



13 NOV 2012

DATE RECEIVED

Mr John Hall
Chief Executive Officer
Queensland Competition Authority
GPO Box 2257
Brisbane Qld, 4001

12th November, 2012

Dear Mr Hall,

**Request for Extension of Time - Irrigation Pricing for SEQWater Schemes
Submissions on Draft Report**

The Mid Brisbane River Irrigators Inc (MBRI) which represents irrigators in the mid Brisbane River has made representation to the Queensland Competition Authority ("QCA") in respect of water pricing under the Central Brisbane River Water Supply Scheme. MBRI notes that the QCA indicative timetable provides for submissions in response to the Draft Report and Draft Prices by 18 January. For the reasons explained below, MBRI believes that the timetable is too short for MBRI and its members to consider the Draft Report and respond properly and would deny procedural fairness to MBRI and its members. Accordingly an extension is requested.

MBRI is unique in that the allocations held by its members are not reliant on any irrigation infrastructure, and accordingly there is currently no charge for water. The material before the Authority to date seems to suggest that the method for calculating a price on MBRI members' water would include infrastructure.

It is expected that these matters would be carefully considered and covered by QCA in its Draft Report. MBRI is very appreciative that a second round of consultation as proposed in December following the release of the Draft, but notes that no dates have been established for consultation. It is not known whether key staff from the QCA would be available over the full consultation period for meetings and discussions on matters contained in the Draft that may need to be covered in submissions back to the QCA.

MBRI anticipates it may need to convene meetings with members and professional advisers and devote considerable resources to develop its response to the Draft Report. The indicative current period for consultation and response falls over the Christmas, New Year and early January Period. Traditionally many irrigators and their families go on holidays over this period and cannot be readily contacted. In addition, it would be very difficult to secure professional advice to assist in providing a cogent reply within the advised time period, as this is the most disrupted period of the year when most businesses and professionals take annual leave and cannot be contacted.

MBRI submits that the timing of the period in which to make submissions on the Draft Report does not provide an adequate and reasonable opportunity to make representations back to the QCA and, more particularly, in the event the Draft Report contains adverse material and findings. It is requested, in the interests of natural justice, that the time period be extended to 31 January 2013.

Yours faithfully,


Tom Wilkinson - Chairman