

Submission to the 10 year Review of the Snowy Water Licence

The following comments relate to Terms of reference 2, 'Water release requirements' - Schedule 4 of the Snowy Water Licence

1 Clause 13. FLEXIBILITY AND PRE-RELEASE PROVISIONS

Clause 13 gives the Licensee the flexibility to reduce or increase Required Annual Releases (RAR) from the Murray and Tumut Developments.

Sub-clauses 13.2 and 13.3 deal with reducing the RAR while sub-clauses 13.4, 13.5 and 13.6 deal with increasing the RAR by up to 200 GL per development.

Sub-clause 13.2 and 13.3 adequately provide for a reduction in RAR, in that the reduction is made subject to agreement and the Water Authorities have advance notice so that they can properly coordinate their water operations.

Sub-clause 13.4 deals with increasing the amount of water released from a Development in a Water Year, by pre-releasing water from a subsequent Water Year, and sub-clauses 13.5 and 13.6 provide adequate compensation to downstream water users under subsequent wet conditions that result in spill from downstream storages.

However clause 13 should be amended to address two shortcomings of the current Licence. These are:

1. The Water Authorities do not receive advance notice if RAR are increased, as there is no similar sub-clause as 13.3 for increases. The wording of sub-clause 13.3 should be amended by adding "or increase" after "reduce".
2. Clause 13 does not address what happens if pre-release from a subsequent Water Year is made from a water depleted storage and dry inflow conditions persist. While the likelihood of such a situation is low, it is possible and would result in premature failure of a Development and should therefore be provided for in the Licence.

The very basis of water management is that there is a fixed relationship between storage (the targets), inflow and yield (RAR); to reduce one of these parameters results in a reduction in one or more of the others. The monthly targets of each Development are of a similar magnitude to average annual inflows and were sized to compensate during a number of dry inflow years, so that RAR could be made in most years. It is not unusual for these "balancing" storages to be as low as 20% of target, while inflows during very dry years can also be as low as 30% of average inflows. Reducing the "balancing" volume by up to 200 GL in this situation would cause the Development to fail and advance the occurrence of the Dry Inflow Sequence Volume (DISV) provision. The storage would fail before it could be replenished by inflows from the subsequent water year.

This issue could be addressed in the Licence by either:

- any DISV that results as a result of pre-releases under clause 13, be compensated by an equivalent amount of Above Target Water, or
- limiting the Licensee's right to increase RAR if the Below Target Water in a Development is below (say) 30% of "target" at the start of a Water Year.

Adoption of the proposed flexibility provisions in 2011 without amendment by submissions received as part of the review, appears to have placed electricity interests in the Scheme ahead of sensible water management principles.

2 Releases to the River Murray

The Licence does not contain a clause which limits diversions from the Snowy River to the River Murray when Hume Reservoir is spilling.

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Additional wording for the Murray Development is required similar to sub-clause 12.4 for the Tumut Development, which limits releases from Jounama Dam to natural inflows when flow in the Tumut River downstream of Blowering Dam exceeds channel capacity. The additional sub-clause for the Murray Development should restrict diversion from Island Bend/Lake Eucumbene and limit Khancoban releases to the sum of natural inflows to Tooma, Geehi and Khancoban while Hume Reservoir is spilling.

B R Dunn

P O Box 34

Cooma, NSW 2630