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Your submission

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Peel Valley Water Users Association Inc The only organisation that represents the Irrigation Industry in the Peel Valley PO Box 952, Tamworth NSW 2340 peelvalleywaterusers@bigpond.com Submission to NSW Department of Industry On the proposed NSW water metering framework September 2018 This submission is being lodged on behalf of all surface water, groundwater and unregulated water users in the Peel Valley, which is a comparatively small irrigation area in the Tamworth district of NSW. We preface this submission with the statement that in our opinion there has been insufficient detailed information provided by NSW Department of Industry – Water on the topic of the new metering requirements; there has been insufficient time available between the 'Webinar' and the closing date for submissions to prepare a comprehensive submission; there was inadequate time provided during the 'Webinar' to submit a question, and NSW Department of Industry - Water appears to be making decisions without the appropriate level of input from affected irrigators. The following comments and queries are submitted, in no particular order, for your consideration: 1. Regarding the metering of surface water works that are authorised of 100mm or larger, and groundwater works that are authorised of 200mm or larger, what exactly does that mean? In the case of surface water, is that the measurement of the size of the inlet of the pump? And in the case of groundwater, is that the measurement of the size of the bore or well that is sunk into the earth? 2. It is not the size of the pump that should be the relevant factor. The relevant factor is the volume of usage. For example, one irrigator has a groundwater licence with a works approval for 2 pump sites, with two 100mm turbine pumps capable of delivering 11 litres per second out of bores 200mm in diameter. His total annual usage last year was around 25 Megalitres out of a 104ML entitlement. It appears that he will be required to install two meters with two data loggers and two sets of telemetry – a massive overkill to be permitted to draw 25 Megalitres. If this is the case, then it is uneconomic for small users to remain in business. Very few irrigators in the Peel Valley use enough water to warrant the excessive metering cost. 3. Similarly, in the case of an irrigator with a groundwater licence and works approval for 3 extraction sites, each equipped with a pump capable of 6 litres per second, and each extraction site being a well with a diameter of approximately 4 feet (ie greater than 200mm), does he require 3 meters and 3 data loggers and 3 sets of telemetry equipment? Or if the three extraction sites are all feeding into one common main delivery line, can one meter be located in the main line beyond the confluence of the outlets from all 3 extraction sites? 4. In another example, an irrigator has a surface water licence with a works approval for two extraction sites. Both are equipped with 150mm pumps, one capable of 2ML per day and the other capable of 7ML per day. The two extraction sites are located in close proximity and either one is used depending on the available flow in the river on the particular day. Both pumps feed into a common main delivery line, so does he require two meters, two data loggers and two sets of telemetry equipment, or can he use one meter in the main line beyond the confluence of the outlets from the two pump installations? (Note that this is a classic example of the fact that the volume used should be the most relevant factor – not the inlet size of the pump – the same size pump can deliver either 2ML or 7ML per day) 5. In country areas, the cost and the lead time in getting a duly qualified installer when required are likely to be

significantly greater than anticipated by NSW Department of Industry – Water. Return travel distances of more than 100 km from the nearest town are common, and with multiple jobs and only a few duly qualified installers, the irrigators will bear significant additional costs. Further, with 8 pattern approved meter manufacturers currently in existence, each with their own design of data loggers and telemetry equipment, the availability of spare parts for each different sized meter at short notice is highly questionable. NSW Department of Industry – Water should specify one basic standard for all data logging and telemetry equipment that must be used by every meter manufacturer, so that spare parts are readily available, and the duly qualified installers do not have to familiarise themselves with multiple different pieces of technology from different manufacturers. Moreover, if the technology was standardised, in the event of a breakdown of a component, the irrigator should then be authorised to plug in replacement parts without the need for a duly qualified person to perform such a basic task. 6. In relation to the above point, the period of 21 days to have meters repaired is likely to prove impractical. NSW Department of Industry – Water needs to either be willing to extend the period of 21 days to a longer timeframe, or alternatively gear up to be in a position to expedite requests for extensions when the period of 21 days cannot be met for legitimate reasons. Irrigators cannot be reasonably prevented from irrigating during the critical growing season because of inappropriate bureaucratic timeframes. 7. The majority of irrigators have pump installations that are located close to the edge of the riverbank, because that is where they get the best performance from their pump. The downside of locating the pump close to the water's edge is that when there is the threat of a flood, the pump and related equipment has to be moved to higher ground. If the meter is disconnected and removed at the same time (because of the susceptibility of damage to the electronic circuitry) does that mean that a duly qualified person must participate in the re-installation of the pumping equipment and meter every time after a flood or a fresh in the river has passed? 8. IPART has approved a meter reading charge to cover the cost of physically reading the water meters across NSW. In the next pricing round, will NSW Department of Industry – Water be seeking the removal of that meter reading charge, because the justification for the charge is no longer applicable? If not, why not? 9. In the WaterNSW submission to 'DOI Water and its taskforce', there are comments regarding the need for both unregulated water users and underground water users to order water. Surface water users have traditionally been required to order water so that it can be released from storage according to the relevant lead time. It is a totally unnecessary and onerous responsibility if irrigators are required to order unregulated or groundwater just to meet a bureaucratic requirement. This requirement to order unregulated water or groundwater needs to be eliminated, because it serves no useful purpose.

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Form Information

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Peel Valley Water Users Association Inc

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Submission to NSW Department of Industry
On the proposed NSW water metering framework
September 2018

This submission is being lodged on behalf of all surface water, groundwater and unregulated water users in the Peel Valley, which is a comparatively small irrigation area in the Tamworth district of NSW.

We preface this submission with the statement that in our opinion there has been insufficient detailed information provided by NSW Department of Industry – Water on the topic of the new metering requirements; there has been insufficient time available between the 'Webinar' and the closing date for submissions to prepare a comprehensive submission; there was inadequate time provided during the 'Webinar' to submit a question, and NSW Department of Industry - Water appears to be making decisions without the appropriate level of input from affected irrigators.

The following comments and queries are submitted, in no particular order, for your consideration:

1. Regarding the metering of surface water works that are authorised of 100mm or larger, and groundwater works that are authorised of 200mm or larger, what exactly does that mean?

   In the case of surface water, is that the measurement of the size of the inlet of the pump? And in the case of groundwater, is that the measurement of the size of the bore or well that is sunk into the earth?

2. It is not the size of the pump that should be the relevant factor. The relevant factor is the volume of usage.

   For example, one irrigator has a groundwater licence with a works approval for 2 pump sites, with two 100mm turbine pumps capable of delivering 11 litres per second out of bores 200mm in diameter. His total annual usage last year was around 25 Megalitres out of a 104ML entitlement. It appears that he will be required to install two meters with two data loggers and two sets of telemetry – a massive overkill to be permitted to draw 25 Megalitres. If this is the case, then it is uneconomic for small users to remain in business. Very few irrigators in the Peel Valley use enough water to warrant the excessive metering cost.

3. Similarly, in the case of an irrigator with a groundwater licence and works approval for 3 extraction sites, each equipped with a pump capable of 6 litres per second, and each extraction site being a well with a diameter of approximately 4 feet (ie greater than 200mm), does he require 3 meters and 3 data loggers and 3 sets of telemetry equipment? Or if the three extraction sites are all feeding into one common main delivery line, can one meter be located in the main line beyond the confluence of the outlets from all 3 extraction sites?

4. In another example, an irrigator has a surface water licence with a works approval for two extraction sites. Both are equipped with 150mm pumps, one capable of 2ML per day and the other capable of 7ML per day. The two extraction sites are located in close proximity and either one is used depending on the available flow in the river on the particular day. Both

pumps feed into a common main delivery line, so does he require two meters, two data loggers and two sets of telemetry equipment, or can he use one meter in the main line beyond the confluence of the outlets from the two pump installations?

(Note that this is a classic example of the fact that the volume used should be the most relevant factor – not the inlet size of the pump – the same size pump can deliver either 2ML or 7ML per day)

5. In country areas, the cost and the lead time in getting a duly qualified installer when required are likely to be significantly greater than anticipated by NSW Department of Industry – Water. Return travel distances of more than 100 km from the nearest town are common, and with multiple jobs and only a few duly qualified installers, the irrigators will bear significant additional costs.

   Further, with 8 pattern approved meter manufacturers currently in existence, each with their own design of data loggers and telemetry equipment, the availability of spare parts for each different sized meter at short notice is highly questionable. NSW Department of Industry – Water should specify one basic standard for all data logging and telemetry equipment that must be used by every meter manufacturer, so that spare parts are readily available, and the duly qualified installers do not have to familiarise themselves with multiple different pieces of technology from different manufacturers.

   Moreover, if the technology was standardised, in the event of a breakdown of a component, the irrigator should then be authorised to plug in replacement parts without the need for a duly qualified person to perform such a basic task.

6. In relation to the above point, the period of 21 days to have meters repaired is likely to prove impractical. NSW Department of Industry – Water needs to either be willing to extend the period of 21 days to a longer timeframe, or alternatively gear up to be in a position to expedite requests for extensions when the period of 21 days cannot be met for legitimate reasons. Irrigators cannot be reasonably prevented from irrigating during the critical growing season because of inappropriate bureaucratic timeframes.

7. The majority of irrigators have pump installations that are located close to the edge of the riverbank, because that is where they get the best performance from their pump. The downside of locating the pump close to the water's edge is that when there is the threat of a flood, the pump and related equipment has to be moved to higher ground. If the meter is disconnected and removed at the same time (because of the susceptibility of damage to the electronic circuitry) does that mean that a duly qualified person must participate in the re-installation of the pumping equipment and meter every time after a flood or a fresh in the river has passed?

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