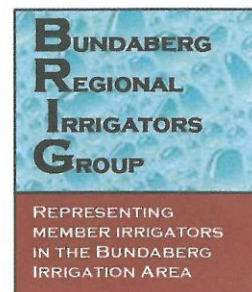


09/12/2012



The Chief Executive
Queensland Competition Authority
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BRISBANE QLD 4001

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Dear Sir

Re: Review of Draft Methodology Paper Regulated Retail Electricity Prices.

The Bundaberg Regional Irrigators Group (BRIG) represents member irrigators within the Bundaberg Regional Council Area.

BRIG members farm on approximately 36,000ha and use an estimated 1100 irrigation pumps and associated distribution systems to irrigate a variety of crops. A significant percentage of these systems (circa 90%) are powered by electricity.

From the methodology paper we have formed the view that the process is that Ergon tariffs will be converted to Energex tariff definitions and charges and that in many instances the existing Ergon meters will not be compatible and that this will require physical meter change and/or upgrade.

BRIG is concerned that the QCA and their consultants are unaware of the potential quantum of impact that this will have on the community, particularly our members.

BRIG strongly requests that any meter upgrade process be phased in over a period of time to ensure equity and minimise upheaval. We further suggest that while this process is being rolled out that Ergon tariffs be retained until suitable metering infrastructure is in place. In our opinion this is a two year period (minimum).

BRIG has identified that there is a need to assist Irrigators to optimise the alignment process when the changeover occurs and requests QCA to recommend that there be a dedicated budget to assist irrigators optimise tariff selection.

We are prepared to assist where possible and would welcome the opportunity to discuss our concerns with the QCA and/or your representatives.

Please call should you require further information or clarification.

Dale Holliss
Company Secretary