

Queensland Competition Authority
GPO Box 2257
Brisbane Q 4001

Rural Irrigation price review 2020-2024 and apportionment of dam safety upgrade costs:

Thank you for the opportunity to contribute to the rural price review and dam safety upgrade cost apportionment review.

Below are a list of Mallawa's concerns in regards prudence, efficiency and cost responsibility.

Beardmore Dam safety inspections, and risk assessment:

From 2021 through 2023, the following reviews and inspections are in the St George Network Service Plan –

- Beardmore Dam 20 year safety review 362K
- Beardmore Dam comprehensive risk assessment 220K
- Beardmore Dam comprehensive inspection 113K

Given the huge expenditure involved in these reviews and inspections, Mallawa has doubts that SunWater is operating prudently and efficiently in this space. Given that these are required at all SunWater storages over time has the best sourcing and procurement policy been developed and implemented?

Operational Costs – The inclusion of emergency action plan and seasonal event costs into operational costs:

Costs of emergency action plans (EAP's) and seasonal events are now being attributed to individual schemes. This is a result of the Inspector General Emergency Management (IGEM) recommendations and the introduction of a SunWater flood control room.

Mallawa does not see that irrigators and customers alone should be responsible for these costs alone, as the benefits are not for the customers alone, but the safety of the wider community, and as such should borne by all.

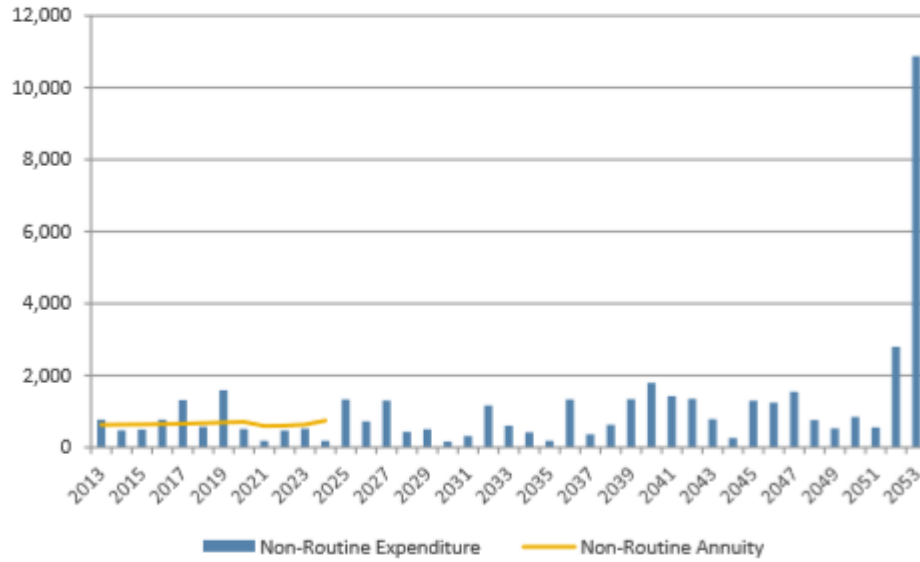
Annuity-funded non-routine projects to 2052/53:

Contained in the St George NSP 2018-2024 is section 6.1. There is an abnormal spend (11 million) in 2053, to date, the numbers Mallawa Irrigation has received do not tie back to the amounts shown in the NSP. Considering the large amount, the unreliable data and the timing (in last year of a 30-year outlook) these numbers require rigorous scrutiny.

6.1 Overview of annuity-funded, non-routine projects to 2052/53

The estimated renewals expenditure out to 2052/53 is shown in Figure 4 below.

Figure 4: Annuity expenditure to 2052/53 (\$'000)



Regards

Rohan Thorogood
 General Manager
 Ph: 0437 626 151