30th November 2018

Queensland Competition Authority GPO Box 2257 Brisbane Q 4001

www.qca.org.au/submissions

Re Irrigation Price Review 2020-24

The Giru Benefited Area Sub Committee consists of most irrigators who are water allocation entitlement holders and farm within the Giru Groundwater Area.

We note the response from SunWater regarding the Giru Benefited Groundwater Area contained under the Tariff Structures Category in Attachment A of Appendix A - Customer Engagement of the SunWater Irrigation Price Review Submission (20 November 2018).

We are yet to review, fully understand and prepare a response to the two reports mentioned in SunWater's submission.

The two reports being 1. Appendix K - OD Hydrology Giru Benefitted Area and

2. Geoffrey Kavanagh - Giru Benefited Area Review April 2017

- We are concerned that there could be deficiencies or inaccuracies contained in these reports.
- We are also concerned as to what level of emphasis and reliance QCA may place on these reports.
- There may be other items of an ecological and aquifer management nature that we have not yet identified that we would like to raise for QCA's consideration in their determinations.
- We support and recommend that the Authority continue with the long-standing arrangements that have been recommended in previous Price Path reviews, the most recent being the Authority's recommendation contained in the 2012-17 SunWater Irrigation Price Review at 3.8 Giru Groundwater Area on Pages 21 & 22.

Please be advised that the GBA Sub Committee intends to lodge a submission noting the 22nd February closing date. Any submission may not be limited to just the concerns or issues mentioned here.

Yours sincerely

John Pierotti

Dino Poletto

Anton Zabala

Robert Stockham

John Parison

Glenn Parise

Gary Lyons