

15 August 2019

NSW Water Reform Task Force
NSW Metering Framework
water.reform@industry.nsw.gov.au

Dear Task Force Members

Submission in Response to the NSW non-urban water metering framework

Coleambally Irrigation Cooperative Limited (CICL) is a strong supporter of any initiative that improves management of the water resource in NSW. Accurate, real time metering is a critical component of efficient water delivery and water resource management.

CICL extracts water under gravity from the Gogelderie weir pool of the Murrumbidgee River. This water is metered through an Accusonic (brand) open channel flow meter. This metering technology is a four path transit time meter and is considered by industry as the best in class for open channel metering. The technology is not pattern approved.

CICL owns and maintains two Accusonic Meters at the site - the second meter was installed for quality assurance and back up reasons. Independent verification measurements are undertaken regularly - at least monthly during the irrigation season - to ensure the meters' accuracy. The CICL offtake meter provides real time data to WaterNSW River Operations and CICL's Water Operations via CICL's SCADA system.

This submission focusses on the requirements for data logging and telemetry at our offtake.

Requirement to have a compliant data logging and telemetry system

CICL strongly disagrees with the requirement to duplicate, at customer expense, the telemetry and data logging system already in place in the Murrumbidgee and expects stakeholders in the Murray area would have a similar view.

While not a requirement until December 2021, CICL has completed a 'non-urban meter validation certificate'. This validation was undertaken by a Certified Practising Hydrographer. Prior to submission of the meter validation certificate, CICL were informed of the requirement to have a NSW Government owned data logger and telemetry unit. CICL firmly believes that this requirement has no logic.

The existing arrangement is a perfectly functioning data logging and telemetry system that provides data to where it is needed, specifically WaterNSW River Operations and CICL operations.

We believe this data could be transparently transferred to wherever it is required, including NRAR. Installing a second telemetry system, at our expense, would only be duplicating the existing system for no apparent gain in extraction control and monitoring. While the expense is probably insignificant to CICL and to most river pumpers, it is the logic of the decision and the duplication of assets and/or the forced redundancy of assets that is questionable.

In addition, CICL takes water through its offtake to deliver water for WaterNSW (Yanco/Billabong System and Tombullen storage) and environmental water for the Department of Planning, Industry and Environment (DPIE) – formerly OEH. This means, from a 'compliance' point of view, that the data provided by the new telemetry has to be adjusted for the various credits and will not provide NRAR with an appropriate tool for monitoring compliance of CICL's licenced extraction. The volume extracted by CICL based on WaterNSW water orders or to deliver environmental water in some years is significant, for example in 2018/19, 40 percent of the water extracted by CICL through its off-take was non CICL water.

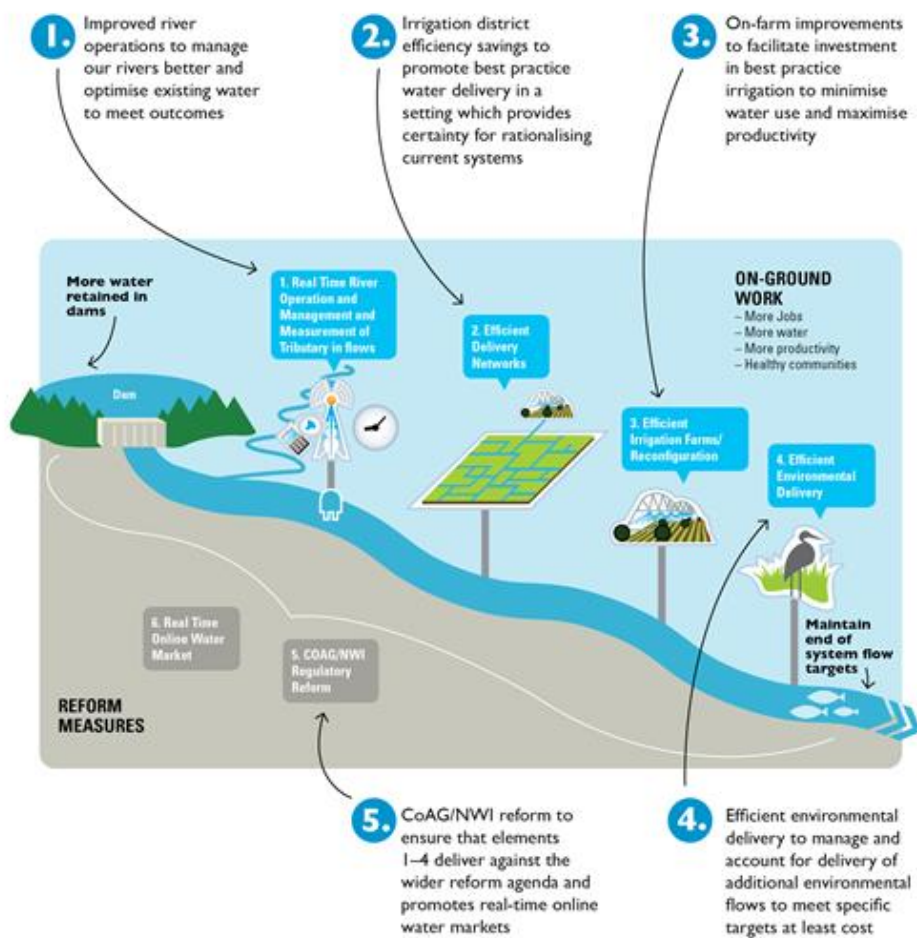
This fact makes the requirement for additional telemetry specifically for NRAR to monitor compliance even more frustrating.

Where does the CARM project (Computer Aided River Management) fit?

The WaterNSW – CARM project was an important initiative implemented in the Murrumbidgee regulated river some years ago. WaterNSW, with the CARM tool, monitors compliance of water extraction against water orders – an essential function for efficient river operations.

The Murrumbidgee extraction meters were funded by Water for Rivers as part of the CARM project (refer Figure one).

Figure 1 Schematic of the CARM river management concept



The CARM project cost was in the order of \$80M. All metering data is fed back to WaterNSW River Operations in near real time, to aid more efficient river operations and enable compliance of water ordering and take. Water savings, based on river efficiencies of which the existing telemetry was an essential element, were transferred out of the valley.

The question of replacing functional systems with new telemetry, at the meter owner's expense, was raised at the roadshows in the Murrumbidgee and Murray areas. Less than five years ago, new government owned meters with high specification data logging and telemetry were installed on the regulated Murray and Murrumbidgee systems. The telemetry has been highly reliable and accurate – and customers have been invoiced and water accounts debited for five years based on this telemetry data.

From the customers' view, it would appear highly contradictory to replace the perfectly functional, purpose designed telemetry system with another system for no apparent gain in monitoring or control of extraction. Attendees of the metering roadshows in the southern valleys vigorously questioned the roadshow presenters on this issue. The reasoning given was 'so NRAR can see the data'. There appears to be no technical reason why the data from the existing telemetry could not be transferred to wherever it is required. This would enable NRAR to 'see' the data while ensuring the information was used for essential real time river operations and maintaining compliance of river extractions to water orders.

If you require any further information please contact Steve Oosthuysen, General Manager Operations on [REDACTED]

Yours faithfully



Clifford Ashby
CEO