

MID BRISBANE RIVER IRRIGATORS (MBRI) SUBMISSION FOLLOWING THE CONSULTATION MEETING IN FERNVALE 10TH OCTOBER 2019

MBRI represents the majority of irrigators who hold allocations in the Central Brisbane River Water Supply Scheme. MBRI considers that there is an incomplete Table in the Draft Report that could prejudice the interests of irrigators seeking to make submissions to the QCA in response to the Draft Report. We request that QCA issue an addendum to the Draft report as soon as possible and certainly no later than 26th October 2019 to allow irrigators to take the revised data into account when making their Final Submissions which are required by the 4th November 2019.

We refer you to table 3 of Part C of the Draft Report which could be considered to be misleading and should be extended to take the full 2013 to 2020 period into account:

- At the time of preparing the Draft Report financial data was available through to 2019/2020.
- Even the data currently displayed shows a serious failure by QCA to meet their own defined parameters of a prudent/efficient cost.
- Should the table be extended as requested we expect it would show an error in QCA's forecast of prudent and efficient costs of over \$30,000,000 or in %age terms an over charge of approximately 30%.
- To correct this overcharge would need irrigation water to the CBRWSS to be supplied at no charge for 8years (based on the current Draft Report price per ML).

MBRI consider that it is more appropriate that QCA advise all parties that this may affect, to ensure those parties have an opportunity to take this flawed forecast in to account.

We attach what we consider a revised table 3 should look like.

MBRI will be making further submissions on the Draft Report before the 4th November 2019.

Yours faithfully

Tom Wilkinson

Chairperson MBRI

Revised Table 3 QCA draft report CBRWSS MBRI version

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
SEQ opex	21.557	16.562	15.511	14.417	12.371	11.800	12.000 est
QCA Rec	18.200	18.500	18.900	19.300	19.700	20.100	20.500
Difference	3.357	(1.938)	(3.389)	(4.883)	(7.321)	(8.3)	(8.5)
Cumulative difference	3.357	1.419	(1.97)	(6.853)	(14.174)	(22.474)	(30.974)