

**Statement of Michael Ilott dated 1 February
2012**

**IN THE MATTER OF
THE QUEENSLAND FLOODS COMMISSION OF INQUIRY**

**A COMMISSION OF INQUIRY UNDER THE
COMMISSIONS OF INQUIRY ACT 1950**

**AND PURSUANT TO THE
COMMISSIONS OF INQUIRY ORDER (No. 1) 2011**

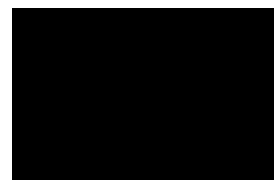
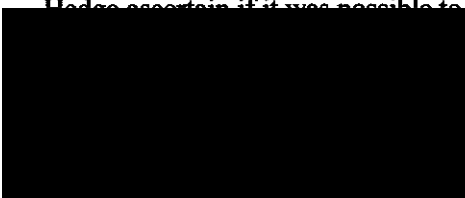
STATEMENT OF MICHAEL GERARD ILOTT

On the 1st day of February 2012, I, **Michael Gerard Ilott**, c/- 123 Eagle Street, Brisbane, state on oath:

1. I am a partner in the firm Allens Arthur Robinson, the solicitors for the Queensland Bulk Water Supply Authority (*Seqwater*).
2. This statement is provided to the Queensland Floods Commission of Inquiry pursuant to a "Requirement to Provide Statement" issued by the Commission dated 30 January 2012. The Requirement to Provide Statement seeks information regarding the process undertaken to comply with a requirement issued by the Commissioner to Seqwater dated 1 March 2011 (the *March 2011 Requirement*). The March 2011 Requirement is **Attachment MG11**.

Preliminary

3. Upon receipt of the March 2011 Requirement I immediately sent it to Seqwater.
4. I was concerned about the logistics of complying with the March 2011 Requirement given the width of it. For example, the final two categories related to any communication with the Department of Environment and Resource Management or any council officer during 2010 and 2011. Given the size of Seqwater's operations, I was concerned about the practicality of producing such a broad range of documents within the timeframe set out in the March 2011 Requirement (namely, 11 March 2011).
5. As a result, I met with Ms Lisa Hendy and Ms Susan Hedge to discuss whether it was possible to narrow the scope of the Requirement. The meeting occurred on 3 March 2011. I explained some of the difficulties the width of the March 2011 Requirement would give rise to in terms of the logistics of producing the documents. I requested that Ms Hendy and Ms Hedge ascertain if it was possible to narrow the scope of the March 2011 Requirement.



6. Subsequently, I received a letter from the Commissioner (dated 8 March 2011) which clarified the scope of some of the categories referred to in the March 2011 Requirement. This letter is **Attachment MGI2**.
7. Attached to this statement as **Attachment MGI3** are letters sent by Allens Arthur Robinson to the Commission dated 11 March 2011, 18 March 2011 and 1 April 2011 which accompanied the documents which were produced to the Commission by Seqwater in response to the March 2011 Requirement.

Specific questions raised by the Commission

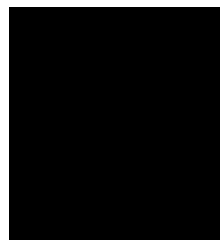
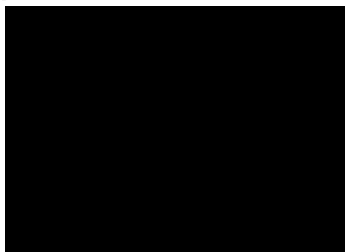
8. The Requirement to Provide Statement requires me to address 11 questions.
9. I have grouped these questions into four categories – identification of sources of potential data; collection of relevant data; processing of data; and review of data.
10. I deal with each of these categories separately below.
11. In preparing this statement, I have had to rely heavily upon information I have been able to identify from files maintained by Allens Arthur Robinson, as solicitors for Seqwater, and from information provided to me by James Hughes, a senior associate employed by the firm. Much of what is set out below has been drawn from these sources, as I do not have personal knowledge of the manner in which the data collection and review exercise was carried out. I established a procedure to identify, collect, process, review and disclose information within the scope of the March 2011 Requirement but did not perform the work myself.

A first step

12. The first step I took was to identify if any of the categories of documents could be easily answered. This applied only to category 7 (the service level agreement between Seqwater and SunWater). This document was retrieved and provided to the Commission.

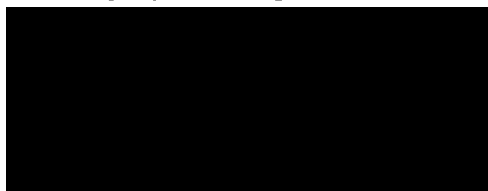
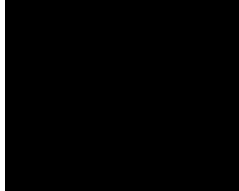
Identification of sources of data and custodians

13. The next step was to identify where potentially relevant documents might be.
14. The following potential sources of information relevant to the March 2011 Requirement (*relevant information*) were identified by Seqwater personnel, Cynthia Crane and David Collyer:



- (a) Seqwater, namely its email archive, shared hard drive (called a "distributed file system"), hard copy documents and voice logs;
 - (b) LinkWater. My understanding (on instructions) was that for a 48 hour period during 12 and 13 January 2011, some Seqwater employees operated out of LinkWater's office);
 - (c) the Flood Operations Centre, namely any hard copy documents and computers located there;
 - (d) Smart State Services. My understanding (on instructions) was that Smart State Services acted as an after hours call centre for Seqwater during the January 2011 flood event;
 - (e) Telstra, namely for SMS messages sent by Seqwater employees;
 - (f) the Water Grid Manager, namely for reports called OCA incident reports;
 - (g) Seqwater email accounts and other tools (for example, personal digital assistants) used by Seqwater employees; and
 - (h) hard copy files.
15. Individuals with potentially relevant information were also identified by category – for example, the engineers and flood officers in the Flood Operations Centre, the management team responsible for dams and the public communications team responsible for communications.
16. Ultimately, the decision was taken (as explained below) that it was not possible to limit the collection of information to certain identified individuals because the categories of information sought were too wide to be reliably limited to certain individuals.

Data collection

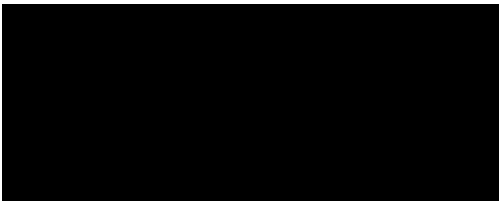

17. My instructions are that Seqwater personnel then went about collecting information from the various sources. My understanding is that this was done:
- (a) electronically; that is, by taking snapshots of data from servers and email accounts; and
 - (b) manually, by retrieving relevant files.
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18. My understanding is that the team I had established within Allens Arthur Robinson assisted with queries about the collection process. I do not know the detail of those queries.
19. My instructions are that the following people (at least) from Seqwater were responsible for the collection of potentially relevant data:
- (a) Cynthia Crane, Manager, Information, Communication & Technology Services;
 - (b) David Collyer, Principal Co-ordinator ICT Project Office;
 - (c) David Nolan, Principal Co-ordinator Infrastructure Services;
 - (d) Michael Strydom, Principal Co-ordinator ICT Customer Services - ICT Services;
 - (e) Bill Medill, Principal Co-ordinator ICT Business Solutions - ICT Services;
 - (f) Brian Youngs, Senior Systems Engineer;
 - (g) Leif Pedersen, Senior Systems Engineer;
 - (h) Louise Thomson, Systems Administrator ECM;
 - (i) Donna Pettiford, Project Manager ECM;
 - (j) Esther Till, ECM Business Analyst;
 - (k) Luke Smith, Senior IT systems Engineer.
20. On my instructions, Ms Crane had the overall carriage of the process. She is no longer employed by Seqwater.

Data processing

21. I address below my understanding of how the various data was processed once it was collected from the various sources.

Seqwater's emails

22. Following discussions with Seqwater personnel, it was determined that it was not possible, in a sensible way, to identify and exclude emails by reference to the categories of information identified in the March 2011 Requirement. Rather, all of Seqwater's emails during the relevant period were treated as a potential source of relevant information. My instructions were that there were in excess of one million emails created by Seqwater during the relevant
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period covered by the March 2011 Requirement. Due to the number of emails which needed to be processed, it was considered necessary to use search terms referable to each relevant category of information identified in the March 2011 Requirement.

23. In consultation with Seqwater personnel, my team prepared search terms to narrow the number of emails containing potentially relevant information for later review. My understanding is that having tested various combinations of search terms to identify those which produced too many irrelevant results and those which produced too few relevant results, the following search terms were ultimately applied to all Seqwater emails for the relevant period, using search engines on Seqwater's computers:

(a) for the third and fourth category, the search terms used were:

(i) "weather" near "forecast";

(ii) "rainfall" near "forecast";

(iii) "flood" near "warning";

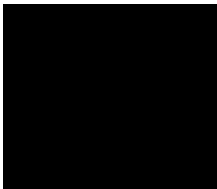
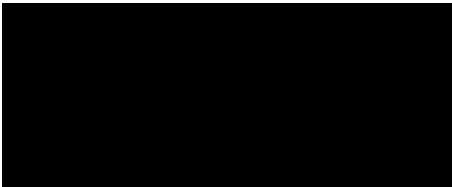
(iv) "weather" near "warning",

together with the date range 1 September 2010 to 8 March 2011;

(b) for the ninth category, the search terms used were the domain name for the Queensland Police Service (police.qld.gov.au) and the date range 1 September 2010 to 8 March 2011;

(c) for the tenth category, the search terms used were the domain names for Brisbane City Council (brisbane.qld.gov.au), Gold Coast City Council (goldcoast.qld.gov.au), Ipswich City Council (ipswich.qld.gov.au), Logan City Council (logan.qld.gov.au), Lockyer Valley Council (lockyervalley.qld.gov.au), Redland City Council (redland.qld.gov.au), Scenic Rim Council (scenic.qld.gov.au), Somerset Council (somerset.qld.gov.au), Sunshine Coast Regional Council (sunshinecoast.qld.gov.au), Toowoomba Regional Council (toowoombarc.qld.gov.au), Moreton Bay Council (moretonbay.qld.gov.au), together with the date ranges 1 September 2010 to 8 March 2011;

(d) for the eleventh category, the search terms used were the domain name of the Department of Environment and Resource Management (DERM) (derm.qld.gov.au), together with the date ranges 1 September 2010 to 8 March 2011.



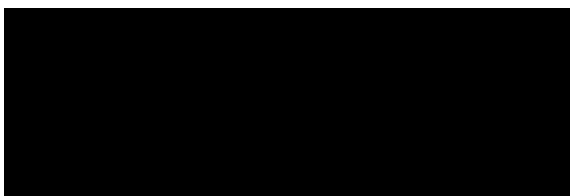
24. I do not believe search terms were applied to Seqwater's emails to attempt to identify those emails that potentially related to the first, second, fifth, sixth and eighth categories of information identified in the March 2011 Requirement. My understanding is that the approach that was adopted was that this information would be contained in source data or within the Flood Operations Centre itself (explained below) and these categories were examined on that basis.

Seqwater's electronic documents (other than emails)

25. My instructions are that Seqwater's entire shared hard drive (which I understand is called a "distributed file system") was searched using search terms designed to identify those categories of documents identified in the Requirement.
26. I cannot recall how many documents contained on Seqwater's shared hard drive were searched, but I was instructed that as at 11 March 2011, Seqwater had identified some 228,995,912 documents and the process of identifying further documents on the shared hard drive was ongoing.
27. These documents were not arranged in any easily identifiable categories. Accordingly, in consultation with Seqwater's IT personnel and again after a process of trial and error, search terms were prepared. These are set out in the document annexed as **Attachment MGI4**.
28. I understand that these search terms were used to search all documents identified on Seqwater's hard drive created between 1 January 2010 to 8 March 2011.

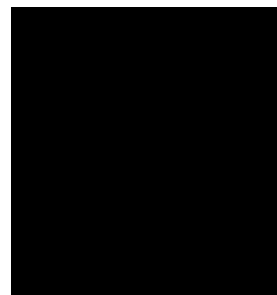
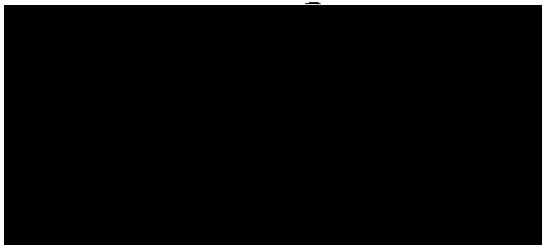
Flood Operations Centre documents and data

29. All documents and computers contained or used in the Flood Operations Centre were considered as sources of potentially relevant information.
30. The Flood Operations Centre was maintained by SunWater for Seqwater.
31. My understanding is that SunWater provided Seqwater with a raw dump of system files, programs, emails from the accounts from the computers situated in the Flood Operations Centre documents, incoming data streams and modelling data. This was provided by Seqwater to Allens Arthur Robinson for review (as outlined below).
32. My understanding is that hard copy documents were also retrieved from the Flood Operations Centre and reviewed.



Data review

33. Once the potentially relevant data was processed (as explained above), it was provided to Allens Arthur Robinson.
34. My understanding is that there were tens of thousands of documents provided.
35. My team of lawyers then set about the task of reviewing the material. I did not personally review the documents.
36. The purpose of the review was to exclude only obviously irrelevant material, predominantly on the basis of date ranges or obvious subject matter irrelevance. If there was any doubt about subject matter relevance, the material was included in the material produced to the Commission.
37. In order to undertake this task in the time provided, the following lawyers participated in a manual review of the data:
 - (a) James Hughes, Senior Associate;
 - (b) Daniel Phelan, Senior Associate;
 - (c) Katherine Hayes, Senior Associate;
 - (d) Stewart Webster, Lawyer;
 - (e) Greg Stirling, Lawyer;
 - (f) Kelly Lloyd, Lawyer;
 - (g) Faheem Anwar, Lawyer;
 - (h) Scott Lang, Law Graduate; and
 - (i) Craig Nicola, Law Graduate.
38. Given the volume of data that required review, the data was divided randomly amongst the lawyers named above for review by reference to the categories of information identified in the March 2011 Requirement. Each lawyer, when doing the review, was instructed to take a conservative approach in that if there was doubt as to the relevance of a document, it was to be included.



39. The following IT personnel were involved in assisting the lawyers to manage the volume of documents which needed to be reviewed:

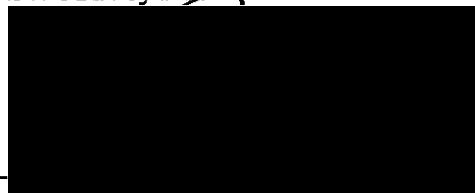
- (a) Emmanuel Iconomidis, ALT Site Manager – Brisbane/Perth;
- (b) Mark Kelaher, Senior Consultant; and
- (c) Benjamin Flinn, Analyst.

40. The potentially relevant data was sorted by each reviewing lawyer into data that was deemed by the reviewing lawyer to be within, or potentially within, the categories of information identified in the March 2011 Requirement and data that was deemed to be outside of those categories of information. Ultimately, all data that was deemed to be within, or potentially within, the categories was collated and given to the Commission.

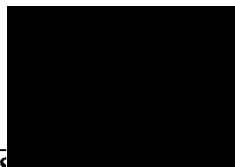
41. In the process of reviewing the data, a further step was undertaken to identify, and if appropriate, exclude documents which were subject to legal professional privilege. My understanding is that there were only a few emails that fell in this category.

42. I do not know if any potentially responsive data was not collected, reviewed or processed or not provided to the Commission. Certainly, the process I set in place (as outlined above), was designed to capture the responsive data but I cannot confirm that every single document within Seqwater was captured and produced. My understanding is that over 250GB of documentation and data has been produced to the Commission in answer to the March 2011 Requirement.

SWORN by Michael Gerard Hott on 1 February 2012 at Brisbane in the presence of:



Deponent



Witness

Our ref: Doc 1539279

1 March 2011

Mr Peter Borrows
Chief Executive Officer, Seqwater
GPO Box 16146
CITY EAST QLD 4002

Dear Sir

Please find enclosed a Requirement to Provide Information to the Commission. It is directed to you by the Commissioner, Queensland Floods Commission of Inquiry, to satisfy any legal requirements which might be thought to stand in the way of providing information to the Commission.

You will note that the return date on the Requirement is 11 March 2011. That is the date upon which submissions to the Commission in relation to flood preparedness for the next wet season are due.

This Requirement refers to material which the Commission currently considers may be particularly relevant to its Terms of Reference. However, the Requirement is not intended in any way to limit your submissions to the Commission.

The Commission would welcome statements from anyone who could summarise, interpret or explain the effect of the items referred to in the Requirement.

Should you wish to discuss the Requirement or any issue arising from it, please telephone Lisa Hendy on [REDACTED]

Yours sincerely

[REDACTED]

Jane Moynihan
Executive Director

Encl.

Our ref: Doc 1539057

1 March 2011

Mr Peter Borrows
Chief Executive Officer, Seqwater
GPO Box 16146
CITY EAST QLD 4002

REQUIREMENT TO PROVIDE INFORMATION TO COMMISSION OF INQUIRY

I, Justice Catherine E Holmes, Commissioner of Inquiry, require the Chief Executive Officer, Seqwater to provide the following information, documents, records and other things to the Queensland Floods Commission of Inquiry under section 5 of the *Commission of Inquiry Act 1950 (Qld)*:

- any catchment information (including pre-flood conditions) for the Wivenhoe, Somerset and North Pine dams for 2010 and 2011;
- records for the Wivenhoe, Somerset and North Pine dams, including but not limited to water level, stored volume, inflows, operational interventions (gates, valves etc) and outflows for 2010 and 2011;
- any record of any communication in relation to warnings (including, but not limited to, meteorological warnings) and related information received during 2010 and 2011;
- any record of any response by Seqwater to warnings and related information received during 2010 and 2011;
- any record of how the Manual of Operational Procedures for Flood Mitigation at Wivenhoe Dam and Somerset Dam was used during 2010 and 2011;
- any record of how the Manual of Operational Procedures for Flood Mitigation at North Pine Dam was used during 2010 and 2011;
- any service level agreement between Seqwater and Sunwater in relation to flood operation services at Wivenhoe, Somerset and North Pine dams;
- any record of any communication with the Flood Operations Centre during the 2010/2011 wet season;
- any record of any communication with the Queensland Police Service during the 2010/2011 wet season;

- any record of any communication with any council of council officer during the 2010/2011 wet season; and
- any record of any communication with the Department of Environment and Resource Management during 2010 and 2011.

Material is to be provided to the Queensland Floods Commission of Inquiry by 11 March 2011.

Material required 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

Our ref: Doc 1544815

8 March 2011

Mr Peter Borrows
 Chief Executive Officer, Seqwater
 GPO Box 16146
 CITY EAST QLD 4002

Dear Mr Borrows

Requirement to Provide Information to Commission - clarification

I refer to the Requirement to Provide Information to the Commission ('the requirement'), dated 1 March 2011, served on you.

I write to clarify that the term "during the 2010/2011 wet season" used within the requirement should be taken to mean the period including 1 September 2010 to 8 March 2011.

Further, as discussed at the meeting between Lisa Hendy and Susan Hedge from the Commission and your legal representatives, Michael Illott and James Hughes of Allens Arthur Robinson, I confirm that the scope of the following items included in the requirement should be taken to be limited as follows:

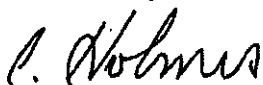
Requirement item	Clarification
Bullet point 1: any catchment information (including pre-flood conditions) for the Wivenhoe, Somerset and North Pine dams for 2010 and 2011	"Catchment information" means rainfall records, catchment conditions (that is, vegetation conditions, saturation etc), storage levels and any other data relevant to forecasting.
Bullet point 2: records for the Wivenhoe, Somerset and North Pine dams, including but not limited to water level, stored volume, inflows, operational interventions (gates, valves etc) and outflows for 2010 and 2011	This item is confined to the examples listed, that is, water levels, stored volume, inflows, operational interventions (gates, valves etc) and outflows.

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 ABN 65 959 415 158

<p>Bullet point 3: any record of any communication in relation to warnings (including, but not limited to, meteorological warnings) and related information received during 2010 and 2011</p>	<p>This item includes warnings from the Bureau of Meteorology, any government entity, any commercial entity or private person regarding weather forecasts and flood events in 2010 or 2011 (for example rainfall forecasts, water flow observations). It does not include warnings or communications unrelated to weather forecasts or flood events.</p>
<p>Bullet point 4: any record of any response by Seqwater to warnings and related information received during 2010 and 2011</p>	<p>This item is confined to warnings and related information regarding weather forecasts and flood events in 2010 and 2011.</p>
<p>Bullet point 9: any record of any communication with the Queensland Police Service during the 2010/2011 wet season</p>	<p>This item is confined to communications with the Queensland Police Service in relation to weather forecasts, rainfall, dam releases, flood levels and disaster management.</p>
<p>Bullet point 10: any record of any communication with any council of [sic] council officer during the 2010/2011 wet season</p>	<p>This item is confined to communications in relation to weather forecasts, rainfall, flood modelling, dam releases, flood levels and disaster management.</p>
<p>Bullet point 11: any record of any communication with the Department of Environment and Resource Management during 2010 and 2011</p>	<p>This item is confined to communications in relation to weather forecasts, rainfall, flood modelling, operational procedures in relation to dams, dam releases, flood levels, disaster management and resource operations plans.</p>

Should you wish to discuss the items listed in the requirement, please telephone Lisa Hendy or [REDACTED]

Yours sincerely



Justice C E Holmes
Commissioner of Inquiry

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MGI-43

Allens Arthur Robinson

11 March 2011

Ms Lisa Hendy
Queensland Floods Commission of Inquiry
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www.aar.com.au

Dear Madam

Requirement to provide information to Commission of Inquiry – Tranche 1

As you know, we act for Seqwater.

We refer to the Requirement to Provide Information to Commission of Inquiry dated 1 March 2011, our meeting on 3 March 2011 and the Requirement to Provide Information – clarification dated 8 March 2011 (the *Information Request*).

We enclose an external hard drive containing some of the information falling within the categories of requested information. We set out below a brief summary of the process our client has undertaken to date, the information contained on the enclosed external hard drive and the next steps our client proposes to take to provide further documents.

1. Process

Our client has to date identified the potential sources of the requested information, namely:

- (a) what entities or persons (both internal and external) may hold the requested information;
- (b) where the requested information may be held (the physical location of the information); and
- (c) the forms in which the various sources of information may exist (including hard copy files, electronic mail, shared hard drives, voice logs, SMS messages etc).

For your information, the process our client is currently undertaking is to:

- (i) collect that information;
- (ii) index and classify the types of information collected;
- (iii) review the information collected to identify information pertaining to the Information Request;

Our Ref JZH:MGI:150540

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Jakarta
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Phnom Penh
Port Moresby
Shanghai
Singapore
Sydney

- (iv) copy the information pertaining to the Information Request; and
- (v) package and deliver the information pertaining to the Information Request.

Since 1 March 2011, Seqwater has involved a core team of between 15 to 25 staff on a full time basis to assist with the process set out above. Further, lawyers from our firm have spent over 100 hours assisting our client throughout the process. However, as you will appreciate, an organisation the size of our client holds a vast amount of information in various forms and places. While every effort has been made by our client to comply with the Information Request within the time frame imposed, our client has been severely constrained by the length of time it takes to identify, collect, sort and transfer information. By way of example, we are instructed that Seqwater has thus far indexed (that is, sorted data into a searchable format):

- (A) data amounting to 361 DVDs or 2682 CDs;
- (B) 228,995,912 documents.

2. Documents enclosed

Broadly speaking, we have provided on the enclosed external hard drive information collected from the following sources:

- (a) the Floods Operations Centre;
- (b) Seqwater's email and archive system;
- (c) Seqwater's hard drive;
- (d) hard copy documents held on Seqwater's premises.

Please note that the information provided on the enclosed external hard drive does not comprise all information that will be provided from these sources, but merely the information our client has managed to gather, sort and provide in the limited time available since receiving the Information Request.

The external hard drive contains files identified as follows:

- (i) FOC Papers [3,4,8];
- (ii) Spatial Datasets [1];
- (iii) Misc-User-PCcomms [1,2,3,4,8];
- (iv) OCA Extract [3,4];
- (v) Vegetation Conditions [1];
- (vi) Communication with Flood Centre [1,2,5,8,9,11] Part Two;
- (vii) Communication with Flood Centre [1,2,5,8,9,11];
- (viii) Linkwater [1,2,8];
- (ix) Warning Emails [1,2,3,4,5,8,10];
- (x) FOC Data [1,2].

The square brackets are intended to indicate broadly which categories of information in the Information Request you might expect to find in each folder.

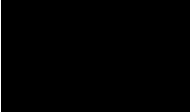
3. Next steps

Our client is continuing with the search for the requested information. We expect a large volume of information will be produced over the next week or so. We are instructed that more information will become available next week (in particular, the results of the search of Seqwater's Distributed File System) and we will provide these results in a second tranche as soon as possible.

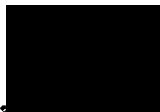
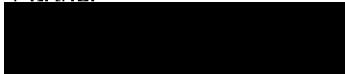
Finally, the Commission will note that the documentation produced today is commercial-in-confidence and, in many cases, contains private information pertaining to officers of Seqwater. Further, some documents are sourced from the Flood Operations Centre which is owned by SunWater Limited. Seqwater requests that before any document provided to the Commission today is made public, Seqwater and SunWater be consulted so that both parties may make submissions to the Commission in respect of the public release of that material. We have provided a copy of this correspondence to SunWater.

Please let us know if you have any queries.


Yours faithfully



Michael Vlott
Partner



James
Senior Associate



Encl

Copy To: SunWater Limited, c/- Mr Paul Hardman, Holding Redlich, Level 1, 300 Queen Street, Brisbane QLD 4000

8

18 March 2011

Ms Lisa Hendy
Queensland Floods Commission of Inquiry
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Dear Madam

Requirement to provide information to Commission of Inquiry – Tranche 2

We refer to the Requirement to Provide Information to Commission of Inquiry dated 1 March 2011, our meeting on 3 March 2011 and the Requirement to Provide Information – clarification dated 8 March 2011 (the *Information Request*).

Further to our letter dated 11 March 2011, we enclose a DVD containing further information falling within the categories of requested information. The information on the DVD is comprised of:

1. miscellaneous hard copy documents provided to us by Seqwater;
2. electronic mail extracted from Seqwater's computer system.

The DVD contains files identified as follows:

- (a) Miscellaneous Hard Copies [1, 2, 10, 11];
- (b) Communication with Flood Centre [2, 8] Part Three;
- (c) Communication with Flood Centre [1, 2, 3, 4, 8, 9, 11] Part Four;
- (d) Communication with Flood Centre [1, 2, 3, 4, 8] Part Five;
- (e) Communication with Flood Centre [1, 2, 3, 4, 6, 8, 9, 10, 11] Part Six;
- (f) Council Communications [1, 2, 4, 8, 10] Part One;
- (g) Council Communications [2, 10] Part Two;
- (h) Council Communications [2, 10] Part Three;
- (i) DERM Communications [2, 5, 11] Part One;
- (j) DERM Communications [2, 5, 11] Part Two;
- (k) Police Communications [1, 2, 4, 8, 9].

The square brackets are intended to indicate broadly which categories of information in the Information Request you might expect to find in each folder.

Our Ref JZH:MGI:120128021

jzhh A0116974549v1 120128021 18.3.2011

Bangkok
Beijing
Beijing IP
Brisbane
Hanoi
Ho Chi Minh City
Hong Kong
Jakarta
Melbourne
Perth
Phnom Penh
Port Moresby
Shanghai
Singapore
Sydney

Our client is continuing with the search for the requested information. We now expect to provide a third (and final) tranche of documents next week, comprising:

- (a) electronic mail for the period 19 February 2011 to 8 March 2011. In this regard, please note that on 19 February 2011 Seqwater began an upgrade of its email infrastructure to better handle any future disaster events. We are instructed that during this upgrade, "email journaling" was disabled and the archived emails for the relevant period will not be available for us to search until next week;
- (b) documents extracted from Seqwater's computerised shared file system; and
- (c) records to be obtained from Smart Service Queensland (Seqwater's after hours call referral centre) – we are instructed that these records need to be screened manually by Smart Service Queensland before they can be retrieved.

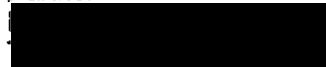
Finally, the Commission will note that the documentation produced today is commercial-in-confidence and, in many cases, contains private information pertaining to officers of Seqwater. Further, some electronic mail may originate from or pertain to other organisations. Seqwater requests that before any document provided to the Commission today is made public, Seqwater be consulted so that it may make submissions to the Commission in respect of the public release of that material.

Please let us know if you have any queries.

Yours faithfully



Michael Illott
Partner



James Hughes
Senior Associate



Encl

1 April 2011

Ms Lisa Hendy
Queensland Floods Commission of Inquiry
Level 30
400 George Street
Brisbane QLD 4001
By Hand

Dear Madam

Requirement to provide information to Commission of Inquiry – Tranche 3

We refer to the Requirement to Provide Information to Commission of Inquiry dated 1 March 2011, our meeting on 3 March 2011 and the Requirement to Provide Information – clarification dated 8 March 2011 (the *Information Request*).

Further to our letters dated 11 March 2011 and 18 March 2011, we enclose a DVD containing the third (and final) tranche of information identified as falling within the categories of requested information. The information on the DVD is comprised of:

1. documents extracted from Seqwater's computerised document management system. In this regard, the folders contained on the DVD are essentially the native files extracted from Seqwater's system (and are in the form of however the relevant user chose to use those files);
2. electronic mail extracted from Seqwater's system for the period from 19 February 2011 to 8 March 2011; and
3. audio files from Smart Service Queensland, (Seqwater's after hours call referral centre).

The DVD contains files identified as follows:

- (a) Groups [1,2,3,4,11];
- (b) Smart Service Queensland [3,4,9,10];
- (c) Emails 19 February 2011 to 8 March 2011 [1,2,3,4] Part 1;
- (d) Emails 19 February 2011 to 8 March 2011 [1,2,10] Part 2;
- (e) Emails 19 February 2011 to 8 March 2011 [1,2,11] Part 3;.

The square brackets are intended to indicate broadly which categories of information in the Information Request you might expect to find in each folder.

Our Ref JZH:MGI:120128021

jzhh A0117100760v1 120128021 1.4.2011

The Commission will note that the documentation produced today is commercial-in-confidence and may contain private information pertaining to officers of Seqwater. Further, some electronic mail may originate from or pertain to other organisations. Seqwater requests that before any document provided to the Commission today is made public, Seqwater be consulted so that it may make submissions to the Commission in respect of the public release of that material.

Finally, also included on the DVD (in the folder entitled "Documents Requested on 31 March 2011") are certain documents requested in the email from Ms Hedge dated 31 March 2011, namely (adopting the numbering used in Ms Hedge's email):

1. Minutes of the stakeholder group meetings regarding the 7th revision of the Manual of Operational Procedures for Flood Mitigation at Wivenhoe and Somerset Dams;
3. The original Flood Event Log created at the Flood Operations Centre, before any amendments were made for the purposes of inclusion in the January 2011 Flood Event Report on the Operation of Wivenhoe and Somerset Dams;
4. Paper by Rob Ayre titled 'Feasibility of Making Pre-Releases from SEQWC Reservoirs' (2001);
6. Wivenhoe Alliance paper titled 'Design Discharges and Downstream Impacts of Wivenhoe Dam Upgrade' (2004)
9. Sinclair Knight Merz and Hydro Consulting Hydro Electric Corporation paper titled 'Preliminary risk assessment Wivenhoe, Somerset and North Pine Dams' (March 2000)
11. Gutteridge, Haskins and Davey Pty Ltd report titled 'Wivenhoe Dam Report on the Safety Review (Draft)' (April 1997)

We will provide the remaining documentation requested as soon as possible.

Please let us know if you have any queries.

Yours faithfully



Michael Illott
Partner

James Hughes
Senior Associate

End

new search criteria.txt
 looked within *.doc* *.xls* *.pdf *.html *.ppt*

((Brisbane valley and flood) or (Brisbane river and flood) or (Brisbane river and flood operation) or (Brisbane river and flood event) or (Brisbane river and inundation)) or (warning and flood) or (rainfall and (forecast or warning)) or (warning and bureau) or (Wivenhoe and water level) or (Wivenhoe and inflow) or (Wivenhoe and release) or (Wivenhoe and outflow) or (Wivenhoe and flood level) or (Wivenhoe and volume) or (Wivenhoe and catchment) or (Wivenhoe and warning) or (Wivenhoe and flood event) or (Wivenhoe and flood mitigation) or (Wivenhoe and inundation) or (Wivenhoe and severe weather) or (Wivenhoe and fuse plug) or (Wivenhoe and flood operation) or (Wivenhoe and capacity) or (Wivenhoe and modelling) or (Wivenhoe and rop) or (Wivenhoe and resource operations plan) or (Wivenhoe and forecast) or (Wivenhoe and rainfall) or (Wivenhoe and council) or (Wivenhoe and operation) or (Wivenhoe and focus) or (Wivenhoe and AHD) or (Wivenhoe and flash flood) or (Wivenhoe and gates) or (Wivenhoe and capacity) or (Wivenhoe and limit) or (Somerset and water level) or (Somerset and inflow) or (Somerset and release) or (Somerset and outflow) or (Somerset and flood level) or (Somerset and volume) or (Somerset and catchment) or (Somerset and warning) or (Somerset and flood event) or (Somerset and flood mitigation) or (Somerset and inundation) or (Somerset and severe weather) or (Somerset and fuse plug) or (Somerset and flood operation) or (Somerset and capacity) or (Somerset and modelling) or (Somerset and rop) or (Somerset and resource operations plan) or (Somerset and forecast) or (Somerset and rainfall) or (Somerset and council) or (Somerset and operation) or (Somerset and focus) or (Somerset and AHD) or (Somerset and flash flood) or (Somerset and gates) or (Somerset and capacity) or (Somerset and limit) or (North Pine and water level) or (North Pine and inflow) or (North Pine and release) or (North Pine and outflow) or (North Pine and flood level) or (North Pine and volume) or (North Pine and catchment) or (North Pine and warning) or (North Pine and flood event) or (North Pine and flood mitigation) or (North Pine and inundation) or (North Pine and severe weather) or (North Pine and fuse plug) or (North Pine and flood operation) or (North Pine and capacity) or (North Pine and modelling) or (North Pine and rop) or (North Pine and resource operations plan) or (North Pine and forecast) or (North Pine and rainfall) or (North Pine and council) or (North Pine and operation) or (North Pine and focus) or (North Pine and AHD) or (North Pine and flash flood) or (North Pine and gates) or (North Pine and capacity) or (North Pine and limit) or (DERM and forecast) or (DERM and rainfall) or (DERM and modelling) or (DERM and release) or (DERM and flood level) or (DERM and ROP) or (DERM and resource operations plan) or (ENVIROMENT AND RESOURCE and forecast) or (ENVIROMENT AND RESOURCE and rainfall) or (ENVIROMENT AND RESOURCE and modelling) or (ENVIROMENT AND RESOURCE and release) or (ENVIROMENT AND RESOURCE and flood level) or ((ENVIROMENT AND RESOURCE) and ROP) or ((ENVIROMENT AND RESOURCE) and resource operations plan) or (COUNCIL and forecast) or (COUNCIL and rainfall) or (COUNCIL and modelling) or (COUNCIL and release) or (COUNCIL and flood level) or (COUNCIL and ROP) or (COUNCIL and resource operations plan) or (flood and police).