

Your details

Title: Mr
First name: Richard
Last name: Sargood
Email: sargood56@bigpond.com
Organisation (if relevant):
Position in organisation:
Address: Iona
Suburb: Corowa
Postcode: 2646
Type of submission: I am making a personal submission
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Sargood Pastoral Co
Iona, Corowa. NSW. 2646
Ph. 02 60350555 Fax 60350512

Submission on NSW water metering framework

We have two meters that were installed under the initial pilot program in the southern basin. These meters were mandatorily imposed upon us and at every opportunity pre installation we were told that these meters would be installed at no cost to us. Since then we have been charged in excess of \$500/meter/yr so right from the very start of this program we have been lied to. We were told we would have remote access to the live data that these meters produced. That has never happened either.

My surface water meter was installed in our suction line without my knowledge after I was shown plans and advised that it would be installed on the delivery side. This was despite having a brand-new mechanical meter on the upstream side. I am still in dispute with the installation of this meter as I would never have agreed to tampering with our suction line in a million years. This is my backup system that has not yet needed to be used. If it does need to be used and it fails because the suction is compromised because of this meter installation I will have no hesitation in taking legal action against all those concerned. My other meter leaked like a sieve so I have a fair expectation that this one will too. There has been no attempt to fix this situation despite promises to do so on a number of occasions and I will not, under any circumstances, take ownership of this meter. This installation issue is symptomatic of all our dealings with water authorities in general. No one is prepared to take responsibility for anything. Everyone says we will look into that or I'll get back to you and nothing ever happens. You can't even advise us of allocation announcements when they are made.

So here you are saying you want us to assume ownership of these meters with conditions attached that you haven't been prepared to meet while you still own the meters i.e.

Metering equipment will need to be:

- validated by a duly qualified person in accordance with AS4747 every five years
- maintained in accordance with a maintenance protocol approved by the Minister and published on the department's website. The protocol will contain requirements for maintenance such as:
 - the frequency that maintenance needs to be carried out
 - the different types of maintenance for different components of the metering equipment
 - requirements for maintenance of telemetry equipment. Users will need to keep records of all maintenance that is carried out.

I don't believe that any of the above requirements have been carried out on either of our meters and they have been installed for six years now, so my question is why should we trust you now. Your track record is appalling yet you are requiring us to do something that you have not been prepared to do yourselves even though you are charging us through the nose for the privilege.

If we do assume ownership of the meters what charges will apply? Knowing how water charges are gouged it will probably be decided that the \$500+/yr we currently pay will be determined as fixed charges so the department can monitor compliance (or fund its Christmas party) and we will have to pay additional variable charges for telemetry etc. There is no mention in any of your documentation of proposed charges. If you are asking us to trust you don't bother, our level of trust is very low.

I will attempt to answer some of your consultation questions in Attachment A below.

4. Are there any barriers to implementing the proposed metering standards that should be considered?

A. Cost is the major factor along with onerous maintenance requirements. If these meters are so fantastic why do they mandatorily need to be certified every five years? What will we be charged for telemetry etc? What will mandatory services cost?

5. What additional information should be included in the data logging and telemetry protocol?

A. We should be able to remotely access all the information and data. Additionally, why would I want to own a meter where someone else owned the data generated. If I own the meter then I believe I own the data that meter generates. I think you are on shaky legal ground if you don't own the meter but think you own the data.

6. Should telemetry be installed by a duly qualified person? What qualifications should the person have? What other options should be considered?

A. What is the definition of a duly qualified person? Anyone who is capable I would hope.

7. What methods could be used to demonstrate the accuracy of existing meters in the field? Is guidance needed on the methods that can be used?

A. Meters by definition should be inherently accurate otherwise why were our original meters deemed to be inaccurate and replaced? If these meters need to be calibrated every five years then they shouldn't have been installed in the first place.

8. What factors need to be considered and what safeguards need to be in place for the proposed transfer of government-owned meters to private ownership? What needs to happen before the transfer can occur?

A. If it happens (and I don't believe it should happen) then the meters should be totally compliant and certified on the day of transfer with the latest software installed. Either that or every cent that we have paid to date is refunded as to the best of my knowledge not one iota of maintenance has ever been performed on our meters. This transfer should not be compulsory.

9. What information and support will water users need to help select metering products and services that meet the required standards? Would you be comfortable with a third party meter provider being responsible for the meter?

A. Why would you possibly want third party responsibility for meters. Such providers would be profit driven and if you were responsible for appointing third party partners you wouldn't care what we were charged. Either way we get screwed over.

I don't believe anyone has or should have issues over compliance. This southern region has been metered, monitored and functional for years. If you have an issue with compliance in the north then make rules on a valley by valley basis that can address any non-compliance. If it aint broke don't fix it, and I believe the southern connected system aint broke.

Richard Sargood
Sargood Pastoral Co
"Iona"
COROWA NSW 2646
Ph. 02 60350555, 0417 698208