



## **Response by Energia to SEM-24-041**

### ***Consultation on the Generator Financial Performance Reporting Framework***

**20 August 2024**

### General Comments

Energia welcomes the opportunity to respond to SEM-24-041. Energia publicly responded to SEM-11-106 when the GFPR was originally consulted upon, and SEM-19-025 when changes to the GFPR were proposed. Energia's general comments in response to SEM-24-041 are consistent with our responses to the previous consultations.

Energia stresses that the information requested and/or reported in the GFPR should be fully justified and proportionate. The information requested and/or reported should align with the audited annual financial statements of the generator companies. It should not require respondents to change their accounting treatment from what they use for their annual accounts.

The RAs gave assurance in the original decision paper on GFPR, SEM-12-027, to treat commercially sensitive information with confidentiality. Any proposed changes to the GFPR template or the subsequent reporting cannot compromise these assurances.

SEM-24-041 states that a new reporting template might be required but does not propose specific changes to the existing template. Energia believes that any proposed specific changes to the GFPR reporting template that follow this consultation must be consulted upon separately prior to implementation, as the most recent changes to the template were consulted upon in SEM-19-025.

### Responses to Consultation Questions

1. *In addition to the broader transparency benefits, are there any other benefits that stakeholders associate with the GFPR publication each year?*

Energia does not associate any benefits with the GFPR publication.

2. *The most recent version of GFPR template used for data gathering from generators is included in Appendix A. Do the stakeholders have any suggestions for enhancing the data gathering process for GFP report? This can include any views on the inclusion of additional revenue and cost elements or detracting of any revenue and cost elements of generation companies currently included in the GFPR template.*

Much of the information requested in Appendix A is publicly available or could be requested by the Regulatory Authorities from the Market Operator. There is therefore an opportunity to streamline the data gathering and reduce the burden on respondents. Energia has no further suggestions. As per our general comment section of this response, any specific proposals for changes to the GFPR template should be consulted upon separately.

3. *The RAs are of the view that GFP Reports should have a focus on revenues earned by the generators through various revenue streams available in the SEM and operating costs of the generators. This is to avoid any distortions to the figures due to commodity and power hedges as well as derivative valuation movements included by the generators in the profits. Do the stakeholders have any view on this?*

Generator's GFPR reporting must be aligned with the accounting treatment used by generators in their annual accounts. To do otherwise would place additional burden on respondents.

4. *According to SEM-12-027, generators with a combined ownership capacity of more than 25MW operating in the SEM are required to complete the GFPR template. Do the stakeholders have a view on this threshold?*

Energia has no specific views on the threshold.

5. *Are there any type of market participants that are currently not covered by the GFPR framework that should be included in future in your view?*

Energia has no additional views on this question.

6. *Any other general comments on the GFPR process and the template?*

Energia's general comments are covered in the first section of this response.