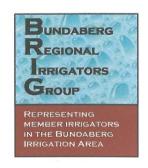
7 January 2012

The Chief Executive Queensland Competition Authority Level 19, 12 Creek Street GPO Box 2257 BRISBANE QLD 4001

By email: electricity@qca.org.au

Dear Sir



ABN: 86 137 318 631 Postal Address: PO Box 953, Bundaberg Qld 4670

07 4151 2555 P

07 4153 1986 F BRIG@bdbcanegrowers.com.au E

#### Re: Regulated Retail Electricity Prices 2013-14

The Bundaberg Regional Irrigators Group (BRIG) represents member irrigators within the Bundaberg Regional Council Area.

Over the past 5 years we have seen electricity prices rise by over 90% and there are very real fears that we will see similar rises in the next 2 years unless there are some fundamental changes in the manner that cost and tariffs are calculated for the irrigation sector.

BRIG members farm on approximately 36,000ha and use an estimated 1,100 irrigation pumps and associated distribution systems to irrigate a variety of crops. A significant percentage of these systems (circa 90%) are powered by electricity.

Approximately 60% of our members source their water from the SunWater Channel system and apart from application costs pay approximately \$47/ML in electricity costs to SunWater. (Volumetric Part D charge).

BRIG is aware that QCA have been tasked with deciding the prices that a retail entity may charge for the tariff years 1 July 2013 to 30 June 2016 and BRIG has every confidence in the professionalism of QCA and that you will be able to identify a number of problems and will be very consultative, transparent and impartial.

BRIG acknowledges the opportunity to provide input and is appreciative of the workshop held in Bundaberg on Friday 23 November which was attended by a number of our members.

Much of what we raise in this submission was articulated at that meeting.

It is unfortunate that QCA can only decide the charges at a retail level and that you have no direct control over the underlying costs of supply. Retail charges are only a small component of the tariff in comparison to the Network charges.

BRIG notes that Regulated prices for Tariff 11 in 2012-13 were determined by the Minister in accordance with the Government's policy, rather than by the QCA and we believe that the Minister has the ability to deal with irrigation tariffs in a similar manner.

BRIG requests that you highlight in your draft determination the destructive potential that the loss of irrigation tariffs 62, 65 and 66 for farmers and irrigators will have on the Agricultural component of the Four Pillar Economy election promise made by the LNP and detail all of the options available to the Minister in making his decision.

The following submission is based entirely on electricity as it relates to irrigation in our Bundaberg region and all of our members are ERGON Energy Customers.

### **Transitional Issues**

BRIG understands that the new set of retail tariffs were established by QCA estimating the costs of supplying customers on each retail tariff. The three main cost components are:

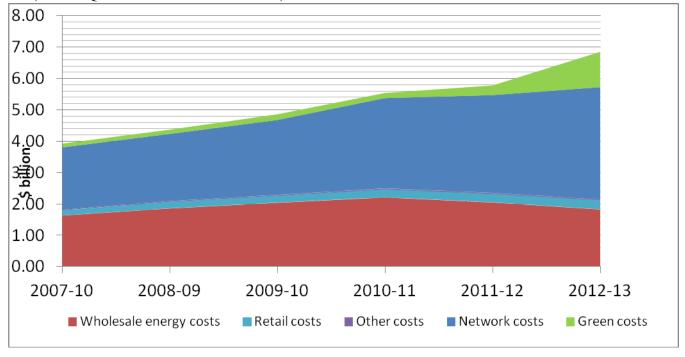
- (a) **Network charges**, which recover the costs associated with transporting electricity through the transmission and distribution networks. The transmission and distribution businesses are regulated monopoly businesses and their charges are determined by the Australian Energy Regulator (AER);
- (b) **Energy costs**, which include the cost of purchasing electricity (including the impact of the carbon tax), environmental and renewable energy costs, energy losses and National Electricity Market (NEM) fees; and
- (c) **Retail costs.** which include:
  - (i) the cost of services provided by a retailer to its customers (for instance, customer service, billing and revenue collection); and
  - (ii) a retail margin to reflect the risks of providing retail electricity services.

In 2012/13, the network charge (N) accounts for around 54% of the total charge and the retail charges (R) account for 46% of the determined price. The R component can be further broken down to show that 26% is actual energy costs and a significant 20% is due to environmental costs. Half of the environmental cost is due to the carbon tax and the other half is the cost of green initiatives such as the Renewable Energy Target.

In Queensland and indeed other States in Australia the cost of the wholesale energy and retail components have actually declined in the past two years whilst Green and Network costs have escalated rapidly.

### **Queensland Electricity Costs**

(Source QCA Presentation 23/12/2012)



BRIG requests QCA to recommend to the Minister That each customer's account be itemised to reflect the different segments that it is comprised of. BRIG suggests that this be broken up as follows:



Retail
Network
Carbon tax
Green (Renewable)
Other

BRIG further suggests that the net CSO applied to each account also be itemised, and that the split between capital and operating cost in the N charge be given as well.

### **Purpose of the Consultation Paper**

BRIG is cogniscent that the purpose of consultation as it affects our members is to investigate the existing obsolete tariffs, and for the Authority to consider that some customers will face significant price impacts if they are required to move to the alternative cost-reflective tariffs.

In the past a number of our members have worked closely with Ergon Energy representatives and irrigation equipment providers to have their pumping system designed and matched to the most suitable, sustainable and efficient tariff available. Significant infrastructure and capital has been installed and is currently operating based on the characteristics of the specific tariff. The downside consequences of removing these tariffs may be immediate and severe.

The following case study provides a very concise example of why we are extremely concerned.

# **Relmay Pty Ltd Case Study**

was first registered is the driving force
of the agribusiness industry in excess of a strict driving roles.
The family run operation produces around tonnes of sugar cane annually from
The vision and leadership that have demonstrated in establishing and developing the enterprise is well known and they are widely respected by the Queensland sugar industry.
In embarked on a large scale project to install additional irrigation
infrastructure to improve water availability to the
operation from intercepted overland flows and water harvesting and to increase existing water storage capacity by 100%.
This enabled the supplementation of existing groundwater entitlements in an area where groundwater resources were limited and the aquifer at risk to saltwater intrusion.  Other benefits included:
<ul> <li>Reduced reliance on groundwater resources and consequent risk attributed to reduced allocation; i.e. drought proofing.</li> </ul>
• Improved cane productivity due to ability to supply irrigation at the right time with the right amount.
• Maximisation of the efficacy and the value of all existing farm capital including the ring tank, laser levelled fields, irrigation delivery systems equipment and machinery by more completely utilising these components of the production function embraced by the
, and the second se
<ul> <li>Improved environmental management by:         <ul> <li>Retaining all irrigation and farm run-off within the farm so that there is minimal risk of offsite nutrient and/or pesticide displacement.</li> <li>Reducing energy usage</li> </ul> </li> </ul>

- o Targeted and efficient water use, reducing reliance and pressure on the groundwater dependant ecosystem in the Bundaberg District Groundwater area
- Increased mill throughput for production of an additional 4,200 tonnes sugar per season

Direct beneficiaries included the owners, Indirect beneficiaries included the Bundaberg District Groundwater Area. This area is defined by the proclaimed sub artesian groundwater area centred around Bundaberg, Gooburrum, Woongarra and Barns Systems and the undeclared areas including Isis, and South Kolan. The in matching electricity and irrigation infrastructure pumping requirements to improve the environmental, economic and social sustainability of their enterprise. This expenditure was based on discussion and advice received from Ergon Energy and was aimed at optimising the tariff structure with the physical and agronomic factors of the crop and to maximize use of off peak (night time) tariffs. Relmay Pry Led

## **Relmay Irrigation Electricity Use Profile**

	User informat	tion <u>per quarter</u>			Cui	rrent Bill - Tariff 62 /0	55			Draft QCA -	Tariff 22		Difference	
Farm		Billing			Tariff		_				_			
name	Account #	period END	kWh	Use time	Charges	Service Fees	Cost	Total Cost	Tariff	Service Fees	Cost	Total Cost	\$ Increase	% Increase
						Tariff 62	Φ.				Φ.			
			-	Day	29.61 ¢/kWh		\$ -		20.159 ¢/kWh		\$			119%
		1/05/2012		Day	27.01 Φ/ΚΨΠ	\$15.2/month	\$ -	\$ 45.60	20.137 Ψ/ΚΨΠ	\$33.26/month	s	\$ 99.78	\$ 54.18	
				Night	10.47 <b>C</b> /kWh		φ -		18.062 <b>C</b> /kWh		-			
		1/05/2012	892	Day	29.61 C/kWh	0150/ 1	\$ 264.12	A 440 70	20.159 ¢/kWh	\$22.25/ I	\$ 179.82	Φ 505.55	A (4.05	15%
		1/05/2012	1,251	Night	10.47 C/kWh	\$15.2/month	\$ 130.98	\$ 440.70	18.062 <b>C</b> /kWh	\$33.26/month	\$ 225.96	\$ 505.55	\$ 64.85	
		1/05/2012	12,184	Day	29.61 ¢/kWh	\$15.2/	\$ 3,607.68	A ( 2(0.72	20.159 ¢/kWh	\$22.26/	\$ 2,456.17	A 7 242 14	ф 9 <b>73</b> 41	14%
		1/05/2012	25,945	Night	10.47 C/kWh	\$15.2/month	\$ 2,716.44	\$ 6,369.72	18.062 <b>C</b> /kWh	\$33.26/month	\$ 4,686.19	\$ 7,242.14	\$ 872.41	
			-				\$ -				\$			119%
l		1/05/2012		Day	29.61 <b>C</b> /kWh	\$15.2/month		\$ 45.60	20.159 <b>C</b> /kWh	\$33.26/month	-	\$ 99.78	\$ 54.18	117/0
		1/05/2012	-			ψ13.2/ Hondi	\$ -	ψ 42.00		ψ55.20/ Ποπαί	\$	ψ >>.70	ψ 54.10	
			700	Night	10.47 C/kWh		A 220.05		18.062 C/kWh		- 157.04			
		1/05/2012	780	Day	29.61 ¢/kWh	\$15.2/month	\$ 230.96	\$ 1,270.48	20.159 ¢/kWh	\$33.26/month	\$ 157.24 \$ 1.714.63	\$ 1,971.65	\$ 701.17	55%
			9,493	Night	10.47 C/kWh		\$ 993.92		18.062 C/kWh		Ψ 1,71 1105			13%
		1/05/2012	6,038 12,110	Day	29.61 ¢/kWh 10.47 ¢/kWh	\$15.2/month	\$ 1,787.85	\$ 3,101.37	20.159 ¢/kWh 18.062 ¢/kWh	\$33.26/month	\$ 1,217.20 \$ 2,187.31	\$ 3,504.29	\$ 402.92	15%
			21,182	Night Day	29.61 <b>C</b> /kWh		\$ 1,267.92 \$ 6,271.99		20.159 ¢/kWh		\$ 2,187.31 \$ 4,270.08			14%
		1/05/2012	46,099	Night	10.47 <b>C</b> /kWh	\$15.2/month	\$ 4,826.57	\$ 11,144.16	18.062 <b>C</b> /kWh	\$33.26/month	\$ 8,326.40	\$12,696.26	\$ 1,552.11	14/0
			857	Day	29.61 <b>C</b> /kWh		\$ 253.76		20.159 ¢/kWh		\$ 172.76			38%
		1/05/2012	3,794	Night	10.47 <b>C</b> /kWh	\$15.2/month	\$ 397.23	\$ 696.59	18.062 <b>C</b> /kWh	\$33.26/month	\$ 685.27	\$ 957.81	\$ 261.23	36 / 0
-			1,346	Day	29.61 <b>C</b> /kWh		\$ 398.55		20.159 ¢/kWh		\$ 271.34			30%
		1/05/2012	4,623	Night	10.47 <b>C</b> /kWh	\$15.2/month	\$ 484.03	\$ 928.18	18.062 <b>C</b> /kWh	\$33.26/month	\$ 835.01	\$ 1,206.13	\$ 277.95	2070
			,025	. 115.11	10.17 Ψ/Κ.Τ.Π		\$ -		10.002 Φ/π 11.11		\$			
		1/05/2012		Day	29.61 ¢/kWh	\$15.2/month		\$ 2,919.72	20.159 ¢/kWh	\$33.26/month	-	\$ 5,057.98	\$ 2,138.26	73%
	-		27,451	Night	10.47 C/kWh		\$ 2,874.12		18.062 <b>C</b> /kWh		\$ 4,958.20	·		
		30/04/2012	516	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ 152.79	\$ 401.30	20.159 <b>C</b> /kWh	\$33.26/month	\$ 104.02	\$ 553.84	\$ 152.55	38%
		30/04/2012	1,938	Night	10.47 <b>C</b> /kWh	\$13.2/IIIOIIII	\$ 202.91	\$ 401.30	18.062 <b>C</b> /kWh	\$55.20/IIIOIIIII	\$ 350.04	ф 555.04	\$ 152.55	
		30/04/2012	5,299	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ 1,569.03	\$ 1,803.51	20.159 <b>C</b> /kWh	\$33.26/month	\$ 1,068.23	\$ 1,493.84	-\$ 309.67	-17%
		30/04/2012	1,804	Night	10.47 <b>C</b> /kWh	\$13.2/month	\$ 188.88	\$ 1,005.51	18.062 <b>C</b> /kWh	φ55.20/ month	\$ 325.84	ф 1,493.04	-\$ 303.07	
l		1/05/2012	8,238	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ 2,439.27	\$ 3,847.65	20.159 ¢/kWh	\$33.26/month	\$ 1,660.70	\$ 4,111.43	\$ 263.78	7%
		1,00,2012	13,016	Night	10.47 <b>C</b> /kWh	φ1012/III0IIII	\$ 1,362.78	ψ 0,017100	18.062 <b>C</b> /kWh	\$55120/ HIGHER	\$ 2,350.95	ψ 1,111110	Ψ 200170	
			105		20.61 (0.137)		\$		20.150 Фл.		A 27.20			47%
		1/05/2012	185	Day	29.61 <b>C</b> /kWh	\$15.2/month	54.78 \$	\$ 143.62	20.159 ¢/kWh	\$33.26/month	\$ 37.29	\$ 211.67	\$ 68.05	
			413	Night	10.47 ¢/kWh		\$ 43.24		18.062 ¢/kWh		\$ 74.60			
			6,547	Day	29.61 <b>C</b> /kWh		\$ 1,938.57		20.159 ¢/kWh		\$ 1,319.81			-11%
		1/05/2012	4,008	Night	10.47 <b>C</b> /kWh	\$15.2/month	\$ 419.64	\$ 2,403.80	18.062 <b>C</b> /kWh	\$33.26/month	\$ 723.92	\$ 2,143.51	-\$ 260.29	11/0
			366	Day	29.61 <b>C</b> /kWh		\$ 108.37		20.159 <b>C</b> /kWh		\$ 73.78			23%
		1/05/2012		,		\$15.2/month	\$	\$ 184.86		\$33.26/month		\$ 226.84	\$ 41.99	20,0
			295	Night	10.47 C/kWh		30.89		18.062 ¢/kWh		\$ 53.28			
		1/05/2012	4,837	Day	29.61 ¢/kWh	\$15.2/month	\$ 1,432.24	\$ 2,244.87	20.159 ¢/kWh	\$33.26/month	\$ 975.09	\$ 2,398.09	\$ 153.23	7%
		1/05/2012	7,326	Night	10.47 <b>C</b> /kWh	\$15.2/monui	\$ 767.03	\$ 2,244.87	18.062 <b>C</b> /kWh	\$33.20/month	\$ 1,323.22	\$ 2,398.09	\$ 155.25	
							\$							77%
l		1/05/2012	57	Day	29.61 <b>C</b> /kWh	\$15.2/month	16.88	\$ 71.59	20.159 <b>C</b> /kWh	\$33.26/month	\$ 11.49	\$ 126.98	\$ 55.40	7770
			0.7	N: -1-4	10.47 (\$4.337)	,	\$		10.062 Ф//327		¢ 15.71			
-			1,333	Night	10.47 C/kWh		9.11		18.062 ¢/kWh		\$ 15.71			23%
		1/05/2012	3,318	Day Night	29.61 ¢/kWh 10.47 ¢/kWh	\$15.2/month	\$ 394.70 \$ 347.39	\$ 787.70	20.159 ¢/kWh 18.062 ¢/kWh	\$33.26/month	\$ 268.72 \$ 599.30	\$ 967.80	\$ 180.10	25%
			3,318	Night	10.47 Ψ/KWΠ		\$ 347.39		10.002 W/KWII		φ 399.30			
l —		1/05/2012	323	Day	29.61 ¢/kWh	\$15.2/month	95.64	\$ 141.24	20.159 ¢/kWh	\$33.26/month	\$ 65.11	\$ 164.89	\$ 23.65	17%
		1,00,2012	-	Night	10.47 <b>C</b> /kWh	Ψ10.2011011111	\$ -	7 111.27	18.062 <b>C</b> /kWh	φυσι20, ποπαι	\$	2 1007	ų <b>2</b> 0.30	
-				Ü			•							

									-			
1/05/2012	-	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ - \$ -	\$ 45.60	20.159 ¢/kWh	\$33.26/month	\$ - \$	\$ 99.78	\$ 54.18	119%
		Night	10.47 C/kWh		Ψ		18.062 <b>C</b> /kWh		-			
1/05/2012	5,848	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ 1,731.59	\$ 2,463.61	20.159 ¢/kWh	\$33.26/month	\$ 1,178.90	\$ 2,462.82	-\$ 0.78	0%
1/03/2012	6,556	Night	10.47 <b>C</b> /kWh	\$13.2/IIIOIIIII	\$ 686.41	\$ 2,405.01	18.062 <b>C</b> /kWh	\$55.20/IIIOIIIII	\$ 1,184.14	\$ 2,402.82	-\$ U.78	
1/05/2012	3,454	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ 1,022.73	\$ 1,964.25	20.159 <b>C</b> /kWh	\$33.26/month	\$ 696.29	\$ 2,341.64	\$ 377.39	19%
1/03/2012	8,557	Night	10.47 <b>C</b> /kWh	ψ13.2/month	\$ 895.92	\$ 1,704.23	18.062 <b>C</b> /kWh	ф33.20/month	\$ 1,545.57	φ 2,541.04	φ 311.37	
 1/05/2012	2,550	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ 755.06	\$ 1,367.08	20.159 ¢/kWh	\$33.26/month	\$ 514.05	\$ 1,590.99	\$ 223.91	16%
	5,410	Night	10.47 C/kWh		\$ 566.43	7 -,	18.062 ¢/kWh	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	\$ 977.15	+ =,======	7	
1/05/2012	2,120	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ 627.73	\$ 1,151.29	20.159 ¢/kWh	\$33.26/month	\$ 427.37	\$ 1,351.68	\$ 200.39	17%
	4,565	Night	10.47 C/kWh		\$ 477.96	1	18.062 ¢/kWh		\$ 824.53			140/
30/04/2012	3,035 6,065	Day Night	29.61 ¢/kWh 10.47 ¢/kWh	\$15.2/month	\$ 898.66 \$ 635.01	\$ 1,579.27	20.159 ¢/kWh 18.062 ¢/kWh	\$33.26/month	\$ 611.83 \$ 1,095.46	\$ 1,807.07	\$ 227.80	14%
	6,742	Day	29.61 C/kWh		\$ 1,996.31		20.159 <b>C</b> /kWh		\$ 1,359.12			-17%
1/05/2012	2,472	Night	10.47 <b>C</b> /kWh	\$15.2/month	\$ 258.82	\$ 2,300.72	18.062 <b>C</b> /kWh	\$33.26/month	\$ 1,339.12	\$ 1,905.39	-\$ 395.33	-1/70
	2,472	rugiit	10.47 Φ/ΚΨΠ		\$ 230.02 \$		10.002 <b>\$\psi_k\till</b> \$		ψ ++0.+2			
 1/05/2012	145	Day	29.61 C/kWh	015.0/ 1	42.93	A 1010	20.159 ¢/kWh	022.25/	\$ 29.23	A 155.05	A 72.40	50%
1/05/2012		,		\$15.2/month	\$	\$ 104.97		\$33.26/month		\$ 157.37	\$ 52.40	
	157	Night	10.47 <b>C</b> /kWh		16.44		18.062 <b>C</b> /kWh		\$ 28.36			
 1/05/2012	7,004	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ 2,073.88	\$ 3,159.26	20.159 <b>C</b> /kWh	\$33.26/month	\$ 1,411.94	\$ 3,305.45	\$ 146.19	5%
1/03/2012	9,931	Night	10.47 <b>C</b> /kWh	ψ13.2/month	\$ 1,039.78	φ 3,137.20	18.062 <b>C</b> /kWh	ф33.20/month	\$ 1,793.74	φ 3,303.43	φ 140.17	
 2/05/2012	396	Day	29.61 <b>C</b> /kWh	\$15.2/month	\$ 117.26	\$ 483.55	20.159 ¢/kWh	\$33.26/month	\$ 79.83	\$ 732.85	\$ 249.30	52%
	3,063	Night	10.47 <b>C</b> /kWh		\$ 320.70	,	18.062 <b>C</b> /kWh	400000000000000000000000000000000000000	\$ 553.24	,	T	
	2.252		22 52 0 4 111	Tariff 65	A 701.00		20 150 0 4 11		675.00			201
1/05/2012	3,353	Day	23.62 ¢/kWh	\$15.2/month	\$ 791.98	\$ 1,278.49	20.159 ¢/kWh	\$33.26/month	\$ 675.93	\$ 1,387.83	\$ 109.34	9%
	3,389	Night	13.01 ¢/kWh 23.62 ¢/kWh		\$ 440.91		18.062 ¢/kWh 20.159 ¢/kWh		\$ 612.12			110/
3/05/2012	2,105 2,109	Day Night	23.62 Φ/kWh 13.01 Φ/kWh	\$15.2/month	\$ 497.20 \$ 274.38	\$ 817.18	18.062 <b>C</b> /kWh	\$33.26/month	\$ 424.35 \$ 380.93	\$ 905.05	\$ 87.87	11%
	2,109	Nigiii	13.01 Ψ/KWΠ		φ 214.38		10.002 W/KWII		Total QCA			
Total use:	322,977				Total T62:	\$ 55,707.51			T22:	\$ 63,788.21	\$ 8,080.69	15%*

\* denotes weighted total % increase When the draft determination and proposed tariff structure was released in 2012 BRIG reviewed most recent accounts at the time.

The initial results of this review showed that whilst the weighted average increase was significant (15%) there was a 72.5% increase in the off-peak (night) component of the account.

In essence, what these proposed tariff changes were signaling to and indeed all irrigators on Tariffs 62/65 is to use more electricity in the peak period.

The existing transmission and electricity production infrastructure and supply arrangements **are** not capable of meeting the shift in demand that will arise from these price signals. In order to meet this increase in demand ERGON will need to install more infrastructure further exacerbating the N effect on the tariff.

Clearly the proposed tariffs were fundamentally flawed in economic and environmental terms and had the potential to cause significant social upheaval.

As a result Minister McArdle and the new Queensland Government announced the retention of the Tariff structure for tariffs 20, 62, 65, and 66 with a 10% increase for the 2012/13 year as a temporary measure to enable full investigation of the impact on irrigators.

Since the implementation of the decision to continue the existing obsolete tarrifs Ergon Energy have kindly modeled the effect of tariff changes on based on the electricity used in 2011/12 billing year.

Energy costs have significantly increased in most accounts from the base tariff. However particular attention must be drawn to account no which increases from \$34,914.10 to \$132,997.56 on the next best proposed alternative (380%).

Irrigators in our area do not have the option of alternative Network providers however, they do have the option however of going off the grid and faced with such unfair tariff choices will be forced to do so.

BRIG requests QCA to recommend to the Minister not to charge the N component on Obsolete Tarriffs 62, 65 and 66 and to allocate a portion of the net CSO to ERGON at the network level to cover this.



The second best alternative to this suggestion is to allow irrigators a Five year transition period to enable them to depreciate and write off existing infrastructure and investment aligned to tariff selection and implement alternative energy sources or exit the industry.

We further suggest that the maximum increase in tariff during this transition period be limited to CPI

### Other Matters

We thank QCA for the opportunity to inform them of any other matters we believe are relevant to the Authority's consideration of transitional arrangements

• BRIG is concerned that in order to transition some irrigators from existing tariffs major upgrades to metering and switchboxes may be required. We are uncertain as to whether

QCA is aware that this cost can be more than \$10,000 per site and potentially much more if there is asbestos in the old switchboard.

- BRIG is aware that rapidly escalating energy costs in other States (NSW) have already seriously impacted on the ability of irrigators to implement water use efficiencies. The cost of utilising water efficient pressurised piped systems is now considered too expensive for many irrigators and irrigation water delivery operators. The National Water Commissions' (NWC) 'National Performance Report 2010-11: rural water service providers' highlights the contradictory messages Governments are sending the irrigation industry. The Murray Darling Basin reforms are in part about making water use more efficient. Yet in becoming more water efficient, through the use of energy intensive pumps, pipes and improved application methods, irrigators are being priced out of the market place.
- During the investigation on the impact of the changes to the application of irrigation electricity tariffs firstly on our members and then the wider community BRIG has become aware that much of the process used by QCA and the AER in determining N & R charges is based on the concept of Competitive Neutrality. Our understanding is that "competitive neutrality requires that public sector business activities which are in competition with the private sector should not have competitive advantages or disadvantages simply by virtue of their government ownership or control."

We are astounded that a natural monopoly owner of the two components of the network (DUOS & TUOS) is allowed to achieve returns of over 10% after all costs including a tax component paid to the State Government. Not only does this result in excessive charges to irrigators but incentivises the owners of the network to over capitalise and provide an unwarranted and unsustainable service reliability.

BRIG requests QCA to investigate these other and to address them in the Draft Determination due late February 2013.



BRIG is extremely concerned by the rapidly escalating energy costs. We believe that these costs will directly and indirectly result in the closure of many, otherwise viable farm based businesses. Irrigators are price takers, often in a global environment, and do not have the ability to pass on increased energy costs to consumers, as has been suggested by some policy "experts".

We are prepared to assist where possible and would welcome the opportunity to discuss our concerns on the impact of out of control energy price increases with the QCA and/or your representatives. Please call should you require further information or clarification.



Dale Holliss Company Secretary

## Annex 1

Current tariff

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	120	808	1630	9
5/04/2012	90	117	1134	892	9
6/01/2012	91	168	1158	1088	9
7/10/2011	91	0	0	0	0
Totals =	364	405	3100	3610	

Date:	kWh	20	22	41	62	(	62 (old)	% Night	Approx \$ Carbon
6/07/2012	2558	\$671.76	\$637.04	\$2,578.45	\$566.79	\$	515.29	64%	\$61.39
5/04/2012	2143	\$578.06	\$559.43	\$2,483.08	\$588.50	\$	535.03	68%	\$51.43
6/01/2012	2414	\$638.89	\$615.17	\$2,537.71	\$629.00	\$	571.85	65%	\$57.94
7/10/2011	0	\$107.54	\$107.54	\$1,692.88	\$54.99	\$	50.02		
Totals =	7115	\$1,996.25	\$1,919.17	\$9,292.12	\$1,839.28	\$	1,672.20	83%	\$170.76
						¢	1 942 06	Old +	

\$1,842.96 Carbon

Current tariff

				"Off	
Date:	Days	"Shoulder"	"Peak"	Peak"	"Demand"
5/07/2012	92	0	0	0	0
4/04/2012	91	0	5299	1804	0
4/01/2012	92	0	7960	10698	0
4/10/2011	91	0	0	9	0
Totals =	366	0	13259	12511	

Date	kWh	20	22		62	(	62 (old)	% Night	Approx \$ Carbon
5/07/2012	0	\$108.72	\$108.72		\$55.59	\$	50.57	0%	\$0.00
4/04/2012	7103	\$1,670.98	\$1,644.52		\$2,182.06	\$	1,983.73	25%	\$170.47
4/01/2012	18658	\$4,215.54	\$4,009.55		\$4,262.83	\$	3,875.31	57%	\$447.79
4/10/2011	9	\$109.52	\$109.33		\$56.13	\$	51.06	100%	\$0.22
	25770	\$6,124.76	\$5,894.12		\$6,618.61	\$	5,960.67		\$618.48
			,	•			0.570.45	Old +	•

\$6,579.15 Carbon

<u>62</u>

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
5/07/2012	92	0	624	697	0
4/04/2012	91	0	516	1968	0
4/01/2012	92	0	991	1173	0
4/10/2011	91	0	0	5	0
Totals =	366	0	2131	3843	

Date	kWh	20	22	62	62 (old)	% Night	Approx \$ Carbon
5/07/2012	1321	\$399.49	\$386.29	\$367.46	\$ 334.09	53%	\$31.70
4/04/2012	2484	\$654.29	\$614.42	\$489.19	\$ 444.74	79%	\$59.62
4/01/2012	2164	\$585.04	\$562.70	\$559.25	\$ 508.45	54%	\$51.94
4/10/2011	5	\$108.64	\$108.54	\$55.62	\$ 50.60	100%	\$0.12
	5974	\$1,767.46	\$1,693.95	\$1,533.52	\$ 1,337.88		\$143.38
		·		•		Old +	

\$1,481.25 Carbon

Current tariff

5 /				"Off	
Date:	Days	"Shoulder"	"Peak"	Peak"	"Demand"
6/07/2012	92	0	409	20996	0
5/04/2012	90	0	0	27451	0
6/01/2012	91	0	14207	27743	0
7/10/2011	91	0	2749	3685	0
Totals =	364	0	17365	79875	

Date	kWh	20	22	62	(	62 (old)	% Night	Approx \$ Carbon
6/07/2012	21405	\$4,820.18	\$4,384.11	\$2,862.11	\$	2,601.90	98%	\$513.72
5/04/2012	27451	\$6,148.60	\$5,577.34	\$3,532.15	\$	3,211.00	100%	\$658.82
6/01/2012	41950	\$9,341.16	\$8,793.52	\$8,659.83	\$	7,872.55	66%	\$1,006.80
7/10/2011	6434	\$1,523.73	\$1,452.79	\$1,506.75	\$	1,369.80	57%	\$154.42
	97240	\$21,853.66	\$20,229.75	\$16,622.84	\$1	5,055.25		\$2,333.76
		·	·	·	\$1	7.389.01	Old + Carbon	·

<u>62</u>

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	0	1806	2494	0
5/04/2012	90	0	1346	4623	0
6/01/2012	91	0	2702	4320	0
7/10/2011	91	0	198	94	0
Totals =	364	0	6052	11531	

Date	kWh	20	22	62	(	62 (old)	% Night	Approx \$ Carbon
6/07/2012	4300	\$1,055.20	\$1,007.07	\$1,018.61	\$	926.04	58%	\$103.20
5/04/2012	5969	\$1,420.20	\$1,326.80	\$1,122.32	\$	1,020.31	77%	\$143.26
6/01/2012	7022	\$1,653.15	\$1,568.90	\$1,570.36	\$	1,427.63	62%	\$168.53
7/10/2011	292	\$171.81	\$170.27	\$137.84	\$	125.34	32%	\$7.01
	17583	\$4,320.36	\$4,095.05	\$3,911.12	\$:	3,499.31		\$421.99
	-	-					Old +	

\$3,921.30 Carbon

need to upgrade metering

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
9/07/2012	90	0	706	1211	0
10/04/2012	95	0	2105	2109	0
6/01/2012	92	0	6722	8959	0
6/10/2011	91	0	4643	1111	0
Totals =	368	0	14176	13390	

Current tariff T65

			68% Night					
Date	kWh	20	22	65	65 (OLD)		% Night	Approx \$ Carbon
9/07/2012	1917	\$528.31	\$504.58	\$ 446.80	\$ 406.21		63%	\$46.01
10/04/2012	4214	\$1,039.81	\$1,000.32	\$ 991.02	\$ 900.96		50%	\$101.14
6/01/2012	15681	\$3,560.27	\$3,387.88	\$ 3,387.09	\$ 3,079.20		57%	\$376.34
6/10/2011	5754	\$1,374.05	\$1,360.64	\$ 1,556.86	\$ 1,415.36		19%	\$138.10
	27566	\$ 6,522.44	\$ 6,275.43	\$ 6,446.76	\$ 5,801.74	\$ -		\$661.58
							Old 1	

\$ 6,463.32 Old + Carbon

#### T65 (already has digital metering)

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	0	2516	2334	19
5/04/2012	90	0	3353	3389	11
6/01/2012	91	0	5215	5321	11
7/10/2011	91	0	1734	1776	11
Totals =	364	0	12818	12820	

Current tariff	T65
Carretta tarrir	103

68% Night

Date	kWh	20	22	41	65	6	5 (OLD)	% Night	Approx \$ Carbon
6/07/2012	4850	\$1,176.26	\$1,132.94	\$ 3,481.56	\$ 1,142.09	\$	1,039.58	48%	\$116.40
5/04/2012	6742	\$1,590.34	\$1,526.82	\$ 3,113.79	\$ 1,546.18	\$	1,406.90	50%	\$161.81
6/01/2012	10536	\$2,426.62	\$2,326.79	\$ 3,555.19	\$ 2,383.08	\$	2,167.74	51%	\$252.86
7/10/2011	3510	\$880.13	\$846.79	\$ 2,786.66	\$ 830.15	\$	755.98	51%	\$84.24
	25638	\$ 6,093.34	\$ 5,855.35	\$ 12,978.20	\$ 5,966.49	\$	5,370.19		\$615.31

Old + \$ 5,985.50 Carbon

T62

Current tariff

<u>62</u>

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
9/07/2012	90	0	1	1478	23
10/04/2012	95	88	396	2975	22
6/01/2012	92	342	1578	4508	22
6/10/2011	91	221	1823	2436	22
Totals =	368	651	3798	11397	

Date	kWh	20	22	41	62	6	2 (OLD)	% Night	Approx \$ Carbon
9/07/2012	1479	\$431.90	\$401.15	\$ 3,303.96	\$241.99	\$	220.02	100%	\$35.50
10/04/2012	3459	\$873.63	\$810.72	\$ 3,627.74	\$587.33	\$	533.97	89%	\$83.02
6/01/2012	6428	\$1,523.59	\$1,425.96	\$ 3,849.89	\$1,235.40	\$	1,123.12	75%	\$154.27
6/10/2011	4480	\$1,093.63	\$1,042.15	\$ 3,602.60	\$1,044.75	\$	949.80	59%	\$107.52
	15846	\$ 3,942.75	\$ 3,701.97	\$ 14,425.19	\$ 3,171.47	\$	2,826.90		\$380.30
			•	•	•			Old	•

Old + \$ 3,207.21 Carbon

<u>62</u>

Date	e:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2	012	92	867	5719	8063	34
5/04/2	012	90	962	7004	8969	36
6/01/2	012	91	1976	13936	17774	37
7/10/2	011	91	158	1003	634	21
T.	otals =	364	3963	27662	35440	

Date	kWh	20	22	41	62	62 (OLD)	% Night	Approx \$ Carbon
6/07/2012	14649	\$3,333.11	\$3,159.23	\$ 5,532.01	\$3,235.94	\$ 2,941.78	61%	\$351.58
5/04/2012	16935	\$3,833.92	\$3,641.90	\$ 5,824.28	\$3,821.93	\$ 3,474.50	59%	\$406.44
6/01/2012	33686	\$7,522.17	\$7,140.30	\$ 7,765.24	\$7,550.10	\$ 6,863.72	59%	\$808.46
7/10/2011	1795	\$502.64	\$488.25	\$ 3,244.38	\$514.68	\$ 467.92	44%	\$43.08
	67065	\$ 15,211.84	\$ 14,451.68	\$ 22,406.91	\$15,184.65	\$ 13,747.92		\$1,609.56
	•	•					Old +	•

\$ 15,357.48 Carbon

T62

Current tariff

<u>62</u>

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	0	0	1240	122
5/04/2012	90	388	6742	2084	248
6/01/2012	91	2224	8054	11166	153
7/10/2011	91	0	0	36	36
Totals =	364	2612	14796	14526	

Date	kWh	20	22	41	62		% Night	Approx \$ Carbon
6/07/2012	1240	\$381.66	\$355.85	\$ 9,806.42	\$212.69	\$ 193.38	100%	\$29.76
5/04/2012	9214	\$2,134.45	\$2,097.10	\$ 18,509.96	\$2,783.08	\$ 2,530.11	27%	\$221.14
6/01/2012	21444	\$4,827.58	\$4,565.77	\$ 13,911.75	\$4,636.95	\$ 4,215.42	62%	\$514.66
7/10/2011	36	\$115.47	\$114.72	\$ 4,019.93	\$59.55	\$ 54.17	100%	\$0.86
	31934	\$ 7,479.16	\$ 7,155.44	\$ 46,289.07	\$ 7,754.27	\$ 6,993.08		\$766.42

Old \$ 7,759.49 +Carbon

(Old rate meters)

Current tariff

<u>62</u>

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
5/07/2012	92	0	3049	4425	0
4/04/2012	91	0	3035	6065	0
4/01/2012	92	0	6105	9627	0
4/10/2011	91	0	923	1681	0
Totals =	366	0	13112	21798	

Date	kWh	20	22		62	6	2 (OLD)	% Night	Approx \$ Carbon
5/07/2012	7474	\$1,753.82	\$1,668.11		\$1,708.59	\$	1,553.29	59%	\$179.38
4/04/2012	9100	\$2,110.54	\$1,990.67		\$1,910.74	\$	1,737.06	67%	\$218.40
4/01/2012	15732	\$3,571.49	\$3,383.91		\$3,462.54	\$	3,147.77	61%	\$377.57
4/10/2011	2604	\$680.71	\$647.65		\$598.65	\$	544.25	65%	\$62.50
	34910	\$ 8,136.57	\$ 7,712.36	\$ -	\$ 7,742.51	\$	6,982.37		\$837.84
		_						Old	

\$ **7,820.21** +Carbon

T62

Current tariff

<u>62</u>

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92		1040	2656	0
5/04/2012	90		2120	4565	0
6/01/2012	91		1840	3951	0
7/10/2011	91		280	226	0
Totals =	364	0	5280	11398	

Date	kWh	20	22		62	6	2 (OLD)	% Night	Approx \$ Carbon
6/07/2012	3696	\$922.25	\$869.15		\$764.69	\$	695.20	72%	\$88.70
5/04/2012	6685	\$1,577.79	\$1,487.23		\$1,392.28	\$	1,265.73	68%	\$160.44
6/01/2012	5791	\$1,382.20	\$1,303.82		\$1,214.77	\$	1,104.37	68%	\$138.98
7/10/2011	506	\$218.92	\$214.80		\$183.94	\$	167.25	45%	\$12.14
	16678	\$ 4,121.16	\$ 3,897.00	\$ -	\$ 3,617.68	\$	3,232.55		\$400.27

Old \$ 3,632.82 +Carbon

Current tariff 62

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92		1830	3253	0
5/04/2012	90		2550	5410	0
6/01/2012	91		5769	10660	0
7/10/2011	91		1283	1405	0
Totals =	364	0	11432	20728	

Date	kWh	20	22		62	6	2 (OLD)	% Night	Approx \$ Carbon
6/07/2012	5083	\$1,227.54	\$1,163.67		\$1,123.37	\$	1,021.27	64%	\$121.99
5/04/2012	7960	\$1,858.43	\$1,751.18		\$1,653.39	\$	1,503.10	68%	\$191.04
6/01/2012	16429	\$3,723.73	\$3,513.95		\$3,472.42	\$	3,156.76	65%	\$394.30
7/10/2011	2688	\$699.20	\$672.64		\$692.66	\$	629.72	52%	\$64.51
	32160	\$ 7,528.90	\$ 7,123.45	\$ -	\$ 7,003.83	\$	6,310.85		\$771.84
	-							Old	

\$ **7,082.69** +Carbon

T62

Current tariff

<u>62</u>

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	0	4920	9571	0
5/04/2012	90	0	3454	8557	0
6/01/2012	91	0	7391	13772	0
7/10/2011	91	0	0	0	0
Totals =	364	0	15765	31900	

Date	kWh	20	22		62	6	2 (OLD)	% Night	Approx \$ Carbon
6/07/2012	14491	\$3,298.34	\$3,109.45		\$3,030.88	\$	2,755.36	66%	\$347.78
5/04/2012	12011	\$2,750.10	\$2,579.25		\$2,375.97	\$	2,159.98	71%	\$288.26
6/01/2012	21163	\$4,765.73	\$4,494.58		\$4,447.81	\$	4,043.47	65%	\$507.91
7/10/2011	0	\$107.54	\$107.54		\$54.99	\$	50.02	0%	\$0.00
	47665	\$10,941.71	\$ 10,312.82	\$ -	\$ 9,971.64	\$	9,008.83		\$1,143.96

Old \$ 10,152.79 +Carbon

Current tariff

62

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92		2758	6328	0
5/04/2012	90		12184	25945	0
6/01/2012	91		21118	34416	0
7/10/2011	91		3839	3927	0
Totals =	364	0	39899	70616	

Date	kWh	20	22		62	(	62 (OLD)	% Night	Approx \$ Carbon
6/07/2012	9086	\$2,108.64	\$1,982.72		\$1,845.42	\$	1,677.68	70%	\$218.06
5/04/2012	38129	\$8,498.93	\$7,984.48		\$7,706.64	\$	7,006.01	68%	\$915.10
6/01/2012	55534	\$12,331.13	\$11,659.07		\$11,981.31	\$	10,892.06	62%	\$1,332.82
7/10/2011	7766	\$1,816.92	\$1,743.22		\$1,927.94	\$	1,752.70	51%	\$186.38
	110515	\$ 24,775.62	\$ 23,391.49	\$ -	\$23,523.30	\$	21,328.44		\$2,652.36
	•	•			•			Old	

\$ 23,980.80 +Carbon

T62

Current tariff

<u>62</u>

				"Off	
Date:	Days	"Shoulder"	"Peak"	Peak"	"Demand"
6/07/2012	92	0	2404	6320	0
5/04/2012	90	0	780	9493	0
6/01/2012	91	0	5936	15031	0
7/10/2011	91	0	3578	6771	0
Totals =	364	0	12698	37615	

Date	kWh	20	22		62	6	62 (OLD)	% Night	Approx \$ Carbon
6/07/2012	8724	\$2,028.96	\$1,902.47		\$1,717.58	\$	1,561.45	72%	\$209.38
5/04/2012	10273	\$2,367.55	\$2,171.63		\$1,536.51	\$	1,396.84	92%	\$246.55
6/01/2012	20967	\$4,722.59	\$4,422.20		\$4,086.01	\$	3,714.56	72%	\$503.21
7/10/2011	10349	\$2,385.46	\$2,252.03		\$2,194.73	\$	1,995.23	65%	\$248.38
	50313	\$ 11,524.56	\$ 10,770.33	\$ -	\$ 9,596.83	\$	8,668.08		\$1,207.51
	•				•			Old	

Old **\$ 9,875.59** +Carbon

Current tariff

62

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
5/07/2012	92	0	6425	9369	0
4/04/2012	91	0	6038	12110	0
4/01/2012	92	0	13249	21635	0
4/10/2011	91	0	2736	3482	0
Totals =	366	0	28448	46596	

Date	kWh	20	22		62	62 (OLD)	% Night	Approx \$ Carbon
5/07/2012	15794	\$3,585.14	\$3,403.60		\$3,544.50	\$ 3,222.29	59%	\$379.06
4/04/2012	18148	\$4,102.10	\$3,862.71		\$3,752.50	\$ 3,411.37	67%	\$435.55
4/01/2012	34884	\$7,787.04	\$7,364.51		\$7,543.38	\$ 6,857.61	62%	\$837.22
4/10/2011	6218	\$1,476.19	\$1,409.44		\$1,476.38	\$ 1,342.19	56%	\$149.23
	75044	\$ 16,970.46	\$ 16,062.26	\$ -	\$16,378.75	\$ 14,833.45		\$1,801.06
							Old	

\$ 16,634.51 +Carbon

T62 LARGE NMI

Current tariff

62

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	631	8215	88300	327
5/04/2012	90	3504	21182	42595	329
6/01/2012	91	3787	19228	22833	325
7/10/2011	91	0	70	2052	175
Totals =	364	7922	48695	155780	

Date	kWh	44	45	46	62	(	62 (OLD)	% Night	Approx \$ Carbon
6/07/2012	97146	\$ 44,734.22	\$ 41,951.71	\$ 48,244.88	\$14,265.53	\$	12,968.46	92%	\$2,331.50
5/04/2012	67281	\$ 40,717.92	\$ 37,969.61	\$ 43,957.31	\$13,483.75	\$	12,257.88	69%	\$1,614.74
6/01/2012	45848	\$ 38,187.67	\$ 35,461.98	\$ 41,857.28	\$10,316.48	\$	9,378.60	58%	\$1,100.35
7/10/2011	2122	\$ 18,301.50	\$ 17,569.26	\$ 36,754.50	\$340.03	\$	309.15	97%	\$50.93
	212397	\$41,985.32	\$132,997.56	\$ 170,859.96	\$38,467.80	\$	34,914.10		\$5,097.53
		Ţ : :,300.02	Ţ.J_,307100	Ţ,000.00	<b>400, 101100</b>	*	C .,C 1 1110	Old	<b>45,531100</b>

Old **\$ 40,011.63** +Carbon

Current tariff

<u>62</u>

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	0	98	962	0
5/04/2012	90	0	857	3794	0
6/01/2012	91	0	914	5173	0
7/10/2011	91	0	364	288	0
Totals =	364	0	2233	10217	

Date	kWh	20	22		62	6	2 (OLD)	% Night	Approx \$ Carbon
6/07/2012	1060	\$342.04	\$322.23		\$212.58	\$	193.29	91%	\$25.44
5/04/2012	4651	\$1,130.09	\$1,052.93		\$842.09	\$	765.56	82%	\$111.62
6/01/2012	6087	\$1,447.35	\$1,341.61		\$1,037.82	\$	943.50	85%	\$146.09
7/10/2011	652	\$251.05	\$245.82		\$221.89	\$	201.75	44%	\$15.65
	12450	\$ 3,190.53	\$ 2,984.58	\$ -	\$ 2,376.38	\$	2,104.09		\$298.80
	•	•	•		•			Old	

\$ 2,402.89 +Carbon

Current tariff

<u>62</u>

				"Off	
Date:	Days	"Shoulder"	"Peak"	Peak"	"Demand"
6/07/2012	92	789	5455	8016	26
5/04/2012	90	1231	8238	11785	47
6/01/2012	91	3191	21236	27551	47
7/10/2011	91	440	2816	2826	48
Tetala	264	ECE4	27745	E0479	
Totals =	364	5651	37745	50178	

Date	kWh	20	22	41	62	62 (old)	% Night	Approx \$ Carbon
6/07/2012	14260	\$3,247.49	\$3,075.66	\$ 4,967.54	\$3,125.51	\$ 2,841.39	62%	\$342.24
5/04/2012	21254	\$4,784.58	\$4,530.93	\$ 6,998.75	\$4,654.89	\$ 4,231.72	61%	\$510.10
6/01/2012	51978	\$11,548.42	\$10,953.06	\$ 10,411.40	\$11,558.12	\$ 10,507.36	59%	\$1,247.47
7/10/2011	6082	\$1,446.25	\$1,384.17	\$ 5,455.64	\$1,477.67	\$ 1,343.37	54%	\$145.97
	93574	\$ 21,046.74	\$ 19,965.82	\$ 27,874.34	\$20,878.20	\$ 18,923.84		\$2,245.78
•				•			Old +	•

\$21,169.62 Carbon

"Off Date: Days "Shoulder" "Peak" Peak" "Demand" 6/07/2012 17 139 290 92 9 397 5/04/2012 90 16 185 9 6/01/2012 91 82 625 820 9 7/10/2011 91 1 4 953 Totals = 364 116 1511

Current tariff 62

Date	kWh	20	22	41	62	(	62 (old)	% Night	Approx \$ Carbon
6/07/2012	446	\$206.89	\$200.79	\$ 2,347.43	\$144.29	\$	131.20	69%	\$10.70
5/04/2012	598	\$237.99	\$229.78	\$ 2,314.09	\$172.99	\$	157.29	69%	\$14.35
6/01/2012	1527	\$443.65	\$426.18	\$ 2,440.69	\$393.19	\$	357.47	59%	\$36.65
7/10/2011	9	\$109.52	\$109.43	\$ 1,758.40	\$57.05	\$	51.90	56%	\$0.22
	2580	\$ 1,018.05	\$ 988.18	\$ 8,901.60	\$ 829.51	\$	697.87		\$61.92
								014 -	

\$759.79 | Old + Carbon

Current tariff

<u>62</u>

				"Off	
Date:	Days	"Shoulder"	"Peak"	Peak"	"Demand"
6/07/2012	92	0	1298	2909	0
5/04/2012	90	0	6547	4008	0
6/01/2012	91	0	7134	9161	0
7/10/2011	91	0	0	1	0
Totals =	364	0	14979	16079	

Date	kWh	20	22		62	62 (old)	% Night	Approx \$ Carbon
6/07/2012	4207	\$1,034.73	\$976.90		\$889.18	\$ 808.37	69%	\$100.97
5/04/2012	10555	\$2,429.62	\$2,359.90		\$2,907.82	\$ 2,643.50	38%	\$253.32
6/01/2012	16295	\$3,694.23	\$3,518.50		\$3,771.56	\$ 3,428.71	56%	\$391.08
7/10/2011	1	\$107.76	\$107.74		\$55.11	\$ 50.14	100%	\$0.02
	31058	\$ 7,286.34	\$ 6,985.04	\$ -	\$ 7,685.67	\$ 6,930.72		\$745.39
	-						Old +	

\$7,676.11 | Carbon

62

**Current Accounts** 

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	1027	3648	6106	22
5/04/2012	90	27	366	268	17
6/01/2012	91	16	206	197	3
7/10/2011	91	31	221	236	7
Totals =	364	1101	4441	6807	

Date	kWh	20	22		41	62	62 (old)	% Night	Approx \$ Carbon
6/07/2012	10781	\$2,481.73	\$2,340.92	\$	4,326.04	\$2,266.28	\$ 2,060.27	66%	\$258.74
5/04/2012	661	\$251.85	\$246.48	\$	2,831.55	\$222.89	\$ 202.66	45%	\$15.86
6/01/2012	419	\$199.77	\$195.77	\$	1,932.31	\$155.78	\$ 141.65	51%	\$10.06
7/10/2011	488	\$214.95	\$209.86	\$	2,197.98	\$167.99	\$ 152.75	55%	\$11.71
	12349	\$ 3,168.30	\$ 3,015.02	\$	11,328.87	\$ 2,874.93	\$ 2,557.33		\$296.38
	-	-		•				Old +	

\$2,853.71 Old + Carbon

Current tariff

62

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	973	6416	8777	25
5/04/2012	90	713	4837	6613	26
6/01/2012	91	1980	13641	17586	26
7/10/2011	91	560	3647	4276	25
Totals =	364	4226	28541	37252	

Date	kWh	20	22	41	62	62 (old)	% Night	Approx \$ Carbon
6/07/2012	16166	\$3,667.02	\$3,477.53	\$ 5,110.79	\$3,589.54	\$ 3,263.24	60%	\$387.98
5/04/2012	12163	\$2,783.56	\$2,641.21	\$ 4,664.08	\$2,715.51	\$ 2,468.67	60%	\$291.91
6/01/2012	33207	\$7,416.73	\$7,038.08	\$ 7,003.00	\$7,421.10	\$ 6,746.45	59%	\$796.97
7/10/2011	8483	\$1,974.73	\$1,881.72	\$ 4,234.06	\$1,974.31	\$ 1,794.85	57%	\$203.59
	70019	\$15,862.05	\$ 15,060.54	\$ 21,052.94	\$15,762.46	\$ 14,273.20		\$1,680.46
	-						Old +	

\$15,953.66 | Carbon

<u>62</u>

Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
6/07/2012	92	0	6020	9522	0
5/04/2012	90	0	57	87	0
6/01/2012	91	0	0	0	0
7/10/2011	91	0	987	2025	0
Totals =	364	0	7064	11634	

Date	kWh	20	22			62	62 (old)	% Night	Approx \$ Carbon
6/07/2012	15542	\$3,529.67	\$3,344.10			\$3,418.78	\$ 3,108.00	61%	\$373.01
5/04/2012	144	\$138.06	\$136.36			\$85.83	\$ 78.06	60%	\$3.46
6/01/2012	0	\$107.54	\$107.54			\$54.99	\$ 50.02	0%	\$0.00
7/10/2011	3012	\$770.51	\$730.43			\$665.16	\$ 604.72	67%	\$72.29
	18698	\$ 4,565.78	\$ 4,340.44	\$	-	\$ 4,286.75	\$ 3,840.79		\$448.75
		-		•				Old +	

\$4,289.55 Carbon

Current tariff

62

Current	Accounts

				"Off	
Date:	Days	"Shoulder"	"Peak"	Peak"	"Demand"
6/07/2012	92	345	1411	2664	60
5/04/2012	90	184	1333	3134	64
6/01/2012	91	592	4325	6618	64
7/10/2011	91	262	2156	2457	34
Totals =	364	1383	9225	14873	

Date	kWh	20	22	41	62	(	62 (old)	% Night	Approx \$ Carbon
6/07/2012	4420	\$1,081.61	\$1,021.94	\$ 6,109.37	\$942.33	\$	856.70	68%	\$106.08
5/04/2012	4651	\$1,130.09	\$1,063.83	\$ 6,267.62	\$952.33	\$	865.78	71%	\$111.62
6/01/2012	11535	\$2,646.51	\$2,505.51	\$ 7,084.61	\$2,517.98	\$	2,289.09	63%	\$276.84
7/10/2011	4875	\$1,180.58	\$1,128.50	\$ 4,420.18	\$1,171.91	\$	1,065.40	56%	\$117.00
	25481	\$ 6,058.79	\$ 5,741.78	\$ 23,922.78	\$ 5,646.55	\$	5,076.97		\$611.54

\$5,688.51 Old + Carbon

"Off Date: Days "Shoulder" "Peak" Peak" "Demand" 5/07/2012 26 92 0 216 4/04/2012 0 323 0 4/01/2012 92 433 3662 32 3176 1143 4/10/2011 91 188 1716 32 Totals = 366 621 5917 4319

Current tariff

Date	kWh	20	22		41	62	(	62 (old)	% Night	Approx \$ Carbon
5/07/2012	216	\$156.27	\$156.72	\$	3,431.35	\$132.98	\$	120.93	0%	\$5.18
4/04/2012	323	\$178.64	\$179.31	\$	1,728.21	\$170.71	\$	155.23	0%	\$7.75
4/01/2012	7271	\$1,709.14	\$1,641.69	\$	4,594.50	\$1,824.84	\$	1,658.97	50%	\$174.50
4/10/2011	3047	\$778.22	\$754.10	\$	4,091.17	\$838.42	\$	762.23	44%	\$73.13
	10857	\$ 2,842.26	\$ 2,753.83	\$	13,886.23	\$ 3,028.95	\$	2,697.36		\$260.57
				•					Old .	

\$2,957.92 Old + Carbon

Current tariff

<u>62</u>

<u>62</u>

	Date:	Days	"Shoulder"	"Peak"	"Off Peak"	"Demand"
	6/07/2012	92	245	3161	4787	53
	5/04/2012	90	675	5848	5881	53
	6/01/2012	91	265	3437	2647	54
	7/10/2011	91	0	280	251	52
Ī	Totals =	364	1185	12726	13566	

Date	kWh	20	22	41	62	62 (old)	% Night	Approx \$ Carbon
6/07/2012	8193	\$1,912.08	\$1,813.97	\$ 6,065.39	\$1,825.62	\$ 1,659.68	61%	\$196.63
5/04/2012	12404	\$2,836.60	\$2,712.40	\$ 6,413.64	\$2,980.18	\$ 2,709.28	53%	\$297.70
6/01/2012	6349	\$1,505.02	\$1,451.60	\$ 5,872.03	\$1,655.32	\$ 1,504.86	46%	\$152.38
7/10/2011	531	\$224.42	\$219.78	\$ 5,106.58	\$187.10	\$ 170.13	47%	\$12.74
	27477	\$ 6,498.13	\$ 6,219.76	\$ 23,498.64	\$ 6,710.22	\$ 6,043.95		\$659.45
			•	·			Old +	•

\$6,703.40 Carbon