
From: Jeremy Morton
Sent: Monday, 9 November 2009 1:14 PM
To: Water
Subject: Proposed amendments to the Water Market Rules

In regard to Murray Irrigation Limited and its concerns about protection the act provides, I make the following comments about the recommendation of the ACCC for Murray Irrigation Limited to re-issue its water entitlements.

- Losses within irrigation supply systems are of a fixed & variable nature.
- A large proportion of those variable losses are un-metered deliveries on to customers property, that water is historically 'owned' by the customers.
- Murray Irrigation Limited's decision to reduce its customer's water entitlements by 17% was excessive and unnecessary.
- Un-metered deliveries account for 8% of losses and the reduction should have been 9% not 17%.
- Murray Irrigation Limited is obviously not comfortable with the decision it has made and I suggest this is the reason why they have asked for the amendment to the rules.
- I don't believe Murray Irrigation Limited should be given protection for complying with the rules when it has gone way beyond what was necessary in realising the benefits of its separate conveyance licence.
- If a customer wishes to transform, that water which has historically been delivered onto the customers property will be retained by Murray Irrigation Limited for the benefit of the remaining customers. I don't believe the intent of the rules is to see one irrigator benefiting from the decision of another to transform.
- It is ultimately for Murray Irrigation Limited to decide the contractual relationship between itself and its customers, protection from legal action should not however be provided where changes are made beyond what is required to comply with the rules.

Regards,

Jeremy Morton