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Form Information

Site Name	NSW Department of Industry
Site Id	47409
Page Standard Name	NSW Government's Water Reform Action Plan
Page Standard Id	134654
Page Custom Form Name	Submissions on draft metering regulation and policies
Page Custom Form Id	171616
Url	https://www.industry.nsw.gov.au/water-reform/make-a-submission
Submission Id	177076
Submission Time	30 Sep 2018 6:09 pm
Submission IP Address	110.143.150.159

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Sustainable, productive and efficient water use in the Lachlan Valley

Submission on

NSW Water Metering Framework

September 2018

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NSW METERING FRAMEWORK

Introduction

Lachlan Valley Water (LVW) welcomes this opportunity to make a submission on the Government's consultation paper on the water metering framework and draft regulations.

Lachlan Valley Water is the peak valley-based industry organisation representing more than 500 surface water and groundwater users in the Lachlan and Belubula valleys. Our members represent all categories of licences, except for those held by environmental water managers, and includes Jemalong Irrigation Corporation. This submission is made on behalf of all members, but individual members also reserve the right to make their own submissions.

Lachlan Valley Water supports the accurate measurement of water usage, and believes it is essential that the regulations are practical and workable, and that they are communicated clearly so that all licence holders can readily understand what they are required to do to comply.

1. Threshold

(a) Basis for determining the minimum threshold

Determining the threshold on the basis of the size of work specified in the works approval, rather than the actual size of work installed, is a simple and clear way to define it. However, it is likely that there will be uncertainty among licence holders, particularly those who have smaller licences, who only use water intermittently or have not previously been required to have a meter.

We therefore recommend that the basis for the definition must be clearly and widely communicated so that those who have installed a smaller pump than allowed under their works approval are aware that they may be required to install a pattern approved meter, and they have the option to amend their works approval if they wish.

We also recommend that there be provision for decommissioned works to be excluded from the requirements.

(b) Multiple works

LVW does not support the proposal that all multiple works should require compliant meters regardless of capacity.

We recommend that compliant meters should only be required where the cumulative capacity of the works is equivalent to the infrastructure size threshold. In our view a blanket requirement for compliant meters across all multiple works will impose high costs on smaller licence holders who do not constitute a significant risk in terms of the volume of water they are able to pump, and it is questionable whether the benefit of metering under these circumstances outweighs the cost.

We acknowledge that this is the more complex option and that the capacity of pumps can vary widely depending on type and configuration. LVW recommends that DoI Water adopt a standard table as a reference for pump capacity and apply this consistently as the measure for cumulative capacity. WaterNSW could provide advice on the tables they use to assess pump capacity. The reference table should also be widely publicised so that licence holders are aware of how pump capacity will be assessed.

(c) 'At risk' groundwater sources

The consultation paper and draft regulations define 'at risk' groundwater sources where the minimum threshold will not apply and where all licensed water users, regardless of the size of the work or the volume of take, will require a compliant meter.

The definition of 'at risk' is very broad, and requiring only one of the three risk factors to be met overstates the risk that extraction will exceed the long term average annual extraction limit (LTAAEL). The clearest indication that usage is at risk of exceeding the LTAAEL is the history of extraction, and we recommend that it would be consistent to use the current trigger (5 year rolling average) which applies in most groundwater water sharing plans.

We therefore recommend that a more accurate definition of 'at risk' would be if the water source:

- Has a rolling 5 year history of extraction greater than 70% of the WSP LTAAEL, **and**
- It is over-allocated, **or**
- The entitlement and account rules combined can result in extraction exceeding the LTAAEL

We also question why licence holders in these water sources who are pumping small volumes through a work will be required to have a compliant meter on that work when basic landholder rights (BLR) extraction is exempt from metering.

As an example, in the Lachlan Unregulated and Alluvial Water Sharing Plan 2012 the current licenced stock and domestic entitlement in the Upper Lachlan groundwater source is 1,248 ML and the estimated BLR for stock and domestic is 6,280 ML. It is unreasonable that a farmer pumping only licenced stock and domestic through a work is required to have a compliant meter when BLR usage does not require a meter.

LVW recommends that any licence holder in an 'at risk' groundwater source who has only a stock and domestic licence should be exempt from the requirement to have a compliant meter, on the basis that they do not pose a significant risk.

Additionally, if all licenced usage, however small, is required to be metered then we also recommend that it is an urgent priority for the NSW Government to develop and implement the Reasonable Use Guidelines for basic landholder rights.

2. Standards for metering equipment

(a) New and replacement meters

One of the barriers to implementation of the National Metering Standards has been the lack of easily accessible information on pattern approved meters, so we welcome the publication by the Department of a list of pattern approved meters, and recommend that it be widely publicised.

Other potential barriers to the implementation timeframe are the lack of clarity around the number of meters that will be required to be installed, or existing meters that need to be validated or verified. LVW has had difficulty obtaining updated information on the number of meters in this valley that are currently compliant and the number of new meters that will be required, but based on information provided for the NSW Metering Business Case in 2011 we understand that approximately 1,000 meters will be needed in the Lachlan Valley (surface water and groundwater).

When this is considered alongside the number of meters required in the northern valleys, the limited number of meters that are pattern approved for larger pipe diameters, and the lead time between ordering a meter and it being available, LVW is concerned there may be difficulties in meeting the roll-out timetable. We agree that there is a need to send a clear market signal, but if it becomes apparent the market is unable to meet demand, the Government should take that into consideration and allow greater flexibility on the timeframe.

(b) Existing meters

LVW endorses the revised policy to allow existing meters which are not pattern approved to be retained subject to either the approved validation procedure or the accuracy verification.

We recommend that the information on the validation and verification procedure be provided in plain English and be widely available, so that both installers and irrigators are clear on the required procedures.

The paper asks what methods could be used to demonstrate the accuracy of existing meters in the field. In the mid 2000's WaterNSW staff checked the accuracy of meters using a Panametrics ultrasonic transit time unit that could be clamped on to the pipe. We suggest that the use of similar, approved test units would be a suitable verification method, acknowledging there would need to be a regular verification procedure for the test unit to ensure it was no less accurate than the meters it was testing.

(c) Irrigation Infrastructure Operators

The meters on large open channel offtakes used by Irrigation Infrastructure Operators (IIO's) are not pattern approved, and we understand there are currently no pattern approved meters available for the volumes and open channel conditions managed by IIO's, although the Corporations already ensure their meters are independently validated on a regular basis, and recalibrated as required to ensure the accuracy meets the required standard.

However, AS4747 (7.2.3.2) does allow licence holders with metering systems that cannot be assessed under the testing conditions to apply for approval to continue using that meter, subject to meeting the requirements of the issuer of the Water Access Licence.

LVW supports the application by Jemalong Irrigation Limited to negotiate an approval to continue using their AFFRA meter subject to meeting the requirements for accuracy and independent verification specified by the NSW Government.

(d) Data and telemetry requirements

We support the principles for the data and telemetry protocol outlined in the consultation paper, and recommend that industry should be involved in developing the detail of the protocol to ensure the requirements are fit for purpose and cost effective.

LVW questions the benefit and cost-effectiveness of requiring telemetry in low risk situations, ie, smaller users who account for less than 20% of water take in that water source, and groundwater bores where there is limited impact on other users or on the aquifer. In the situation where a groundwater user has installed a number of bores to spread impact, the requirement for every work to have telemetry would be extremely costly, particularly in the groundwater sources currently defined as 'at risk'. A requirement to install telemetry should be able to clearly demonstrate that the data will add value to water resource planning and management.

If one of the objectives of telemetry is to reduce the on ground requirement for staff to read meters, we see this as a cause for concern. LVW believes a continued WaterNSW on-ground role in meter reading and provision of information is central to encouraging good compliance.

LVW does not consider it is necessary for telemetry to be installed by a duly qualified person, on the basis that potentially there may not be sufficient duly qualified people available to meet demand, and if the installation is faulty it will be readily apparent.

3. Other requirements

(a) Requirement to keep records for taking water – users not required to have meter

Clause 243B of the draft regulation provides that users who are not required to have a compliant meter will need to maintain records of water usage in a form approved by the Minister, and indicates that reporting will eventually be through an online portal.

LVW recommends that an appropriate method to record usage for water users who are subject to this clause would be to install a non-pattern approved meter. This will be cheaper than a pattern approved meter, and if accuracy is within +/-10% we believe this would be an adequate standard, bearing in mind that this take is likely to represent only 5% of total usage within NSW. This would also require WaterNSW to maintain its on-ground meter reading function.

4. Meter Ownership

LVW does not have a view on the proposed transfer of government-owned meters to private ownership, as this is not applicable in the Lachlan Valley. We do not object to meters being owned and maintained by a third party provider, noting that the obligation to ensure the meter meets the required standards remains with the licence holder.

The information that will be required to help water users select metering products and services includes:

1. As a priority, WaterNSW and DoI Water should provide plain English information on their websites on what is required under Australian Standard AS 4747, and a regularly updated list of pattern approved meters.
2. Once the regulations are finalised, information should be readily available from NRAR, DoI Water and WaterNSW on the metering standards, the procedure required to allow existing meters to be retained, and the timetable.
3. Written advice should be provided to all licence holders clearly explaining the requirements and timetable. Where it is possible to retain an existing meter, the advice should clearly set out the licence holder's obligations to meet either the validation or verification standard.