



Contact: Lisa Welsh  
Direct line: 07 3120 0140  
Our ref: 2491993  
Your ref:

4 November 2019

Mr Charles Millstead  
Chief Executive Officer  
Queensland Competition Authority  
Level 27, 145 Ann Street  
BRISBANE QLD 4000

Dear Mr Milstead

**2020-24 Irrigation Price Review – submission to second phase consultation**

Thank you for the opportunity to participate in the QCA's Irrigation price investigation for 2020-24. We have read the QCA's draft report, released as part of its second phase consultation and which includes draft recommendations to Government on irrigation prices for specified schemes between 1 July 2020 and 30 June 2024. We welcome the opportunity to provide feedback on this report. Our irrigation price review submission is attached.

Our submission accepts many of the assumptions supporting recommended prices. Where necessary, we have provided updated information to assist the QCA in making final recommendations.

There are several areas where we do not agree with the QCA's approach. Our main concern relates to the QCA's approach to forecasting operating expenditure recommended by its consultant. Our submission explains our concerns and proposed changes that we consider the QCA need to make in its final report to ensure Sunwater has sufficient revenues to maintain service delivery in the 2020–24 price path period.

We also outline several areas of the decision where the QCA's assumptions or calculations do not appear to be correct or substantiated. Our submission provides additional information to assist the QCA assess these areas of difference.

We look forward to continuing to work constructively and transparently with the QCA, customers and other stakeholders. Should the QCA require additional information on the issues identified in the referral notice or our submission, please do not hesitate to contact Lisa Welsh (07 3120 0140, [lisa.welsh@sunwater.com.au](mailto:lisa.welsh@sunwater.com.au)).

Yours sincerely

A handwritten signature in blue ink that reads "Nicole Hollows".

**Nicole Hollows**  
Chief Executive, Sunwater

**Attachment:** Sunwater Irrigation Price Review – Submission to QCA draft report

**address** Green Square North, Level 9,  
515 St Pauls Terrace, Fortitude Valley, Queensland 4006  
**post** PO Box 15536, City East, Queensland 4002  
[sunwater.com.au](http://sunwater.com.au)

**telephone** +617 3120 000 **facsimile** +617 3120 0260  
**email** [info@sunwater.com.au](mailto:info@sunwater.com.au)  
**ACN** 131 034 985