



**Energia response to SEM Committee
Consultation Paper SEM-19-025**

***Generator Financial Performance Reporting Update to
Requirements***

2 July 2019

1. Introduction

Energia welcomes the opportunity to respond to the SEM Committee Consultation Paper SEM-19-025 titled “Generator Financial Performance Reporting Update to Requirements” (the “**Consultation Paper**”).

2. Energia’s Comments

As a general comment, Energia would like to stress that the information requested and / or reported should be fully justified, proportionate, should not go beyond what is currently included in the audited accounts and should not result in the disclose of commercially sensitive information or be potentially misleading.

Energia sees no benefit in giving a detailed breakdown of DA, ID and BM revenues that would justify the additional administrative burden this would impose on generators.

Furthermore, the RAs have always maintained, including in this Consultation Paper, that in completing the financial reporting template, the information provided should align with the audited annual financial statements. The provision of such information would go well beyond what is included in the audited accounts.

Reporting on groups of generators according to “Generation Type” (i.e. baseload, mid-merit, peak, price taker) is no longer relevant to the evolving electricity market in I-SEM and given the growing penetration of renewables on the system. Reporting by “Generation Type” should therefore be dropped in the next and subsequent financial reports.

The RAs also gave assurances in SEM-12-027 to treat commercially sensitive information with confidentiality. This must be adhered to in all circumstances. Reporting by “Generation Type” potentially reduces the number of generators in any particular grouping to a very small number which does not respect confidentiality, as was the case in Table 3.9 of SEM-19-016 where as few as two plants (Moneypoint coal units) were mid-merit in FY2017, two plants were baseload (Moneypoint coal units) in FY2016 and only four plants were baseload (Synergen, Whitegate, Auginish and Aghada gas units) in both FY2016 and FY2017.