	\$5.34	\$8.54	\$75.38	\$64.35
North Coast	\$9.54	\$7.25	\$45.04	\$4.48	\$6.64	\$65.70	\$63.41
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2. This table is presented to demonstrate the impact on the Peel Valley – other valleys can obviously make their own representations to IPART.

APPENDIX 1 – (d) Projected total regulated river water charges in the State of NSW – Ranked by High Security charges

Projected Total Regulated River prices for 2020/21 year for the whole of NSW(all prices are in \$ per Megalitre)							
Prices determined by ACCC for WaterNSW 2015/16 year				Prices proposed by DPI Water in 2020/21		Total High Security Prices	Total General Security Prices (Irrigators)
River/Valley	High Security Entitlement	General Security Entitlement	Usage	High and General Security Entitlement	Usage 'Water Take'		
	(a)	(b)	(c)	(d)	(e)	(a)+ (c) + (d) + (e)	(b) + (c) + (d) + (e)
Peel	\$31.65	\$3.48	\$52.27	\$3.64	\$6.56	\$94.12	\$65.95
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North Coast	\$9.54	\$7.25	\$45.04	\$4.48	\$6.64	\$65.70	\$63.41
Hunter	\$26.03	\$8.86	\$14.77	\$3.62	\$2.51	\$46.93	\$29.76
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Table K. 1: Page 348 - Regulated river proposed prices

Regulated river Pricing water source	2013/14 to 2015/16		2016/17		2017/18		2018/19		2019/20		2020/21		Full cost recovery	
	Entitle-ment	Water take	Entitle-ment	Water take	Entitle-ment	Water take	Entitle-ment	Water take	Entitle-ment	Water take	Entitle-ment	Water take	Entitle-ment	Water take
01. Border	\$2.32	\$1.79	\$2.32	\$1.79	\$2.37	\$1.85	\$2.38	\$1.86	\$2.38	\$1.86	\$2.38	\$1.86	\$2.38	\$1.86
01. Border with FPH	\$2.32	\$1.79	\$2.19	\$1.71	\$2.19	\$1.71	\$2.19	\$1.71	\$2.19	\$1.71	\$2.19	\$1.71	\$2.19	\$1.71
02. Gwydir	\$1.37	\$1.26	\$1.39	\$1.20	\$1.43	\$1.22	\$1.46	\$1.25	\$1.50	\$1.29	\$1.54	\$1.32	\$1.78	\$1.53
02. Gwydir with FPH	\$1.37	\$1.26	\$1.39	\$1.20	\$1.43	\$1.22	\$1.46	\$1.25	\$1.50	\$1.29	\$1.54	\$1.32	\$1.57	\$1.35
03. Namoi	\$2.75	\$1.88	\$2.77	\$1.85	\$2.83	\$1.89	\$2.83	\$1.89	\$2.83	\$1.89	\$2.83	\$1.89	\$2.83	\$1.89
03. Namoi with FPH	\$2.75	\$1.88	\$2.60	\$1.74	\$2.60	\$1.74	\$2.60	\$1.74	\$2.60	\$1.74	\$2.60	\$1.74	\$2.60	\$1.74
04. Peel	\$2.33	\$3.71	\$2.26	\$4.01	\$2.32	\$4.12	\$2.37	\$4.22	\$2.43	\$4.33	\$2.49	\$4.44	\$3.64	\$6.56
05. Lachlan	\$1.86	\$2.14	\$1.57	\$2.10	\$1.57	\$2.10	\$1.57	\$2.10	\$1.57	\$2.10	\$1.57	\$2.10	\$1.57	\$2.10
06. Macquarie	\$1.98	\$1.90	\$1.74	\$1.88	\$1.74	\$1.88	\$1.74	\$1.88	\$1.74	\$1.88	\$1.74	\$1.88	\$1.74	\$1.88
06. Macquarie with FPH	\$1.98	\$1.90	\$1.69	\$1.82	\$1.69	\$1.82	\$1.69	\$1.82	\$1.69	\$1.82	\$1.69	\$1.82	\$1.69	\$1.82
07. Far West	-	-	-	-	-	-	-	-	-	-	-	-	-	-
08. Murray	\$1.50	\$0.97	\$1.46	\$1.05	\$1.50	\$1.07	\$1.54	\$1.09	\$1.58	\$1.12	\$1.62	\$1.15	\$1.62	\$1.15
09. Murrumbidgee	\$1.23	\$0.79	\$1.22	\$0.81	\$1.25	\$0.82	\$1.28	\$0.84	\$1.32	\$0.87	\$1.35	\$0.89	\$1.50	\$0.99
10. North Coast	\$5.58	\$5.54	\$4.48	\$6.64	\$4.48	\$6.64	\$4.48	\$6.64	\$4.48	\$6.64	\$4.48	\$6.64	\$4.48	\$6.64
11. Hunter	\$2.73	\$1.75	\$2.69	\$1.84	\$2.76	\$1.88	\$2.83	\$1.93	\$2.90	\$1.98	\$2.97	\$2.03	\$3.62	\$2.51
12. South Coast	\$5.00	\$5.61	\$4.57	\$7.27	\$4.68	\$7.45	\$4.80	\$7.64	\$4.92	\$7.83	\$5.04	\$8.02	\$5.34	\$8.54
Minimum annual charge	\$105.34		\$150.00		\$150.00		\$150.00		\$150.00		\$150.00			

FPH = flood plain harvesting

Table K.2: Unregulated river proposed prices

Unregulated rivers Pricing water source	2013/14 to 2015/16			2016/17			2017/18			2018/19			2019/20			2020/21		
	2-part entitlement	Water take	1-part entitlement	2-part entitlement	Water take	1-part entitlement	2-part entitlement	Water take	1-part entitlement	2-part entitlement	Water take	1-part entitlement	2-part entitlement	Water take	1-part entitlement	2-part entitlement	Water take	1-part entitlement
04A. North West	\$3.73	\$1.60	\$5.34	\$2.31	\$2.46	\$4.77	\$2.31	\$2.46	\$4.77	\$2.31	\$2.46	\$4.77	\$2.31	\$2.46	\$4.77	\$2.31	\$2.46	\$4.77
06A. Central West	\$5.87	\$2.52	\$8.39	\$2.66	\$2.88	\$5.54	\$2.66	\$2.88	\$5.54	\$2.66	\$2.88	\$5.54	\$2.66	\$2.88	\$5.54	\$2.66	\$2.88	\$5.54
07. Far West	\$4.67	\$2.00	\$6.67	\$4.20	\$2.57	\$6.77	\$4.20	\$2.57	\$6.77	\$4.20	\$2.57	\$6.77	\$4.20	\$2.57	\$6.77	\$4.20	\$2.57	\$6.77
07. Far West with FPH	\$4.67	\$2.00	\$6.67	\$4.22	\$2.18	\$6.40	\$4.22	\$2.18	\$6.40	\$4.22	\$2.18	\$6.40	\$4.22	\$2.18	\$6.40	\$4.22	\$2.18	\$6.40
08. Murray	\$6.77	\$2.91	\$9.67	\$2.65	\$4.23	\$6.88	\$2.65	\$4.23	\$6.88	\$2.65	\$4.23	\$6.88	\$2.65	\$4.23	\$6.88	\$2.65	\$4.23	\$6.88
09. Murrumbidgee	\$8.30	\$3.55	\$11.85	\$3.27	\$5.76	\$9.03	\$3.27	\$5.76	\$9.03	\$3.27	\$5.76	\$9.03	\$3.27	\$5.76	\$9.03	\$3.27	\$5.76	\$9.03
10. North Coast	\$7.00	\$3.00	\$10.01	\$4.74	\$5.08	\$9.82	\$4.74	\$5.08	\$9.82	\$4.74	\$5.08	\$9.82	\$4.74	\$5.08	\$9.82	\$4.74	\$5.08	\$9.82
11. Hunter	\$2.30	\$2.17	\$4.48	\$1.29	\$2.10	\$3.39	\$1.29	\$2.10	\$3.39	\$1.29	\$2.10	\$3.39	\$1.29	\$2.10	\$3.39	\$1.29	\$2.10	\$3.39
12. South Coast	\$2.26	\$1.48	\$3.74	\$2.10	\$1.80	\$3.90	\$2.15	\$1.83	\$3.98	\$2.21	\$1.86	\$4.07	\$2.27	\$1.89	\$4.16	\$2.27	\$1.89	\$4.16
Minimum annual charge	\$105.34			\$150.00			\$150.00			\$150.00			\$150.00			\$150.00		

FPH = flood plain harvesting

Table K.3: Groundwater proposed prices

Groundwater Pricing water source	2013/14 to 2015/16			2016/17			2017/18			2018/19			2019/20			2020/21		
	2-part entitle- ment	Water take	1-part entitle- ment	2-part entitle- ment	Water take	1-part entitle- ment	2-part entitle- ment	Water take	1-part entitle- ment	2-part entitle- ment	Water take	1-part entitle- ment	2-part entitle- ment	Water take	1-part entitle- ment	2-part entitle- ment	Water take	1-part entitle- ment
09. Murrumbidgee	\$2.47	\$1.07	\$3.53	\$2.13	\$1.72	\$3.85	\$2.18	\$1.77	\$3.95	\$2.24	\$1.81	\$4.05	\$2.29	\$1.85	\$4.14	\$2.35	\$1.90	\$4.25
13. Inland	\$4.86	\$2.09	\$6.95	\$3.99	\$3.23	\$7.22	\$3.99	\$3.23	\$7.22	\$3.99	\$3.23	\$7.22	\$3.99	\$3.21	\$7.20	\$3.99	\$3.21	\$7.20
14. Coastal	\$4.07	\$1.85	\$5.92	\$2.01	\$3.75	\$5.76	\$2.01	\$3.75	\$5.76	\$2.01	\$3.75	\$5.76	\$2.01	\$3.74	\$5.75	\$2.01	\$3.74	\$5.75
Minimum annual charge	\$105.34			\$150.00			\$150.00			\$150.00			\$150.00			\$150.00		