

Why are we recommending irrigation prices?

The Queensland Government directed us to recommend irrigation prices for Sunwater and Seqwater customers over the pricing period 1 July 2020 to 30 June 2024.

This includes recommending prices for irrigation customers in the **Burdekin-Haughton water supply scheme (WSS)** and **distribution system**. Prices for non-irrigation customers are outside the scope of our review.

After extensive consultation with irrigators, we have released our final report. The Government will make the final decision on irrigation prices, taking our recommendations into consideration.

How we have recommended prices

We recommended two-part tariffs for the tariff groups in this scheme. The first part (Part A and Part C) is a *fixed price* per megalitre (ML) of water access entitlement (WAE), and the second part (Part B and Part D) is a *volumetric price* per ML of water used.

The volumetric price recovers variable costs (e.g. a portion of labour costs, and electricity costs relating to pumping) that change with water usage. The remaining costs are recovered by the fixed price. We assessed all expenditure to ensure that Sunwater only recovers prudent and efficient costs.

We applied the pricing principles in the referral, as these give effect to the Government's water pricing policy. Under that policy, prices are to gradually transition over time to the 'lower bound cost target'. This target recovers the irrigation share of the scheme's operating, maintenance and capital renewal costs but does not recover a return on, or of, the scheme's existing asset base (as at 1 July 2000). We also moderated bill impacts by capping total price increases to inflation plus \$2.38/ML of WAE (from 2020–21, increasing by inflation). More details are in Part A (chapter 2) of our report.

Under our recommended prices, cost recovery for Sunwater's irrigation customers will improve from 90% in 2020–21 to 94% by 2023–24. The shortfall is currently funded by a subsidy, paid by the Queensland taxpayer, which will reduce over time as prices transition to the lower bound cost target.

What prices have we recommended?

For river-only customers in the Burdekin-Haughton WSS, our recommendations result in the fixed price remaining constant over the pricing period, and the volumetric price decreasing to the cost-reflective level immediately. Prices fully recover costs.

For the Burdekin Channel and Gladys Lagoon tariff groups, our recommendations result in the total fixed price increasing by our estimate of inflation (2.24%) plus \$2.38/ML (2020–21 dollars) until prices reach the cost-reflective level in 2021–22. Total volumetric prices decrease to the cost-reflective level immediately. Prices fully recover costs by the end of the pricing period.

For the Giru Groundwater Area tariff group, our recommendations result in the total fixed price increasing by our estimate of inflation (2.24%) plus \$2.38/ML (2020–21 dollars) over the price path period. Total volumetric prices increase by inflation over the price path period. Prices will not recover costs by the end of the pricing period. Cost recovery will increase from 55% in 2020–21 to 67% by 2023–24.

Dam safety upgrades for this scheme are due to be commissioned in 2024–25. While this will not impact on prices in this pricing period, we have estimated the impact in the year following commissioning (2025–26) to be:

- \$9.36/ML increase to the cost-reflective fixed price for river-only customers
- \$11.57/ML increase to the total cost-reflective fixed price for distribution system customers.

Our recommended prices are shown in the table below.

Recommended prices for irrigation customers—\$/ML

Tariff group	2019–20 (Existing)	2020–21	2021–22	2022–23	2023–24
Burdekin-Haughton WSS					
Fixed (Part A)	12.71	12.71	12.71	12.71	12.71
Volumetric (Part B)	0.54	0.33	0.34	0.35	0.36
Burdekin channel					
Fixed (Part A)	3.49	3.83	3.92	4.01	4.10
Volumetric (Part B)	0.54	0.33	0.34	0.35	0.36
Fixed (Part C)	39.10	42.09	43.89	44.87	45.87
Volumetric (Part D)	29.60	23.28	23.80	24.33	24.88
Total Fixed	42.59	45.92	47.81	48.88	49.97
Total Volumetric	30.14	23.61	24.14	24.68	25.24
Burdekin – Giru Groundwater					
Fixed (Part A)	3.49	3.83	3.92	4.01	4.10
Volumetric (Part B)	0.54	0.33	0.34	0.35	0.36
Fixed (Part C)	17.86	20.38	23.26	26.27	29.40
Volumetric (Part D)	14.82	15.37	15.71	16.07	16.43
Total Fixed	21.35	24.21	27.18	30.28	33.50
Total Volumetric	15.36	15.70	16.06	16.42	16.78

Burdekin – Gladys's Lagoon (other than Natural Yield)					
Fixed (Part A)	3.49	3.83	3.92	4.01	4.10
Volumetric (Part B)	0.54	0.33	0.34	0.35	0.36
Fixed (Part C)	39.10	42.09	43.89	44.87	45.87
Volumetric (Part D)	29.60	23.28	23.80	24.33	24.88
Total Fixed	42.59	45.92	47.81	48.88	49.97
Total Volumetric	30.14	23.61	24.14	24.68	25.24

Drainage charges

We recommended that current drainage charges for the Burdekin-Haughton distribution system should be increased each year by our measure of inflation (2.24%).

Drainage diversion charges

We recommended that current drainage diversion charges should be increased each year by our measure of inflation.

Distribution system water harvesting charges

We recommended that distribution system water harvesting charges should comprise any applicable DNRME water harvesting charges, our recommended volumetric Part D price, and a Sunwater lease fee if relevant.

More details are in Part B (Chapter 8) of our report.

How we have addressed stakeholder concerns

Dam safety

Some irrigation stakeholders have raised concerns about the allocation of dam safety expenditure to irrigators.

The primary service provided by most dams that are within the scope of our review is the supply of water to users. In order to provide that service, the water business must comply with a range of regulatory obligations, including dam safety requirements. As a compliance cost, we consider that dam safety upgrade expenditure should be treated as a normal cost of operation in supplying water services to customers.

We reflected the incidental flood moderation benefits of dams by only allocating 80% of irrigators' share of dam safety upgrade expenditure to the allowable cost base.

Where a dam has a formal flood mitigation role, we consider that the costs of dam safety upgrades should be shared with beneficiaries in the broader community. See Part A (Chapter 4) of our report for further details.

Operating costs

Some irrigation stakeholders in this scheme have raised concerns with costs incurred to implement the 2015 recommendations made by the Inspector-General Emergency Management (IGEM costs), electricity costs and insurance costs.

We accepted Sunwater's revised (lower) IGEM costs provided to us in June 2019. However, we allocated this between

irrigation and non-irrigation customers using the headworks utilisation factor. More details are in Part B (section 2.9) of our report.

We accepted Sunwater's June 2019 base year electricity cost estimates for bulk schemes as they are not materially different from our alternative estimates. However, we reduced electricity costs for distribution systems by 4.8%. See Part B (section 2.5) of our report for further details.

While we accepted Sunwater's final insurance costs for 2019–20 as a base year estimate, we also allocated these costs between irrigation and non-irrigation customers using the headworks utilisation factor. More details are in Part B (section 2.6) of our report.

Some irrigation stakeholders were also concerned with Sunwater's cost allocation methodology used to allocate non-direct costs. We reviewed the cost allocation methodology and consider it appropriate. Non-direct costs are allocated based on the share of direct labour in a scheme because these costs mainly relate to staff time on head office and local support functions. See Part B (section 2.8) of our report for further details.

Renewals annuity

Some irrigation stakeholders raised concerns about Sunwater's asset management practices and the prudence and efficiency of some projects.

We identified improvements to Sunwater's asset planning and management to ensure assets are not replaced earlier or later than required. See Part B (section 3.2) of our report for further details.

We reduced Sunwater's forecast renewals expenditure by 35.2% (relative to the November 2018 submission) to reflect our assessment of the prudent and efficient level of expenditure. See Part B (sections 3.4 and 3.5) of our report for further details.

Some stakeholders were concerned with our recommendation to move to a RAB-based approach for future price reviews.

We consider that moving away from an annuity approach for funding asset renewals in favour of a RAB-based approach would reduce the reliance on long-term renewals forecasts, improve transparency by allowing customers to see the pricing impacts of near-term renewals expenditure, and incentivise Sunwater to achieve efficiencies including the flexibility to reprioritise its expenditure to pursue least cost opportunities.

Recreation costs

Some irrigation stakeholders raised concerns over the recovery of renewals expenditure relating to recreation services from irrigators.

We reviewed Sunwater's forecast renewals expenditure to ensure that expenditure relating to recreational services have

been excluded. See Part B (section 3.4) of our report for further details.

Distribution losses

Some irrigation stakeholders were concerned about the level of distribution loss WAE allocated to irrigators.

We estimated the costs associated with historical excess distribution loss WAEs, and allocated the bulk holding (fixed) costs of these to Sunwater on the basis that distribution system customers should not pay for distribution loss WAEs in excess of what is required to meet actual loss releases. More details are in Part B (section 6.2) of our report.

Tariff structure

Some irrigation stakeholders were concerned about the fixed/variable tariff structure, and the underlying nature of the costs. In addition, electricity costs should be considered and recovered through a fixed and variable \$/ML component.

Aligning the tariff structure with the nature of the underlying costs is also consistent with our recommended allocation of volume risk. It will also help to address the revenue adequacy requirements in the referral notice.

We consider that our recommended approach of assigning some electricity costs to fixed costs based on the underlying nature of the electricity tariffs better meets the requirements set out in the referral notice, which requires us to have regard to the underlying fixed and variable nature of costs in setting prices. Further details are in Part A (section 3.2) and Part B (section 7.2) of our report.

Scheme-specific pricing issues

A number of irrigation stakeholders in this scheme sought resolution of the pricing structure for the Giru Groundwater Area tariff group.

On the basis of information available, we do not consider that the portion of water supplied from other water sources (i.e. other than releases from the Haughton Balancing Storage) is sufficient to warrant a cost offset in any calculation of a separate tariff for the Giru Groundwater Area tariff group over the 2020–24 price path.

We recommended prices that transition to a lower bound price target for Giru Groundwater Area customers that is the same as for Burdekin Channel tariff group customers, as we do not consider that the costs of supply differ materially between these two tariff groups. Further details are in Part B (section 6.4) of our report.

QCA fee

Some stakeholders did not support the recovery of QCA regulatory fees through irrigation prices.

Our review is limited to pricing for irrigation customers in Sunwater and Seqwater irrigation schemes. As such, we

consider that irrigation customers are the key beneficiaries of our regulatory service, and should be allocated the associated costs. We allocated regulatory fees based on water entitlements (ML) held by irrigation customers in each of the water supply schemes specified in the referral. More details are in Part B (section 2.9) of our report.

Access charge

Some irrigation stakeholders did not support the inclusion of an access charge.

We welcome the water businesses working with their customers to reach agreement on issues of concern. We are generally receptive to recognising such agreements when we recommend irrigation prices, subject to any agreement being consistent with the requirements set out in the referral.

Given the importance of the access charge and its impact on affordability, we have recommended that an access charge not be introduced until further consultation is undertaken with Sunwater's customers, particularly with small water users. See Part B (section 6.3) of our report for further details.

Electricity cost pass through mechanism

Some stakeholders provided in principle support for Sunwater's proposed electricity cost pass through mechanism.

We are concerned that the automatic pass through of electricity costs has the potential for large bill impacts and reduced incentives for the efficient use of electricity.

We have encouraged Sunwater to further refine the proposal and demonstrate clear customer support. The Government may wish to consider any such agreement were one to be reached subsequent to our report. More details are in Part A (section 3.3) of our report.

Other matters raised by stakeholders

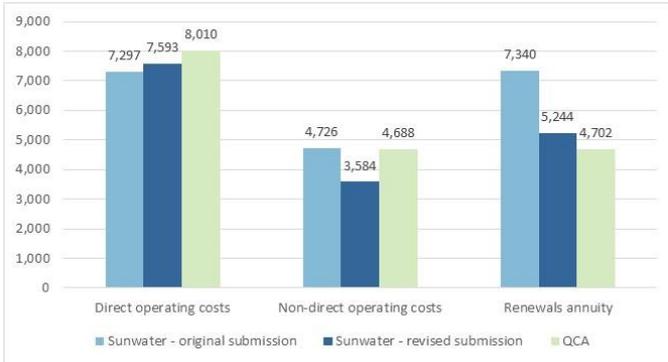
Some irrigation stakeholders in this scheme have raised concerns about price levels, affordability and the impact of higher water prices on their businesses, regional economies and local communities.

We consider that recommending prices that are consistent with the Government's pricing principles takes into account social welfare, capacity to pay and regional development considerations. We also moderated bill impacts. More details are in Part A (chapter 2) of our report.

We have recommended a reduction in scheme costs for Burdekin–Haughton WSS and distribution system

We have reduced Sunwater's proposed WSS costs by 10% over the pricing period 1 July 2020 to 30 June 2024.

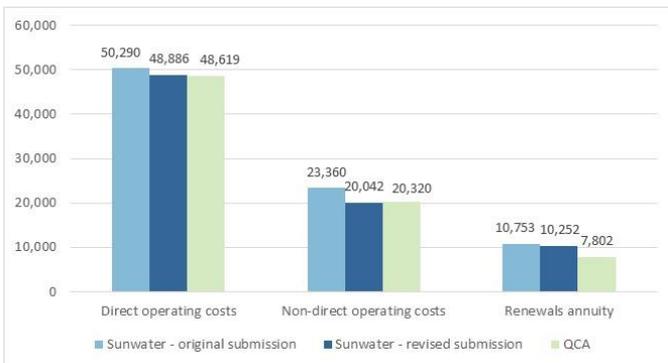
Total costs over the price path period—Burdekin-Haughton WSS (2018–19 dollars) (\$'000)



Notes: 1. Revenue offsets are not included in the charts. 2. QCA Non-direct operating costs includes the QCA regulatory fees.

We have reduced Sunwater's proposed distribution system costs by 9% over the pricing period 1 July 2020 to 30 June 2024.

Total costs over the price path period – Burdekin Haughton distribution system (2018–19 dollars) \$'000



Notes: 1. Revenue offsets are not included in the charts. 2. QCA Non-direct operating costs includes the QCA regulatory fees.

Further details on our recommended costs for Sunwater schemes are in Part B (chapters 2 to 4) of our report.

We have assessed local impacts

We moderated bill impacts for distribution system customers by limiting the increase in the combined fixed and volumetric price to inflation plus \$2.38/ML of WAE (from 2020–21, increasing by inflation). We have recommended that the fixed price increases by inflation plus \$2.38/ML (from 2020–21, increasing by inflation) until the cost-reflective level is reached, and the volumetric price for Giru Groundwater Area customers increases by inflation only.

The table below presents an estimate of the change in water bills (compared to the bill based on current prices), for various levels of water use.

More details on bill impacts are in Part B (chapters 7 and 9, and appendix C) of our report.

Change in water bill

Water use as portion of entitlement held (%)	Water bill change from 2019–20 to 2020–21 (%)	Water bill change from 2019–20 to 2023–24 (%)
Burdekin–Haughton WSS		
0	–	–
25	–	–
50	(1)	(1)
75	(1)	(1)
100	(2)	(1)
Burdekin channel		
0	8	17
25	3	12
50	–	9
75	(2)	6
100	(4)	3
Burdekin – Giru Groundwater		
0	13	57
25	12	50
50	10	44
75	10	40
100	9	37
Burdekin – Gladys Lagoon (other than Natural Yield)		
0	8	17
25	3	12
50	–	9
75	(2)	6
100	(4)	3

Where you can find out more

The final report is on the [QCA website](#) in three parts:

- Part A—key regulatory and pricing framework issues that apply to both Sunwater and Seqwater
- Part B—Sunwater schemes
- Part C—Seqwater schemes.

What happens next?

The Government will consider our final report and make the final decision on irrigation water prices for Sunwater and Seqwater customers over the pricing period 1 July 2020 to 30 June 2024.