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<b>Are you an individual or representing an organisation?</b>	Organisation
<b>Organisation or Business Details</b>	
<b>Name of Organisation</b>	South West Water Users
<b>Who are you representing?</b>	Water related industry
<b>Proposed changes to recording and reporting requirements</b>	
<b>The draft public exhibition regulation includes proposed changes to the recording and reporting mandatory conditions. Do you have any comments on the recording and reporting requirements?</b>	Yes
<b>Please provide your comments on the proposed recording and reporting requirements</b>	submission attached
<b>Draft public exhibition regulation</b>	
<b>Do you have any other comments on the draft public exhibition regulation?</b>	Yes
<b>If yes, please provide your comments.</b>	submission attached
<b>Thank you for your submission</b>	
<b>If you would like to provide any additional information or supporting documents to help us understand your view please upload them here or email water.reform@industry.nsw.gov.au</b>	<a href="https://drive.google.com/open?id=1fJu3GrfD0EkViWOSpTNUGrgKgP4kuW1L">File 1https://drive.google.com/open?id=1fJu3GrfD0EkViWOSpTNUGrgKgP4kuW1L</a>

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# Submission to the Metering Review Taskforce

12 August 2019

From

## South West Water Users

*South West Water Users (SWWU) represents water users on the Lower Darling River downstream of the Menindee Lakes water storage scheme and NSW licensed water users on the Murray River from the Murrumbidgee Junction to the South Australian Border.*

*Our members use water for domestic and livestock purposes as well as for irrigation of both permanent plantings and annual crops using both general and high security water entitlements.*

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South West Water Users (SWWU) appreciates the opportunity to provide comment on the proposed changes to metering arrangements in NSW.

Public meetings were recently held at Pooncarie and at Coomealla to discuss the proposals and members of SWWU attended these meetings. Unfortunately, these meetings were poorly organised and all who attended left far more confused than when they arrived.

As an opening comment, there is a need for a more professional explanation of what is proposed and particularly this has to be in the context of the nature of local water use. A 'one format suits all locations' simply did not work.

For the sake of brevity we will list our concerns with the metering proposals in a dot point format.

- SWWU believes that water metering systems not only have to be accurate but they also have to be widely perceived to be so.
- SWWU are opposed to private ownership of meters
- SWWU are vehemently opposed to the proposed conversion of the existing Government owned meters in the South of NSW to private ownership.
- Where a private or public utility or service provider distributes water, electricity or gas, the meter is owned and maintained by that entity and the costs are passed on to the user. The metering of diversions of water, our most valuable natural resource, should be no different.
- The Southern meters are currently government owned. They are only several years' old, meet very high technical standards in terms of metering, security, encryption, telemetry etc. and currently ensure a standard of compliance which provides confidence in the system.
- Telemetry systems are critical – and SWWU would recommend that the proposed 200 mm limit for requiring telemetry is too large. This limit places a greater burden on NRAR staff who then have to do more frequent physical compliance checks on pumping sites without telemetry.
- SWWU believes ownership of data from meters must be held by the regulating authority as this is critical for compliance activity. We strongly oppose 'third parties' being involved in this as it is a threat to the integrity of the data transmission system. Water users should have access to the data but this is separate to ownership of the data.

- We are not convinced that there is an adequate understanding of the IT issues around ensuring integrity in electronic meters.
- Experience in Southern NSW shows the principal effective security component is the physical alarms on meter installations linked to 'stand-alone' telemetry systems owned by and reporting in to the regulating authority- currently WaterNSW. Any third party involvement in this process compromises security.
- We are not convinced there is adequate security around the Access Codes for each meter and there would not appear to be any system for detecting alterations to internal meter registry settings in real time.
- We have concerns around the reporting requirements of very small pumps – as used for stock and domestic applications. Queries on this were not answered at the local meetings and yet this is of direct relevance to many of our members.

In conclusion, our views are based on what we believe to be necessary for there to be widespread public confidence in metering systems. The NSW Water Use Industry deserves nothing less.

We would welcome any further discussion on these issues and would note that the recent attempts at providing information in this region were notably deficient.

Alan Whyte

Chair,

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