

BRISBANE • MELBOURNE • SYDNEY



30 January 2012

Queensland Floods Commission of Inquiry
Level 30, 400 George Street
BRISBANE QLD 4000

Partner
Direct Line
Email
Our Ref

Toby Boys
[Redacted]
toby.boys [Redacted]
TZB:1180005

Attention: Ms Susan Hedge

By hand

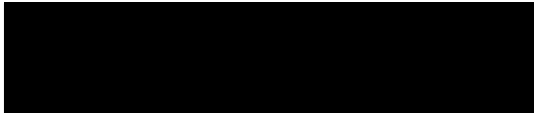
Dear Ms Hedge

Queensland Floods Commission of Inquiry

We refer to the Requirement to Provide Statement (**the Requirement**) dated 25 January 2012 sent to Richard (Bill) Stephens (your reference Doc 1835088).

Please find **enclosed** Richard Stephens' statement in response to the Requirement.

Yours sincerely



HOLDING REDLICH

Enclosures: 1

QUEENSLAND TO WIT

I, **RICHARD WILLIAM (BILL) STEPHENS**, of c/- SunWater Limited (**SunWater**), Level 10, 179 Turbot Street, Brisbane in the State of Queensland on 30 January 2012 do solemnly and sincerely declare as follows:

INTRODUCTION

- 1 This statement is given in response to a notice dated 25 January 2012 ("**notice**") requiring me to give a statement for the purpose of the Queensland Floods Commission of Inquiry. Exhibited to this statement and marked "**RWS-1**" is a copy of the notice.
- 2 This statement has been provided without any knowledge of the contents of other evidence that will or may be adduced, or the submissions that have or will be made to the Commission of Inquiry. I will supplement this statement with addendum statements if it is necessary.
- 3 I will provide any further information or explanation required by the Commission of Inquiry.
- 4 I have previously provided a statement to the Commission of Inquiry dated 5 April 2011 ("**my first statement**")

DATES AND TIMES PRESENT IN THE FLOOD OPERATIONS CENTRE

- 5 As set out in paragraph 31 of my first statement, I worked as a technical assistant in the FOC during the January 2011 flood event in the following shifts:
 - (a) Approximately 7pm, Sunday 9 January 2011 to 7am, Monday 10 January 2011 with Rob Ayre and John Ruffini as the flood engineers on shift (Terry Malone was also in the FOC at the start of the shift); and
 - (b) Approximately 7am to 7pm on Sunday 16 January 2011 with Rob Ayre as the flood engineer on shift.

ENTRIES IN THE FLOOD EVENT LOG

- 6 The notice requires me to provide a statement which gives an account of the entries in the flood event log that were made by me between 12am 7 January and 12am 12 January on the following topics:
 - (a) The transition from strategy W1 to W2 or W3;
 - (b) The transition to strategy W2;
 - (c) The transition to strategy W3;

- (d) The transition to strategy W4;
- (e) The primary consideration in operating the dam and choosing release rates at any time,

(I refer to those entries for convenience as the “**relevant event log entries**”).

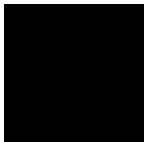
7 The notice also requires me to provide information in respect to:

- (a) Any errors or omissions in the entries in the relevant event log entries;
- (b) Any information or details that I am able to add to the account given in the relevant event log entries.

8 The entries that I consider may be relevant event log entries are the following:

Sunday 9 January 2011

[date]/ Time	Action	Category	Initials
09.01.2011 7:10PM	<i>FOC called Tony Jacobs (SRC) advising him that high releases from Wivenhoe (3000 cumecs) are expected to be necessary in view of heavy rain over the last 3 hours.</i>	Correspondence	BS
09.01.2011 7:15PM	<i>FOC called Peter Burrows (Seqwater) advising him that high rainfall is expected overnight and releases from Wivenhoe causing damaging flooding are likely to be necessary.</i>	Correspondence	BS
09.01.2011 7:15PM	<i>FOC called Peter Allen advising him that FOC is now looking at much larger flows and will have to ramp up releases to around 3000 cumecs as by as early as midnight which is likely to have flooding impacts on low-lying areas of Brisbane.</i>	Correspondence	BS
09.01.2011	<i>TM called Don Carroll (BCC) advising him of potential for high releases sooner than previously</i>	Correspondence	BS



7:20PM	expected.		
09.01.2011 9:15PM	Geoff Perkins (BoM) called and spoke with TM. They discussed rainfall expectations and flood warning requirements for Brisbane. Bremer/Warrill situation being monitored. Actual and projected flows sent to Geoff.	Correspondence	BS
09.01.2011 10:00PM	JR called Wivenhoe operator (Doug Grigg) and confirmed current flooding expectations based on rainfall predictions and expected impacts.	Correspondence	BS
09.01.2011 11:25PM	JR called Ross Drabble (ICC) regarding rates of rise at Mt Crosby (approx 200 mm from going over) – will be inundated within the next couple of hours. Confirmed more rain is on the way and releases will need to be increased.	Correspondence	BS

- 9 I consider that the 7:10PM entry, the two 7:15PM entries, and the 7:20PM entry may be relevant event log entries because, based on the information in the entries, they were conversations about expected heavy rainfall which would lead to higher release rates from Wivenhoe Dam. Accordingly, it seems from the entry that the primary consideration in choosing higher release rates was the expected heavy rainfall.
- 10 I believe that the reference to “3000 cumecs” in both the 7:10PM entry and the second 7:15PM entry may be an error. I believe that may be the case because I recall that I was told during discussions with the flood engineers a number of weeks after the flood event that it could not have been the case that Wivenhoe Dam would be releasing 3000 cumecs at that stage of the event, so I must have made a mistake in making those entries. I do not know what the correct entries should have been. I cannot add any further information in regards to those entries, other than what is already contained in paragraphs 38 to 44 of my first statement.
- 11 In relation to the 9:15PM entry, I believe that this may be a relevant event log entry because I believe the third sentence relates to a discussion about monitoring the Bremer River and Warrill Creek and I understand that release strategies under the

flood operations manual requires consideration of flows into the Brisbane River below Wivenhoe Dam. I am not aware of any error or omission in this entry and there is nothing that I am now able to add to the account given in this relevant event log entry.

- 12 In relation to the 10:00PM entry, I believe that this may be a relevant event log entry because I believe it relates to a conversation about rainfall predictions and the impact that further rain would have on releases from Wivenhoe Dam (where Doug Grigg was the operator at the time). I am not aware of any error or omission in this entry and there is nothing that I am now able to add to the account given in this relevant event log entry.
- 13 In relation to the 11:25PM entry, I believe that this may be a relevant event log entry because of the reference in the second sentence to more rain being on the way and the need to increase releases as a result. I am not aware of any error or omission in this entry and there is nothing that I am now able to add to the account given in this relevant event log entry.
- 14 I am unable to recall any conversations (in person or telephone) that I took part in with, or overheard between, the flood operations engineers and/or the flood officers and/or other persons during my shift from 7pm, Sunday 9 January 2011 to 7am, Monday 10 January 2011 on the following topics:
 - (a) The transition from strategy W1 to W2 or W3;
 - (b) The transition to strategy W2;
 - (c) The transition to strategy W3;
 - (d) The transition to strategy W4;
 - (e) The primary consideration in operating the dam and choosing release rates at any time.
- 15 To my recollection, the flood officers did not use the terms "W1, W2, W3 or W4" in discussions with me. I am familiar with those terms because I am familiar with the flood operations manual; however, those are not terms I recall being used in discussions with the flood engineers. Rather, my recollection is that the flood engineers usually discussed matters such as rates of release and downstream flow rates (by reference to a certain amount of "cumecs"), as well as the impact of flow rates downstream, such as particular bridges being affected or levels of inundation to urban areas.

AND I MAKE this solemn declaration conscientiously believing the same to be true and by virtue of the provisions of the *Oaths Act 1867*.

Affirmed and Declared at Brisbane)

This 30th day of January 2012 in the)
presence of:)



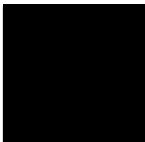
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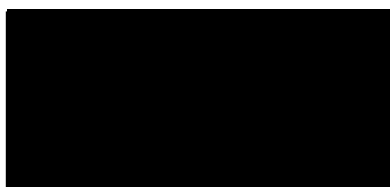
Signature of the declarant

~~Justice of the Peace/ Solicitor/
Commissioner for Declarations~~

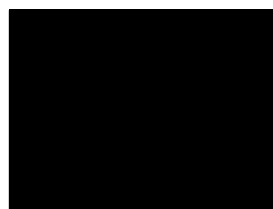


CERTIFICATE OF EXHIBIT

Exhibit marked “**RWS-1**” is the exhibit to the statement of **RICHARD WILLIAM (BILL) STEPHENS** sworn 30 January 2012.



Deponent ✓



Solicitor

B:1377523_1 NMW

CERTIFICATE OF EXHIBIT

Holding Redlich
Level 1, 300 Queen Street
Brisbane Q 4000
Tel: (07) 3135 0500
Fax: (07) 3135 0599
Ref: TZB:11800005

Our ref: Doc 1835088

25 January 2012

Mr Bill Stephens
Flood Officer
SunWater
Level 10/179 Turbot Street
BRISBANE QLD 4000

REQUIREMENT TO PROVIDE STATEMENT TO COMMISSION OF INQUIRY

I, Justice Catherine E Holmes, Commissioner of Inquiry, pursuant to section 5(1)(d) of the *Commissions of Inquiry Act 1950* (Qld), require Bill Stephens to provide a written statement, under oath or affirmation, to the Queensland Floods Commission of Inquiry, in which the said Bill Stephens gives an account of:

1. the dates and times when he was present at the flood operations centre during the 6 to 19 January 2011 flood event
2. the flood operations engineer or engineers who were at the flood operations centre at those dates and times
3. entries in the flood event log that is Exhibit 23 before the Commission that were made by him between 12.00 am, 7 January and 12.00 am, 12 January 2011 on the following topics:
 - a. the transition from strategy W1 to W2 or W3
 - b. the transition to strategy W2
 - c. the transition to strategy W3
 - d. the transition to strategy W4
 - e. the primary consideration in operating the dam and choosing release rates at any time
4. any errors or omissions in the entries in the flood event log that is Exhibit 23 before the Commission that were made by him between 12.00 am, 7 January and 12.00 am, 12 January 2011 on the topics listed as 3(a) to (e), above.
5. any information or details that he is able to add to the account given in the entries in the flood event log that is Exhibit 23 before the Commission that were made by him between 12.00 am, 7 January and 12.00 am, 12 January 2011 on the topics listed as 3(a) to (e), above.
6. Any further information or details, including accounts, if possible, of all conversations (in person or telephone) he took part in with, or overhead between:

400 George Street Brisbane
GPO Box 1738 Brisbane
Queensland 4001 Australia
Telephone 1300 309 634
Facsimile +61 7 3405 9750
www.floodcommission.qld.gov.au
ABN 82 696 762 534

- a. the flood operations engineers and/or
- b. the flood officers and/or
- c. other persons

between 12.00 am, 7 January and 12.00 am, 12 January 2011 on the topics listed as 3(a) to (e), above.

In addressing these matters, Bill Stephens is to:

- provide all information in his possession and identify the source or sources of that information;
- make commentary and provide opinions he is qualified to give as to the appropriateness of particular actions or decisions and the basis of that commentary or opinion.

Bill Stephens may also address other topics relevant to the Terms of Reference of the Commission in the statement, if he wishes.

The statement is to be provided to the Queensland Floods Commission of Inquiry by 12pm, Monday 30 January 2012.

The statement can be provided by post, email or by arranging delivery to the Commission by emailing info@floodcommission.qld.gov.au.



Commissioner
Justice C E Holmes