Recommendation No 18 "...move to a RAB-based approach for future price reviews"

Submission agrees - provided reasons for a change from current approach are fully canvassed.

Chapter 5 Forecast Entitlement and Usage Volumes

Submission cannot reconcile numbers in Fig. 5, Fig. 8 and associated tables. The inclusion of numbers associated with HP usage (presumed not to be irrigation related) should also be accompanied by Figures and Tables related to irrigation only.

Submission regards projected usage as a subjective assessment. To maintain consistency throughout the Report, a period of 15 years is considered appropriate (HUF calculations cover a similar time frame). A general trend in yearly historical usage can be projected by giving an extra weighting to usage of - say - latest 5 years.

General
Submission requests calculation of final Part A and Part B values be fully detailed. For example, costs of QCA $2.5M; are they spread over 5 years with an interest component or included in first available year?